

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

IN RE:	)	
Renese Lang	)	Docket Nos. 2024-120
License Nos. 075.0144321PROV	)	2024-121
	)	2024-122

STIPULATED VOLUNTARY SURRENDER OF LICENSE AND ORDER

STIPULATION

NOW COMES the State of Vermont, by and through Prosecuting Attorney Ultan Doyle, and Respondent Renese Lang, who hereby 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.

Alleged Facts

2. Renese Lang ("Respondent") of Napoleonville, Louisiana was provisionally licensed by the State of Vermont as a Licensed Nursing Assistant ("LNA") under license number 075.0144321PROV. This license was originally issued on February 29, 2024 and expired on May 28, 2024.
3. On or about March 5, 2024, Respondent was assigned by a nursing agency to work as an LNA at a care facility (the "Facility") in Randolph, Vermont.
4. Respondent was working as a LNA at the Facility on or about April 7, 2024.
5. S.D., an LPN who was also working at the Facility that day, reported that she saw a resident pick up mashed potatoes from the floor and then heard Respondent say to the resident, "That's disgusting. You need to throw that away."
6. Respondent then took the resident into a bathroom, which provoked the resident to yell at Respondent and splash toilet water onto her.

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7. S.D. said that she then saw Respondent and the resident with their arms wrapped around each other's necks and pushing against each other.
8. Respondent said to the resident, "You need to wash your hands. That's disgusting."
9. At the time, Respondent was trying to push the resident into the bathroom and the resident was trying to push her way out.
10. Respondent then said, "You better come get here before I beat her ass."
11. S.D. intervened and took the resident back to her room.
12. L.P.N. K.D., who was also on duty at the time, reported that she heard shouting from the bathroom across from the nurse's station and saw Respondent coming out of the bathroom with her back to K.D.
13. K.D. did not see what was happening but heard Respondent yelling.
14. K.D. said to Respondent, "You definitely need to step away."
15. Respondent replied, "I need to get away before the police are called."
16. K.D. told Respondent that she needed "to go take a breather."
17. Respondent then left to go outside and smoke a cigarette.
18. Respondent's employment at the Facility was terminated immediately as a result of this incident.

Violation One: 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.

19. The State re-alleges and incorporates Paragraphs 2 through 18 above.
20. Vermont law requires LNAs to practice competently by providing safe and acceptable patient care.
21. Paragraphs 2 through 18 above demonstrate that Respondent failed to provide safe and acceptable patient care when she yelled at a resident and tried to push her into the bathroom.

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22. 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 Two: 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.

23. The State re-alleges and incorporates Paragraphs 2 through 18 above.
24. The essential standards of acceptable and prevailing practice require that an LNA treat residents with respect and not push or yell at them.
25. Paragraphs 2 through 18 above demonstrate that Respondent failed to conform to essential standards of acceptable and prevailing practice when she yelled at a resident and tried to push her into the bathroom.
26. 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).

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.

27. The State re-alleges and incorporates Paragraphs 2 through 18 above.
28. As an LNA, 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.
29. Paragraphs 2 through 18 demonstrate that Respondent failed to exercise independent professional judgment in the performance of licensed activities when she yelled at a resident and tried to push her into the bathroom.
30. 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).

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Understandings

31. This Stipulation is neither an admission of liability by Respondent nor a concession by the State of Vermont that its charges are not well-founded. To avoid delay, uncertainty, inconvenience, and the expense of protracted litigation, the Parties enter this full and final Stipulation pursuant to these Understandings and the Order below. Respondent does not dispute that the State may be able to prove these charges by a preponderance of the evidence if this matter proceeds to a merits hearing. Respondent desires to voluntarily surrender her LNA license.
32. Respondent understands that the Board must review and accept the terms of the Stipulated Voluntary Surrender of License. If the Board rejects any portion, the entire Stipulated Voluntary Surrender of License shall be null and void.
33. Respondent specifically waives any claim that any disclosures made to the Board during review of this agreement have prejudiced Respondent's right to a fair and impartial hearing if this agreement is not accepted and proceeds to a hearing on the merits before the same Board.
34. Respondent has read and reviewed this entire document and agrees it contains the entire agreement between the parties.
35. Respondent is of sound mind and is not under the influence of drugs or alcohol at the time of signing this Stipulated Voluntary Surrender of License.
36. Respondent voluntarily enters into this agreement after the opportunity to consult with legal counsel and is not being coerced by anyone into signing this Stipulated Voluntary Surrender of License.
37. Respondent voluntarily waives the right to a contested hearing before the Board and waives any right to appeal from this Stipulated Voluntary Surrender of License.
38. Respondent agrees that the Board may enter the Acceptance of Voluntary Surrender and Order set forth below.

ACCEPTANCE OF VOLUNTARY SURRENDER AND ORDER

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

- A. The Board of Nursing hereby **ACCEPTS** Respondent's **VOLUNTARY SURRENDER** of her Vermont LNA license.
- B. Any future application for licensure shall be subject to the licensing requirements of that particular profession. If a future application for licensure in the State of Vermont is approved, that license shall be **CONDITIONED** pursuant to whatever terms are found to be reasonable at the time of Respondent's application for licensure, taking into account the facts above.

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- C. This Stipulated Voluntary Surrender of License and 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 Stipulated Voluntary Surrender of License and Order will remain part of Respondent's licensing file and may be used for purposes of determining sanctions in any future disciplinary matter.

AGREED TO:

STATE OF VERMONT
SECRETARY OF STATE

Dated: 12/12/2024

Signed by:
Ultan Doyle
2B74B44B65E04E9...
By: Ultan Doyle
Prosecuting Attorney

RESPONDENT

Dated: 12/12/2024

DocuSigned by:
Renese Lang
A1CA43218F08490...
By: Renese Lang

APPROVED AND SO ORDERED:

VERMONT BOARD OF NURSING

Dated: 1/13/25

Signed by:
William James Floyd
3B82E783001248E...
By: William James Floyd
Chairperson

Date of Entry: 1/14/25

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SPECIFICATION OF CHARGES

NOW COMES the State of Vermont and makes the following Charges against the Respondent, Renese Lang:

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.

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Relief Requested

WHEREFORE, the LNA license of Renese Lang should be revoked, suspended, reprimanded, conditioned, or otherwise disciplined.

DATED at Montpelier, Vermont this 30th day of July, 2024.

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SECRETARY OF STATE

By: Ultan Doyle
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