

**STATE OF RHODE ISLAND AND
PROVIDENCE PLANTATIONS**

**DEPARTMENT OF HEALTH
DIVISION OF EMERGENCY
MEDICAL SERVICES**

EMS Case 09-001A

**In the Matter of:
Sandra Leplat EMT-C #13851**

CONSENT ORDER

This matter is before the Department of Health, Division of Emergency Medical Services (hereinafter "Department"), upon allegations that Sandra Leplat (hereinafter "Respondent") did engage in conduct that would constitute grounds for disciplinary action against her EMT license while employed as an emergency medical technician for the Pascoag Fire Department. This conduct is alleged to have occurred on December 28, 2008 while Respondent was rendering emergency medical services to a patient. Specifically, the allegation is that Respondent did fail to administer care in accordance with the applicable EMS standards of practice and in violation of the Asthma protocol of the *Rhode Island Prehospital Care Protocols and Standing Orders*, in the following particulars:

1. Respondent, the officer in charge of this incident and the EMT Cardiac who accompanied the patient to the hospital, treated the patient with oxygen and a 1 mg bolus of 1: 1,000 epinephrine IV. Respondent did not provide nebulizer treatments, administer Hydrocortisone Sodium Succinate (Solu-Cortet) or use epinephrine subcutaneously.
2. The patient orally informed Respondent that she had already used her inhaler 4 to 6 times and had self administered two breathing treatments.
3. The epinephrine administered by the Respondent was the wrong concentration (1: 1,000, not 1:10,000), the wrong dose (1 mg, not 0.5 mg based on weight), and given as a bolus, not over 5-10 minutes, in violation of the *Asthma* protocol.
4. Respondent administered the medication, regardless of any miscommunication or factual dispute, without confirming that it was the right medication in the right dose by direct personal observation in violation of EMS standards of practice.

5. Since this 2008 incident, the Asthma Protocol has been amended to discontinue the dosing mechanism of the 1: 10.000 concentration of epinephrine.

With respect to this matter, it is agreed by the parties as follows:

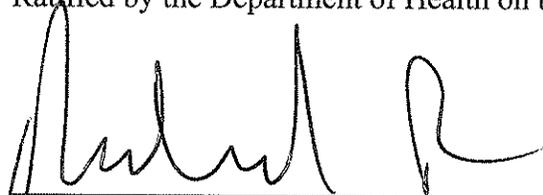
1. Respondent is a licensed EMT-Cardiac #13851 in the State of Rhode Island. Respondent's mailing address is 46 Spring Street, Pascoag, RI 02859.
2. Respondent admits to the jurisdiction of the Department and hereby agrees to remain under the jurisdiction of the Department for the purposes of administration of this consent order.
3. Respondent has read this Consent Order and understands this Consent Order and further understands that it will be effective upon ratification and approval by the Director of the Department or his designee.
4. Respondent hereby acknowledges and waives:
 - a. The right to appear personally or by counsel at an administrative hearing at which the burden of proof and persuasion would be upon the Department
 - b. The right to produce witnesses and evidence in her behalf at a hearing;
 - c. The right to cross-examine witnesses;
 - d. The right to have subpoenas issued by the Department;
 - e. The right to further procedural steps except for those specifically contained herein;
 - f. Any and all rights of appeal of this Consent Order;
5. This Consent Order shall become a part of the public record of this proceeding once it is ratified by the Director.
6. Ratification of this Consent Order by the Director will constitute an admission of the facts contained herein for the purposes of this proceeding only. It does not and will not constitute an admission of facts, either in fact or by operation of law (as, for instance, by way of *estoppel*, *collateral estoppes*, *res judicata* or the like) in any other proceeding, including, but not limited to, proceedings before the Rhode Island Commission for Human Rights, the Equal Employment Opportunity Commission, the United States District Court or the Rhode Island Superior Court in proceedings to enforce Respondent's rights under the Rhode Island Fair Employment Practices Act, the Rhode island Civil Rights Act, Title VII of the Civil Rights Act of 1964, or other statutes or doctrines of law providing redress for employment discrimination.

7. Respondent has satisfactorily completed an approved course to become a paramedic and approved instructors' courses in basic life support, advanced life support, and pediatric advanced life support, all of which include instruction related to Asthma and the proper treatment thereof.
8. Respondent consents to a period of unsupervised probation for one year retroactive to January 1, 2009 and ending December 31, 2009.
9. Respondent is deemed to have completed the period of unsupervised probation without incident.

Signed on this 19th day of July, 2013,


Sandra Leplat, EMT-C

Ratified by the Department of Health on this 22 day of July, 2013.


Michael Fine, MD
Director of Health