



State of New Jersey
DEPARTMENT OF HEALTH
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www.nj.gov/health

PHILIP D. MURPHY
Governor

SHEILA Y. OLIVER
Lt. Governor

SHEREEF M. ELNAHAL, MD, MBA
Commissioner

March 9, 2019

Debra Vaccarella
[REDACTED]

**Re: Notice of Proposed Revocation
Health Officer License # 100464
Investigation # 2018-0812**

Dear Ms. Vaccarella:

The New Jersey Department of Health (the Department) is statutorily charged with licensing health officers and ensuring individuals seeking health officer licensure have the necessary qualifications and training to serve in this role. N.J.S.A. 26:1A-38 and Reorganization Plan No. 003-2005, 37 N.J.R. 2735(a). With this responsibility, the Department promulgated regulations setting forth the process and the necessary qualifications for an individual to gain and maintain licensure as a health officer. N.J.A.C. 8:7-1.3 et seq.

On October 24, 2018, the Department's Office of Local Public Health (OLPH) received a complaint alleging that you improperly received licensure as a health officer because you did not possess the requisite experience for licensure and that you may have falsified information on your health officer licensure application. Following receipt of this complaint, the OLPH conducted an investigation, the findings of which are outlined below.

On or around August 29, 2017, you submitted an application to OLPH to sit for the health officer examination. On September 27, 2018, you supplemented your application by sending additional documentation to OLPH, demonstrating completion of academic work required by the application. While the application and supportive documentation you submitted is included in your file, and there is a letter from the Department indicating you had been approved to sit for the November 2017 health officer licensing examination, there is no documentation showing any review of your application by either OLPH or the New Jersey Public Health Licensing and Examination Board (Board) to determine whether you qualified to sit for the health officer exam, as required by N.J.A.C. 8:7-1.3. Specifically, N.J.A.C. 8:7-1.3 requires either the Board or OLPH to review health officer licensing applications to determine whether the candidates should be approved to sit for upcoming health officer licensing exams. Because your file lacked evidence that either the Board or OLPH reviewed your qualifications, found that you met the eligibility requirements for licensure and approved you to sit for the exam, OLPH interviewed the active members of the Board to determine whether your application was reviewed and approved prior to you sitting for the exam.

During the fall of 2017, which is when your application would have been considered by the Board, there were five active Board members, including yourself, and six vacancies. Interviews with the active Board members yielded the following information:

- On October 6, 2017, the Board met at the Geiger Center Conference Room at the Rutgers University Office of Continuing Professional Education. A copy of the agenda from this meeting shows that the Board intended to review several candidate applications at the meeting.
- Five members, including you, participated in this meeting: P.T., K.S., M.L., L.M. and yourself.
- One member (P.T.) participated via conference call and was not able to review licensing applications, as he did not have access to the application files shared at the meeting.
- Three members (K.S., M.L. and L.M.) deny reviewing your application.
- As the only remaining member, you could not review your own application.

Based upon these interviews, OLPH concluded that the Board did not review and approve your application to sit for the health officer licensing exam. Because the Board did not approve you to sit for the exam, and staff at OLPH denied reviewing your application to determine whether you qualified to sit for the exam, OLPH recently conducted a review of your health officer application to determine if you met the qualifications necessary to sit for the licensure exam, as specified in N.J.A.C. 8:7-1.10. From this review, OLPH has determined that you failed to demonstrate the necessary qualifications to sit for the health officer exam.

Pursuant to N.J.A.C. 8:7-1.10, “health officer applicants must complete two years’ full-time employment in a position providing administrative experience in at least three of the five existing recognized public health activities as specified in N.J.A.C. 8:52.” The five recognized public health activities include administration, environmental health, communicable disease, chronic disease and maternal child health. In response to this requirement, you listed detailed information relevant to your experience as a registered environmental health specialist with the Hunterdon County Department of Public Safety/Hunterdon County Department of Health under the ‘Employment Record’ section of your application. While this experience covers an impressive 31 years of experience in the field of environmental health and two years’ experience in environmental health grant administration, it does not show evidence of two years’ full-time experience in a third public health area as required by the rule.

Further, when reviewing the documentary evidence required for your application, the letter of recommendation that accompanied your application and described your work experience in three of the five recognized public health activities did not provide enough information to confirm the required work experience. Specifically, the August 31, 2017 recommendation letter authored by Carla Hobbs, the supervisor under which your working experience was acquired, stated that you had work experience in administration, environmental health and communicable disease. While the recommendation letter demonstrated sufficient experience in administration and environmental health, it did not provide evidence of two years’ full-time work experience in communicable disease. Although Ms. Hobbs listed examples of administrative duties (“Debra is a trained POD manager” and “[Debra] has served as a manager in many flu clinics”), examples of academic knowledge (“[Debra] has extensive knowledge regarding rabies”) and examples of part-time work (“she has assisted the epidemiology and nursing staff in Legionella investigation”) under the ‘Communicable Disease’ section of the letter, none of these examples rise to the level of two years’ full-time experience in communicable disease. In an attempt to clarify this, on October 24, 2018, the OLPH asked Ms. Hobbs to submit a more detailed letter including dates of

experience in three of the five recognized areas of public health activities. Although Ms. Hobbs submitted another letter, it was largely similar to the original letter and did not include any new information. As a result, you failed to demonstrate that you completed two years' full-time employment in a position providing administrative experience in at least three of the five existing recognized public health activities, as required by N.J.A.C. 8:7-1.10 to be a licensed health officer.

In addition, while reviewing your health officer licensing application and attempting to verify your years of work experience, the OLPH contacted the Hunterdon County Division of Health Services Health Officer, Karen DeMarco, and Hunterdon County Chief of Staff, George Wagner, and learned additional information that makes your application for the health officer examination invalid.

[REDACTED]

However, this information was never disclosed to the Department, as was required when you submitted your application for the health officer examination.

[REDACTED]

The application also provides a declaration that says: "I certify, under penalty of perjury under the laws of the State of New Jersey, that this application contains no willful misrepresentations or falsifications and that the information given by me in connection with this application for licensure as a Health Officer is true, correct and complete. I am aware that if an investigation discloses any misrepresentation to any answer to questions on this form, the application will be rejected. I further understand that any false statement knowingly made by me is grounds for denial of licensure or revocation of a license issued in reliance upon false information." You signed beneath the declaration, despite the fact that your application contained false information [REDACTED]

Based upon the foregoing, the Department finds that your application to sit for the health officer examination was never reviewed and approved by either the Board or OLPH, as required by N.J.A.C. 8:7-1.3, and had your application been reviewed, it would not have been approved as you did not meet all of the required qualifications to sit for the health officer licensing examination. Additionally, OLPH finds that you knowingly provided false information on your application [REDACTED]

Accordingly, under the authority of N.J.S.A. 26:1A-43 and N.J.A.C. 8:7-1.7, please be advised that the Department intends to revoke your Health Officer license as you provided false information on your Health Officer Licensing Application and failed to meet the eligibility requirements to sit for the New Jersey Health Officer Licensing Examination.

Pursuant to N.J.S.A. 52:14B-1 et seq. and N.J.A.C. 8:7-1.7(b), you may request a hearing before the Office of Administrative Law to contest this proposed agency action. If you request a hearing, this agency action shall be held in abeyance until such time as a hearing has been conducted and a final decision has been rendered. Your request for a hearing on this matter must be submitted in writing and must be accompanied by a response to the charges contained herein. Your request for a hearing must be submitted within 30 days from the date of mailing of this notice

and include **Control # 2018-0812**. If you choose to request a hearing please forward your request to:

New Jersey Department of Health
Office of Legal & Regulatory Compliance
P.O. Box 360, Room 805
Trenton, NJ 08625-0360
Attn: Ms. Tami Roach

Please note that this agency action shall become final and effective 30 days after this notice has been mailed to you unless you request a hearing. Failure to submit a written hearing request within such 30-day period shall result in forfeiture of your rights to a hearing.

Sincerely,

A handwritten signature in blue ink, appearing to read 'SS', with a stylized flourish at the end.

Shereen Semple, MS
Director, Office of Local Public Health

SENT VIA REGULAR U.S. MAIL AND CERTIFIED MAIL # 7012 0470 0000 3284 4152
RETURN RECEIPT REQUESTED