

State of Vermont
Vermont Board of Nursing

In re: Holly Switser
License Number 026.0130884
Docket Number: D-2023-39 & D-2023-40

Order to Remove Conditions

On September 8, 2025, the Vermont Board of Nursing considered Holly Switser's request for Removal of Conditions imposed pursuant to a Stipulation & Consent Order under Docket Number 2023-39 & 2023-40. Ms. Switser has successfully met the conditions. After reviewing the follow-up file, the State does not object to removal of all conditions.

Order:

The Board hereby removes all conditions from Holly Switser's Registered Nurse license.

Vermont Board of Nursing

Signed by:
Marsha H Arend

E5ED693720C64FA...

Date: September 8, 2025

— Marsha Arend, Nursing Board

Date of Entry: 9 / 9 / 2025



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

September 4, 2025

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

Case: Holly Switser
Credential: License # 026.0130884
Docket No: 2023-39 & 40

Dear Attorney Doyle:

Please find the enclosed Request to **Remove Conditions** 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*

Cc: Kristin Donnelly, Case Manager
Holly Switser, Respondent

Holly Switser

317 Glenwood Estates
West Burke, VT 05871
802-424-6616
hswitser@icloud.com

September 4th, 2025

Vermont Board of Nursing
Office of Professional Regulation
89 Main Street, 3rd Floor
Montpelier, VT 05620-3402

Re: Petition to Remove Conditions on RN License #026.0130884

Dear Members of the Vermont Board of Nursing,

I am writing to respectfully request the removal of the conditions currently placed on my Registered Nurse license.

Following the Board's decision related to the investigation dated April 20, 2022, I have taken full responsibility and complied with all requirements. Specifically:

- I successfully completed and submitted the required ethics course within the 90-day deadline.
- I paid the \$1,500 penalty in full within the 6-month deadline.
- I have remained in full compliance with all Board conditions and have not incurred any further issues since the resolution of this matter.

Over the past 3 years, I have worked diligently to demonstrate my accountability, professionalism, and commitment to safe nursing practice. This experience has been a meaningful opportunity for growth, and I have strengthened my professional judgment, ethical awareness, and dedication to the high standards expected of Vermont nurses.

I respectfully ask the Board to consider my record of compliance and good standing in support of my petition to have the remaining conditions on my license lifted. I remain committed to practicing nursing with integrity, responsibility, and the highest regard for patient safety.

Thank you for your time and consideration of this request.

Sincerely,
Holly Switser, RN
026.0130884

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

IN RE:)
HOLLY SWITSER) **Docket No. 2023-39**
License No. 026.0130884) **Docket No. 2023-40**

STIPULATION AND CONSENT ORDER

STIPULATION

NOW COME the State of Vermont, by and through State Prosecuting Attorney Ultan Doyle, and Respondent Holly Switser, by and through her attorney, Jessica L. Burke, 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. Holly Switser ("Respondent") of West Burke, Vermont is licensed by the State of Vermont as a Registered Nurse ("RN") under license number 026.0130884. This license was originally issued on July 6, 2017, and expires on March 31, 2023.
3. During the relevant time period, Respondent worked as Director of Nursing for Saint Johnsbury Health and Rehabilitation (the "Facility") in Saint Johnsbury, Vermont.
4. On April 20, 2022, the Division of Licensing and Protection ("DLP") conducted an unannounced staff vaccination requirement review at the Facility.
5. During that review, the Facility's Administrator produced to DLP investigators a photocopy of Respondent's COVID-19 vaccination record card.
6. The card listed Respondent as having received dose one of Pfizer's two dose COVID-19 vaccination on December 1, 2021 and her second dose on December 22, 2021.

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7. On April 27, 2022, Respondent told DLP investigators that she gave a copy of her COVID-19 vaccination record card to the Facility's administrator on the day she received her second COVID-19 vaccination, which was she claimed was December 22, 2021.
8. DLP investigators showed her documentation from the Vermont Department of Health's Immunization Registry which listed Respondent as having received only one dose of the two dose Pfizer vaccine.
9. In response, Respondent told the DLP investigators that she knew she had not received her second COVID-19 vaccination dose, when she told them she had.
10. Respondent subsequently admitted to an OPR investigator that she had filled in the second dose of her COVID-19 vaccination card herself, without having received that vaccination, and that this was the card that was presented to DLP investigators as proof of her COVID-19 vaccination status.

Violation One: 3 V.S.A. §1582(a)(3) Engaging in conduct of a character likely to deceive, defraud, or harm the public.

11. Paragraphs 2 through 10 above are incorporated herein.
12. As an RN, Respondent is required to refrain from engaging in conduct of a character likely to deceive, defraud, or harm the public.
13. Paragraphs 2 through 10 demonstrate that Respondent engaged in conduct of a character likely to deceive, defraud, or harm the public by submitting to the Facility's administrator a COVID-19 vaccination card that she had falsified.
14. The act(s), omission(s), and/or circumstance(s) described above constitute grounds for discipline because Respondent committed unprofessional conduct of a character likely to deceive, defraud, or harm the public in violation of 26 V.S.A. §1582(a)(3).

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.

15. Paragraphs 2 through 10 above are incorporated herein.
16. 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.

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17. Paragraphs 2 through 10 demonstrate that Respondent willfully made and filed false reports and records in the practice of the profession by submitting to the Facility's administrator a COVID-19 vaccination card that she had falsified.
18. 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).

Understandings

19. Respondent admits that the facts above are true and that the conditions below are necessary to protect the public.
20. Respondent understands that the Nursing Board must review and accept the terms of the Stipulation and Consent Order. If the Board rejects any portion, the entire Stipulation and Consent Order shall be null and void.
21. Respondent specifically waives any claims that any disclosures made to the full Board during its review of this agreement have prejudiced her rights to a fair and impartial hearing in future hearings if this agreement is not accepted by the Board.
22. Respondent has read and reviewed this entire document and agrees that it contains the entire agreement between the parties.
23. Respondent is not under the influence of any drugs or alcohol at the time she signs this Stipulation and Consent Order.
24. 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.
25. Respondent voluntarily waives the right to a contested hearing before the Board of Nursing and waives any right to appeal from this Stipulation and Consent Order.
26. Respondent agrees that the Order set forth below may be entered by the Board, will be a binding Order upon Respondent, and will be made public.
27. Respondent understands that Respondent is responsible for all compliance costs associated with this Stipulation and Consent Order and any violation of this Order may result in additional disciplinary action.

ORDER

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

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- A. Respondent's license is hereby **REPRIMANDED**. This reprimand will be attached to the license indefinitely.
- B. An **ADMINISTRATIVE PENALTY OF ONE THOUSAND FIVE HUNDRED DOLLARS** (\$1,500.00) 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.
- C. The Board of Nursing hereby **CONDITIONS** Respondent's license commencing with the date of entry of this Stipulation and Consent Order:
1. Re-issuance of License. Upon the commencement of these conditions, Respondent shall be issued a license labeled "conditioned."
 2. License Renewal. This Order does not automatically extend the license and Respondent must comply with the requirements for license renewal.
 3. Required Coursework. Respondent shall, at her own expense and within ninety (90) days of the date of entry of this Stipulation and Consent Order, satisfactorily complete the following pre-approved courses:
 - i. Righting a Wrong (offered by NCSBN).
- *Respondent must provide satisfactorily completed workbooks and certificates of completion to the Case Manager.
- **Coursework may not be counted toward any continuing education requirement of licensure.
- D. Upon compliance with and completion of all required conditions, Respondent must petition to remove any or all conditions from the license and demonstrate full compliance with the Order.
- E. Notwithstanding any provision above, Respondent must continue to meet all requirements to maintain licensure, for license renewal, and for license reinstatement.
- F. 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).
- G. This Stipulation and Consent Order will remain part of Respondent's licensing file and may be considered relative to any future disciplinary matter.

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AGREED TO:

Dated: 7/5/23

STATE OF VERMONT
SECRETARY OF STATE

By: Ultan Doyle
Ultan Doyle, Esq.
State Prosecuting Attorney

HOLLY SWITSER
RESPONDENT

Dated: 7/4/23

By: Holly Switzer
Holly Switzer

APPROVED AS TO FORM:

JESSICA L. BURKE
ATTORNEY FOR RESPONDENT

Dated: 7/4/23

By: /s/ Jessica Burke
Jessica L. Burke, Esq.

APPROVED AND SO ORDERED:

VERMONT BOARD OF NURSING

Dated: 8/14/23

DocuSigned by:
By: Jennifer Laurent
681741915719477
Chairperson

Date of Entry: 8/14/23

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

IN RE:)
HOLLY SWITSER) **Docket No. 2023-39**
License No. 026.0130884) **Docket No. 2023-40**

SPECIFICATION OF CHARGES

NOW COMES the State of Vermont, by and through State Prosecuting Attorney, Ultan Doyle, and makes the following charges against the Respondent, Holly Switser:

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.

Statement of Facts

2. Holly Switser ("Respondent") of West Burke, Vermont is licensed by the State of Vermont as a Registered Nurse ("RN") under license number 026.0130884. This license was originally issued on July 6, 2017, and expires on March 31, 2023.
3. During the relevant time period, Respondent worked as Director of Nursing for Saint Johnsbury Health and Rehabilitation (the "Facility") in Saint Johnsbury, Vermont.
4. On April 20, 2022, the Division of Licensing and Protection ("DLP") conducted an unannounced staff vaccination requirement review at the Facility.
5. During that review, the Facility's Administrator produced to DLP investigators a photocopy of Respondent's COVID-19 vaccination record card.
6. The card listed Respondent as having received dose one of Pfizer's two dose COVID-19 vaccination on December 1, 2021 and her second dose on December 22, 2021.
7. On April 27, 2022, Respondent told DLP investigators that she gave a copy of her COVID-19 vaccination record card to the Facility's administrator on the day she

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received her second COVID-19 vaccination, which was she claimed was December 22, 2021.

8. DLP investigators showed her documentation from the Vermont Department of Health's Immunization Registry which listed Respondent as having received only one dose of the two dose Pfizer vaccine.
9. In response, Respondent told the DLP investigators that she knew she had not received her second COVID-19 vaccination dose, when she told them she had.
10. Respondent subsequently admitted to an OPR investigator that she had filled in the second dose of her COVID-19 vaccination card herself, without having received that vaccination, and that this was the card that was presented to DLP investigators as proof of her COVID-19 vaccination status.

Violation One: 3 V.S.A. §1582(a)(3) Engaging in conduct of a character likely to deceive, defraud, or harm the public.

11. The State re-alleges and incorporates Paragraphs 2 through 10 above.
12. As an RN, Respondent is required to refrain from engaging in conduct of a character likely to deceive, defraud, or harm the public.
13. Paragraphs 2 through 10 demonstrate that Respondent engaged in conduct of a character likely to deceive, defraud, or harm the public by submitting to the Facility's administrator a COVID-19 vaccination card that she had falsified.
14. The act(s), omission(s), and/or circumstance(s) described above constitute grounds for discipline because Respondent committed unprofessional conduct of a character likely to deceive, defraud, or harm the public in violation of 26 V.S.A. §1582(a)(3).

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.

15. The State re-alleges and incorporates Paragraphs 2 through 10 above.
16. 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.
17. Paragraphs 2 through 10 demonstrate that Respondent willfully made and filed false reports and records in the practice of the profession by submitting to the Facility's administrator a COVID-19 vaccination card that she had falsified.

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18. 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(a)(15) Failing to exercise independent professional judgment in the performance of licensed activities when that judgment is necessary to avoid action repugnant to the obligations of the profession.

19. The State re-alleges and incorporates Paragraphs 2 through 10 above.
20. As an RN, Respondent is required to exercise her own independent professional judgment in the performance of licensed activities when that judgment is necessary to avoid action repugnant to the obligations of the profession.
21. Paragraphs 2 through 10 demonstrate that Respondent failed to exercise independent professional judgment by submitting to the Agency COVID-19 vaccination cards that she had falsified.
22. 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)(15).

Relief Requested

WHEREFORE, the RN license of Respondent should be revoked, suspended, reprimanded, conditioned, or otherwise disciplined.

DATED at Montpelier, Vermont this 3rd day of March, 2023.

STATE OF VERMONT
SECRETARY OF STATE

By:


Ultan Doyle
State Prosecuting Attorney
89 Main Street, 3rd Floor
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(802)828-1217
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