



RICHARD J. CODEY
Acting Governor

New Jersey Office of the Attorney General

Division of Consumer Affairs
New Jersey State Board of Physical Therapy Examiners
124 Halsey Street, 6th Floor, Newark, NJ 07102



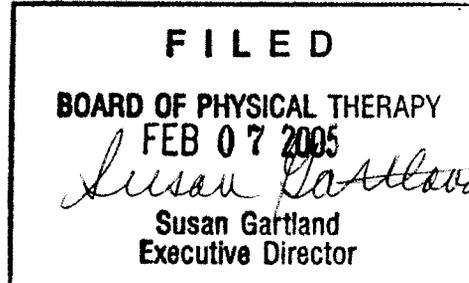
PETER C. HARVEY
Attorney General

RENI ERDOS
Director

Mailing Address:
P.O. Box 45014
Newark, NJ 07101
(973) 504-6455

By Certified and Regular Mail

Susan Slater, P.T.
Susan Slater Physical Therapy
200 Mountain Avenue
Bound Brook, 08805



Re: Offer of Settlement In Lieu of Filing a Formal Disciplinary Complaint

Dear Ms. Slater:

This letter is to advise you that the New Jersey State Board of Physical Therapy Examiners (the "Board") has had an opportunity to review information concerning the application for reinstatement of license to practice physical therapy in the state of New Jersey that was received on or about December 1, 2004 from Susan Eckhardt, P.T. Specifically, the information reviewed included Ms. Eckhardt's reinstatement application that indicated that her last renewal was due January 31, 2004 or within thirty (30) days of this date and an affidavit from Ms. Eckhardt that verified that she continued to work as a physical therapist at your physical therapy facility located at 200 Mountain Avenue, Bound Brook, New Jersey during the period that Ms. Eckhardt's license was suspended pursuant to N.J.S.A. 45:1-7.1(b).

Upon review of all available information, the Board has preliminarily found that probable cause exists to support a finding that you violated N.J.S.A. 45:1-21(n) in that you aided and abetted an unlicensed individual in the practice of physical therapy at your facility for approximately nine months. The Board finds that as the owner of the facility you are responsible for ascertaining that all of your therapists and therapist assistants are currently licensed when you employ and permit them to practice physical therapy. Ms. Eckhardt failed to renew her license within thirty days of the January 31, 2004 renewal period and you permitted her to continue to practice with a suspended license after February 29, 2004 and until December of 2004 when she submitted her application for reinstatement. Pursuant to N.J.S.A. 45:1-7.1(c) "any individual who continues to practice with an expired license or certificate of registration or certification after 30 days following the expiration date shall be deemed to be engaged in the unlicensed practice of the regulated profession..." Thus, your conduct constitutes the aiding and abetting of an unlicensed person in the practice of physical therapy.

At this juncture, the Board has preliminarily concluded that the above violations are sufficient to warrant the initiation of formal disciplinary proceedings against you. Notwithstanding that decision, however, the Board has determined that it will first offer you an opportunity to settle this matter, and thereby avoid the initiation of disciplinary proceedings, should you consent to:

1. Cease and desist in the future from aiding and abetting individuals who are not currently licensed from engaging or continuing to practice physical therapy;

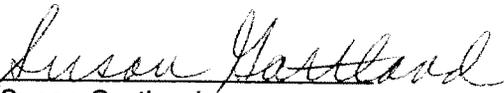
2. Pay a penalty in the amount of \$1000.00 for permitting an individual to continue to practice physical therapy while her license was suspended for failure to timely renew (to be paid immediately upon your signing of the acknowledgment at the bottom of this letter by sending a certified check or money order payable to the Board of Physical Therapy Examiners, P.O. Box 45012, Newark, New Jersey 07101 to attention of Susan Gartland, Executive Director.).

If you are willing to settle this matter on the offered settlement terms, you may do so by signing the acknowledgment at the bottom of this letter, and returning it to the Board office. Upon your signature, this letter will be a matter of public record.

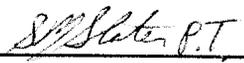
In the event you are unwilling to settle this matter on the offered terms, it will be referred to the Attorney General's office for the initiation of appropriate enforcement action. In such event, you will be afforded an opportunity to defend against the alleged violations. If an evidentiary hearing is deemed warranted the Board will either conduct that hearing at a date and time to be scheduled or refer the matter to the Office of Administrative Law. You are advised, however, that in the event formal charges are filed, the Board may assess civil penalties in an amount greater than that herein offered in settlement should any charges against you be sustained. Additionally, the Board may, if the facts are found to so warrant, enter an order, requiring you to reimburse certain monies and/or requiring you to pay costs incurred by the Board. Should you have any questions concerning this letter or the settlement offer herein, I suggest that you contact Deputy Attorney General, Carmen A. Rodriguez who may be reached at (973) 648-3696.

If you elect to settle this matter presently, you should sign the acknowledgment at the bottom of this letter and return it to the Board within fifteen (15) days following your receipt of this letter. In the event that the Board receives no response from you within fifteen (15) days, the Board's settlement offer will be withdrawn, and the matter will be referred to the Attorney General's Office for the initiation of appropriate enforcement proceedings.

NEW JERSEY STATE BOARD OF
PHYSICAL THERAPY EXAMINERS

By: 
Susan Gartland
Executive Director

ACKNOWLEDGMENT: I, Susan Slater, P.T. hereby acknowledge that I have read and reviewed the settlement proposal set forth in the above letter. I acknowledge the conduct which has been charged. I am aware that, by signing this acknowledgment, I am waiving any rights I may have to defend myself against any charges of wrongdoing at an administrative hearing. I am also aware that the action taken against me by the Board herein is a matter of public record, and that this letter is a public document. I hereby agree to pay a penalty in the amount of \$1000.00 (to be paid upon signing of this acknowledgment).


Susan Slater, P.T.

Dated:

cc: Carmen A. Rodriguez, Deputy Attorney General