

**STATE OF CONNECTICUT
DEPARTMENT OF PUBLIC HEALTH
HEALTHCARE QUALITY AND SAFETY BRANCH**

In re: Alan Manubag, RN

Petition Number: 2022-699

STATEMENT OF CHARGES

Pursuant to the General Statutes of Connecticut, §§19a-10 and 19a-14, the Department of Public Health ("Department") brings the following charges against Alan Manubag:

1. Alan Manubag ("Respondent") is, and at all times referenced in this Statement of Charges, the holder of Connecticut registered nurse license number R54628.
2. At all relevant times, Respondent was practicing nursing at Autumn Lake Healthcare at New Britain, in New Britain, Connecticut and provided nursing care for patient #1.
3. On or about April 9, 2018, Respondent reinserted patient #1's percutaneous endoscopic gastrostomy tube ("PEG-tube") after it became dislodged.
4. On or about April 9, 2018, Respondent's care for patient #1 violated the standard of care in one or more of the following ways in that he:
 - a. reinserted the PEG-tube without the proper training and/or qualifications
 - b. reinserted the PEG-tube without an appropriate medical order;
 - c. failed to verify the PEG-tube was properly placed;
 - d. failed to properly monitor, assess, and/or re-assess patient #1 after the PEG-tube reinsertion; and/or
 - e. failed to notify and/or obtain the assistance of an appropriate medical provider.
5. The above-described facts constitute grounds for disciplinary action pursuant to Connecticut General Statutes §20-99(b) including, but not limited to §20-99(b)(2).

WHEREFORE, the Department prays:

The Connecticut Board of Examiners for Nursing, as authorized by Connecticut General Statutes §§20-99(b) and 19a-17, revoke or order other disciplinary action against Respondent's nursing license as it deems appropriate and consistent with law.

Dated November 8th, 2023.



Christian D. Andresen, MPH, Section Chief
Practitioner Licensing and Investigations Section
Healthcare Quality and Safety Branch

**STATE OF CONNECTICUT
CONNECTICUT BOARD OF EXAMINERS FOR NURSING**

Alan Y Manubag, RN
465 Buckland Hills Drive, Apt 33231
Manchester, CT 06042-9105

VIA EMAIL (manubagalan3@gmail.com)

RE: Alan Y Manubag - Petition No. 2022-699

NOTICE OF HEARING

By authority of the General Statutes of Connecticut, Section 4-177, you are hereby notified to appear before the Board of Examiners for Nursing for a hearing on the attached Charges against you at **8:30 AM on December 6, 2023**. The hearing will be held by video conference during the meeting of the Board of Examiners for Nursing. The link to connect to the hearing will be provided by email 3-5 days prior to the hearing.

These Charges are being brought against you under the provisions of the Sections 19a-9, 19a-10 and 20-99(b) of the Connecticut General Statutes. The hearing will be conducted in accordance with Chapter 54 of the General Statutes of Connecticut and Section 19a-9-1, et seq., of the Regulations of Connecticut State Agencies (Public Health Code).

At the hearing you will have the opportunity to present your evidence, including witnesses and documents. It will be your responsibility to provide the hearing connection link to any witnesses you may call.

Filing an Answer; Failure to File Answer:

You are required to file an answer to the attached Charges with the Department of Public Health within 14 days from the date of this Notice of Hearing. *Please note: failure to file an Answer could result in the allegations being found to be true as stated, and the possibility that you will not be permitted to submit any evidence concerning the allegations.*

Representation by an Attorney:

At the aforementioned hearing you may be represented by an attorney and present evidence on your behalf. Although you may represent yourself (pro se), you are urged to obtain the services of an attorney.

Documents:

If you intend to introduce documents into evidence, **YOU MUST COMPLY WITH THE FOLLOWING REQUIREMENTS:**

Exhibits should be pre-marked for identification (i.e. Department exhibit 1, Respondent exhibit A), page numbered, and properly redacted.

The following information shall be redacted.

- (1) Date of birth
- (2) Mother's maiden name
- (3) Motor vehicle operator's license number
- (4) Social Security Number
- (5) Other government-issued identification number
- (6) Health insurance identification number
- (7) Financial account number
- (8) Security code or personal identification number (PIN)

Order Re: Filings

In preparation for this hearing, you must, no later than November 24, 2023, provide the information specified in the attached Notice for Submissions.

All communications to the Board shall be submitted in this fashion. The Department or Respondent shall provide a copy of each document filed to Respondent or Department as the case may be and certify such to the Board.

Failure to Appear:

If you fail to appear at the hearing, upon proof that due notice was served upon you to appear, the Board may proceed in the same manner as though you were present in person. **The Board may hold a fact-finding meeting immediately following the close of the record.**

Please call 860-509-7566 as soon as possible if you have any questions about the hearing schedule.

Dated at Hartford, Connecticut this 13th day of November 2023.

For the Connecticut Board of Examiners for Nursing

/s/ Tyra Anne Peluso
Tyra Anne Peluso, Administrative Hearings Specialist

c: Christian Andresen, Section Chief, Practitioner Licensing and Investigations
Joelle Newton, Staff Attorney, Office of Legal Compliance

The Department of Public Health is an equal opportunity provider and employer.

*If you require aid/accommodation to participate fully and fairly,
please contact the Public Health Hearing Office at 860-509-7566.*

Notice for Submissions

The hearing in the matter of Alan Y Manubag, RN has been scheduled for **December 6, 2023**, and will be conducted remotely through Microsoft Teams/teleconference.

On or before **November 24, 2023**, you must provide the following by electronic mail response to the Department of Public Health, Public Health Hearing Office at phho.dph@ct.gov.

1. Electronically Pre-filed exhibits – Exhibits should be pre-marked for identification (i.e., Department exhibit 1, Respondent exhibit A), page numbered, **and properly redacted for any personally identifiable information**. *Parties and/or counsel should stipulate to any exhibits and facts not in dispute and provide any objections to proposed exhibits*. All exhibits also must be sent to the opposing party or counsel.
2. Witness List – identify any persons expected to be called to testify. Be sure to notify your witnesses that they will be required to remain available and in attendance for the full duration of the hearing. (This will eliminate the difficulty of trying to reach witnesses again for rebuttal or additional examination later in the hearing). Witness lists also must be sent to the opposing party or counsel.
3. Photo Identification: Self-represented parties should provide a copy of a government-issued photo identification for yourself and any witnesses you expect to call. Photo identification is *not* required for parties represented by counsel, or witnesses called to testify for parties represented by counsel.
4. Electronic Mail (“e-mail”) addresses for parties, counsel, and witnesses. All e-mail addresses must be current and able to receive all notices relating to this matter.
5. Cellphone numbers for all parties, counsel, and witnesses at which they can be reached and respond to text message during the hearing (in the event a connection is lost).
6. A statement whether executive session may be required to receive testimony containing personal protected information, and if so, what that information may be (treatment records, patient records, therapy reports). Parties or counsel should identify any witnesses listed in response to #2 above who may provide testimony relating to personal protected information requiring executive session.
7. A statement whether an interpreter will be needed for the proceeding.

This is a formal public hearing. It will be video recorded and posted on the DPH website for public viewing*. All hearing participants should appear on video in proper attire, in proper surroundings, and remove any potential distractions.

In preparation, please make sure all of your devices are fully functioning and properly charged. All participants are required to have video and audio functions on when testifying or speaking.

Documents are not required to be shared on-screen during hearings, as all parties, attorneys, board members and/or hearing officers have been provided such documents prior to the hearing. Parties and/or attorneys who elect to share documents for viewing on-screen during the hearing must do so from their own equipment. Confidential documents should only be shared in executive session. Hearing Office staff / Teams administrators are not responsible for the sharing of submitted documents in the presentation of a party’s case.

Should you have any question please contact the hearing office at phho.dph@ct.gov.

*The executive session portion of any hearing will not be recorded on video or posted for public viewing.

