

Tony Evers  
Governor



**State of Wisconsin**  
Department of Health Services

Kirsten L. Johnson  
Secretary

**DIVISION OF PUBLIC HEALTH**

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September 19, 2023

(Via E-Mail and Certified US Mail)

Tonya Greger  
14329 120th Ave  
Chippewa Falls, WI 54729

**Re: Reprimand of Tonya Greger #70107127**

Dear Ms. Greger:

The Department of Health Services (Department), Emergency Medical Services (EMS) Section, hereby reprimands you, Tonya Greger, License #701727, for providing emergency medical care without a current license, as required by Wis. Admin Code DHS §110.05, 110.13(2) and Wis. Admin Code § 256.15(2)(a).

**Factual Basis for the Department's Action**

On February 14, 2023, the Department was notified that you, Tonya Greger, had been functioning as an emergency medical services practitioner with Eagle Point FD First Responders without a valid license.

Due to Emergency Order #21, your Emergency Medical Technician (EMT) license expired on October 1, 2020, and you applied for late renewal of your EMT license on March 23, 2023. Despite this, you continued to provide patient care, without a valid EMT license, from October 1, 2020, to February 14, 2023.

On March 9, 2023, the Department requested Eagle Point FD First Responders provide the number of times you, Tonya Greger, responded with Eagle Point FD First Responders after your EMT license expired.

On March 16, 2023, Eagle Point FD First Responders provided the Department with documentation listing at least 118 emergency medical responses you completed after your EMT license expired.

Interviews with you and Eagle Point FD First Responders confirmed that you provided emergency medical care after your EMT license expired from October 1, 2020, to February 14, 2023.

### **Legal Authority for Department Action**

Under Wis. Admin Code DHS § 110.56,

The department may reprimand a licensee, permit holder, or certificate holder if the department finds that the person has violated a requirement of this chapter or ch. 256, Stats., or engaged in conduct described in s. DHS 110.54. A reprimand documents the department's finding that the permittee, certificate holder or licensee has violated a requirement of this chapter or ch. 256, Stats., or has engaged in conduct described in s. DHS 110.54. A reprimand may be in the form of a letter issued to the person who is the subject of the reprimand...

Wis. Admin. Code DHS § 110.05 states,

(1) Before an individual may perform emergency medical care or advertise for the provision of emergency medical care as an EMS professional, the individual shall be certified as an emergency medical responder or licensed as an EMS practitioner by the department...

Wis. Admin Code DHS § 110.13(2) states,

(2) An EMS professional may only perform emergency medical care that is within the Wisconsin scope of practice for the practice level at which the EMS professional is licensed or certified.

Wis. Admin Code DHS § 256.15(2)(a) states,

(a) ... no individual may act as or advertise for the provision of services as an emergency medical services practitioner unless he or she holds an emergency medical services practitioner license...

Wis. Admin. Code DHS §110.54 provides:

The department may take any enforcement action under ss. 110.55 to 110.58, which it determines is appropriate against a person subject to the requirements of this chapter and ss. 256.12 to 256.18, Stats., for any of the following reasons:

(4) The person violated any provision of ch. 256, Stats., or this chapter.

### **Department Action**

Based on the investigation findings, it has been determined that you provided emergency medical care without a current license, as required by Wis. Admin Code DHS §110.05, 110.13(2) and Wis. Admin Code § 256.15(2)(c).

Tonya Greger #70107127

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Your Wisconsin EMT license expired on September 30, 2020. You provided services as an EMS provider in the state of Wisconsin between October 1, 2020, and February 14, 2023, while you did not hold a valid license. The Department reviewed records and conducted interviews to confirm these facts. Furthermore, you admitted to practicing without a valid EMT license during that time period. You have since applied to renew your EMT license and your license has been renewed.

You provided care to at least 118 patients while not having current EMS license. Having current EMS licensure ensures that you have met certain standards and will adhere to best practices. As an EMS provider, you often work in environments where patient's lives are at stake and depend on your care. Maintaining current licensure assures the public and your patients that you can provide effective care in an emergency situation. Without current licensure, there is no assurance that the care you provided met those standards and practices. Your conduct shows that you provided patient care without a current EMS license, which is contrary to the safe performance of an EMS professional.

In accordance with Wis. Admin. Code DHS §110.56, the Department will post the reprimand on the Department's website, will retain a copy of this letter of reprimand in your file, and may consider it in determining what further enforcement action may be appropriate if violations continue.

Pursuant to Wis. Admin. Code DHS § 110.56, the Department's issuance of this reprimand is a final decision of the Department and is not subject to an administrative hearing.

If you have any questions regarding this decision, please contact me at 608-266-8853 or [mark.mandler@dhs.wisconsin.gov](mailto:mark.mandler@dhs.wisconsin.gov).

Sincerely,



Mark Mandler

EMS Section Manager

Office of Preparedness and Emergency Health Care

Wisconsin Department of Health Services