

STATE OF FLORIDA  
BOARD OF CHIROPRACTIC MEDICINE

Final Order No. DOI-99-0600-S -MQA Date 6-10-99

DEPARTMENT OF HEALTH

Petitioner,

vs.

PATRICK J. ST. GERMAIN, D.C.,

Respondent.

FILED  
Department of Health  
Angela Hall, AGENCY CLERK  
By: Stephanie J. Hall  
Deputy Agency Clerk

CASE NOS.: 93-18501  
95-08870  
95-14472

LICENSE NO.: CH 0005913

FINAL ORDER ACCEPTING SETTLEMENT COUNTER-STIPULATION

THIS MATTER came before the Board of Chiropractic (hereinafter referred to as the "Board") pursuant to Section 120.57(4), Florida Statutes, on February 12, 1999, in Jacksonville, Florida, for a determination of whether to accept the proposed Settlement Stipulation (a copy of which is attached and incorporated herein by reference) entered into between the parties in the above-styled case. The Petitioner was represented by Jim Newton, Esq. The Respondent was present and represented by William Furlow, Esq., at the proceedings.

Upon consideration of the Administrative Complaint and the proposed Settlement Stipulation in this matter, and being otherwise fully advised in the premises, the Board voted to REJECT the Stipulation as an acceptable disposition in this matter. The Board offered Respondent a Counter-Stipulation. The terms of the Counter-Stipulation are embodied in this Order, and consist of all the terms in the original Stipulation, with the following changes:

Paragraph 7 of the stipulated disposition section is amended to provide that the monitor shall be permitted to enter Respondent's practice location as well as the two other practice locations owned by Respondent, and shall randomly select a total of 10 patient records in cases of personal injury or third party liability for evaluation, and shall be permitted to interview staff at all three locations. The clause in paragraph 7 providing for early termination of monitoring after an initial and a subsequent visit is deleted. All other terms of the Stipulation to remain in full

force and effect to the extent not inconsistent herewith.

By letter dated May 4, 1999, Respondent, through counsel, accepted the terms of the Counter-Stipulation. It is hereby ORDERED AND ADJUDGED:

1999 MAY 12 AM 11:34  
BOARD OF CLINICAL LAB  
PERSONNEL

1. The Settlement Counter-Stipulation is hereby approved and adopted in toto and incorporated herein by reference.
2. Respondent will adhere to and abide by all of the terms and conditions of the Counter-Stipulation.
3. This Order shall be placed in and become a part of Respondent's official records and shall become effective upon filing with the Clerk of the Department of Health.

DONE AND ORDERED this 7 day of June, 1999.



DR. RICHARD SHELDON,  
CHAIRMAN  
Board of Chiropractic

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Final Order has been provided by U.S. Mail to Patrick St. Germain, D.C., c/o William Furlow, Esq., P.O. Box 1988, Tallahassee, FL 32301, and by hand delivery/United States Mail to the Clerk, Department of Health and its Counsel, 2020 Capital Circle S.E., Bin # C01, Tallahassee, Florida 32399-1703, on or before 5:00 p.m., this \_\_\_\_\_ day of \_\_\_\_\_, 1999.

\_\_\_\_\_

pl

STATE OF FLORIDA: 01  
BOARD OF CHIROPRACTIC  
PERSONNEL

FILED

DEPARTMENT OF HEALTH  
DEPUTY CLERK

CLERK *Stephanie J. Dixon*  
DATE 9-9-99

DEPARTMENT OF HEALTH

Petitioner,

vs.

PATRICK J. ST. GERMAIN, D.C.,

Respondent.

CASE NOS.: 93-18501  
95-08870  
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force and effect to the extent not inconsistent herewith.

Respondent shall have 20 days from the date of receipt of this Order to elect whether to accept the terms of the Counter-Stipulation or request an administrative hearing.

DONE AND ORDERED this 8 day of March, 1999.

  
DR. RICHARD SHELDON,  
CHAIRMAN  
Board of Chiropractic

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Final Order has been provided by U.S. Mail to Patrick St. Germain, D.C., c/o William Furlow, Esq., P.O. Box 1988, Tallahassee, FL 32301, and by hand delivery/United States Mail to the Clerk, Department of Health and its Counsel, 2020 Capital Circle S.E., Bin # C01, Tallahassee, Florida 32399-1703, on or before 5:00 p.m., this \_\_\_\_\_ day of \_\_\_\_\_, 1999.

\_\_\_\_\_

AMENDED CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Order has been provided by certified mail to Patrick J. St. Germain, DC, 719 South Orange Blossom Trail, Apopka, Fl. 32703, William Furlow, Esq., Post Office Box 1988, Tallahassee, Fl. 32301, Clerk, Department Of Health, and it's Counsel at or before 5:00 p.m., this 9 day of March, 1999.

Miller

STATE OF FLORIDA  
DEPARTMENT OF HEALTH  
BOARD OF CHIROPRACTIC MEDICINE

DEPARTMENT OF HEALTH<sup>1</sup>

Petitioner,

vs.

PATRICK J. ST. GERMAIN, D.C.

Respondent.

CASE NOS. 93-18501  
95-08870  
95-14472

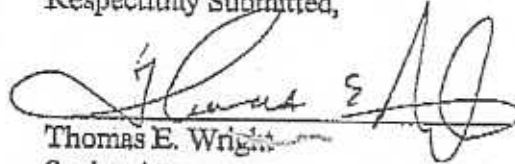
MOTION FOR BOARD'S FINAL ORDER BY STIPULATION

Petitioner, Department of Health, by and through its undersigned counsel, moves the above-styled causes be scheduled before the Board of Chiropractic Medicine for consideration of a Stipulation entered into between the parties as settlement of the Administrative Complaints filed in this cause. Enclosed herewith is a copy of the entire investigative report and additional

<sup>1</sup> Effective July 1, 1997, Petitioner, Department of Health (hereinafter referred to as the "Department"), is the state agency charged with regulating the practice of chiropractic medicine pursuant to Section 20.43, Florida Statutes (Supp. 1996); Chapter 455, Florida Statutes, and Chapter 460, Florida Statutes. Pursuant to the authority of Section 20.43(2)(g), Florida Statutes, the Petitioner has contracted with the Agency for Health Care Administration (hereinafter referred to as the "Agency") to provide consumer complaint, investigative and prosecutorial services required by the Division of Medical Quality Assurance, councils, or boards, as appropriate.

documentation in support of this motion.

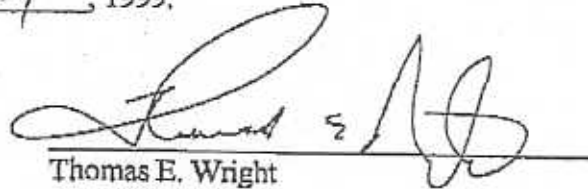
Respectfully Submitted,



Thomas E. Wright  
Senior Attorney  
Agency for Health Care  
Administration  
General Counsel's Office - MQA  
Allied Health  
P.O. Box 14229  
Tallahassee, Florida 32317-4229  
(904)487-2225

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the above and foregoing has been provided to William M. Furlow, Esquire, P.O. Box 1988, Tallahassee, Florida 32301 by U.S. Mail this 13 day of January, 1999.



Thomas E. Wright  
Senior Attorney

DRG/mt  
01/12/99

STATE OF FLORIDA  
AGENCY FOR HEALTH CARE ADMINISTRATION  
BOARD OF CHIROPRACTIC

AGENCY FOR HEALTH CARE  
ADMINISTRATION,

Petitioner,

vs.

PATRICK J. ST. GERMAIN, D.C.,

Respondent.

CASE NOS. { 93-18501  
95-08870  
95-14472

SETTLEMENT STIPULATION

PATRICK J. ST. GERMAIN, D.C., licensed chiropractic physician hereinafter referred to as "Respondent," and the Agency for health Care Administration, hereinafter referred to as "the Agency," pursuant to Section 120.57(3), Florida Statutes do stipulate and agree to the following joint Stipulation and Final Order of the Board of Chiropractic, hereinafter referred to as "Board," incorporating this Stipulation and Agreement in the above-styled matter:

STIPULATED FACTS

1. For all times pertinent herein, Respondent was a licensed chiropractic physician in the State of Florida, having been issued license number CH 0005913.

2. Respondent was charged by an Administrative Complaint filed by the Agency and properly served upon Respondent with violation of Section 460.413(1)(m)(n), Florida Statutes. A true and correct copy of the Administrative Complaint is attached hereto



as Exhibit A.

3. Respondent neither admits nor denies the allegations of fact contained in the Administrative Complaint attached hereto as Exhibit A.

4. Case Numbers 95-08870 and 95-14472 are currently pending before the Agency for Health Care Administration, are under investigation by the agency, and there has not yet been a determination of probable cause in the case. Respondent neither admits nor denies that probable cause might exist to believe a violation may have occurred in Case Numbers 95-08870 and 95-14472. However, without admitting that probable cause exists, after consulting with legal counsel, and for the purpose of presenting these consolidated matters to the Board of Chiropractic for consideration of this Stipulation, Respondent expressly WAIVES A FINDING OF PROBABLE CAUSE for Case Numbers 95-08870 and 95-14472.

5. Respondent understands that this waiver of a probable cause determination shall also constitute a WAIVER OF CONFIDENTIALITY as to the issues and matters contained in the investigative reports and the issues presented at the Board meeting concerning Case Numbers 95-08870 and 95-14472 so that proper consideration of this Stipulation may occur. Respondent further understands that should the Board reject this Stipulation, Case Numbers 95-08870 and 95-14472 shall remain public records of the agency.

6. In the event the Board rejects this stipulation, the investigation of Case Numbers 95-08870 and 95-14472 shall then

continue and that upon completion of the investigations, each case shall then be presented before the probable cause panel for a determination of probable cause. If directed by the panel, the Agency shall then file an administrative complaint against the Respondent as indicated by review of the investigative materials.

7. Upon signing this stipulation, Respondent expressly waives his right to a prompt investigation and consideration by the Probable Cause Panel of any allegations contained in DBPR Case Numbers 95-08870 and 95-14472.

#### STIPULATED CONCLUSIONS OF LAW

1. Respondent, in his capacity as a licensed chiropractic physician, admits that in such capacity he is subject to the provisions of Chapter 455 and Chapter 460, Florida Statutes, and the jurisdiction of the Agency and the Board.

2. Respondent admits that, if proven by the Board, the facts set forth in the Administrative Complaint would constitute a violation of Chapter 460, Florida Statutes, as alleged in the Administrative Complaint.

3. If proven by the Agency, other factual circumstances might exist in Case Numbers 95-08870 and 95-14472 which may constitute violations of Chapter 460, Florida Statutes if probable cause were found to exist and an administrative complaint were filed in each case.

#### STIPULATED DISPOSITION

1. Respondent shall not in the future violate Chapter 460, Florida Statutes, as alleged in the Administrative Complaint.

2. Respondent shall be fined five thousand (\$5,000.00) dollars and shall pay the fine to the Executive Director of the Board of Chiropractic within thirty (30) days of the date of entry of the Final Order adopting this Stipulation.

3. Within six (6) months of the date of entry of the Final Order adopting this settlement stipulation, Respondent shall provide the Board with a sworn statement (executed before a notary public or some other person authorized by law to administer an oath or affirmation) attesting that he has read the laws and rules of the Florida Board of Chiropractic.

4. Within six (6) months of the date of entry of the Final Order adopting this stipulation, Respondent shall attend a regularly scheduled meeting of the Board of Chiropractic and make his presence known on the record. Respondent shall remain in attendance at the meeting until adjournment.

5. Within six (6) months of the date of entry of the Final Order adopting this settlement stipulation, Respondent shall complete a total of fifteen (15) hours of Board approved courses with primary focus in record keeping and risk management. Courses chosen by Respondent to meet the requirement of this provision may include both topics in a single course.

The course(s) taken in satisfaction of the requirements of this provision shall be in addition to those continuing education hours normally required for licensure renewal.

Respondent shall be responsible for assuring that the Board timely (postmarked by the last day of the reporting period)

receive independent verification that Respondent has attended and completed the course(s) required by this provision on such forms as the course provider(s) utilize in verifying attendance and completion of the course(s).

If the course(s) has not been previously approved by the Board, the Respondent shall be responsible for assuring that the Board receive sufficient information to approve the course including a copy of the detailed course syllabus or outline, curriculum vitae of the instructors, and all other information required by Rule 59N-13.004, Florida Administrative Code.

Home study and videotape courses may not be used to satisfy the obligations imposed by this provision.

6. Respondent shall be monitored on a quarterly basis, by a Board approved monitor, for a period of eighteen (18) months from the date of entry of the Final Order adopting this Stipulation.

The Board approved monitor shall evaluate Respondent's record keeping practices and billing practices, for those patients seen personally by the Respondent or where the Respondent has acted as the signing authority for purposes of third party or other reimbursement (hereinafter referred to as Respondent's records), to determine if Respondent is in compliance with Rules 59N-17.005, 59N-17.0055, 59N-17.006, and 59N-17.0065, Florida Administrative Code, as those rules are in effect at the time of the Final Order adopting this stipulation or may thereafter be amended by the Board.

7. Respondent shall obtain a Board approved monitor,

selected from the list of monitors maintained in the Board Staff Office or the monitor shall be a chiropractic physician selected by Respondent and approved by the Board, who shall, beginning within thirty (30) days of the date of the Final Order adopting this Stipulation and every ninety (90) days thereafter, be permitted to enter Respondent's practice during regular business hours and randomly select at least five (5) of Respondent's records for evaluation. The Board approved monitor shall also be permitted to interview Respondent's staff concerning Respondent's record keeping and billing practices.

The Board approved monitor shall confer with Respondent on his/her findings and the monitor shall submit a report to the Board within thirty (30) days of the date of his/her review and specifically describe whether Respondent is in compliance with the Board's rules. The report shall also describe a conference with Respondent and Respondent's plans to correct for any deficiencies found by the monitor to then exist.

Within ten (10) days of the date of the monitor's report, Respondent shall submit a statement to the Board attesting (under oath or by affirmation) that he has reviewed the monitor's findings and, if necessary, has implemented plans to correct for any deficiencies then existing.

If the Board approved monitor, on the initial and subsequent visit, finds no deficiencies in Respondent's records, the Board or its designated committee chairperson will notify the Respondent in writing, by U.S. certified mail, that it has received

the monitor's reports, reviewed the reports, that further monitoring of Respondent's practice by the Board is no longer necessary, that further reports from monitoring of Respondent's practice are no longer necessary and that Respondent has fulfilled his obligations to the Board.

If the monitor fails to show for a scheduled visit or otherwise be unable to complete his or her assessment of Respondent's records, the Respondent shall contact the Board Office immediately in writing and select another Board approved monitor to conduct or complete the assessment. Respondent shall be responsible for assuring that any subsequent monitor is provided with sufficient information to complete or conduct the assessment.

Respondent shall be responsible for all costs associated with the monitoring of his practice by the Board approved monitor.

8. Respondent or his representative shall appear before the Board and, if present, Respondent may be called to testify or provide evidence as to any matters raised during the Board's review of this settlement stipulation.

9. It is expressly understood that a violation of the terms of this Stipulation as adopted by Final Order of the Board of Chiropractic shall be considered a violation of Chapter 460, Florida Statutes, for which disciplinary action may be initiated.

10. It is expressly understood that this Stipulation is subject to approval of the Board and the Agency and, except as noted, has no force or effect until an Order is based upon it by the Board.



11. This Stipulation is executed by Respondent for the purpose of avoiding further administrative action with respect to these causes. To this regard, Respondent authorizes the Board to review and examine all investigative file materials concerning Respondent prior to or in conjunction with consideration of the Stipulation.

12. Furthermore, should this joint Stipulation not be accepted by the Board, it is agreed that presentation and consideration of this Stipulation and other documents and matters by the Board shall not unfairly or illegally prejudice the Board or any of its members including members of the Probable Cause Panel from further participation, consideration or resolution of these proceedings.

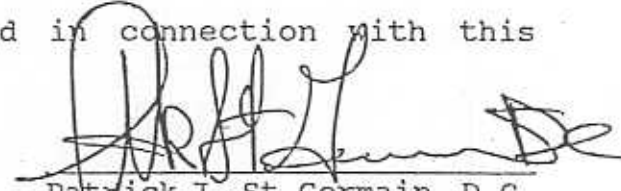
13. Respondent agrees not to withdraw from or in any matter revoke or repudiate the terms of this stipulation prior to the time of its presentation and full consideration by the Board. Should Respondent withdraw from or in any manner repudiate or revoke the terms of this stipulation prior to its presentation and/or full consideration by the Board, Respondent agrees to waive all rights he may have to seek any attorney's fees and costs incurred as the result of this disciplinary proceeding up to and including the date of his withdrawal from this Settlement Stipulation or the date of his attempt to repudiate or revoke the terms of this Stipulation.

14. Respondent and the Agency fully understand this joint Stipulation and subsequent Final Order incorporating same will in no way preclude additional proceedings by the Board and/or the

Agency against Respondent for acts or omissions not specifically set forth in the Administrative Complaint attached as Exhibit A or as would be revealed by review of the investigative reports for DBPR Case Numbers 95-08870 and 95-14472.

15. Respondent expressly waives all rights to ~~seek~~ judicial review of or to otherwise challenge or contest the validity of the joint stipulation of facts, conclusions of law, imposition of discipline, and the Final Order of the Board incorporating said Stipulation.

16. Unless this stipulation is expressly rejected by the Board, Respondent waives the right to seek any attorney's fees or costs from the Agency and the Board in connection with this disciplinary proceeding.

  
Patrick J. St. Germain, D.C.

1/4/96  
Date

Before me, personally appeared Patrick St. Germain,  
whose identity is known to me by personally  
(type of identification) and who, under oath, acknowledges that  
his/her signature appears above.

Sworn to and subscribed by Paula A. Grennell before me this  
4 day of January, 1996.



Notary Public  
My Commission Expires: 4-28-97

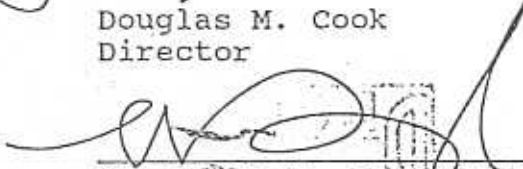


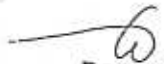
OFFICIAL SEAL  
PAULA A. GRENNELL  
My Commission Expires  
April 28, 1997  
Comm. No. CC 281349



APPROVED this 23rd day of January, 1996.

Douglas M. Cook  
Director

  
BY: Nancy M. Snurkowski  
Chief Attorney

  
December 7, 1995  
h:\jmp10\chiro\stgermain.stp

STATE OF FLORIDA  
AGENCY FOR HEALTH CARE ADMINISTRATION  
BOARD OF CHIROPRACTIC

AGENCY FOR HEALTH CARE  
ADMINISTRATION,

Petitioner,

vs.

AHCA Case No. 93-18501

PATRICK J. ST.GERMAIN, D.C.,

Respondent.

ADMINISTRATIVE COMPLAINT

Petitioner, Agency For Health Care Administration, hereinafter referred to as "Petitioner", files this Administrative Complaint before the Board of Chiropractic against Patrick J. St. Germain, D.C., hereinafter referred to as "Respondent", and alleges:

1. Petitioner is the State agency charged with regulating the practice of Chiropractic pursuant to Section 20.165, Florida Statutes, Section 20.42, Florida Statutes, Chapter 455 Florida Statutes, and Chapter 460, Florida Statutes.
2. Respondent is, and has been at all times material hereto, a licensed Chiropractor, license number CH 0005913.
3. Respondent's last known address is 719 S. Orange Blossom Trail, Apopka, Florida 32703-6557.
4. Respondent provided chiropractic care to patients' R.O., Sr. and R.O., Jr. during concurrent time periods.
5. Patient R.O., Sr. was involved in an automobile accident

on or about June 18, 1991.

6. Respondent provided chiropractic care and/or services to patient R.O., Sr. from on or about December 23, 1992 through on or about June 1, 1993.

7. Respondent's ~~medical~~ records for patient R.O., Sr. are incomplete and inconsistent, in that, the subjective complaints, objective findings, patient assessment, patient prognosis, and patient improvement notes do not correlate to each other.

8. Respondent's records for patient R.O., Sr. fail to include the rationale or justification for the continued treatment of the patient.

9. Respondent failed to maintain documentation that would justify the continued treatment of the patient.

10. Respondent's records for patient R.O., Sr. fail to indicate that the duration of treatment and utilizations of chiropractic services rendered were of benefit to the patient's complaints.

11. Respondent's records for patient R.O., Sr. do not indicate the need nor the findings of the patient's re-evaluations.

12. Respondent's patient records for R.O., Sr. fail to provide sufficient documentation of medical necessity for diagnostic testing.

13. Rule 59N-17.0065(2)(3)(4), Florida Administrative Code, (formerly Rule 61F2-17.0065(2)(3), Florida Administrative Code), states the following:

- (2) Adequate patient records shall be legibly maintained. Initial and follow-up services (daily

records) shall consist of documentation to justify care. If abbreviations or symbols are used in the daily recordkeeping, a key must be provided.

- (3) All patient records shall include patient history, symptomatology, examination, diagnosis, prognosis, and treatment.

- (4) ~~Provided~~ Provided the Board takes disciplinary action against a chiropractic physician for any reason, these minimal clinical standards will apply. It is understood that these procedures are the accepted standard(s) under this chapter.

14. Rule 61F2-17.005, Florida Administrative Code (1993) states in pertinent part that:

- (1) The overutilization of chiropractic services or practice by exercising influence on a patient in such a manner as to exploit the patient for financial gain of a licensee or a third party is prohibited by Section 460.413(1)(n), Florida Statutes.
- (2) Overutilization of chiropractic services or practice is defined as services or practices rendered, or goods or appliances sold by a chiropractic physician to a patient for financial gain of the chiropractic physician or a third party which are excessive in quality or quantity to the justified needs of the patient.
- (3) Overutilization occurs when:
  - (a) The written chiropractic records, required to be kept by Subsection 460.413(1)(n), Florida Statutes, do not justify or substantiate the quantity or number of chiropractic services, practices rendered, or goods or appliances sold by a chiropractic physician to a patient.

#### COUNT I

15. Petitioner realleges and incorporates paragraphs one (1) through fourteen (14) above.

16. Based on the foregoing, Respondent has violated Section 460.413(1)(m), Florida Statutes [Formerly § 460.413(1)(n), Florida Statutes] by failing to keep written chiropractic records

justifying the course of treatment of the patient including but not limited to patient histories, examination results, test results, x-rays, diagnosis of a disease, condition, or injury.

COUNT II

17. Petitioner realleges and incorporates paragraphs one (1) through fourteen (14) above, as is fully stated herein.

18. Respondent billed patient R.O., Sr. and/or a third party payor for chiropractic treatment and/or services.

19. Based on the foregoing, Respondent has violated Section 460.413(1)(n), Florida Statutes (1993) [Formerly § 460.413(1)(o), Florida Statutes] by exercising influence on the patient in such a manner as to exploit the patient for financial gain of the licensee.

WHEREFORE, Petitioner respectfully requests the Board of Chiropractic to enter an Order pursuant to Section 460.413(2), Florida Statutes imposing one or more of the following penalties: revocation or suspension of the Respondent's license, imposition of an administrative fine not to exceed \$1,000 for each count, issuance of a reprimand, placement of the chiropractic physician on probation for a period of time and subject to such conditions as the Board may specify, including requiring the chiropractic physician to submit to treatment, to attend continuing education courses, to submit to reexamination, or to work under the supervision of another chiropractic physician.

SIGNED this 30th day of march, 1995.

Douglas M. Cook  
Director

By: Nancy M. Snurkowski  
Chief Attorney  
Allied Health

COUNSEL OR OTHER QUALIFIED  
REPRESENTATIVE FOR DEPARTMENT:

Jon M. Pellet, Legal Trainee  
Agency For Health Care Administration  
1940 N Monroe Street  
Suite 60  
Tallahassee, Fl 32399-0792  
904/488-0062

NMS/JMP/MCP

PCP reasonable cause: R. Harris, D.C. & F. Reyes, D.C.  
PCP reasonable cause date: 3/30/94

PCP Pre-expert: R. Harris, D.C. & F. Reyes, D.C.  
PCP Pre-expert Date: 12/14/94

PCP: R. Sheldon D.C. & R. Harris, D.C.  
PCP date: March 15, 1995

**FILED**

AGENCY FOR  
HEALTH CARE ADMINISTRATION  
DEPUTY CLERK

CLERK

DATE

Brandon L. Moore  
4-4-95