

**STATE OF CONNECTICUT  
DEPARTMENT OF PUBLIC HEALTH  
BUREAU OF REGULATORY SERVICES**

In re: Cynthia Hudson, EMT

Petition No. 971120-070-002

**CONSENT ORDER**

WHEREAS, Cynthia Hudson, EMT of New Britain, Connecticut (hereinafter "respondent") has been issued certificate number 94-237 to practice as a emergency medical technician by the Department of Public Health (hereinafter "the Department") pursuant to Chapter 368d of the Connecticut General Statutes, as amended; and,

WHEREAS, the Department alleges that:

1. On or about November 14, 1996, respondent provided substandard pre-hospital care and/or services, which were detrimental to the safety, health and/or welfare of patient SH as follows:
  - a. Failure to obtain an adequate medical history.
  - b. Failure to take the patient's vitals.
  - c. Failure to assess the patient adequately.
  - d. Failure to transport and/or move the patient on a stretcher.
  - e. Failure to prepare an adequate patient run form.
  
2. The above described facts constitute grounds for disciplinary action pursuant to the General Statutes of Connecticut, §19a-180b, taken in conjunction with Regulations, Connecticut State Agencies §19a-179-9(f).

WHEREAS, respondent, in consideration of this Consent Order, has chosen not to contest the above allegations of wrongdoing but, while admitting no guilt or wrongdoing, agrees that for purposes of this or any future proceedings before the Department, this Consent Order shall have the same effect as if proven and ordered after a full hearing held pursuant to §§19a-14 and 19a-180(b) of the General Statutes of Connecticut.

NOW THEREFORE, pursuant to §§19a-14, 19a-17 and 19a-180(b) of the General Statutes of Connecticut, respondent hereby stipulates and agrees to the following:

1. Respondent waives her right to a hearing on the merits of this matter.
2. Respondent's certificate shall be placed on probation for a period of one (1) year under the following terms and conditions:
  - a. Respondent shall provide her employer at each place where respondent practices as an emergency medical technician throughout the probationary period, with a copy of this Consent Order within fifteen (15) days of its effective date, or within fifteen (15) days of commencement of employment at a new facility. Respondent agrees to provide reports from such employer monthly for the first six (6) months of probation; and, quarterly for the remainder of the probationary period, stating that respondent is practicing with reasonable skill and safety.
  - b. Respondent shall obtain written approval from the Department prior to any change in employment.
  - c. Respondent shall obtain at her own expense, the services of an EMT-P or emergency department physician, pre-approved by the Department (hereinafter "supervisor"), to conduct a monthly random review of twenty five percent (25%) or fifty (50) of respondent's patient run form records, whichever is the larger number. In the event

respondent has fifty (50) or fewer patients, the monitor shall review all of respondent's patient run form records.

- (1) Respondent's supervisor shall meet with her not less than once every month for the first six (6) months of her probationary period and quarterly for the remainder of the probationary period.
  - (2) The supervisor shall have the right to monitor respondent's practice by any other reasonable means which he or she deems appropriate. Respondent shall fully cooperate with the supervisor in providing such monitoring.
  - (3) Respondent shall be responsible for providing written supervisor reports directly to the Department monthly for the first six (6) months of the probationary period and quarterly for the remainder of the probationary period. Such supervisor's reports shall include documentation of dates and durations of meetings with respondent, number and a general description of the patient records reviewed, additional monitoring techniques utilized, and statement that respondent is practicing with reasonable skill and safety.
- d. Within the first six (6) months of the probationary period, respondent shall attend and successfully complete coursework pre-approved by the Department covering the following subjects: (i) patient assessment and basic pre-hospital care; (ii) the transportation of patients; (iii) review of basic behavioral central nervous systems, including, but not limited to the effect of strokes on that system; and, (iv) medical and legal ethical issues. Within twenty (20) days of the completion of such coursework, respondent shall provide the Department with proof, to the Department's satisfaction, of the successful completion of such course(s).

2. All correspondence and reports are to be addressed to:

Bonnie Pinkerton, Nurse Consultant  
Department of Public Health  
Division of Health Systems Regulation  
410 Capitol Avenue, MS #12HSR  
P.O. Box 340308  
Hartford, CT 06134-0308

3. All reports required by the terms of this Consent Order shall be due according to the following schedule:
- a. Monthly reports shall be due on the tenth business day of each month.
  - b. Quarterly reports shall be due the tenth business day of every third month.
4. Respondent shall comply with all state and federal statutes and regulations applicable to her licensure.
5. Respondent shall pay all costs necessary to comply with this Consent Order.
6. Any alleged violation of any provision of this Consent Order may result in the following procedures at the discretion of the Department:
- a. The Department shall notify respondent in writing by first-class mail that the term(s) of this Consent Order have been violated, provided that no prior written consent for deviation from said term(s) has been granted.
  - b. Said notification shall include the acts or omission(s) which violate the term(s) of this Consent Order.
  - c. Respondent shall be allowed fifteen (15) days from the date of the mailing of notification required in paragraph 6a above to demonstrate to the satisfaction of the Department that she has complied with the terms of this Consent Order or, in the alternative, that she has cured the violation in question.

- d. If respondent does not demonstrate compliance or cure the violation by the limited fifteen (15) day date certain contained in the notification of violation to the satisfaction of the Department, she shall be entitled to a hearing before the Department which shall make a final determination of the disciplinary action to be taken.
  - e. Evidence presented to the Department by either the Department or respondent in any such hearing shall be limited to the alleged violation(s) of the term(s) of this Consent Order.
7. In the event respondent violates any term of this Consent Order, respondent agrees immediately to refrain from practicing as a emergency medical technician, upon request by the Department, for a period not to exceed 45 days. During that time period, respondent further agrees to cooperate with the Department in its investigation of the violation. Respondent further agrees that failure to cooperate with the Department in its investigation during said 45 day period shall constitute grounds for the Department to seek a summary suspension of respondent's certificate. In any such summary action, respondent stipulates that her failure to cooperate with the Department's investigation shall constitute an admission that her conduct constitutes a clear and immediate danger as required pursuant to the General Statutes of Connecticut, sections 4-182(c) and 19a-17(c).
8. In the event respondent violates any term of this Consent Order, said violation may also constitute grounds for the Department to seek a summary suspension of her certificate before the Department.
9. In the event respondent is not employed as a emergency medical technician for periods of thirty (30) consecutive days or longer, or is employed as a emergency medical technician less than twenty (20) hours per week, or is employed outside of the State of Connecticut, respondent

shall notify the Department in writing. Such periods of time shall not be counted in reducing the probationary period covered by this Consent Order.

10. Legal notice shall be sufficient if sent to respondent's last known address of record reported to the Licensure and Registration Section of the Division of Health Systems Regulation of the Department.
11. This Consent Order is effective on the first day of the month immediately following the date this Consent Order is accepted and ordered by the Department.
12. Respondent agrees that this Consent Order shall be deemed a public document, and the Department's allegations as contained in this Consent Order shall be deemed true in any subsequent proceeding before the Department in which her compliance with this Consent Order or with §19a-180 of the General Statutes of Connecticut, as amended, is at issue.
13. Any extension of time or grace period for reporting granted by the Department shall not be a waiver or preclude the Department from taking action at a later time. The Department shall not be required to grant future extensions of time or grace periods.
14. This Consent Order and terms set forth herein are not subject to reconsideration, collateral attack or judicial review under any form or in any forum. Further, this Order is not subject to appeal or review under the provisions of Chapters 54 or 368a of the General Statutes of Connecticut, provided that this stipulation shall not deprive respondent of any rights that she may have under the laws of the State of Connecticut or of the United States.
15. This Consent Order is a revocable offer of settlement which may be modified by mutual agreement or withdrawn by the Department at any time prior to its being executed by the last signatory.

16. Respondent permits a representative of the Legal Office of the Bureau of Regulatory Services to present this Consent Order and the factual basis for this Consent Order to the Department. Respondent understands that the Department has complete and final discretion as to whether this executed Consent Order is approved or accepted.
17. Respondent understands and agrees that she is responsible for satisfying all of the terms of this Consent Order during vacations and other periods in which she is away from her residence.
18. Respondent has the right to consult with an attorney prior to signing this document.

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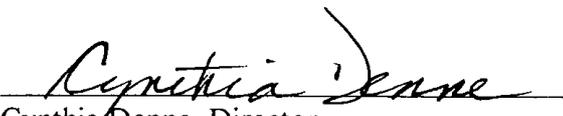
I, Cynthia Hudson, EMT, have read the above Consent Order, and I stipulate and agree to the terms as set forth therein. I further declare the execution of this Consent Order to be my free act and deed.

  
Cynthia Hudson, EMT

Subscribed and sworn to before me this may day of May 1998.

  
Notary Public or person authorized *Connie Saper*  
by law to administer an oath or affirmation *(Not)*

The above Consent Order having been presented to the duly appointed agent of the Commissioner of the Department of Public Health on the 21<sup>st</sup> day of May 1998, it is hereby accepted.

  
Cynthia Denne, Director  
Division of Health Systems Regulation