

**BEFORE THE MINNESOTA  
EMERGENCY MEDICAL SERVICES REGULATORY BOARD**

In the Matter of the Certificate  
of: Patrick G. Stone, EMT-Paramedic  
Certificate Number: 501133

**STIPULATION  
AND ORDER**

IT IS HEREBY STIPULATED AND AGREED by and between Patrick G. Stone, EMT-Paramedic (“Respondent”), and the Complaint Review Panel of the Minnesota Emergency Medical Services Regulatory Board (“Panel”) as follows:

1. During all times herein, Respondent has been and now is subject to the jurisdiction of the Board from which he holds a certificate in the State of Minnesota.

2. Respondent has been advised by Board representatives that he may choose to be represented by legal counsel in this matter. Although aware of his right to representation by counsel, Respondent has knowingly and expressly waived that right. The Board was represented by Assistant Attorney General Karen Andrews, 1400 Bremer Tower, 445 Minnesota Street, St. Paul, Minnesota 55101, (651) 296-0410. Respondent and the Panel hereby agree as follows:

**FACTS**

3. For the purpose of this stipulation, the Board may consider the following facts as true:

a. On May 24, 2006, a scheduled inspection of the Belle Plaine Ambulance was conducted by Board staff with the Respondent, who was manager of the ambulance service. As a result of the inspection, Board staff sent a letter to the City Administrator of the City of Belle Plaine on May 25, 2006, stating the deficiencies and action needed to correct them.

Respondent received a copy of the letter. Among the deficiencies cited were four (4) statements requiring the verification and signature of the ambulance service's medical director.

b. On December 18, 2006, a review of required ambulance service documentation was conducted at the direction of the Belle Plaine Ambulance medical director. During the review, four (4) forms were identified containing the electronic signature of the medical director. The medical director stated he had not given the Respondent permission to use his electronic signature. In a letter dated February 12, 2007, Respondent acknowledged using the medical director's electronic signature without permission.

4. On July 23, 2007, Respondent met with the Panel to discuss the above facts.

#### **STATUTES**

5. The Panel views Respondent's practices as inappropriate in such a way as to require Board action under Minn. Stat. § 144E.28, subd. 4, and Respondent agrees that the conduct cited above constitutes a reasonable basis in law and fact to justify the disciplinary action under these statutes.

#### **REMEDY**

6. Upon this stipulation and all of the files, records, and proceedings herein, and without any further notice or hearing herein, Respondent does hereby consent that until further order of the Board, made after notice and hearing upon application of Respondent or the Board's own motion, the Board hereby **SUSPENDS** Respondent's License to practice as an Emergency Medical Technician – Paramedic (EMT-P). The suspension is **STAYED** as long as Licensee complies with the following requirements:

a. Within 4 months of the effective date of this Stipulation and Order, Respondent must submit to the Board a description(s) of an Ethics course(s) for its approval;

b. Within 30 days of completing the Ethics course, Respondent shall submit to the Board:

1) documentation verifying that Respondent has successfully completed the previously-approved course;

2) a copy of all materials used and/or distributed in the course; and

3) a written report summarizing what Respondent learned in the course and how it relates to Respondent's past conduct. Respondent's report shall be typewritten in his own words, double-spaced, and at least two pages in length.

7. Respondent shall comply with the laws and rules of the Board. Respondent agrees that failure to comply with the Board's laws and rules shall be a violation of this Stipulation and Order. Any violation of the laws and rules of the Board within two years from the effective date of this stipulation shall result in suspension of Respondent's license.

8. Respondent shall fully and promptly cooperate with the Board's reasonable requests concerning compliance with this Stipulation and Order, including requests for explanations, documents, and/or appearances at conferences. Minn. Stat. § 144E.30, subd. 3 applies to such requests.

9. Within seven days of any change, Respondent shall provide the Board with his current address and telephone information. The information shall be sent to Mary Hedges at the Emergency Medical Services Regulatory Board, University Park Plaza, 2829 University Avenue S.E., Suite 310, Minneapolis, Minnesota 55414-3222.

10. In the event Respondent resides or practices outside the State of Minnesota, Respondent shall promptly notify the Board in writing of the location of his residence and all work sites. Periods of residency or practice outside of Minnesota will not be credited toward any

period of Respondent's suspended, limited, or conditional certificate in Minnesota unless Respondent demonstrates that practice in another state conforms completely with Respondent's Minnesota certification.

11. This stipulation, related investigative reports, and other documents shall constitute the entire record of the proceeding upon which this order is based. The investigative reports, other documents, or summaries thereof, may be filed with the Board with the stipulation. Any reports or other material related to this matter which are received after the date the Board approves the stipulation and order shall become a part of the record and may be considered by the Board in future aspects of this proceeding.

12. In the event the Board in its discretion does not approve this settlement, this stipulation is withdrawn and shall be of no evidentiary value and shall not be relied upon, introduced in any disciplinary action by either party hereto, except that Respondent agrees that if the Board rejects this stipulation and this case proceeds to hearing, Respondent will assert no claim that the Board was prejudiced by its review and discussion of this stipulation or of any records relating hereto.

13. Respondent waives any further hearings on this matter before the Board to which Respondent may be entitled by Minnesota or United States Constitutions, statutes, or rules and agrees that the order to be entered pursuant to the stipulation shall be the final order herein.

14. Respondent hereby acknowledges that he has read and understands this stipulation and has voluntarily entered into the stipulation without threat or promise by the Board or any of its members, employees, or agents. This stipulation contains the entire agreement between the parties, there being no other agreement of any kind, verbal or otherwise, which varies the terms of this stipulation.

15. Under the Minnesota Government Data Practices Act, this stipulation and order is classified as public data. Minn. Stat. § 13.41, subd. 4. All documents in the record shall maintain the data classification to which they are entitled under the Minnesota Government Data Practices Act, Minn. Stat. ch. 13. They shall not, if they are not already public documents, become public merely because they are referenced herein. Pursuant to the Health Insurance Portability and Accountability Act of 1996, the Board must report the disciplinary action contained in this Stipulation and Order to the Healthcare Integrity and Protection Data Bank.

Dated: 21 SEPT 07



Patrick Stone, EMT-Paramedic  
Respondent

Dated: 9/28/07

  
FOR THE PANEL

### ORDER

Upon consideration of this stipulation and all the files, records, and proceedings herein, IT IS HEREBY ORDERED that the terms of this stipulation are adopted and implemented by the Board this 15<sup>th</sup> day of November, 2007.

MINNESOTA EMERGENCY MEDICAL  
SERVICES REGULATORY BOARD

By:   
MARY HEDGES  
Executive Director