



*Protecting, maintaining and improving the health of all Minnesotans*

**HEALTH OCCUPATIONS PROGRAM  
MINNESOTA DEPARTMENT OF HEALTH**

**A Determination In the Matter of  
Paula Quinlan  
Unlicensed Complementary and Alternative Health Care Practitioner**

**AUTHORITY**

1. The Office of Complementary and Alternative Health Care Practice, within the Minnesota Department of Health (hereinafter "MDH") has the authority to discipline unlicensed complementary and alternative health care practitioners for violations of Minnesota Statutes, section 146A.08. Under section 146A.09, subdivision 1, MDH has the authority to revoke, suspend, censure, reprimand, impose limitations or conditions, and impose a civil penalty not to exceed \$10,000 for each separate violation, with the amount to be fixed so as to deprive the practitioner of any economic advantage gained by reason of the violation or to reimburse MDH for all costs of the investigation proceeding.
2. Pursuant to Minnesota Statutes, section 146A.01, subdivision 4(a), complementary and alternative health care practices include the broad domain of complementary and alternative healing methods and treatments, including but not limited to: (7) detoxification practices and therapies; (8) energetic healing; (11) healing practices utilizing food, food supplements, nutrients, and the physical forces of heat, cold, water, touch and light; (13) healing touch; (19) mind-body healing practices; or (20) naturopathy.
3. Pursuant to Minnesota Statutes, section 146A.01, subdivision 4(b), MDH may take disciplinary action against a complementary and alternative health care practitioner for engaging in surgery, x-ray radiation, administering or dispensing legend drugs and controlled substances, practices that invade the human body by puncture of the skin, setting fractures, and the use of medical devices as defined in Minnesota Statutes, section 147A.01.
4. Pursuant to Minnesota Statutes, section 146A.01, subdivision 6, a complementary and alternative health care practitioner means a person who is not licensed or registered by a health-related licensing board or the commissioner of health, is engaged in and providing

complementary and alternative health care services for remuneration or is holding oneself out to the public as a practitioner of complementary and alternative health care practices.

5. Pursuant to the Minnesota Government Data Practices Act, Minnesota Statutes, Chapter 13, and Minnesota Statutes, section 146A.06, subdivision 2, this Determination is public data. Pursuant to section 146A.06, subdivision 2, all other data comprising the record shall not be considered part of this Determination and shall maintain the classifications to which they are entitled under the MGDPA and Minnesota Statutes, section 146A.06, subdivision 2.

### **FINDINGS OF FACT**

1. Practitioner has been practicing as a coach, educator and speaker in Minnesota for Paula Quinlan Consulting (hereinafter "Practitioner"). Practitioner is the sole proprietor of Paula J Quinlan Consulting LLC.
2. Practitioner is, and has been, subject to the jurisdiction of MDH because Practitioner engages in unlicensed complementary and alternative health care practice as defined in Minnesota Statutes, section 146A.01.
3. Practitioner states she is certified the following trainings:
  - Certified Lightfield Nutriscopy Imaging, September 2007
  - Certified Aroma Therapist, August 2006
  - Reiki I Certified, February 2006
  - Reiki II Certified, October 2006
  - Healing Touch I completed, February 2006
  - Raindrop Technique (physical health), 2004-2005
  - Raindrop Technique (spiritual health), 2005
  - Quantum Touch Live, October 2007
  - Dietary Supplement and Health Education Act Certified, June 2008
  - Kinetic Education Workshop, August 2009
  - National Association of Certified Natural Health Professional, April 2010
4. Practitioner reported she was certified / trained in Lightfield Nutriscopy Imaging in 2007. Practitioner described Lightfield Nutriscopy Imaging as looking at a sample of blood under a microscope and discussing the differences between the sample blood appearance versus the appearance of pictures of 'optimal blood' Then discussing with the client ways to improve their lifestyle and improve their blood.
5. Practitioner stated she takes blood from clients via finger prick and places the droplet of blood on a slide. Practitioner examines the client's blood under a microscope, takes a photogram and prints the photogram for the client. Practitioner provides the client with a

pamphlet containing photographs of “optimal blood” and then compares the client’s blood with the photographs of optimal blood. Based on the results of the Lightfield Nutriscopy Imaging, Practitioner recommends herbal or energy therapies, all offered by the Practitioner at her place of business.

6. Practitioner stated from 2008 to 2014, she performed 137 Lightfield Nutriscopy Imaging procedures. Practitioner charged fees ranging from \$55 to \$200 per procedure.
7. In a letter dated February 18, 2015, Practitioner stated she sold her Omega 1800 microscope and Moticam camera, which were used for the Lightfield Nutriscopy Imaging. Practitioner enclosed a sales receipt which shows a profit of \$401.

### **CONCLUSION**

Practitioner did not comply with the requirements of Minnesota Statutes, sections 146A.01, subdivision 4(b) and 146A.08 subdivision 1(s).

### **DETERMINATION**

1. Practitioner shall immediately cease her activities related to taking blood from clients and making suggestions for clients.
2. Within 30 days of the effective date of this Determination, Practitioner shall pay a civil penalty of \$9,830 representing the economic benefit gained by reason of the violations and \$546.79 to reimburse MDH for the costs of the investigation and proceeding to date. Practitioner must make the payment by check, in the amount of \$10,376.78, made payable to the “State of Minnesota, Treasurer” and mail the check to the attention of: MDH, Health Occupations Program, Investigation and Enforcement, PO Box 64882, Saint Paul, MN 55164-0882.
3. Practitioner may pay the \$10,376.78 civil penalty in monthly installments for up to thirty-six months. If Practitioner chooses to make installments, she must notify MDH in writing about her intentions, including how many installments she intends to make, in what amount, and over which time period. Practitioner must send this information to: MDH, Health Occupations Program, Investigation and Enforcement, PO Box 64882, Saint Paul, MN 55164-0882, within 30 days of receipt of this Determination.
4. Each payment will be made by check payable to “Treasure, State of Minnesota”, and mailed to MDH, Health Occupations Program, Investigation and Enforcement, PO Box 64882, Saint Paul, MN 55164-0882, or any other address specified by MDH. Each payment is due by the last day of each month; however, Practitioner may prepay at any

time.

5. The penalty may be referred to the Minnesota Department of Revenue (MDOR), or any other source for collection, if the debt is 31 days past the established due date. When this Order for a penalty becomes public and MDH refers the matter to MDOR, MDOR is authorized by Minnesota Statutes, section 16D.17 to obtain a judgment against Practitioner without further notice or proceeding.