

**FILED WITH
Executive Secretary
October 30, 2013
IOWA UTILITIES BOARD
FCU-2012-0019**

OFFICE OF CONSUMER ADVOCATE

**DIRECT TESTIMONY
OF
KAREN SOUHRADA**

In Re Rehabilitation Center of Allison, Iowa

Docket No. FCU-2012-0019

October 30, 2012

1 **Q: Please state your name.**

2 A: Karen Souhrada.

3 **Q: By whom are you employed?**

4 A: Rehabilitation Center of Allison.

5 **Q: What is your position?**

6 A: Social worker.

7 **Q: Are you aware that the Rehabilitation Center of Allison filed a complaint with**
8 **the Iowa Utilities Board regarding the failure of calls and faxes to complete to**
9 **the Rehabilitation Center of Allison, including calls and faxes from the**
10 **Waverly Health Center and the Shell Rock Clinic?**

11 A: Yes.

12 **Q: Would you accept my word the complaint was filed on September 24, 2012?**

13 A: Yes.

14 **Q: Do you have any knowledge that would substantiate the claim that calls and**
15 **faxes were not completing from the Waverly Health Center or the Shell Rock**
16 **Clinic to the Rehabilitation Center of Allison?**

17 A: I remember that one of the nurses at the Shell Rock Clinic called me on my
18 personal cellphone while I was at work. I do not remember which nurse. I do not
19 remember the date. I do remember it was second shift. I answered the call because
20 the caller ID showed the number for the Shell Rock Clinic. The nurse said they
21 could not reach the phone line at our Allison facility. She called me on my
22 personal cellphone because she knew I worked at the Allison facility. The nurse at

1 the Shell Rock Clinic was wanting to speak with the nurse at our Allison facility. I

2 gave the call to our nurse.

3 **Q: Is there anything you would like to add?**

4 A: Not at this time.

5 **Q: Does that conclude your testimony?**

6 A: Yes.

STATE OF IOWA)
) ss.
COUNTY OF BUTLER)

I, Karen Souhrada, being first duly sworn on oath, depose and state that that I am familiar with the contents of the foregoing testimony and that the foregoing testimony is true and correct to the best of my knowledge and belief.

/s/ Karen L. Souhrada
Karen Souhrada

Subscribed and sworn to before me this 22 day of October, 2013.

/s/ Kelly J. Zurcher
Notary Public

My Commission expires: April 27, 2016