



**State of New Jersey**  
**DEPARTMENT OF HEALTH**  
 OFFICE OF EMERGENCY MEDICAL SERVICES  
 PO BOX 360  
 TRENTON, N.J. 08625-0360

PHILIP D. MURPHY  
*Governor*

SHEILA Y. OLIVER  
*Lt Governor*

[www.nj.gov/health](http://www.nj.gov/health)

JUDITH M. PERSCHILL, RN, BSN, MA  
*Commissioner*

March 31, 2021

Mr. Nathan Saunders  
 [REDACTED]

**Re: Notice of Proposed Probation  
 Investigation Control # 2020-0245V  
 EMS ID # 630304**

Dear Mr. Saunders:

The New Jersey Department of Health (Department) is vested with the responsibility of carrying out the provisions of N.J.S.A. 26:2H-1 et seq., Health Care Facilities Planning Act, which was enacted, in part, to ensure that all hospital and related health care services rendered in the State of New Jersey are of the highest quality. As defined at N.J.S.A. 26:2H-2(b), health care services include any pre-hospital care rendered by Basic Life Support (BLS) personnel. In addition, N.J.S.A. 26:2K-7 et seq., the Emergency Medical Services Act, authorizes the Department to certify Emergency Medical Technicians (EMT). In furtherance of the objectives set forth in the statutes, the Department has adopted regulations that govern the training, certification and professional conduct of EMTs and EMT candidates. (See N.J.A.C. 8:40A-1.1 et seq.)

On December 21, 2020, the New Jersey Department of Health, Office of Emergency Medical Services (OEMS) Investigator(s) conducted an audit of incomplete patient care reports (PCRs) of Mt Ephraim Police Reserve, Inc. (MEPRI), which is a licensed BLS agency. At the time of the audit, you were employed by MEPRI as an EMT. The audit revealed that you failed to complete eleven (11) patient care reports. Specifically, the PCRs were in draft form, were not signed by you and were not submitted to the facility receiving the patient, when the patient was transported to the hospital, within 24 hours of completion of the call, as required by N.J.A.C. 8:40-3.6. Below is a list of assignments where you failed to complete PCRs:

PRID	Date	Time
65613431	12/16/2020	11:42
65655134	12/16/2020	16:27
65623739	12/16/2020	21:52
65624518	12/16/2020	23:30

65646474	12/18/2020	09:11
65648385	12/18/2020	11:07
65655085	12/18/2020	12:14
65655101	12/18/2020	13:21
65655112	12/18/2020	16:46
65666454	12/19/2020	16:46
65676468	12/20/2020	00:36

This is also not the first time that you have failed to complete your PCR's. In 2019, OEMS received a complaint that you were not completing PCR's. As a result, OEMS investigated the matter and determined that you failed to complete your PCR's. Consequently, OEMS issued you a verbal warning to complete your PCR's within 24 hours of completion of the call.

As you should already be aware, EMTs are responsible for completing patient care reports in a timely manner. Specifically, N.J.A.C. 8:40-6.4(a) states that the duties of BLS ambulance crewmembers includes completing a patient care report for each patient. N.J.A.C. 8:40-3.6(a) further requires the EMT crewmembers to complete a PCR for each patient encounter and for each crewmember to sign the report. Moreover, N.J.A.C. 8:40-3.6(d) provides that “[a] copy of the patient care report shall be given to an authorized representative at the receiving health care facility. This shall be done no later than 24 hours after completion of the call.” OEMS’s rules require the timely completion of PCR's because they provide an accurate record of the patient complaint, presentation, assessment, treatment and outcome in the pre-hospital setting. If the patient is transported to the hospital, the PCR becomes part of the patient’s hospital medical record and contains valuable information to assist other practitioners within the healthcare continuum to determine the most appropriate management of the patient’s illness or injury. An EMT’s failure to complete his PCR's in a timely manner hinders other practitioners’ ability to properly manage the patient’s care and treatment and places the patient’s health at risk.

Additionally, under N.J.S.A. 26:2K-67, BLS agencies must electronically submit PCR data to the Department. This information is critical for the monitoring of health bio surveillance and identifying risks to public health and safety. A BLS crewmember’s failure to complete their PCR's in a timely manner prevents the Department from receiving this necessary data and inhibits its ability to protect the public health.

Despite a previous warning issued by OEMS regarding your failure to complete your PCR's, you continue to violate the above PCR completion requirements. As such, OEMS finds that you remain noncompliant with your PCR responsibilities.

N.J.A.C. 8:40A-10.2(b) provides that the Commissioner or his or her designee, may place on probation and suspend the certification of an EMT for violation of any of the rules set forth in this chapter. This includes, but is not limited to:

18. Failure to comply with any of the patient reporting requirements of this chapter;

23. Failure to comply with any part of this chapter, any applicable part of N.J.A.C. 8:40 or N.J.A.C. 8:41, or any applicable law, rule and/or regulation.

Because you continue to fail to complete your PCRs in accordance with the above rule requirements, the **Department proposes to place you on Clinical Probation for one hundred eighty (180) days**. Pursuant to N.J.A.C. 8:40A-10.2(e), “[a]n EMT who has been placed on probation may be monitored for performance by the Department.” Consistent with N.J.A.C. 8:40A-10.2(e), the terms of your probation are as follows:

- a. Clinical Probation period must be completed while you are working in a clinical setting as an EMT;
- b. Under no circumstances may you act independently or in conjunction with, or on the same MAV, BLS ambulance or SCTU as, another probationary EMT;
- c. You must be monitored for performance. This monitoring shall include complete supervision of all calls in which you provide BLS services (including 100% chart review) by your employer, MEPRI or any other EMS program by which you are employed or volunteer. Your employer(s) are required to provide a written quarterly report to the Department signed by the employer’s medical director as to your progress and any remediation that needs to be performed during that quarter;
- d. You shall provide the Department, within fourteen (14) days of your probation, with the name(s) of all the EMS programs you are employed by or volunteer with. You are required to notify the Department within one (1) business day of any changes in your status with these agencies; and
- e. You are to successfully complete an EMS Documentation class within three (3) months of the date of this letter, which can count towards your recertification requirements as an EMT in the State of New Jersey. These elective credit hours must be approved by the Department prior to completion.

Pursuant to N.J.A.C. 8:40A-10.3(b), you are entitled to a hearing before the Office of Administrative Law to contest this Department’s decision to place your EMT certification on probation. Your request for a hearing on this matter must be submitted in writing and must be accompanied by a response to the charges contained herein. In the event that you request a hearing, the probation shall be held in abeyance until such time as the hearing has been concluded and a final decision rendered. Please include the control number **2020-0245V** on your correspondence, and forward your request to:

New Jersey Department of Health  
Office of Legal & Regulatory Compliance  
P.O. Box 360  
Trenton, NJ 08625-0360

Failure to submit a written request for hearing within 30 days from the date of this Notice shall be interpreted as an acceptance of this Department's decision to place your EMT certification on probation, negating any further appeal rights and converting this action into a final agency decision.

If you have any questions concerning this matter, please contact Investigator Zak Raab at (609) 633-7777 or via email at Zachary.Raab@doh.nj.gov.

Sincerely,



Terry Clancy, PhD, RN, NRP  
Director  
Office of Emergency Medical Services

c: Eric Hicken, Chief, Licensing Inspection and Enforcement, OEMS  
Candace Gardner, Chief, Clinical Education and Licensure, OEMS  
Zak Raab, Investigator, OEMS

SENT VIA REGULAR U.S. MAIL AND CERTIFIED MAIL # [REDACTED]  
RETURN RECEIPT REQUESTED

