

State of Vermont
Vermont Board of Nursing

In re: Robin Collins
License Number 026.0139888
Docket Number: D-2021-54 & 2022-256

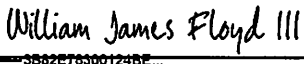
Order to Remove Conditions

On May 12, 2025, the Vermont Board of Nursing considered Robin Collins's request for Removal of Conditions imposed pursuant to a Stipulation & Consent Order under Docket Number 2021-54 and 2022-256. Ms. Collins has successfully met the conditions. After review of the follow-up file, the State does not object to removal of all conditions.

Order:

The Board hereby removes all conditions from Robin Collins's Registered Nurse license.

Vermont Board of Nursing

Signed by:


3892E78300124BE...
Jennifer Laurent, Board Chair

Date: May 12, 2025

Date of Entry: 5 / 13 / 25



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

Sarah Copeland Hanzas, Secretary of State
S. Lauren Hibbert, Deputy Secretary
Michael D. Warren, Interim Director

March 21, 2025

Ultan Doyle, Esq.
Office of Professional Regulation
89 Main Street, 3rd Floor
Montpelier, VT 05620-3402

Case: Robin Collins
Credential: License # 026.0139888
Docket No: 2021-54 & 2022-256

Dear Attorney Doyle:

Please find the enclosed Request “**to remove conditions**” filed on the above captioned docket number. Pursuant to the Office of Professional Regulation’s Administrative Rule 3.8 you have 10 days to respond to the motion.

You may contact me at (802) 828-2367 if you have any questions.

Sincerely,

/s/ Julie Bowen
Docket Clerk

Enc: *Request to Remove Conditions*

Cc: Kristin Donnelly, Case Manager
David Pocius, Esq., Respondent’s Attorney

DAVID M. POCIUS
DPOCIUS@PFCLAW.COM

March 20, 2025

Via Email to sos.docketclerk@vermont.gov

Vermont Secretary of State
Office of Professional Regulation
Board of Nursing
89 Main St., 3rd Floor
Montpelier, VT 05620-3402

Re: Petition to Remove Restrictions from License; License No. 026.0139888

To The Vermont Board of Nursing:

I continue to represent licensee Robin Lynn Collins, licensed by the State of Vermont as a Registered Nurse ("RN") under license number 026.0139888. I write to petition to have all conditions removed from her RN license. Nurse Collins entered into a Stipulation and Consent Order approved by the Vermont Board of Nursing (the "Board") and entered on February 2, 2023 (the "Stipulation") in Dockets No. 2021-54 and No. 2022-256. Nurse Collins has successfully completed the supervision and employer reporting conditions of her Board Order and has otherwise successfully met all conditions of her license.

More specifically, under the terms of the Stipulation, Nurse Collins agreed to accept certain conditions and requirements on her license. She has since diligently complied with and completed all conditions. She has provided, or caused to be provided, all necessary notifications, workbooks, reports, and written documentation to her Case Manager, Kristin Donnelly. In addition, the Stipulation (§14) provides that she can petition the Board to remove any and all conditions on her license after the conditional period of two years.

Nurse Collins understands that the Board is empowered to regulate the conduct of the Nursing profession to ensure the public is adequately protected. Nurse Collins has learned from this experience and fully complied with all conditions imposed by the Stipulation and Consent order such that continued license conditions are unwarranted and unnecessary.

Below, I address each relevant Stipulation condition, by reference to the corresponding paragraph number in the Order section of the Stipulation, and then provide information as to compliance. While we assume the Board has all documentation and information submitted to Kristin Donnelly, please let me know if the Board would like any additional documentation to support compliance with the terms and conditions of the Stipulation.

¶ 2	Complete a minimum of two years of supervised nurse practice in which she worked at least eighty (80) hours every calendar month as a Registered Nurse.	Nurse Collins completed this requirement while working at Centers Healthcare in Granville, New York as demonstrated by the monthly reports submitted to her Case Manager by her supervisors.
¶ 3	Provide a copy of the Stipulation to all employers.	Nurse Collins timely provided a copy of the Stipulation to her employer during the conditional period, Centers Healthcare.
¶ 3	Timely have her supervisor submit an approved employer agreement.	Nurse Collins timely caused her supervisor at the Centers Healthcare to submit an approved employer agreement on or about March 15, 2023.
¶ 4	Submit monthly report from all employers evaluating Nurse Collins's work and attendance using Board issues forms.	A supervisor at Centers Healthcare timely submitted monthly reports to Kristin Donnelly throughout her period of employment there.
¶ 5	Practice only under the supervision of a licensed RN in good standing. This On-Site Supervision required the supervising RN to be present in the same facility as Nurse Collins.	Nurse Collins complied with this requirement at all times, as demonstrated by the monthly reports submitted to Kristin Donnelly by her supervisor.
¶ 6	Nurse Collins could not work in a supervisory role, or work for a nurse registry, traveling nurse agency, float-pool, home health care agency, temporary nursing agency, or as a private duty nurse or personal care provider requiring a nursing or nursing assistant license.	Nurse Collins complied with this requirement at all times while working throughout the conditional period as an RN at Centers Healthcare.
¶ 8	Out-of-State Practice credit requiring Board approval.	Through the Board's designee, Kristin Donnelly, Nurse Collins received permission to obtain any necessary credit towards fulfillment of the Stipulation terms and conditions while working at Centers Healthcare in Granville, New York since August 22, 2022.
¶ 10	Timely notify nurse licensing boards of any other states in which Nurse Collins was licensed.	Nurse Collins timely notified nurse licensing boards in the other states in which she is licensed: New York, Virginia, and Florida.
¶ 11	Timely renew license.	Nurse Collins timely renewed her Vermont license. Her license now remains effective until Mar 31, 2025.
¶ 12	Pay all costs of complying with Consent Order.	Nurse Collins paid all costs associated with complying with the Stipulation.

BOARD OF NURSING

March 20, 2025

Page 3

¶14	Petition the Board to remove any and all conditions following the conditional period of two years.	Having completed all requirements of the Stipulation, Nurse Collins can now petition the Board to remove any and all of the conditions on her license.
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Please let me know if the Board requires any other documentation or support for this Petition. We otherwise look forward to approval of this Petition at the next scheduled Board meeting.

Cordially yours,

Paul Frank + Collins P.C.



David M. Pocius

DMP:

Enclosures

cc: Kristin Donnelly, Case Manager (Kristin.Donnelly@vermont.gov)

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

IN RE:	)	
Robin Collins	)	Docket Nos. 2021-54
License No. 026.0139888	)	2022-256

STIPULATION AND CONSENT ORDER

STIPULATION

NOW COME the State of Vermont, by and through State Prosecuting Attorney Ultan Doyle, and Respondent Robin Collins, by and through her attorney David M. Pocius, Esq., who stipulate and agree as follows:

Board Authority

1. 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 ("OPR Rules").

Stipulated Facts

2. Robin Collins ("Respondent"), of Rutland, Vermont, is licensed as a Registered Nurse ("RN") under license number 026.0139888. The State of Vermont first issued this license on November 29, 2016, and it expires on March 31, 2023.
3. On August 4, 2021, Respondent signed a Stipulation and Consent Order (the "Order"), which subjected Respondent's license to certain conditions for a minimum of one year.
4. The Order included a condition No. 2 that: "Respondent shall be prohibited from working more than forty (40) hours per week."
5. The Order also included a condition No. 5 which provided in relevant part as follows:

Reports from Employers/Program Director. Within one (1) month of the date of this order or within one (1) month of the commencement of nursing employment, and **monthly** thereafter, Respondent shall cause every nursing employer Respondent has worked for during the month to submit to

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Montpelier, VT
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the Board an evaluation of Respondent's work performance and attendance during that month.

6. The Board approved the Stipulation and Consent Order on September 14, 2021, at which time, Respondent was employed as an RN by the Pines at Rutland Center for Nursing and Rehabilitation in Rutland, Vermont ("the Facility").
7. L.K. became Director of Nursing at the Facility in March of 2022.
8. Each month Respondent's employer report was due to be submitted to OPR, Respondent filled the employer report out herself and asked L.K. to review and sign the report.
9. L.K. signed employer reports filled out by Respondent for April, May, and June of 2022 and then Respondent faxed the reports to OPR.
10. All of the reports contained similar information.
11. Each employer report contained a question, asking whether there had been any "licensee errors in practice, judgment, or decision-making."
12. Respondent always answered, "no" to this question.
13. This answer was false for the May employer report.
14. On May 20, 2022, Respondent neglected to administer an 8:00am dose of Diazepam to a patient.
15. Respondent did not administer the Diazepam to the patient until 3:00pm after discovering her mistake while doing a medication count with the oncoming nurse.
16. On July 7, 2022, Respondent did not administer an 8:00am dose of medication to another patient until 11:00am.
17. In mid-July of 2022, L.K. discovered that the May employer report submitted to OPR did not include the medication error she had made on May 20, 2022.
18. On July 25, 2022, L.K. confronted Respondent about her responses on her employer reports.
19. Respondent denied the accusation and said she was just doing what she had been instructed to do in the past.
20. Thereafter, Respondent was issued a final warning for being "deceitful and not forthcoming regarding her conditions and upholding the conditions of the order."
21. On July 26, 2022, Respondent resigned from the Facility.

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22. On August 9, 2022, Respondent told an OPR investigator that since the second month after the Order was issued, she had been filling out the employer reports herself and having the Facility's Director of Nursing sign them.
23. Respondent also admitted that she had made a medication error on May 20, 2022 and that it should have been included in the May of 2022 employer report.
24. Respondent further admitted that at times she had worked up to 60 hours a week at the Facility since the Order was issued, as requested by the Facility in light of its staffing shortages.

Violation One: 3 V.S.A. § 129a(a)(4) Failing to comply with an order of the board or violating any term or condition of a license restricted by the board.

25. Paragraphs 2 through 24 above are incorporated herein.
26. Respondent is required to comply with orders of the Board and not violate any term or condition of a license restricted by the Board.
27. Paragraphs 2 through 24 demonstrate that Respondent failed to comply with an order of the Board and violated conditions of her license that was restricted by the Board when she worked more than 40 hours a week and when she submitted an employer report for May of 2022, which failed to include a medication error she had committed on May 20, 2022.
28. The act(s), omission(s), and/or circumstance(s) described above constitute grounds for discipline because Respondent committed unprofessional conduct in violation of 3 V.S.A. § 129a(a)(4).

Violation Two: 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.

29. Paragraphs 2 through 24 above are incorporated herein.
30. As an RN, Respondent is required to make and file accurate reports and records in the practice of the profession and must refrain from willfully making or filing false reports or records and from willfully impeding or obstructing the proper making or filing of reports or records.
31. Paragraphs 2 through 24 demonstrate that Respondent willfully made and filed false reports and records in the practice of the profession or willfully impeded or obstructed the proper making or filing of reports or records when she submitted employer reports that she had filled out herself; and when she submitted an employer report for May of 2022, which failed to include a medication error she had committed on May 20, 2022.

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32. The act(s), omission(s), and/or circumstance(s) described above constitute grounds for discipline because Respondent committed unprofessional conduct by willfully making and filing false reports in the practice of the profession and willfully impeding or obstructing the proper making or filing of reports or records in violation of 3 V.S.A. §129a(a)(7).

Violation Three: 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.

33. Paragraphs 2 through 24 above are incorporated herein.
34. As an RN, Respondent is required to practice competently by providing safe and acceptable patient care.
35. Paragraphs 2 through 24 above demonstrate that Respondent failed to provide safe and acceptable patient care when she administered patient medication approximately 7 hours late on one occasion and approximately 3 hours late on another occasion.
36. The act(s), omission(s), and/or circumstance(s) described above constitute grounds for discipline because the Respondent has committed unprofessional conduct in violation of 3 V.S.A. §129a(b)(1).

Violation Four: 3 V.S.A. §129a(b)(2) 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: (2) failure to conform to the essential standards of acceptable and prevailing practice.

37. Paragraphs 2 through 24 above are incorporated herein.
38. The essential standards of acceptable and prevailing practice require that an RN follow providers orders when administering medication and accurately document patient records.
39. Paragraphs 2 through 24 above demonstrate that Respondent failed to conform to essential standards of acceptable and prevailing practice when she administered patient medication approximately 7 hours late on one occasion and approximately 3 hours late on another occasion.
40. The act(s), omission(s), and/or circumstance(s) described above constitute grounds for discipline because the Respondent has committed unprofessional conduct in violation of 3 V.S.A. §129a(b)(2).

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Understandings

41. 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.
42. 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.
43. This Stipulation and Consent Order is intended to resolve all matters related to Docket No. 2021-54 and 2022-256. This Stipulation and Consent Order is intended to supersede and replace the Stipulation and Consent Order approved by the Board on September 14, 2021 in Docket No. 2021-54.
44. Respondent specifically waives any claims that any disclosures made to the Board during the review of this agreement have prejudiced Respondent's rights to a fair and impartial hearing in future hearings if this agreement is not accepted by the Board.
45. Respondent has read and reviewed this entire document and agrees that it contains the entire agreement between the parties.
46. Respondent is not under the influence of any drugs or alcohol at the time Respondent signs this Stipulation and Consent Order.
47. 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.
48. 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.
49. 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. Respondent's license is hereby **REPRIMANDED**. This reprimand will be attached to the license indefinitely.
- B. An **ADMINISTRATIVE PENALTY OF SEVEN HUNDRED FIFTY DOLLARS (\$750.00)** is assessed against Respondent. Respondent shall remit payment within six (6) months of the date of entry of this Order. Payment of the penalty may be made on a payment plan if needed.

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C. The Board of Nursing hereby CONDITIONS Respondent's license FOR A MINIMUM OF TWO (2) YEARS. The conditions will be as follows:

1. Re-issuance of License. Upon the commencement of these conditions, Respondent shall be issued a license labeled "conditioned."
2. Length of Time of Conditions Imposed. The conditions shall remain in place until Respondent has completed all conditions ordered (hereinafter referred to as the "Conditions"). Respondent shall be subject to the Conditions until Respondent completes a **minimum of two (2) years** of supervised nursing practice in which Respondent works at least eighty (80) hours every calendar month as a Registered Nurse. Part time hours of fewer than eighty (80) hours every calendar month shall be credited on a prorated basis. Respondent shall be prohibited from working more than forty (40) hours per week.
3. Notification to Employers/Nursing School. Respondent shall provide a copy of this Stipulation and Consent Order to all employers in any current or future setting in which Respondent practices as a registered nurse and inform them of Respondent's conditional license status. Within ten (10) days of the date of entry of this Consent Order or of any subsequent nursing employment, Respondent shall cause Respondent's immediate supervisor to submit to the Board an employer agreement form approved by the Board, acknowledging receipt of the Stipulation and Consent Order and the ability to comply with the conditions in the Consent Order.

In the event Respondent is attending a nursing program which has a clinical portion that involves actual patient care, Respondent shall provide a copy of the Stipulation and Consent Order to the Program Director. Respondent shall cause the Program Director to submit to the Board a nursing program agreement form approved by the Board, acknowledging receipt of the Stipulation and Consent Order and the ability of the program to comply with the conditions in the Consent Order during clinical experience.

4. Reports from Employers/Program Director. Within one (1) month of the date of this order or within one (1) month of the commencement of nursing employment, and **monthly** thereafter, Respondent shall cause every nursing employer Respondent has worked for during the month to submit to the Board an evaluation of Respondent's work performance and attendance during that month. In the event Respondent is attending a nursing program, Respondent shall cause the Program Director to submit to the Board, on a monthly basis, a written evaluation of Respondent's performance and attendance. These reports shall be submitted in writing on forms issued by the Board. All employer reports shall indicate satisfactory performance (i.e., consistently meeting all standards of nursing practice) and attendance.
5. Practice Under Supervision. Respondent shall practice as a licensed registered nurse only in a setting where Respondent is supervised for the entire shift by a licensed registered nurse in good standing with the Board or a foreign jurisdiction's equivalent licensing authority. The level of supervision required is On-Site

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Supervision. On-Site Supervision means the supervising nurse is present in the same facility as Respondent.

6. Types of Employment Prohibited. Respondent shall not work in a supervisory role. Respondent shall not work for a nurse registry, traveling nurse agency, float-pool, home health care agency, temporary nursing employment agency, or as a private duty nurse or personal care provider requiring a nursing or nursing assistant license during the effective period of this Consent Order.
7. Interview with the Board or its Designee. Respondent shall appear in person for interviews with the Board or its designee upon request.
8. Out-of-State Practice. Before any out-of-state practice can be credited toward fulfillment of these terms and conditions, Respondent shall first obtain approval from the Board or its designee. The Board will approve out-of-state nursing practice so long as Respondent can still comply with the provisions of this Consent Order. If Respondent receives discipline on a nursing license held in another state during the conditioned period, Respondent must inform the Board of such, in writing, within ten (10) days of receiving such discipline.
9. Notification of Place of Employment/Personal Address/Telephone Number. Within ten (10) days of the date of entry of this Consent Order, Respondent shall notify the Board, in writing, of Respondent's current place of employment, personal address, and telephone number. Respondent shall further notify the Board, in writing, within forty-eight (48) hours of any change in employment (including resignation or termination), personal address, or telephone number.
10. Notification to Other States. In the event that Respondent is licensed in nursing in any other state(s), Respondent must inform the nursing licensing board of the state(s) in which Respondent is licensed of the conditional status of Respondent's Vermont nursing license within thirty (30) days of the date of entry of this Order.
11. License Renewal. This Order does not automatically extend the license and Respondent must comply with the requirements for license renewal.
12. Costs. Respondent shall bear all costs of complying with this Consent Order.
13. Violation of this Order. If Respondent violates this Order, the Board, after giving Respondent notice and an opportunity to be heard, may rescind or modify this Order and impose additional appropriate disciplinary actions. If a complaint of unprofessional conduct is made against Respondent during the term of this Order, this Order shall be automatically extended until the unprofessional conduct matter is concluded.
14. Completion of Conditional License Period. Respondent shall submit a petition to the Docket Clerk to remove any and all conditions on Respondent's license. The State will assent to, or oppose, Respondent's petition. The Board will conduct a hearing, if necessary. Respondent bears the burden and must present proof that

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Respondent has fully complied with the terms of this Order and these conditions are no longer necessary to protect the public.

- C. Notwithstanding any provision above, the Respondent must continue to meet all Board requirements for maintaining a license, license renewal and license reinstatement.
- D. 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).
- E. 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.
- F. This Stipulation and Consent Order shall be applicable as a matter of law to all other licenses issued by the Board, as provided in 3 V.S.A. § 129(l).

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05620-3402

AGREED TO:

**STATE OF VERMONT
SECRETARY OF STATE**

Dated: 2/2/23

By: Ultan Doyle
Ultan Doyle
Prosecuting Attorney

**ROBIN COLLINS
RESPONDENT**

Dated: 2/2/2023

By: Robin L Collins
Print Name Here: Robin L Collins

APPROVED AS TO FORM:

ATTORNEY FOR RESPONDENT

Dated: 2/2/2023

By: David M. Pocius, Esq.
David M. Pocius, Esq.
Paul Frank + Collins P.C.

APPROVED AND SO ORDERED:

VERMONT BOARD OF NURSING

Dated: 2/15/23

DocuSigned by:
By: Jennifer Laurent
Board Chair

Date of Entry: 2/16/23

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

IN RE:)
Robin Collins) **Docket No. 2022-256**
License No. 026.0139888)

SPECIFICATION OF CHARGES

NOW COMES the State of Vermont (the "State") and makes the following charges against Registered Nurse, Robin Collins:

Board Authority

1. 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 ("OPR Rules").

Statement of Facts

2. Robin Collins ("Respondent"), of Rutland, Vermont, is licensed as a Registered Nurse ("RN") under license number 026.0139888. The State of Vermont first issued this license on November 29, 2016, and it expires on March 31, 2023.
3. On August 5, 2021, Respondent signed a Stipulation and Consent Order (the "Order"), which subjected Respondent's license to certain conditions for a minimum of one year.
4. The Order included a condition No. 2 that: "Respondent shall be prohibited from working more than forty (40) hours per week."
5. The Order also included a condition No. 5 which provided in relevant part as follows:

Reports from Employers/Program Director. Within one (1) month of the date of this order or within one (1) month of the commencement of nursing employment, and **monthly** thereafter, Respondent shall cause every nursing employer Respondent has worked for during the month to submit to the Board an evaluation of Respondent's work performance and attendance during that month.

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6. The Board approved the Stipulation and Consent Order on September 14, 2021, at which time, Respondent was employed as an RN by the Pines at Rutland Center for Nursing and Rehabilitation in Rutland, Vermont ("the Facility").
7. L.K. became Director of Nursing at the Facility in March of 2022.
8. Each month Respondent's employer report was due to be submitted to OPR, Respondent filled the employer report out herself and approached L.K. when she was busy and had her sign the report.
9. L.K. signed employer reports filled out by Respondent for April, May, and June of 2022 and then Respondent faxed the reports to OPR.
10. All of the reports contained similar information.
11. Each employer report contained a question, asking whether there had been any "licensee errors in practice, judgment, or decision-making."
12. Respondent always answered, "no" to this question.
13. This answer was false for the May employer report.
14. On May 20, 2022, Respondent neglected to administer an 8:00am dose of Diazepam to a patient.
15. Respondent did not administer the Diazepam to the patient until 3:00pm after discovering her mistake while doing a medication count with the oncoming nurse.
16. On July 7, 2022, Respondent did not administer an 8:00am dose of medication to another patient until 11:00am.
17. In mid-July of 2022, L.K. discovered that the May employer report that Respondent had submitted to OPR did not include the medication error she had made on May 20, 2022.
18. On July 25, 2022, L.K. confronted Respondent about potentially falsifying her employer reports.
19. Respondent denied the accusation and said she was just doing what she had been instructed to do in the past.
20. Respondent was issued a final warning for being "deceitful and not forthcoming regarding her conditions and upholding the conditions of the order."
21. On July 26, 2022, Respondent did not show up for work and resigned from the Facility by email later that day.

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22. On August 9, 2022, Respondent told an OPR investigator that since the second month after the Order was issued, she had been filling out the employer reports herself and having the Facility's Director of Nursing sign them.
23. Respondent also admitted that she had made a medication error on May 20, 2022 and that it should have been included in the May of 2022 employer report.
24. Respondent further admitted that at times she had worked up to 60 hours a week at the Facility since the Order was issued.

Violation One: 3 V.S.A. § 129a(a)(4) Failing to comply with an order of the board or violating any term or condition of a license restricted by the board.

25. The State re-alleges and incorporates Paragraphs 2 through 24 above.
26. Respondent is required to comply with orders of the Board and not violate any term or condition of a license restricted by the Board.
27. Paragraphs 2 through 24 demonstrate that Respondent failed to comply with an order of the Board and violated conditions of her license that was restricted by the Board when she worked more than 40 hours a week; when she submitted employer reports that she had filled out herself; and when she submitted an employer report for May of 2022, which failed to include a medication error she had committed on May 20, 2022.
28. The act(s), omission(s), and/or circumstance(s) described above constitute grounds for discipline because Respondent committed unprofessional conduct in violation of 3 V.S.A. §129a(a)(4).

Violation Two: 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.

29. The State re-alleges and incorporates Paragraphs 2 through 24 above.
30. As an RN, Respondent is required to make and file accurate reports and records in the practice of the profession and must refrain from willfully making or filing false reports or records and from willfully impeding or obstructing the proper making or filing of reports or records.
31. Paragraphs 2 through 24 demonstrate that Respondent willfully made and filed false reports and records in the practice of the profession and willfully impeded or obstructed the proper making or filing of reports or records when she submitted employer reports that she had filled out herself; and when she submitted an employer report for May of 2022, which failed to include a medication error she had committed on May 20, 2022.

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32. The act(s), omission(s), and/or circumstance(s) described above constitute grounds for discipline because Respondent committed unprofessional conduct by willfully making and filing false reports in the practice of the profession and willfully impeding or obstructing the proper making or filing of reports or records 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.

33. The State re-alleges and incorporates Paragraphs 2 through 24 above.
34. As an RN, Respondent is required to practice competently by providing safe and acceptable patient care.
35. Paragraphs 2 through 24 above demonstrate that Respondent failed to provide safe and acceptable patient care when she administered patient medication approximately 7 hours late on one occasion and approximately 3 hours late on another occasion.
36. The act(s), omission(s), and/or circumstance(s) described above constitute grounds for discipline because the Respondent has committed unprofessional conduct in violation of 3 V.S.A. §129a(b)(1).

Violation Three: 3 V.S.A. §129a(b)(2) 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: (2) failure to conform to the essential standards of acceptable and prevailing practice.

37. The State re-alleges and incorporates Paragraphs 2 through 24 above.
38. The essential standards of acceptable and prevailing practice require that an RN follow providers orders when administering medication and accurately document patient records.
39. Paragraphs 2 through 24 above demonstrate that Respondent failed to conform to essential standards of acceptable and prevailing practice when she administered patient medication approximately 7 hours late on one occasion and approximately 3 hours late on another occasion.
40. The act(s), omission(s), and/or circumstance(s) described above constitute grounds for discipline because the Respondent has committed unprofessional conduct in violation of 3 V.S.A. §129a(b)(2).

STATE OF VERMONT



Prosecuting Attorney
Office of
Professional Regulation
89 Main Street
3rd Floor
Montpelier, VT
05620-3402

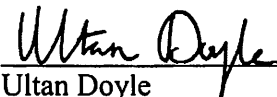
Relief Requested

WHEREFORE, the State of Vermont respectfully requests that the Board revoke, suspend, condition, or otherwise discipline the RN license of Robin Collins.

DATED at Montpelier, Vermont this 18th day of November, 2022.

STATE OF VERMONT
SECRETARY OF STATE

By:



Ultan Doyle
State Prosecuting Attorney
Office of Professional Regulation
802.828.1217
ultan.doyle@vermont.gov

STATE OF VERMONT



Prosecuting Attorney
Office of
Professional Regulation
89 Main Street
3rd Floor
Montpelier, VT
05620-3402