Public Comment Note

This meeting is open to the public with limited spacing due to social distancing requirements. Because of this, we are asking that if you do not have business before the Investigations Committee, that you please consider attending through one of our virtual offerings.

The Board strongly believes that transparency and open government are paramount and holds firm upon the importance of the public to have an ability to observe and comment upon the Board proceedings and to provide comment and insight upon items appearing on the agenda.

To assist with ensuring a fair and consistent manner by which all public comment can be received for the purpose of assisting the Board and/or committee with a potential decision at hand, we ask that public comment on an agenda item be submitted in writing at least eight (8) hours prior to the meeting to joseph.house@ks.gov.

All public comment submitted will be provided as submitted to each committee member and will be read at the appropriate time by Board staff if it can be done within 5 minutes. All public comment relating to and identifying a specific agenda item will be presented or read prior to a vote on that agenda item.

1. Continuing Education Audit Sanctioning Reference Points *****

   1.1 Sample Template and Information
2. Continuing Education Audits

These continuing education audit cases utilize the CE audit sanctioning reference points.

Note: All renewal applicants acknowledge to having met all renewal requirements prior to submission of their renewal application and indicate that they have completed the required number of hours of approved CE in all categories and subcategories prior to submitting. Those selected for an audit are given, at a minimum, 30 days to respond to the request for documentation.

<table>
<thead>
<tr>
<th>Level</th>
<th>Action</th>
<th>Score</th>
<th>Fines</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td>1st Violation</td>
</tr>
<tr>
<td>No Sanction</td>
<td>No Action</td>
<td>Less than 5</td>
<td>$0</td>
</tr>
<tr>
<td>Sanction Level 1</td>
<td>Local Action Approved, if done</td>
<td>5 to 20</td>
<td>$25</td>
</tr>
<tr>
<td>Sanction Level 2</td>
<td>Modification of Certificate</td>
<td>21 to 80</td>
<td>$50</td>
</tr>
<tr>
<td>Sanction Level 3</td>
<td>Limitation of Certificate</td>
<td>81 to 150</td>
<td>$75</td>
</tr>
<tr>
<td>Sanction Level 4</td>
<td>Suspension of Certificate for less than 3 months</td>
<td>151 to 400</td>
<td>$150</td>
</tr>
<tr>
<td>Sanction Level 5</td>
<td>Suspension of Certificate for 3 or more months</td>
<td>401 to 750</td>
<td>$300</td>
</tr>
<tr>
<td>Sanction Level 6</td>
<td>Revocation of Certificate</td>
<td>751 or more</td>
<td>$500</td>
</tr>
</tbody>
</table>

2.1 Individual responded to the CE audit and had met all continuing education requirements upon submission of their application. Case should not have been assigned. Staff recommendation is to dismiss the case with no violation found.

Case 2020-010 0.00 No Sanction

2.2 Self report received from an ambulance service after an internal audit determined two individuals submitted their renewal applications prior to having the renewal requirements completed. Investigation confirmed the findings. Evidence indicates a violation of making a false or misleading statement on an application for certification renewal.

Case 2019-094 5.43 Sanction Level 1
Completed all lacking requirements prior to expiration of the renewed certificate. Staff recommendation is to accept local action and a $25 fine.

Case 2019-095 306.02 Sanction Level 4
Completed all lacking requirements after expiration of the renewed certificate. Staff recommendation is additional CE hours and a $150 fine in lieu of suspension.

2.3 Individual responded to the CE audit and was identified as having an insufficient quantity of hours. Upon involvement of the Board’s investigator, additional hours were identified by the individual and submitted. Individual had all renewal requirements completed upon submission of his/her renewal application. Evidence indicates a violation of failing to furnish documents legally requested by the board within a timely manner.

Case 2020-011 177.05 Sanction Level 4
Staff recommendation is a $150 fine in lieu of suspension.

2.4 Individual responded to the CE audit. Individual submitted his/her renewal application prior to having the renewal requirements completed. Individual completed all lacking requirements prior to expiration of the renewed certificate. Evidence indicates a violation of making a false or misleading statement on an application for certification renewal.

Case 2020-015 56.30 Sanction Level 2
Staff recommendation is a $50 fine.
2.5 Individual responded to the CE audit. Individual submitted his/her renewal application prior to having the renewal requirements completed. Individual completed all lacking requirements after the expiration of the renewed certificate. Evidence indicates a violation of making a false or misleading statement on an application for certification renewal. Staff recommendation in each of these is a fine and additional continuing education hours, if listed.

<table>
<thead>
<tr>
<th>Case</th>
<th>Amount</th>
<th>Sanction Level</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>Case 2020-001</td>
<td>109.62</td>
<td>3</td>
<td>$75 fine – 11.5 hrs</td>
</tr>
<tr>
<td>Case 2020-012</td>
<td>418.62</td>
<td>5</td>
<td>$300 fine – 10.25 hrs</td>
</tr>
<tr>
<td>Case 2020-019</td>
<td>56.30</td>
<td>2</td>
<td>$50 fine</td>
</tr>
<tr>
<td>Case 2020-024</td>
<td>631.84</td>
<td>5</td>
<td>$300 fine – 26.75 hrs</td>
</tr>
<tr>
<td>Case 2020-029</td>
<td>45.43</td>
<td>2</td>
<td>$50 fine</td>
</tr>
<tr>
<td>Case 2020-032</td>
<td>143.48</td>
<td>3</td>
<td>$75 fine</td>
</tr>
<tr>
<td>Case 2020-034</td>
<td>622.03</td>
<td>5</td>
<td>$300 fine – 11.5 hrs</td>
</tr>
<tr>
<td>Case 2020-035</td>
<td>542.86</td>
<td>5</td>
<td>$300 fine – 23 hrs</td>
</tr>
<tr>
<td>Case 2020-036</td>
<td>75.87</td>
<td>2</td>
<td>$50 fine</td>
</tr>
<tr>
<td>Case 2020-037</td>
<td>75.87</td>
<td>2</td>
<td>$50 fine</td>
</tr>
<tr>
<td>Case 2020-040</td>
<td>30.87</td>
<td>2</td>
<td>$50 fine</td>
</tr>
<tr>
<td>Case 2020-041</td>
<td>125.43</td>
<td>3</td>
<td>$75 fine</td>
</tr>
<tr>
<td>Case 2020-043</td>
<td>30.30</td>
<td>2</td>
<td>$50 fine</td>
</tr>
<tr>
<td>Case 2020-044</td>
<td>45.43</td>
<td>2</td>
<td>$50 fine</td>
</tr>
<tr>
<td>Case 2020-045</td>
<td>121.30</td>
<td>3</td>
<td>$75 fine</td>
</tr>
<tr>
<td>Case 2020-046</td>
<td>81.93</td>
<td>3</td>
<td>$75 fine</td>
</tr>
<tr>
<td>Case 2020-050</td>
<td>41.74</td>
<td>2</td>
<td>$50 fine</td>
</tr>
<tr>
<td>Case 2020-054</td>
<td>496.33</td>
<td>5</td>
<td>$300 fine – 16 hrs</td>
</tr>
</tbody>
</table>

2.6 Individual did not respond wholly to the CE audit responding completely only after the involvement of the Board’s investigator. Individual submitted his/her renewal application prior to having the renewal requirements completed. Individual completed all lacking requirements prior to expiration of the renewed certificate. Evidence indicates a violation of making a false or misleading statement on an application for certification renewal and a violation of failing to furnish documents legally requested by the board within a timely manner. Staff recommendation is a $150 fine.

<table>
<thead>
<tr>
<th>Case</th>
<th>Amount</th>
<th>Sanction Level</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>Case 2020-016</td>
<td>160.87</td>
<td>4</td>
<td></td>
</tr>
</tbody>
</table>

2.7 Individual did not respond wholly to the CE audit responding completely only after the involvement of the Board’s investigator. Individual submitted his/her renewal application prior to having the renewal requirements completed. Individual completed all lacking requirements after expiration of the renewed certificate. Evidence indicates a violation of making a false or misleading statement on an application for certification renewal and a violation of failing to furnish documents legally requested by the board within a timely manner. Staff recommendation is a fine and additional continuing education hours, if listed.

<table>
<thead>
<tr>
<th>Case</th>
<th>Amount</th>
<th>Sanction Level</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>Case 2020-009</td>
<td>187.17</td>
<td>4</td>
<td>$225 fine</td>
</tr>
<tr>
<td>Case 2020-020</td>
<td>245.43</td>
<td>4</td>
<td>$225 fine</td>
</tr>
<tr>
<td>Case 2020-021</td>
<td>165.43</td>
<td>4</td>
<td>$225 fine</td>
</tr>
<tr>
<td>Case 2020-022</td>
<td>208.91</td>
<td>4</td>
<td>$225 fine</td>
</tr>
<tr>
<td>Case 2020-026</td>
<td>176.30</td>
<td>4</td>
<td>$225 fine</td>
</tr>
<tr>
<td>Case 2020-030</td>
<td>299.43</td>
<td>4</td>
<td>$225 fine</td>
</tr>
<tr>
<td>Case 2020-031</td>
<td>207.17</td>
<td>4</td>
<td>$225 fine</td>
</tr>
<tr>
<td>Case 2020-033</td>
<td>187.17</td>
<td>4</td>
<td>$225 fine</td>
</tr>
<tr>
<td>Case 2020-042</td>
<td>756.75</td>
<td>6</td>
<td>$500 fine – 21.5 hrs</td>
</tr>
</tbody>
</table>
2.8 Individual initially responded to the CE audit and was identified as having an insufficient quantity of hours. The individual failed to respond to the Board's Investigator. Evidence indicates a violation of making a false or misleading statement on an application for certification renewal; a violation of failing to furnish documents legally requested by the board within a timely manner; and a violation of failing to cooperate with the board in its investigation of possible violations.

Case 2020-048  547.55  Sanction Level 5
Staff recommendation is to suspend until deficiency is resolved, 3.5 hrs of additional CE, and a $475 fine (3 violations).

2.9 Individual failed to respond to the CE audit and failed to respond to the Board's Investigator. Evidence indicates a violation of failing to furnish documents legally requested by the board within a timely manner; and a violation of failing to cooperate with the board in its investigation of possible violations.

Case 2020-027  975.00  Sanction Level 6
Staff recommendation is to revoke individual's certification and a $500 fine.

3. Consent Agenda

3.1 Case 2019-101 – Pending criminal charges disclosed on renewal
Individual indicated that he/she had pending criminal charges on his/her renewal application. Investigation determined that the individual was convicted upon misdemeanor crimes only. Evidence supports no violation occurred.
Staff recommendation is to allow the processing of the renewal application pending the successful completion of all other requirements.

3.2 Case 2020-013 – Representing oneself as an EMS provider without certification
Received information that an individual that does not hold EMS certification had been providing EMS care. Investigation found no evidence to support the allegation.
Staff recommendation is to close the case.

3.3 Case 2020-006 – Failure to Respond
Received information that a service declined to run a 911 call perhaps due to inadequate staffing. Investigation found no evidence to support the allegation and identified that the service was not dispatched to the call.
Staff recommendation is to close the case.

4. Discussion Cases

4.1 Case 2019-054 – Felony disclosed on application
Individual indicated that he/she had been convicted of a felony and failed to respond to the Board's investigation to demonstrate rehabilitation sufficient to warrant the public trust.
Staff recommendation is to deny the application for certification.

4.2 Case 2019-082 – Felony disclosed on application
Individual indicated that he/she had been convicted of a felony. Provided documentation demonstrating multiple felony convictions and still owing
restitution in two of the convictions. Evidence supports that the individual is working towards demonstrating rehabilitation sufficient to warrant the public trust. Staff recommendation is to conditionally approve the application pending resolution of outstanding restitution within 12 months.

4.3 **Case 2020-049 – Failure to disclose felony conviction on application**  
Individual failed to disclose his/her felony conviction upon an application. Individual was convicted of a felony outside the state of Kansas and that conviction has since been removed from the individual’s record; however, the court had ordered the individual to disclose the conviction when asked in a direct question or upon any application for public office or licensure by any state or local agency. Evidence supports a violation of making a false or misleading statement on an application. Staff recommendation is to offer the individual a consent agreement that would allow for the processing of his/her application.

4.4 **Case 2019-058 – Representing oneself as an EMS provider without certification**  
Received information that an individual had been providing EMS care for approximately a year as part of an ambulance service without having an EMS credential. Investigation confirmed this information. Individual has since gained certification as an EMS provider in Kansas. Evidence indicates that state statute was violated by the individual. Evidence indicates that the service violated regulation in failing to maintain their roster of attendants and that this is a second violation of this regulation by this service.

**Individual** - Violation of K.S.A. 65-6150 is a class B misdemeanor.  
**Service** – Failure of operator or an agent to comply with statute or regulation pertaining to the operation of a licensed ambulance service (Incompetence) – 2nd violation no likelihood of harm to patient – Graduated Sanction Level 3 or 4 - Fine $650 or $1200.

4.5 **Case 2020-005 - Representing oneself as an EMS provider without certification**  
Received information that an individual had been providing EMS care for approximately three years as part of an agency providing emergency medical response. Investigation confirmed this information and identified that although the individual had passed an initial course of instruction, he/she had never successfully completed Kansas examinations for certification. The agency providing emergency medical response is not an ambulance service.  

**Individual** - Violation of K.S.A. 65-6150 is a class B misdemeanor.

4.6 **Case 2020-017 - Representing oneself as an EMS provider without certification**  
Received information that an individual currently enrolled in an initial course, but not certified, is providing EMS care as part of an agency providing emergency medical response. Investigation confirmed the information reported. Individual refused to cooperate with the Board’s investigator.  

**Individual** - Violation of K.S.A. 65-6150 is a class B misdemeanor.  
Recommend making a note on the individual’s application to bring the individual in front of the Investigation’s Committee prior to issuance of certification.
4.7 Case 2020-002 – Diversion of medications / Felony conviction
Received information that an EMS provider was arrested and charged with
diversion of scheduled medications. Investigation confirmed this information.
Individual has been under an emergency order of suspension since arrest.
Criminal case has concluded with the EMS provider being convicted of multiple
felony crimes related to the diversion. The EMS provider is currently awaiting sentencing.

**Provider** – Convicted of a felony and not sufficiently rehabilitated to warrant
the public trust – Graduated Sanction Level 1 to 6 – Staff recommends revocation of certificate.

4.8 Case 2020-004 – Missing patient care reports
Received a self report stating that the service was unable to locate a patient care
report and upon their investigation identified that multiple members of the service
had failed to complete a patient care report within 24 hours of the transport.
Investigation confirmed the self report findings and identified four providers.

**Service** – Failed to keep and maintain required records – 1st violation –
Graduated Sanction Level 1 to 6 – Fine $250 - $2500.
Violation of regulation by not providing the receiving facility the completed
patient care report within 24 hours of transport – 1st violation – Graduated
Sanction Level 1 to 4 potential harm to patient – Fine $250-2500.

**Providers** – Aided and abetted in the violation of regulation by not completing
a patient care report within 24 hours of transport – 1st violation – Graduated
Sanction Level 1 to 4 potential harm to patient – Fine $25 - $150.

4.9 Case 2020-014 – Operating a non-licensed ambulance
Received information that a permitted ambulance service utilized a non-licensed
ambulance. Investigation confirmed this information and identified that the
ambulance was licensed in other states, but not Kansas.

**Service** – Violation of regulation by utilizing a non-Kansas licensed
ambulance – 1st violation: no likelihood of harm to patient – Graduated
Sanction Level 1 to 3 – Fine $250-450.

4.10 Case 2020-028 – Inadequate staffing during transport
Received a self-report from a service that transported a patient in a police car
and with only one EMS provider to an ambulance staged in another location.
Investigation found that there was a circumstance that delayed response by the
ambulance service and allowed only one crew member to arrive on scene.

**Service** – Violation of regulation by not having adequate staffing during
transport – 1st violation with no likelihood of harm to patient – Graduated
Sanction Level 1 to 3 – Fine $250 - $450. Mitigating circumstances exist to
consider accepting local action.

**Provider** – Aided and abetted in the violation of regulation – 1st violation with
no likelihood of harm to patient – Graduated Sanction Level 1 to 3 – Fine $25
- $75. Mitigating circumstances exist to consider accepting local action.

4.11 Case 2020-051 – Impaired provider
Received a self-report from both a service and an individual indicating the
provider’s termination from a permitted ambulance service due to testing positive
for an illicit substance. Investigation indicates that the individual was unable to
perform authorized services with reasonable skill/safety due to use of drugs/controlled substances.

Provider – Inability to perform authorized services with reasonable skill/safety due to use of drugs – 1st violation no likelihood of harm to patient – Graduated Sanction Level 1 to 6 – Fine $25-500. Consider an impaired provider program referral (through consent agreement).

4.12 Case 2020-018 – Performance of unauthorized activities
Received a self-report from an ambulance service stating that one provider administered more medication than authorized in protocol and another administered a medication without a protocol or order. Evidence indicates that both medications were administered without proper authorization. Evidence further indicates that information within the patient care report for the encounter was inaccurate.

Providers – Performing acts beyond authorized activities; falsifying patient’s records; and falsifying ambulance service’s records – 1st violation no likelihood of harm to patient – Graduated Sanction Level 1 to 3 – Fine $25-75.

4.13 Case 2020-038 – Performance of unauthorized activities
Received a self-report from an ambulance service stating that two providers performed an unauthorized activity by administering a medication not approved for administration at their level of certification. Evidence indicates that this occurred.

Providers – Performing acts beyond authorized activities; performed activities not authorized at the level of certification held – 1st violation: no likelihood of harm to patient – Graduated Sanction Level 1 to 3 – Fine $25-75

4.14 Case 2020-052 – Performance of unauthorized activities
Received a self-report from an ambulance service stating that a provider performed an unauthorized activity by administering a medication not approved for administration at their level of certification. Evidence indicates that this occurred and that two other providers contributed to the violation.

Provider – Performing acts beyond authorized activities; performed activities not authorized at the level of certification held; and failure to take action to safeguard a patient – 1st violation: no likelihood of harm to patient – Graduated Sanction Level 1 to 3 – Fine $25-75

Additional Providers – Aiding and abetting in the violation of a regulation; failure to take action to safeguard a patient – 1st violation; potential harm to patient – Graduated Sanction Level 1 to 4 – Fine $25-150

4.15 Case 2020-039 – Medication error
Received a self-report from an ambulance service stating that a provider made a medication error by administering the wrong medication. Evidence indicates that this occurred and there was actual harm to the patient by the error.

Provider – Failing to take appropriate action to safeguard patient; inadequate patient care – 1st violation: actual harm to patient – Graduated Sanction Level 1 to 6 – Fine $25-500.
4.16 Follow Up - Case 2016-002
Respondent in the above noted case entered into a consent agreement. Respondent failed to adhere to the terms of the consent agreement by not submitting documentation as required.

Staff recommendation: Violation in terms of consent agreement. Failure to comply within consent agreement states evidence of breach, violation, or failure to comply shall result in a 90-day suspension of certificate, with notice and opportunity to be heard.

4.17 Follow Up - Cases 2019-059 and 2019-087
These cases were tabled from the February 2020 meeting requesting the service to develop and implement changes to prevent future staffing violations. Evidence notes that similar additional violations occurred in March, May, June, and July 2020.

Staff recommendation: Consider initiating the process to revoke the operator’s permit.

4.18 Case 2019-044 – Patient Care
Received multiple reports alleging unauthorized patient care, inadequate patient care, and a failure to act. Evidence suggests that violations occurred and confirmed the reports.

Providers – Failure to safeguard a patient; falsifying a patient’s record; falsifying an ambulance service’s record; inadequate patient care; fraudulent or dishonest act related to the qualifications, functions, or duties of an EMS provider – 1st violation: potential harm to patient – Graduated Sanction Level 1 to 4 – Fine $25-$150. Aggravating circumstances due to number of violations.

5. Adjournment

***** Denotes items requiring Board action.

NOTES: Please remember to turn off all cell phones or place them on silent mode during the Board meeting. If it is necessary to accept the call, please step outside of the meeting room to continue your phone call. Additionally, the use of tobacco is not permitted inside this building.
Agenda Item: Sanctioning Reference Points (SRP) – CE Audits
Committee: Investigations

BACKGROUND
The Board desires to provide a fair and consistent method of adjudication through the process of enforcement of its statutes, rules, and regulations.

Sanctioning reference points are a means to determine the severity of the infraction based upon the facts identified in the case. These points can be applied to the already established graduated sanctions and provide the Board with a consistent approach.

On April 7, 2017, the Board adopted and put into effect a Provider Continuing Education Audit Policy. Within that policy, the Board directed that any audit where it was determined that the individual did not have approved hours of continuing education and in sufficient quantity and distribution to renew certification would be forwarded to the Board’s Investigation Committee with a recommendation to suspend the provider’s certification until further notice of the Board. It also stated that if a person did not respond after 2 requests and within 30 days, that would be forwarded to the Board’s Investigation Committee with a recommendation to revoke the provider’s certification.

There are primarily two (2) regulations violated through continuing education audits – Failure to Comply and Falsification of a Renewal Application. Failure to comply occurs when an individual does not respond to the lawful requests of the Board. Falsification of a renewal application occurs when an individual attests that they have completed all of their continuing education in sufficient quantity and distribution at the time the application is submitted and that has not been done.

DISCUSSION
A copy of the developed SRP for Continuing Education Audits is attached (Enclosure 1). Specific points are applied based upon the answers for each question. This SRP was applied to the 34 continuing education audits on the Investigations Committee docket.

It should be noted that the sub-categories do appear on this SRP and this line will need to be removed for those with a certification expiration date on and after December 31, 2020. All renewals submitted prior to January 2020 still had a requirement to adhere to subcategories of continuing education.

Discussion may want to address:
- Applicability
- Weights on scoring.
- Standardizing fine amounts and usage of a fine vs. suspension.
- Consideration of future delegation of the use of this tool to the Executive Director (with a report provided to the Investigations Committee and/or Board of each use).

FINANCING
Usage of this tool will have no fiscal effect upon the Board.

ALTERNATIVES
The Committee has the following alternatives concerning the matter at hand. The Committee may:
1. Proceed with utilization of the SRP as provided for CE Audits.
2. Modify the SRP and proceed with its utilization for CE Audits.
3. Reject the SRP.
4. Table the item.

**RECOMMENDATION**

To proceed with utilization of the SRP as provided and for CE Audits.

**POSSIBLE MOTION(S)**

That the Investigations Committee utilize the SRP for CE Audit cases in determining the applicable sanction for the identified violation in statute and/or regulation.

Enclosures:

1. SRP – CE Audit
### Case Number

#### Level of Certification (EMR, EMT, AEMT, Paramedic)

<table>
<thead>
<tr>
<th>Hours Needed (EMR - 16; EMT - 28; AEMT - 44; Paramedic - 60)</th>
<th>Score</th>
</tr>
</thead>
<tbody>
<tr>
<td>Did Individual Respond to 1st Notice of Audit</td>
<td>(NA = 0; Yes = 5; No = 10)</td>
</tr>
<tr>
<td>Did Individual Respond to 2nd Notice of Audit</td>
<td>(NA = 0; Yes = 20; No = 80)</td>
</tr>
<tr>
<td>Did Individual Respond to 1st Notice of Audit Request for Additional Information</td>
<td>(NA = 0; Yes = 5; No = 10)</td>
</tr>
<tr>
<td>Did Individual Respond to 2nd Notice of Audit Request for Additional Information</td>
<td>(NA = 0; Yes = 10; No = 20)</td>
</tr>
<tr>
<td>Did Individual Respond to 3rd Notice of Audit Request for Additional Information</td>
<td>(NA = 0; Yes = 15; No = 30)</td>
</tr>
</tbody>
</table>

If any of Lines 5 through 8 are answered "No", enter "150"; otherwise add Lines 4 through 8 and enter here: 0

| Did Individual Respond to Investigator 1st Request | (NA = 0; Yes = 10; No = 20) |   |
| Did Individual Respond to Investigator 2nd Request | (NA = 0; Yes = 20; No = 80) |   |

If any of Lines 4 through 8, 10, or 11 are answered "Yes", based upon the date the renewal application was submitted:

| Were all hours approved (prior, retroactive, or presumptive) | (NA = 0; Yes = 0; No = 5) |   |
| Were approved in sufficient quantity to renew at the level requested | (NA = 0; Yes = 0; No = 5) |   |
| Were approved hours in sufficient distribution to renew at the level requested | (NA = 0; Yes = 0; No = 5) |   |

If Line 13, 14, or 15 is "No":

| Were all additional approved hours completed on or before expiration (December 31) | (NA = 0; Yes = 5; No = 10) |   |

How many hours were submitted:

(NA = 100; Hours Submitted - Hours Needed = -10; Hours Submitted > Hours Needed = (Number of Hours short / Number of Hours needed) * 100)

How many hours were approved:

(NA = 100; Hours Submitted - Hours Needed = -10; Hours Submitted > Hours Needed = (Number of Hours short / Number of Hours needed) * 150)

### Special Recommendations:

- No Action

### Sanction Score

0.00

#### Sanctioning Reference Points

<table>
<thead>
<tr>
<th>Level</th>
<th>Action</th>
<th>Score</th>
<th>1st Violation</th>
<th>2nd Violation</th>
<th>3rd or Subsequent</th>
</tr>
</thead>
<tbody>
<tr>
<td>No Sanction</td>
<td>No Action</td>
<td>Less than 5</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
</tr>
<tr>
<td>Sanction Level 1</td>
<td>Local Action Approved, if done</td>
<td>5 to 20</td>
<td>$25</td>
<td>$100</td>
<td>$200</td>
</tr>
<tr>
<td>Sanction Level 2</td>
<td>Modification of Certificate</td>
<td>21 to 80</td>
<td>$50</td>
<td>$125</td>
<td>$225</td>
</tr>
<tr>
<td>Sanction Level 3</td>
<td>Limitation of Certificate</td>
<td>81 to 150</td>
<td>$75</td>
<td>$150</td>
<td>$250</td>
</tr>
<tr>
<td>Sanction Level 4</td>
<td>Suspension of Certificate for less than 3 months</td>
<td>151 to 400</td>
<td>$150</td>
<td>$225</td>
<td>$325</td>
</tr>
<tr>
<td>Sanction Level 5</td>
<td>Suspension of Certificate for 3 or more months</td>
<td>401 to 750</td>
<td>$300</td>
<td>$375</td>
<td>$475</td>
</tr>
<tr>
<td>Sanction Level 6</td>
<td>Revocation of Certificate</td>
<td>751 or more</td>
<td>$500</td>
<td>$500</td>
<td>$500</td>
</tr>
</tbody>
</table>