

BEFORE THE BOARD OF HEALING ARTS
OF THE STATE OF KANSAS

In the Matter of)

Paradise, Elizabeth J.M., O.T.A.)
Kansas License No. 18-01627)

Case No. 25-HA 00017

CONSENT ORDER

COMES NOW, Petitioner, Disciplinary Panel Disciplinary Panel #39, a duly authorized committee of the Kansas State Board of Healing Arts ("Board"), by and through Jacob T. Overbey, Associate Litigation Counsel, and Elizabeth J.M. Paradise, O.T.A., ("Licensee") *Pro Se*, and move the Board for approval of a Consent Order affecting Licensee's license to practice as an occupational therapy assistant in the state of Kansas. The parties stipulate and agree to the following:

1. Licensee's last known mailing address is **CONFIDENTIAL**

CONFIDENTIAL, Licensee's last known e-mail address to the Board is **CONFIDENTIAL**

2. Licensee is or has been entitled to engage in the practice as an occupational therapy assistant in Kansas, having been issued License No. 18-01627 on or about August 27, 2019. As of March 31, 2024, Licensee's license is Cancelled-Failure to Renew.

3. At all times relevant to the allegations set forth in this Consent Order, Licensee held a current and active license to engage in the practice as an occupational therapy assistant in the state of Kansas.

Consent Order

Elizabeth J.M. Paradise, O.T.A.
License No. 18-01627

4. A protective order is hereby entered to protect all confidential information under K.S.A. 65-2898a.

5. The Board has received information **CONFIDENTIAL** and has reason to believe there are grounds to take action under the Kansas Occupational Therapy Practice Act, K.S.A. 65-5401, *et seq.* Specifically:

a. **CONFIDENTIAL**

b.

c.

d.

Consent Order
Elizabeth J.M. Paradise, O.T.A.
License No. 18-01627

CONFIDENTIAL

e.

f.

g.

h.

Consent Order
Elizabeth J.M. Paradise, O.T.A.
License No. 18-01627

CONFIDENTIAL

Licensee was

terminated from her employment.

6. Licensee's conduct, if proven, constitutes violations of the Occupational Therapy Practice Act, including:

- a. K.S.A. 65-5410(a)(2), as further defined by K.A.R. 100-54-5(r), in that Licensee willfully committed acts of unprofessional conduct by obtaining fees by fraud, deceit, or misrepresentation, in that she billed for services that were not rendered as billed;
- b. K.S.A. 65-5410(a)(2), as further defined by K.A.R. 100-54-5(h), in that Licensee was sanctioned by a medical care facility for acts or conduct that would constitute grounds for suspension or revocation of a license under 65-5410 and amendments thereto; and
- c. K.S.A. 65-5410(a)(2), as further defined by K.A.R. 100-54-5(o), in that Licensee committed acts of unprofessional conduct likely to deceive, defraud, or harm the public.

7. Licensee acknowledges that if formal hearing proceedings were conducted, and Licensee presented no exhibits, witnesses, or other evidence, the Board has sufficient evidence to prove that Licensee violated the Kansas Occupational Therapy Practice Act with respect to the above allegations. Licensee further waives her right to dispute or otherwise contest the allegations contained in the above paragraphs in any further proceedings before the Board.

Consent Order

Elizabeth J.M. Paradise, O.T.A.
License No. 18-01627

8. Licensee voluntarily and knowingly waives her right to a hearing. Licensee voluntarily and knowingly waives her right to present a defense by oral testimony and documentary evidence, and to conduct cross-examination of witnesses. Licensee voluntarily and knowingly agrees to waive all possible substantive and procedural motions and defenses that could be raised in an administrative hearing were held.

9. The Board is the sole and exclusive administrative agency of the State of Kansas authorized to regulate the practice of the healing arts, specifically the practice of occupational therapy assistants in the state of Kansas.

10. The Kansas Occupational Therapy Practice Act is constitutional on its face and as applied in the case. Licensee agrees that in considering this matter, the Board is not acting beyond its jurisdiction as provided by law.

11. This Consent Order and the filing of such document are in accordance with applicable law and the Board has jurisdiction to enter into the Consent Order as provided by K.S.A. 77-505 and K.S.A. 65-2838. Upon approval, these stipulations shall constitute the findings of the Board, and this Consent Order shall constitute the Board's Final Order.

12. The terms and conditions of this Consent Order are entered into between the undersigned parties and are submitted for the purpose of allowing these terms and conditions to become an Order of the Board. This Consent Order shall not be binding on the Board until an authorized signature is affixed at the end of this document. Licensee specifically acknowledges that counsel for the Board is not authorized to sign this Consent Order on behalf of the Board.

Consent Order
Elizabeth J.M. Paradise, O.T.A.
License No. 18-01627

13. Upon execution of this Consent Order by affixing a Board authorized signature below, the provisions of this Consent Order shall become a Final Order under K.S.A. 65-2838 and K.S.A. 77-526. This Consent Order shall constitute the Board's Order when filed with the Office of the Executive Director for the Board and no further Order is required.

14. Licensee further understands and agrees that if the Board finds, after due written notice and an opportunity for a hearing, that Licensee has failed to comply with any of the terms of this Consent Order, the Board may immediately impose any sanction provided for by law. Licensee hereby expressly understands and agrees that, at any such hearing, Licensee retains the right to confront and examine all witnesses, present evidence, testify on her own behalf, contest the allegations, present oral argument, appeal to the courts, and all other rights set forth in the Kansas Administrative Procedures Act, K.S.A. 77-501 *et seq.* and the Kansas Occupational Therapy Practice Act, K.S.A. 65-5401 *et seq.*

15. Nothing in this Consent Order shall be construed to deny the Board jurisdiction to investigate alleged violations of the Kansas Occupational Therapy Practice Act, or to investigate complaints received under the Risk Management law, K.S.A. 65-4921 *et seq.*, that are known or unknown and are not covered under this Consent Order, or to initiate formal proceedings based upon known or unknown allegations of violations of the Kansas Occupational Therapy Practice Act.

16. Licensee hereby releases the Board, its individual members (in their official and personal capacity), attorneys, employees and agents, hereinafter collectively referred to as "Releasees", from any and all claims including but not limited to those alleged damages, actions,

Consent Order

Elizabeth J.M. Paradise, O.T.A.
License No. 18-01627

liabilities, both administrative and civil, including the Kansas Judicial Review Act, K.S.A. 77-601 *et seq.* arising out of the investigation and acts leading to the execution of this Consent Order. This release shall forever discharge the Releasees of any and all claims or demands of every kind and nature that Licensee has claimed to have had at the time of this release or might have had, either known or unknown, suspected or unsuspected, and Licensee shall not commence to prosecute, cause or permit to be prosecuted, any action or proceeding of any description against the Releasees.

17. This Consent Order when signed by both parties, constitutes the entire agreement between the parties and may only be modified or amended by a subsequent document executed in the same manner by the parties.

18. Licensee agrees that all information maintained by the Board pertaining to the nature and result of any complaint and/or investigation may be fully disclosed to and considered by the Board in conjunction with the presentation of any offer of settlement, even if Licensee is not present. Licensee further acknowledges that the Board may conduct further inquiry as it deems necessary before the complete or partial acceptance or rejection of any offer of settlement.

19. Licensee, by signature to this document, waives any objection to the participation of the Board members, including the Disciplinary Panel and General Counsel, in the consideration of this offer of settlement and agrees not to seek the disqualification or recusal of any Board member or General Counsel in any future proceedings on the basis that the Board member or General Counsel has received investigative information from any source which otherwise may not be admissible or admitted as evidence.

Consent Order
Elizabeth J.M. Paradise, O.T.A.
License No. 18-01627

20. Licensee acknowledges she has read this Consent Order and fully understands the contents.

21. Licensee acknowledges this Consent Order has been entered into freely and voluntarily.

22. Licensee further understands and agrees that upon signature by Licensee, this document shall be deemed a public record and shall be reported to any entities authorized to receive disclosure of the Consent Order.

23. Licensee acknowledges the Board may consider all aspects of this Consent Order in any future matter regarding Licensee.

24. Licensee shall obey all federal, state, and local laws and rules governing the practice of occupational therapy assistants in Kansas that may in place at the time of execution of the Consent Order or may become effective subsequent to the execution of this document.

25. This Consent Order constitutes **public disciplinary action**.

26. In lieu of conducting a formal proceeding, Licensee, by signature affixed to this Consent Order, hereby voluntarily agrees to the following actions against her license to practice as an occupational therapy assistant:

PUBLIC CENSURE

IT IS HEREBY ORDERED Licensee is publicly censured by the Board.

LICENSE SUSPENSION

IT IS HEREBY ORDERED Licensee's license to practice as an occupational therapy assistant is **SUSPENDED** for a period of **twenty-nine (29)** days from the date of execution of this

Consent Order
Elizabeth J.M. Paradise, O.T.A.
License No. 18-01627

Consent Order. Licensee agrees she will not make any application for reinstatement of her license to practice as an occupational therapy assistant through the state of Kansas or through any other municipal, state or federal governmental entity of the United States of America for a period of no longer than twenty-nine (29) days while this Consent Order is in effect.

IT IS HEREBY ORDERED that the Consent Order and agreement of the parties contained herein is adopted by the Board as findings of fact, conclusions of law, and as a Final Order of the Board.

IT IS SO ORDERED on this 16th day of December, 2024.

FOR THE KANSAS STATE BOARD OF
HEALING ARTS:

Susan Gile

Susan Gile
Executive Director

12/16/2024
Date

Elizabeth J.M. Paradise
Elizabeth J.M. Paradise
Licensee

9-30-24
Date

Consent Order
Elizabeth J.M. Paradise, O.T.A.
License No. 18-01627

PREPARED AND APPROVED BY

/s/ *Jacob T. Overbey*

Jacob T. Overbey, KS #29543

Associate Litigation Counsel

Kansas State Board of Healing Arts

800 SW Jackson Street

Topeka, Kansas 66612

jacob.overbey@ks.gov

Ph: (785) 296-0961

Fx: (785) 368-7103

Consent Order

Elizabeth J.M. Paradise, O.T.A.

License No. 18-01627

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that the foregoing Consent Order was served on the 16th day of December 2024, by depositing the same in the United States Mail, first class postage prepaid, and via email to below:

Elizabeth J.M. Paradise

CONFIDENTIAL

Licensee

Licensing Administrator
Kansas Board of Healing Arts
800 SW Jackson Lower Level Suite A
Topeka, Kansas 66612

And the original was hand filed with the office of the Executive Director

Susan Gile, Executive Director
Kansas State Board of Healing Arts
800 SW Jackson Lower Level Suite A
Topeka, Kansas 66612

And a copy was hand-delivered to:

Jacoby T. Overbey
Associate Litigation Counsel
Kansas State Board of Healing Arts
800 SW Jackson Street Lower Level Suite A
Topeka, Kansas 66612

Consent Order
Elizabeth J.M. Paradise, O.T.A.
License No. 18-01627

Compliance Coordinator
Kansas State Board of Healing Art
800 SW Jackson Street Lower Level Suite A
Topeka, Kansas 66612

Licensing Administrator
Kansas State Board of Healing Arts
800 SW Jackson Street Lower Level Suite A
Topeka, Kansas 66612

/s/ [Signature]

Staff Member

Consent Order
Elizabeth J.M. Paradise, O.T.A.
License No. 18-01627