

BEFORE THE BOARD OF MEDICAL EXAMINERS  
OF THE STATE OF IOWA

\* \* \* \* \*

IN THE MATTER OF THE COMPLAINT	:	
	:	
AND STATEMENT OF CHARGES AGAINST	:	ORDER
	:	
RHONDA WAGONER, EMT-I and EMT-D	:	05-88-146
	:	
RESPONDENT	:	

\* \* \* \* \*

NOW on NOVEMBER 16, 1988, the above entitled matter having been filed with the Executive Director, Iowa State Board of Medical Examiners, and the said Executive Director, having reviewed the file and being fully advised in the premises  
FINDS:

1. That the Respondent was issued EMT-D, certificate number 8123, on June 11, 1982, and EMT-I certificate number 644 on November 10, 1982, both of which are recorded in the permanent records in the office of the Iowa State Board of Medical Examiners.

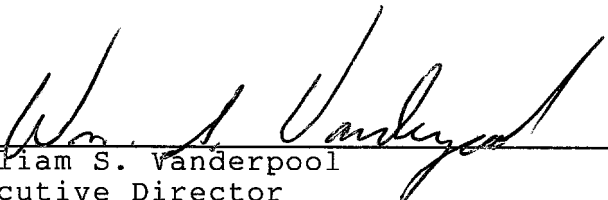
2. That a Complaint and Statement of Charges was filed against the Respondent, Rhonda Wagoner, EMT-I, EMT-D on August 18, 1988, and was scheduled to be heard before the Iowa State Board of Medical Examiners.

3. That the Iowa State Board of Medical Examiners has jurisdiction of the parties and the subject matter herein.

4. That the respondent and the Iowa State Board of Medical Examiners have entered into an Informal Settlement providing that an Order should be entered suspending the Respondent's EMT-I and EMT-D certificates for a period of fifteen days, effective

November 16, 1988.

THEREFORE, IT IS HEREBY ORDERED that EMT-D certificate number 8123 issued to the Respondent, on June 11, 1982 and EMT-I certificate number 644 issued to the Respondent on November 10, 1982 are suspended for a period of fifteen (15) days effective November 16, 1988.

  
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William S. Vanderpool  
Executive Director  
Iowa State Board of Medical Examiners  
1209 East Court Ave.  
Des Moines, Iowa 50319-0180

BEFORE THE BOARD OF MEDICAL EXAMINERS  
OF THE STATE OF IOWA

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IN THE MATTER OF THE	)	
	)	
COMPLAINT AND STATEMENT	)	
	)	
OF CHARGES AGAINST	)	NO. 05-88-146
	)	
RHONDA WAGONER, EMT-1 AND	)	
EMT-D,	)	
	)	INFORMAL SETTLEMENT
RESPONDENT.	)	

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COME NOW the Iowa Board of Medical Examiners [the Board] and Rhonda Wagoner, EMT-1 and EMT-D [the Respondent] and, pursuant to Iowa Code §§ 17A.10 and 258A.3(4), enter into the following Informal Settlement of the contested case currently on file:

1. The Respondent was issued certificate no. 8123 to practice as an Advanced Emergency Medical Technician - Ventricular Defibrillation (EMT-D) on June 11, 1982 and was issued certificate no. 644 to practice as an Advanced Emergency Medical Technician (EMT-1) on November 10, 1982.

2. A Complaint and Statement of Charges was filed against the Respondent on August 18, 1988.

3. The Board has jurisdiction of the parties and the subject matter.

4. The Respondent's certificates to practice as an EMT-1 and EMT-D shall be suspended for a period of fifteen (15) days to commence on NOVEMBER 16, 1988.

5. This Informal Settlement is subject to approval of the Board. If the Board fails to approve this Informal Settlement, it shall be of no force or effect to either party.

6. This Informal Settlement is voluntarily submitted on this 10<sup>TH</sup> day of NOVEMBER 1988.

Rhonda Wagoner  
RHONDA WAGONER, EMT-1 AND EMT-D

Subscribed and sworn to before me on this 8 day of November, 1988.

Leah Wagoner  
Notary Public in and for the  
State of Iowa

This Informal Settlement is accepted by the Iowa Board of Medical Examiners on the 10<sup>TH</sup> day of NOVEMBER, 1988.

John Anderson M.D.  
JOHN ANDERSON, M.D., Chairman  
Iowa Board of Medical Examiners

Subscribed and sworn to before me on this 17 day of NOVEMBER, 1988.

Juanita Carr  
Notary Public in and for the  
State of Iowa

BEFORE THE BOARD OF MEDICAL EXAMINERS  
OF THE STATE OF IOWA

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IN THE MATTER OF THE COMPLAINT :  
AND STATEMENT OF CHARGES AGAINST : COMPLAINT AND STATEMENT  
RHONDA WAGONER, EMT-I AND EMT-D : OF CHARGES  
RESPONDENT : 05-88-146

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COMES NOW William S. Vanderpool, Executive Director of the Iowa State Board of Medical Examiners, on the 18<sup>th</sup> day of August, 1988, and files this Complaint and Statement of Charges against Rhonda Wagoner an Advanced Emergency Medical Technician (EMT-I) and Advanced Emergency Medical Technician - Ventricular Defibrillation, (EMT-D), certified pursuant to Chapter 147A, Code of Iowa and alleges:

1. That Mary L. Ellis is the duly appointed and qualified Director of Public Health of the State of Iowa.

2. That John R. Anderson, M.D., Chairman; C. L. Peterson, D.O., Vice Chairman; Marian C. Bourek, Secretary; Charlotte Cleavenger, D.O.; Dorothy J. Gildea, M.D.; John W. Olds, M.D.; Ann O'Neill; Hormoz Rassekh, M.D.; and Robert B. Stickler, M.D. are the duly appointed and qualified officers and members of the Iowa State Board of Medical Examiners.

3. That the Respondent is a resident of Madison County, Iowa, and was issued certificate number 8123 to practice as an Advanced Emergency Medical Technician - Ventricular Defibrillation (EMT-D) on June 11, 1982, and was issued certificate number 644 to practice as an Advanced Emergency

Medical Technician (EMT-I) on November 10, 1982.

4. That the Respondent's certificates are current until November 10, 1988.

5. That on April 15, 1986, the Respondent falsified an Iowa Prehospital Care Report by stating that a heart monitor showed asystole instead of ventricular fibrillation.

6. That the Iowa State Board of Medical Examiners is authorized to take disciplinary action against the Respondent pursuant to the provisions of sections 147A.7(1), 147A.7(1)(f) and 147A.7(1)(i) of the Code of Iowa which state in whole or in part:

147A.7(1) - "The Board may deny an application for issuance or renewal of an advanced EMT or paramedic certificate, or suspend or revoke the certificate when it finds that the applicant or certificate holder is guilty of any of the following acts or offenses:"

147A.7(1)(f) - "Knowingly making misleading, deceptive, untrue or fraudulent representation in the practice of a profession..."

147A.7(1)(i) - "Willful or repeated violations of this chapter or of rules adopted pursuant to this chapter."

7. That the Iowa State Board of Medical Examiners is authorized to take disciplinary action against the Respondent pursuant to the provisions of rules 641-132.11(3) and 641-132.11(3)(d) of the Iowa Administrative Code which state in whole or in part:

641-132.11(3) - "The board may deny an application for

issuance or renewal of an advanced EMT or paramedic certificate, or suspend or revoke such a certificate when it finds that the applicant or certificate holder has:"

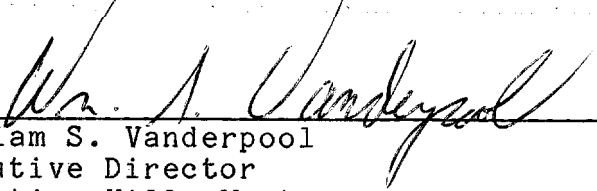
641-132.11(3)(d) - "Violated any of the provisions of or failed to comply with pertinent requirements of Iowa Code chapter 147A or the rules implementing such chapter."

8. That paragraphs 6 and 7 constitute grounds for the Iowa State Board of Medical Examiners to revoke, suspend or otherwise discipline the certificates to practice as an Advanced Emergency Medical Technician (EMT-I) which was issued to the Respondent on November 10, 1982; and Advanced Emergency Medical Technician - Ventricular Defibrillation (EMT-D) which was issued to the Respondent on June 11, 1982.

WHEREFORE the undersigned charges that Rhonda Wagoner, EMT-I and EMT-D is subject to discipline pursuant to the provision of sections 147A.7(1), 147A.7(1)(f) and 147A.7(1)(i) of the Code of Iowa and Rules 641-132.11(3) and 641-132.11(3)(d) of the Iowa Administrative Code and the undersigned prays that the Board enter an order fixing a time and place of hearing for the Complaint and Statement of Charges. The undersigned further prays that upon final hearing, the Board enter its findings of fact and decision to revoke, suspend or otherwise discipline certificate number 644, issued to the Respondent to practice as an Advanced Emergency Medical Technician (EMT-I) on November 10, 1982 and certificate number 8123, issued to the Respondent to practice as an Advanced Emergency Medical Technician - Ventricular Defibrillation on June 11, 1982 and for such other relief as the Board

deems just in the premises.

IOWA STATE BOARD OF MEDICAL EXAMINERS

  
\_\_\_\_\_  
William S. Vanderpool  
Executive Director  
Executive Hills West  
1209 E. Court Avenue  
Des Moines, IA 50319  
Telephone: 515/281-5171