



BEFORE THE MINNESOTA

BOARD OF EXECUTIVES FOR LONG-TERM SERVICES AND SUPPORTS

In the Matter of
Patricia Amusan, LALD
License No. 3281

**STIPULATION AND
CONSENT ORDER**

IT IS HEREBY STIPULATED AND AGREED by Patricia Amusan, LALD (“Licensee”), and the Minnesota Board of Executives for Long-Term Services and Supports Standards of Practice Committee (“Committee”) as follows:

I.

JURISDICTION

1. The Minnesota Board of Executives for Long-Term Services and Supports (“Board”) is authorized pursuant to Minnesota Statutes chapter 144A to license and regulate assisted living directors and to take disciplinary action as appropriate.

2. Licensee holds a license from the Board to practice as a licensed assisted living director in the State of Minnesota and is subject to the jurisdiction of the Board with respect to the matters referred to in this Stipulation and Consent Order.

II.

REPRESENTATION

3. Licensee is self-represented in this matter. The Committee is represented by Alex Mountain, Assistant Attorney General.

III.

FACTS

For the purpose of this Stipulation and Consent Order only, the Board finds the following:

4. On October 29, 2021, the Board granted Licensee an Assisted Living Director ("ALD") license.
5. Since January 19, 2022, Licensee has been the Director of Record for Tender Care Homes.
6. On March 27, 2025, the Board received information that Licensee was subject to a maltreatment finding in November 2024. The maltreatment arose out of conduct—toward a minor—occurring while Licensee was employed as a Registered Nurse.

IV.

REGULATIONS

7. Licensee acknowledges the conduct described in section III. above constitutes a violation of Minnesota Rules 6400.7095, subpart 1.I. (unprofessional conduct) and justifies the disciplinary action described in section V. below.

V.

DISCIPLINARY ACTION

8. Upon this Stipulation and all of the files, records, and proceedings herein, and without any further notice or hearing herein, Licensee consents that until further order of the Board, the Board may make and enter an order as follows:

A. Suspension

9. The Board **SUSPENDS** Licensee's license to practice as a licensed assisted living director in the State of Minnesota. Licensee therefore shall not:

a. Engage in any act or practice in the State of Minnesota which constitutes the practice of an assisted living director under Minnesota Statutes section 144A, *et seq.*, and Minnesota Rules chapter 6400;

b. Advertise or use "Licensed Assisted Living Director," "LALD," or any other title or letters under any circumstances as to lead the public or clients to believe that she is engaged in the practice of an assisted living director in the State of Minnesota; and

c. Imply to clients or other persons by words or conduct that she holds a valid license to practice as an assisted living director in Minnesota.

B. Reinstatement of License

10. Licensee may request reinstatement of her license following ninety (90) days from the date of this Order. The burden of proof shall be upon Licensee to demonstrate by a preponderance of the evidence that she is capable of practicing as an assisted living director in a fit and competent manner. At the time of Licensee's request, Licensee may be required to meet with a Committee and shall comply with, at a minimum, the following:

a. ***Completion of Coursework.*** Licensee shall arrange to enroll in and complete no less than twenty (20) hours of education on the topics of assisted living director role and responsibilities. Licensee must obtain preapproval from the Committee for the course(s) that Licensee selects. To secure preapproval, Licensee shall submit to the Committee a course description, including course objectives and the instructor's name and applicable credentials. Licensee shall complete the courses prior to her petition for reinstatement of licensure. As a part of Licensee's petition, Licensee shall submit a three-page paper describing the course(s) she completed and what she learned from the course(s). Successful completion of the course(s) shall be determined at the sole discretion of the Committee and verified by Licensee's submission of

official certificates indicating completion of the preapproved courses. Licensee shall be responsible for any expenses associated with this coursework. These courses shall not be reported as regular continuing education credit for Licensee's subsequent renewals.

b. ***Additional Information.*** Licensee shall provide any additional information relevant to her petition reasonably requested by the Committee.

c. ***Licensure Requirements.*** Licensee shall meet all licensure requirements in effect at the time of her petition for reinstatement, including but not limited to completing the appropriate application, paying requisite fees, and completing any necessary continuing education requirements.

11. The Board may, at any regularly scheduled meeting following Licensee's petition for reinstatement pursuant to paragraph 10 above, take any of the following actions:

- a. Reinstatement Licensee's license;
- b. Reinstatement Licensee's license with limitations upon the scope of Licensee's practice and/or with conditions for Licensee's practice; or
- c. Continue the suspension of Licensee's license upon her failure to meet the burden of proof.

VI.

CONSEQUENCES FOR NONCOMPLIANCE OR ADDITIONAL VIOLATIONS

12. If Licensee fails to comply with or violates this Stipulation and Consent Order, the Committee may, in its discretion, seek additional discipline either by initiating a contested case proceeding pursuant to Minnesota Statutes chapter 14 or by bringing the matter directly to the Board pursuant to the following procedure:

a. The Committee shall schedule a hearing before the Board. At least 20 days before the hearing, the Committee shall mail Licensee a notice of the violation(s) alleged by the Committee. In addition, the notice shall designate the time and place of the hearing. Within ten days after the notice is mailed, Licensee shall submit a written response to the allegations. If Licensee does not submit a timely response to the Board, the allegations may be deemed admitted.

b. The Committee, in its discretion, may schedule a conference with Licensee prior to the hearing before the Board to discuss the allegations and to attempt to resolve the allegations through agreement.

c. Prior to the hearing before the Board, the Committee and Licensee may submit affidavits and written argument in support of their positions. At the hearing, the Committee and Licensee may present oral argument. Argument shall not refer to matters outside the record. The evidentiary record shall be limited to the affidavits submitted prior to the hearing and this Stipulation and Consent Order. The Committee shall have the burden of proving by a preponderance of the evidence that a violation has occurred. If Licensee has failed to submit a timely response to the allegations, Licensee may not contest the allegations but may present argument concerning the appropriateness of additional discipline. Licensee waives a hearing before an administrative law judge, discovery, cross-examination of adverse witnesses, and other procedures governing hearings pursuant to Minnesota Statutes chapter 14.

d. Licensee's correction of a violation before the conference, hearing, or meeting of the Board may be taken into account by the Board but shall not limit the Board's authority to impose discipline for the violation. A decision by the Committee not to seek discipline

when it first learns of a violation shall not waive the Committee's right to later seek discipline for that violation, either alone or in combination with other violations, at any time while this Stipulation and Consent Order is in effect.

e. Following the hearing, the Board will deliberate confidentially. If the allegations are not proved, the Board shall dismiss the allegations. If a violation is proved, the Board may impose additional discipline, including conditions or limitations on Licensee's practice, suspension, or revocation of Licensee's license.

f. Nothing herein shall limit the Committee's or the Board's right to temporarily suspend Licensee's license pursuant to Minnesota Statutes section 214.077 or 214.104, based on a violation of this Stipulation and Consent Order or based on conduct of Licensee not specifically referred to herein.

VII.

ADDITIONAL INFORMATION

13. Licensee is responsible for all costs incurred as a result of compliance with this Stipulation and Consent Order.

14. In the event Licensee resides or practices outside the State of Minnesota, Licensee must promptly notify the Board in writing of the location of her residence and all work sites. Periods of residency or practice outside of Minnesota will not be credited toward any period of Licensee's suspended license in Minnesota unless Licensee demonstrates that practice in another state conforms completely with Licensee's Minnesota license to practice as an assisted living director.

15. 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 nor

introduced in any disciplinary action by either party hereto except that Licensee agrees that should the Board reject this Stipulation, and if this case proceeds to hearing, Licensee will assert no claim that the Board was prejudiced by its review and discussion of this Stipulation or of any records relating hereto.

16. Either party may seek enforcement of this Stipulation and Consent Order in any appropriate civil court.

17. Licensee waives all formal hearings on this matter and all other procedures before the Board to which Licensee may be entitled under the 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.

18. Licensee hereby knowingly and voluntarily waives any and all claims against the Board, the Office of the Minnesota Attorney General, the State of Minnesota and their agents, employees, and representatives which may otherwise be available to Licensee relative to the action taken or authorized against Licensee's license under this stipulation.

19. Licensee hereby acknowledges that she has read, understands, and agrees to this stipulation and has freely and voluntarily signed the stipulation without threat or promise by the Board or any of its members, employees, or agents.

20. This Stipulation and Consent Order contains the entire agreement between the parties there being no other agreement of any kind, verbal or otherwise, which varies this stipulation.

VIII.

DATA PRACTICES NOTICES

21. This Stipulation and Consent Order constitutes disciplinary action by the Board and is classified as public data pursuant to Minnesota Statutes section 13.41, subdivision 5. This Stipulation and Consent Order is a public document and will be sent to all appropriate data banks and entities consistent with Board policy.

CONSENT:

LICENSEE



PATRICIA AMUSAN, LALD

Dated: 8/26/25

FOR THE STANDARDS OF
PRACTICE COMMITTEE



BOARD MEMBER

Dated: 8/27/2025

ORDER

Upon consideration of the Stipulation and all the files, records, and proceedings herein, the terms of the Stipulation are approved and adopted, and the recommended remedy set forth in the Stipulation is hereby issued as an Order of this Board effective this 22 day of October, 2025.

MINNESOTA BOARD
OF EXECUTIVES FOR LONG-TERM
SERVICES AND SUPPORTS



STEPHEN JOBE
Executive Director