

AGENDA

CONNECTICUT STATE BOARD OF EXAMINERS FOR PHYSICAL THERAPISTS

Tuesday, September 13, 2022 at 8:30 AM
Department of Public Health
410 Capitol Avenue, Hartford CT

CALL TO ORDER

I. **MINUTES**

Adoption of the minutes from June 14, 2022

II. **OPEN FORUM**

III. **OFFICE OF LEGAL COMPLIANCE**

A. Chang Yoon PT, P.T. - Petition No. 2020-912
Presentation of Consent Order – Linda Fazzina, Staff Attorney, DPH

ADJOURN

This meeting will be held remotely

Board of Examiners for Physical Therapist via Microsoft Teams

Join on your computer, mobile app or room device

[Click here to join the meeting](#)

Meeting ID: 261 195 306 73

Passcode: XEkask

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[+1 860-840-2075](#) - Phone Conference ID: 633 218 379#

The following minutes are draft minutes which are subject to revision and which have not yet been adopted by the Board.

The **Connecticut State Board of Examiners for Physical Therapists** held a meeting on June 14, 2022.

BOARD MEMBERS PRESENT:	Michael J. Parisi, PT, Chairman Laurie Devaney, PT Kristin A. Schweizer, PT James Ware, MD
BOARD MEMBERS ABSENT:	None
ALSO PRESENT	Stacy Schulman, Esq., Hearing Officer, DPH Jeffrey Kardys, Board Liaison

The meeting was called to order by Mr. Parisi at 8:30 a.m. All participants were present via Microsoft Teams.

Ms. Schweizer was welcomed to her first meeting as a Board member.

I. MINUTES

The minutes from the February 15, 2022 meeting were reviewed and approved unanimously on a motion by Ms. Devaney, seconded by Dr. Ware.

II. OLD BUSINESS

Mr. Parisi reported that proposed legislation pertaining to a licensure compact for physical therapists did not pass in 2022. It will be raised again during the 2023 legislative session.

III. OFFICE OF LEGAL COMPLIANCE

A. Jason A. Mussman, P.T. - Petition No. 2016-1201

Joelle Newton, Staff Attorney, Department of Public Health presented a Consent Order in this matter. Respondent was not present and was not represented by counsel.

Following discussion, Ms. Schweizer made a motion, seconded by Ms. Devaney, to deny approval of the Consent Order. The motion passed unanimously.

B. Brian E. Sniffin, P.T. - Petition No. 2022-189

Craig Sullivan, Staff Attorney, Department of Public Health presented a Reinstatement Consent Order in this matter. Respondent was present but was not represented by counsel. Respondent surrendered his license to practice in September 2019.

Following discussion, Dr. Ware made a motion, seconded by Ms. Schweizer, to approval of the Consent Order which reinstates Mr. Sniffin's license to probation with conditions for a period of four years. The motion passed unanimously.

IV. ADJOURNMENT

There was no further business, and the meeting was adjourned at 9:04 a.m. on a motion by Ms. Devaney.

Respectfully submitted,
Michael J. Parisi, PT
Chairman
Connecticut State Board of Examiners for Physical Therapists

CONSENT ORDER COVER SHEET

In Re: Chang Yoon, P.T.

Petition No. 2020-912

1. Chang Yoon of Bloomfield, Connecticut ("respondent") graduated from Northeastern University in 2019 and was issued license number 012448 to practice physical therapy on September 11, 2019.
2. Respondent has no prior disciplinary history with the Department.
3. The Department opened this petition as the result of notification it received that respondent's Massachusetts physical therapy license was disciplined.
4. Respondent does not currently practice physical therapy in Connecticut.
5. On May 15, 2020, the Massachusetts Board of Registration of Allied Health Professionals ("Massachusetts Board") approved a Consent Agreement pursuant to which respondent agreed to a one (1) year stayed suspension of his Massachusetts physical therapy license, followed by a one (1) year term of probation ("Massachusetts Agreement"). The Massachusetts agreement was based, in part, on respondent's admission that the Massachusetts Board could find, if the matter proceeded to an adjudicatory hearing, that (a) respondent billed, or caused to be billed, for fraudulent chiropractic services and (b) respondent practiced beyond the scope of his license and engaged in gross negligence. Respondent further admitted that the Massachusetts Board could find that his conduct violates one or more standards of ethical conduct and that his conduct constitutes unprofessional conduct.

A copy of the Massachusetts Agreement is attached.

6. Respondent has agreed to the following discipline under the attached Consent Order:
 - Reprimand
 - At least ninety (90) days prior written notice of intent to return to practice in Connecticut. The Department may require respondent to satisfy additional terms and conditions before respondent can resume practice in Connecticut.
7. The Department and respondent respectfully request that the State Board of Examiners for Physical Therapists approve and accept the attached Consent Order to resolve this petition.

English	This document is important and should be translated immediately.
Español	Este documento es importante y debe ser traducido de inmediato.
Português	Este documento é importante e deve ser traduzida imediatamente.
Italiano	Questo documento è importante e deve essere tradotto immediatamente.
Ελληνικά	Το έγγραφο αυτό είναι σημαντικό και θα πρέπει να μεταφράζονται αμέσως.
Français	Ce document est important et doit être traduit immédiatement.
中文	这份文件是重要的，应当立即转换。

SUFFOLK COUNTY

BOARD OF REGISTRATION OF
ALLIED HEALTH PROFESSIONALS

_____)
In the Matter of _____)
Chang Goo Yoon _____)
License Number 186600 _____)
_____)

2018-000760-IT-ENF

CONSENT AGREEMENT

The Board of Registration of Allied Health Professionals (the "Board") and Chang Goo Yoon, a Physical Therapist ("PT") with license number 186600 (the "Licensee"), do hereby stipulate and agree to the contents herein and that the following information shall be entered into and become a permanent part of the file of the Licensee, maintained by the Board:

1. The Licensee states that he voluntarily enters into this Agreement in resolution of the Complaint and Order to Show Cause pertaining to 2018-000760-IT-ENF (collectively, "the Complaint"), which currently are pending against him.
2. The Licensee admits that, if this matter were to proceed to an adjudicatory hearing, the Board could find that (1) he billed or caused to be billed fraudulent services; specifically, chiropractic services, and (2) he practiced beyond the scope of his license and engaged in gross negligence. The Licensee admits that the Board could find that his conduct constitutes one (1) or more violations of Board authorities, including but not limited to violations of MGL Chapter 112, Sections 23 and 61, and one (1) or more standards of ethical conduct. The Licensee additionally admits that the Board could find that his conduct constitutes unprofessional conduct and conduct that undermines the public confidence in the integrity of his profession, in violation of Massachusetts common law. The Licensee understands and agrees that his conduct warrants disciplinary action by the Board and that this Agreement serves to memorialize discipline against him.
3. It is the desire and intent of the Licensee and the Board to completely resolve the Complaint without an adjudicatory hearing conducted before the Board and pursuant to the Massachusetts Administrative Procedures Act ("MGL c. 30A") and the Standard Adjudicatory Rules of Practice and Procedure set forth in Title 801 of the Code of Massachusetts Regulations ("CMR") Section 1.00, *et seq.* ("801 CMR 100").

4. The Licensee and the Board hereby agree that the Licensee's license to practice as a Massachusetts PT is hereby subject to a ONE (1) YEAR TERM OF STAYED SUSPENSION ("the Stayed Suspension Period") FOLLOWED BY A ONE (1) YEAR TERM OF PROBATION ("the Probation Period") AS OF THE EFFECTIVE DATE OF THIS AGREEMENT. The Effective Date of this Agreement is the date the Board signs this Agreement ("the Effective Date"), and it is identified on the last page of this Agreement.

5. The Licensee and the Board hereby further agree that during the Probation Period, the Licensee shall be MONITORED and shall abide by the following terms and conditions subject to paragraphs 6 through 8 of this Agreement:

a. His practice as a PT in Massachusetts shall be monitored by a Board-approved monitor who is willing to serve as his clinical and administrative consultant and auditor (the "Monitor").

b. In accordance with paragraph eight (8) of this Agreement, the Licensee shall provide the Board with a list of three (3) different Physical Therapists ("PTs") who may serve as his Monitor, as well as their resumes. The PTs must be licensed by the Board and have no history of discipline with the Board. Further, the PTs must have no actual or perceived conflict of interest with the Licensee. The Licensee will rank the individuals in the order of his preference and the Board will choose one (1) of the three (3) proposed individuals, or notify the Licensee that none of the proposed individuals are approved and provide the Licensee an additional ten (10) days to submit another list of three (3) proposed monitors and their resumes. The Board reserves the right to require the Licensee and/or any proposed monitors to appear before it or a sub-committee of its members at any time during the Stayed Suspension Period or the Probation Period. The Licensee shall mail this information to the Board, whose address is: "The Board of Registration of Allied Health Professionals, Attention: The Executive Director, 1000 Washington Street, Suite 710, Boston, MA 02118" ("the Board's address of record").

c. The Licensee and the Board agree that if either deems the Monitor to be performing poorly or otherwise inadequate, the Licensee shall propose a new Monitor in accordance with the process stated above within fifteen (15) days of the notification to/from the Board stating that the existing Monitor must be replaced.

d. The Licensee shall ensure that the Monitor conducts a complete and comprehensive clinical and administrative review of the Licensee's practice once every NINETY (90) days, for a total of FOUR (4) reports, and submits to the Board, at its address of record, a written report of the results of each such review. These clinical and administrative reviews shall be conducted in accordance with monitoring criteria, if any, to be furnished to the Licensee by the Board, and shall identify any deficiencies in the Licensee's clinical or administrative practices that, in the professional judgment of the Monitor, reasonably warrant corrective action by the Licensee. The Monitor shall furnish a copy of each such report to the Licensee. In the event that the Monitor is unable to complete a clinical and administrative review in a timely fashion due to the Monitor's own personal and professional commitments, the Licensee and the Monitor shall notify the Board in writing of the reasons why the Monitor is unable to complete the review by that date, and the Board, for good cause shown, may extend the deadline for completion of that review and submission of the required report. The first such monitoring

report shall be due within forty-five (45) days after the Licensee is advised by the Board which monitor has been selected. Thereafter, the monitoring reports shall be due every ninety (90) days. The Monitor's written reports shall be furnished to the Board within ten (10) days of each clinical and administrative review.

e. The Licensee shall take any and all corrective actions that are reasonably necessary to correct any and all deficiencies identified in any of the clinical and administrative reviews conducted by the Monitor as required above. Not later than thirty (30) days after his receipt of each clinical and administrative review report from the Monitor, the Licensee shall submit to the Board, at its address of record, a detailed written report identifying the steps that have been taken or are being taken to correct any deficiencies cited in the Monitor's report, and the dates by which such corrective actions will be completed.

f. The Licensee understands and agrees that the Board shall bear no responsibility or liability for the costs of any monitoring services.

g. The Licensee agrees that the Monitor's purpose is to enhance the Licensee's ability to practice in the physical therapy profession. To that end, the Licensee and the Board hereby agree that the Licensee, and not the Monitor, is solely responsible for the Licensee's compliance with Board rules and regulations at all times and is responsible for all violations thereto.

6. The Licensee understands that successful completion of the monitoring component of the Probation Period set forth in this Agreement is contingent upon the Licensee having his active practice as a PT in Massachusetts monitored for a period of one (1) full year and otherwise abiding by the terms of this Agreement. Should the Licensee not practice as a PT in Massachusetts, or cease practice in Massachusetts as a PT, his license will remain on probation status, but credit will not be earned towards the monitoring component of the Probation Period. Accordingly, the Licensee understands and agrees that the Probation Period may be extended as necessary to ensure one (1) full year of monitoring of his Massachusetts practice as a PT.

7. The Licensee states that as of the date of his signature of this Agreement, he is not practicing as a PT in Massachusetts. In this manner, the Licensee understands and agrees that the MONITORING REQUIREMENTS OF PROBATION (the "Monitoring Period") will not begin until he resumes active practice as a PT in Massachusetts and a Board-approved Monitor is in place.

8. The Licensee and the Board hereby agree that the Probation Period and the Monitoring Period are exclusive. Further, the Probation Period will not end unless and until all Monitoring criteria required by this Agreement have been submitted to the Board, and all terms and conditions of this Agreement have been met to the Board's satisfaction. As indicated in paragraph four (4) of this Agreement, the Licensee's Probation Period will begin immediately following the completion of the Stayed Suspension Period. By comparison, the Monitoring Period will begin once the Licensee returns to practice as a PT in Massachusetts and a Board-approved Monitor is in place. Accordingly, pursuant to this Agreement, it is the Licensee's duty to notify the Board, in writing, of his decision to return to practice as a PT in Massachusetts no less than twenty (20) days prior to his first day of work. Such notice shall be sent to the Board at

its address of record. Such notice shall include the name and credentials of the Licensee's proposed Monitors as required by paragraph five-b (5(b)) of this Agreement. In other words, the timeframes and duties identified in paragraph five (5) of this Agreement go into effect once the Licensee sends the aforementioned notice to the Board of his decision to return to active practice in MA.

9. The Licensee agrees that, during the Stayed Suspension Period, he shall complete a total of EIGHTEEN (18) HOURS OF BOARD-APPROVED CONTINUING EDUCATION. These ~~hours of continuing education shall not be counted toward the Licensee's required hours, if any,~~ of continuing education as enunciated in the Board's regulations. The Licensee understands and agrees that he will complete all hours of continuing education as follows: six (6) in the subject of BILLING, six (6) in the subject of ETHICS, and six (6) in the subject of DOCUMENTATION. The Licensee must identify the proposed continuing education to the Board by mailing information of same to the Board at its address of record for approval. Before the termination of the Stayed Suspension Period, the Licensee shall submit to the Board, at its address of record, written verification from the continuing education sponsor(s) that he has successfully completed all said continuing education.

10. Pursuant to this Agreement, the Licensee and the Board hereby agree that the Licensee may submit to the Board, in writing, A PETITION TO END THE PROBATION PERIOD AFTER SATISFYING ALL TERMS AND CONDITIONS OF THIS AGREEMENT, INCLUDING BUT NOT LIMITED TO THE TERMS AND CONDITIONS OF THE MONITORING PERIOD and after the Licensee has received four (4) monitoring reports satisfactory to the Board and has otherwise successfully completed every requirement set forth in this Agreement. The Licensee understands and agrees that the Board retains sole discretion to grant or deny any such Petition. The Licensee further understands and agrees that the Board, at its discretion, may require, among other things, an oral examination or interview of the Licensee and/or the Monitor prior to or in connection with its consideration of any Petition filed pursuant to this paragraph, which must be mailed to the Board at its address of record with a copy of this fully executed Agreement and evidence of satisfactory completion of the above-mentioned continuing education.

11. The Licensee hereby agrees to comply with all requirements contained in this Agreement, state and federal laws, as well as all laws and regulations governing the practice of physical therapy, including notifying the Board of any change in his practice status or address of record.

12. The Licensee acknowledges and agrees that the Board's receipt of credible information of his failure to satisfy any of the terms of this Agreement shall result in the Board's initiation of formal adjudicatory action, pursuant to the MGL c. 30A and 801 CMR 1.00. The sole issue to be determined at such an adjudicatory proceeding shall be whether the Licensee has committed a violation of the terms of this Agreement. The Licensee agrees that if the Board were to find that he had violated or failed to comply with any material term of this Agreement, the Board may impose other sanctions provided for by law, including but not limited to permanently revoking his license or requiring the Licensee to surrender his license.

13. The Board agrees that in return for the Licensee's execution of this Agreement, it will not further prosecute the allegations arising from the Complaint.

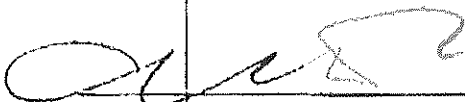
14. The Licensee understands that if the Board were to hold a hearing pursuant to MGL c. 30A and 801 CMR 1.00 on the basis of the facts set forth in the Complaint, he would be entitled to a hearing during which he would possess the rights to confront and cross-examine witnesses, to call witnesses, to present evidence, to testify on his own behalf, to contest the allegations, to present oral argument, to appeal to the courts, and all other rights set forth in MGL c. 30A and 801 CMR 1.00. The Licensee understands that his action in entering into this Agreement is a final act and not subject to reconsideration or judicial review, and the Licensee hereby waives his right to an administrative hearing conducted in accordance with MGL c. 30A and 801 CMR 1.00 relative to the Complaint, and he waives any right to appeal this administrative action under the provisions of MGL c. 30A or any other related law.

15. The Licensee states that he has used legal counsel in connection with his decision to enter into this Agreement, or if he has not used legal counsel, that his decision to act *pro se* was freely made by him.

16. The Licensee understands that this Agreement is a matter of "public record" within the meaning of Massachusetts General Law Chapter 4, Section 7, and that it is therefore subject to public disclosure by the Board in accordance with the provisions of that statute. Accordingly, the Board may forward a copy of this Agreement to other licensing boards, law enforcement entities, and to any other individual or entity as required by law.

17. The Licensee understands that this Agreement will not be effective until the Board formally approves it by signing below.

18. In accordance with this Agreement, after his successful completion of all requirements set forth in this Agreement, the Licensee will be eligible for full reinstatement of his license upon the Licensee's written Petition pursuant to paragraph ten (10) of this Agreement.




Chang Goo Yoon
License Number 18660

4/30/2020
Date



Witness
Name (printed): JIWON YOON

4/30/2020
Date

Tonia Tassimani 

Board Chair or
Executive Director

05.15.20
EFFECTIVE DATE

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

In re: Chang Yoon, P.T.

Petition No. 2020-912

CONSENT ORDER

WHEREAS, Chang Yoon of Bloomfield, Connecticut ("respondent") has been issued license number 012448 to practice as a physical therapist by the Department of Public Health ("the Department") pursuant to Chapter 376 of the General Statutes of Connecticut, as amended; and,

WHEREAS, the Department alleges that:

1. On or about May 15, 2020, the Massachusetts Board of Registration of Allied Health Professionals ("Massachusetts Board") approved a Consent Agreement in Case Number 2018-000760-IT-ENF ("Massachusetts Agreement") in which respondent agreed to a one (1) year term of stayed suspension of his Massachusetts' physical therapy license, followed by a one (1) year term of probation. The Massachusetts Agreement was based, in part, upon respondent's admission that the Massachusetts Board could find, if the matter proceeded to an adjudicatory hearing, that: (a) respondent billed, or caused to be billed, for fraudulent chiropractic services; and (b) respondent practiced beyond the scope of his license and engaged in gross negligence. Respondent further admitted that the Massachusetts Board could find that his conduct violates one or more standards of ethical conduct and that his conduct constitutes unprofessional conduct.

2. From approximately August 2013 through January 2018, respondent fraudulently billed, or caused to be billed, for services he did not perform and/or for services that were beyond the scope of his practice as a physical therapist.
3. The above-described facts constitute grounds for disciplinary action pursuant to the General Statutes of Connecticut, §20-73a(a), including, but not limited to:
 - a. §20-73a(a)(2); and/or
 - b. §20-73a(a)(7).

WHEREAS, respondent, in consideration of this Consent Order, has chosen not to contest the above allegations of wrongdoing, but while admitting no guilt or wrongdoing, agrees that for purposes of this or any future proceedings before the Board of Examiners for Physical Therapists ("the Board"), this Consent Order shall have the same effect as if proven and ordered after a full hearing held pursuant to §§19a-9, 19a-10 and 20-73a of the General Statutes of Connecticut.

WHEREAS, respondent does not currently practice as a physical therapist in the State of Connecticut.

NOW THEREFORE, pursuant to §§19a-17 and 20-73a of the General Statutes of Connecticut, respondent hereby stipulates and agrees to the following:

1. Respondent waives respondent's right to a hearing on the merits of this matter.
2. Respondent's license number 012448 to practice as a physical therapist in the State of Connecticut is hereby reprimanded.
3. If respondent intends to commence practicing as a physical therapist in Connecticut, respondent shall give written notice to the Department no less than ninety (90) days before said commencement. Respondent agrees that the Department may require respondent to satisfy additional terms and/or conditions before respondent may commence the practice

of physical therapy in Connecticut. Respondent agrees that any commencement of the practice of physical therapy in Connecticut in disregard of the above shall constitute a violation of this Consent Order and may subject respondent to further disciplinary action.

4. All correspondence and reports are to be addressed to:

Practitioner Compliance and Monitoring Unit
Department of Public Health
410 Capitol Avenue, MS #12HSR
P.O. Box 340308
Hartford, CT 06134-0308

5. Respondent shall comply with all state and federal statutes and regulations applicable to respondent's licensure.
6. Any alleged violation of any provision of this Consent Order may result in the following procedures at the discretion of the Department:
- a. The Department shall notify respondent in writing by first-class mail that the term(s) of this Consent Order have been violated, provided that no prior written consent for deviation from said term(s) has been granted.
 - b. Said notification shall include the acts or omission(s) which violate the term(s) of this Consent Order.
 - c. Respondent shall be allowed fifteen (15) days from the date of the mailing of notification required in paragraph 6a above to demonstrate to the satisfaction of the Department that respondent has complied with the terms of this Consent Order or, in the alternative, that respondent has cured the violation in question.
 - d. If respondent does not demonstrate compliance or cure the violation within the fifteen (15) days specified in the notification of violation to the satisfaction of the Department, respondent shall be entitled to a hearing before the Board which shall make a final determination of the disciplinary action to be taken.

- e. Evidence presented to the Board by either the Department or respondent in any such hearing shall be limited to the alleged violation(s) of the term(s) of this Consent Order.
7. In the event respondent violates any term of this Consent Order, said violation may also constitute grounds for the Department to seek a summary suspension of respondent's license before the Board.
8. Legal notice shall be sufficient if sent to respondent's last known address of record reported to the Practitioner Licensing and Investigations Section of the Healthcare Quality and Safety Branch of the Department.
9. This Consent Order is effective on the date this Consent Order is accepted and ordered by the Board.
10. Respondent understands that this Consent Order is a public record.
11. Respondent understands and agrees that the Department's allegations as contained in this Consent Order shall be deemed true in any proceeding before the Board in which respondent's compliance with this Consent Order or with §20-73a of the General Statutes of Connecticut, as amended, is at issue. Further, respondent understands that any discipline imposed by this Consent Order shall be reported to the National Practitioner Data Bank maintained by the United States Department of Health and Human Services.
12. In the event respondent violates a term of this Consent Order, respondent agrees immediately to refrain from practicing as a physical therapist, upon request by the Department, for a period not to exceed forty-five (45) days. During that time period, respondent further agrees to cooperate with the Department in its investigation of the violation, and to submit to and complete a medical, psychiatric or psychological evaluation, if requested to do so by the Department; and, that the results of the evaluation shall be submitted directly to the Department. Respondent further agrees that failure to

cooperate with the Department in its investigation during said forty-five (45) day period shall constitute grounds for the Department to seek a summary suspension of respondent's license. In any such summary action, respondent stipulates that failure to cooperate with the Department's investigation shall be considered by the Board and shall, as a matter of law, constitute a clear and immediate danger as required pursuant to Connecticut General Statutes, sections 4-182(c) and 19a-17(c). The Department and respondent understand that the Board has complete and final discretion as to whether a summary suspension is ordered.

13. Any extension of time or grace period for reporting granted by the Department shall not be a waiver or preclude the Department from acting at a later time. The Department shall not be required to grant future extensions of time or grace periods.
14. This Consent Order and terms set forth herein are not subject to reconsideration, collateral attack or judicial review under any form or in any forum. Respondent agrees that this Consent Order shall not be subject to modification as a result of any claim that the terms contained herein may result in action by third parties, including, but not limited to, healthcare facilities and/or credentialing or licensure boards and respondent waives any right to seek reconsideration or modification of this Consent Order pursuant to §4-181a of the General Statutes of Connecticut without the express consent and agreement of the Department. Respondent assumes all responsibility for assessing such actions prior to the execution of this document. Further, this Consent Order is not subject to appeal or review under the provisions of Chapters 54 or 368a of the General Statutes of Connecticut, provided that this stipulation shall not deprive respondent of any rights that respondent may have under the laws of the State of Connecticut or of the United States.

15. This Consent Order is a revocable offer of settlement which may be modified by mutual agreement or withdrawn by the Department at any time prior to its being executed by the last signatory.
16. Respondent permits a representative of the Department to present this Consent Order and the factual basis for this Consent Order to the Board. Respondent understands that the Board has complete and final discretion as to whether this executed Consent Order is approved or accepted. Respondent hereby waives any claim of error that could be raised that is related to or arises during the course of the Board's discussions regarding whether to approve or reject this Consent Order and/or a Board member's participation during this process, through the Board member's review or comments, including but not limited to bias or reliance on evidence outside the administrative record if this matter proceeds to a hearing on a statement of charges resulting in a proposed decision by the Board and/or a panel of the Board and a final decision by the Board.
17. Respondent has been informed that he has the right to consult with an attorney prior to signing this Consent Order.
18. The execution of this document has no bearing on any criminal liability without the written consent of the Director of the Medicaid Fraud Control Unit or the State's Attorney's Office where the allegation occurred or Bureau Chief of the applicable unit in the Chief State's Attorney's Office. The purpose of this Consent Order is to resolve the pending administrative license disciplinary petition only and is not intended to affect any civil or criminal liability or defense.
19. This Consent Order embodies the entire agreement of the parties with respect to this case. All previous communications or agreements regarding the subject matter of this consent order, whether oral or written, between the parties are superseded unless expressly incorporated herein or made a part hereof.



I, Chang Yoon, have read the above Consent Order, and I stipulate and agree to the terms as set forth therein. I further declare the execution of this Consent Order to be my free act and deed.

Chang Yoon, P.T.

Subscribed and sworn to before me this 7th day of July 2022.

LOREDANA STARITA
Notary Public, State of New York
No. 01ST5045769
Qualified in Suffolk County
Commission Expires October 3

Notary Public or person authorized
by law to administer an oath or affirmation

The above Consent Order having been presented to the duly appointed agent of the Commissioner of the Department of Public Health on the 29th day of July 2022, it is hereby accepted.

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

The above Consent Order having been presented to the Board of Examiners for Physical Therapists on the _____ day of _____ 2022, it is hereby ordered and accepted.

Board of Examiners for Physical Therapists