



State of Vermont
Office of the Secretary of State

Office of Professional Regulation

89 Main Street, 3rd Floor
Montpelier, VT 05620-3402
sos.vermont.gov

James C. Condos, Secretary of State
Christopher D. Winters, Deputy Secretary
S. Lauren Hibbert, Director

January 24, 2022

Nicole Andreson, Esq.
PO Box 988
Burlington, VT 05402-0988

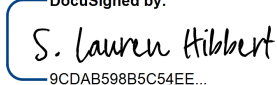
Case: In Re: Elyssa Leverenz
Credential: Registered Nurse 026.0135456
Docket No: 2020-89

Dear Attorney Andreson:

Enclosed please find a copy of the approved *Stipulation and Consent Order*

For questions about complying with this Order, please contact the Case Manager at 802-828-1635

Sincerely,

DocuSigned by:

9CDAB598B5C54EE...
S. Lauren Hibbert
Director

Enc: *Stipulation and Consent Order*

cc:

George Belcher, Esq., Hearing Officer
Jennifer Colin, Esq., Prosecuting Attorney
Kristin Donnelly, Case Manager
Nicole Andreson, Respondents Attorney, First Class Mail and Email

**STATE OF VERMONT
SECRETARY OF STATE
OFFICE OF PROFESSIONAL REGULATION
BOARD OF NURSING**

IN RE:)
ELYSSA A. LEVERENZ) **Docket No. 2020-89**
License No. 026.0135456)

STIPULATION AND CONSENT ORDER

STIPULATION

NOW COMES the State of Vermont, by and through State Prosecuting Attorney Elizabeth A. St. James, and the Respondent, Elyssa Leverenz, represented by Nicole Andreson, Esq., who stipulate and agree as follows:

Board Authority

1. The Vermont State Board of Nursing (the “Board”) has authority to issue warnings or reprimands; suspend, revoke, limit, or condition current licenses; or prevent the renewal of lapsed licenses if, after disciplinary hearing, the Board finds that the Respondent has engaged in unprofessional conduct. 3 V.S.A. § 129(a); 3 V.S.A. § 129a; 3 V.S.A. § 814(d); 26 V.S.A. Chapter 28; the Administrative Rules of the Board of Nursing (the “ARBN”); and the Rules of the Office of Professional Regulation.

Stipulated Facts

2. Elyssa A. Leverenz (“Respondent”) of South Burlington, Vermont is licensed by the State of Vermont as a Registered Nurse (“RN”) under license number 026.0135456. This license was originally issued June 3, 2018 on the basis of endorsement, and expires on March 31, 2021. Respondent was previously licensed in Vermont as a Licensed Nursing Assistant under license number 075.0105679.
3. At all relevant times, Respondent was employed at Burlington Health and Rehabilitation Center (“the Facility”) as a Registered Nurse.
4. On November 9, 2019, Respondent was working the night shift at the Facility.
5. Part of Respondent’s duties that night included checking patients’ blood glucose levels and recording that information in the medication administration record (the “MAR”).
6. On the morning of November 10, 2019, a nurse working the morning shift (“Nurse 1”) noticed that the blood glucose levels from the preceding night shift looked incorrect. Nurse 1 checked the machine that records the blood glucose levels, the

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Accu-Check meter, and compared those numbers to the blood glucose levels entered in the MAR. The numbers did not match.

7. Respondent admits to documenting false blood glucose levels for patients during the November 9th night shift. Respondent explained that due to exhaustion and fatigue she documented blood glucose levels on certain patients that she had not actually checked.
8. Respondent also fell asleep while on shift on multiple occasions.
9. On November 11, 2019, Respondent's employment at the Facility was terminated due to the events described above.

Violation One: 3 V.S.A §129a(a)(7) Willfully making or filing false reports or records in the practice of the profession, willfully impeding or obstructing the proper making or filing of reports or records, or willfully failing to file the proper reports or records.

10. The State re-alleges and incorporates Paragraphs 2 through 9 above.
11. As an RN, Respondent has an obligation be truthful in the making or filing of reports or records in the practice of the profession.
12. Paragraphs 2 through 9 above demonstrate that Respondent made or filed false reports or records in the practice of the profession.
13. The act(s), omission(s), and/or circumstance(s) described above constitute grounds for discipline because Respondent has committed unprofessional conduct in violation of 3 V.S.A. §129a(a)(7).

Violation Two: 3 V.S.A §129a(b)(1) Failure to practice competently by reason of any cause on a single occasion or on multiple occasions may constitute unprofessional conduct, whether actual injury to a client, patient, or customer has occurred. Failure to practice competently includes: (1) performance of unsafe or unacceptable patient or client care.

14. The State re-alleges and incorporates Paragraphs 2 through 9 above.
15. As an RN, Respondent has an obligation to provide safe and acceptable patient care.
16. Respondent provided unsafe and unacceptable patient care by engaging in the conduct described in Paragraphs 2 through 9 above.
17. The act(s), omission(s), and/or circumstance(s) described above constitute grounds for discipline because Respondent has committed unprofessional conduct in violation of 3 V.S.A. §129a(b)(1).

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Understandings

45. Respondent acknowledges that the facts above are true and that the conditions set out in the Consent Order below are appropriate and necessary to protect the public.
46. Respondent understands that the Board must review and accept the terms of the Consent Order. If the Board rejects any portion, the entire Stipulation and Consent Order shall be null and void.
47. Respondent specifically waives any claims that any disclosures made to the full Board during its review of this agreement have prejudiced Respondent's rights to a fair and impartial hearing if this agreement is not accepted by the Board and proceeds to a contested hearing.
48. Respondent has read and reviewed this entire document and agrees that it contains the entire agreement between the parties.
49. Respondent is not under the influence of any drugs or alcohol at the time Respondent signs this Stipulation and Consent Order.
50. Respondent voluntarily enters into this agreement after the opportunity to consult with legal counsel and is not being coerced by anyone into signing this Stipulation and Consent Order.
51. Respondent voluntarily waives Respondent's right to a contested hearing before the Board and waives any right to appeal from this Stipulation and Consent Order.
52. Respondent agrees that the Order set forth below may be entered by the Board.

ORDER

Based on the Stipulation above, it is **ORDERED AND ADJUDGED** as follows:

- A. The Board of Nursing hereby **WARNS** Respondent's license.
- B. Notwithstanding any provision above, the Respondent must continue to meet all Board requirements for maintaining a license, license renewal and license reinstatement.
- C. This Stipulation and Consent Order is a matter of public record and may be reported to other licensing authorities as provided in 3 V.S.A. §129(a).
- D. This Stipulation and Consent Order will remain part of Respondent's licensing file and may be used for purposes of determining sanctions in any future disciplinary matter.
- E. This Stipulation and Consent Order shall be applicable as a matter of law to all other licenses issued by the Board of Nursing, as provided in 3 V.S.A. §129(l).

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AGREED TO:

Dated: 1/7/2022

Dated: 1/7/2022

APPROVED AS TO FORM:

Dated: 1/7/2022

APPROVED AND SO ORDERED:

Dated: 1/10/2022

Date of Entry: 1/24/2022

STATE OF VERMONT
SECRETARY OF STATE

DocuSigned by:
Jennifer Colin
By: D190D9C5BA65468...
Jennifer B. Colin
State Prosecuting Attorney

ELYSSA A. LEVERENZ
RESPONDENT

DocuSigned by:
Elyssa A. Leverenz
By: B62D96198DD842B...
Elyssa A. Leverenz

NICOLE ANDRESON, ESQ.
ATTORNEY FOR RESPONDENT

DocuSigned by:
Nicole Andreson
By: CA3D94815BE24A0...
Nicole Andreson, Esq.

VERMONT BOARD OF NURSING

DocuSigned by:
Jennifer Laurent
By: EB4744945719477...
Chairperson

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