

**State of Vermont
Board of Nursing**

In re: Jennie Stoddard
License Number: 026.0024873
Docket Number: 2025-106

Order to Remove Conditions

On October 13, 2025, the Board of Nursing considered Jennie Stoddard's request for Removal of Conditions imposed on her license pursuant to a Stipulation and Consent Order effective August 13, 2025, under Docket Number 2025-106. The conditions included successful completion of continuing education. Ms. Stoddard has met all the conditions. After review of the compliance file, the State does not object to removal of all conditions.

Order:

The Board of Nursing hereby removes all conditions from Jennie Stoddard's license to practice as a Registered Nurse.

Vermont Office of Professional Regulation

Signed by: William James Floyd III Date: 10/13/2025
3B82E78300124BE...
Board of Nursing Chair

Date of Entry: 10 / 14 / 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

September 11, 2025

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

Case: Jennie Stoddard
Credential: License # 026.0024873
Docket No: 2025-106

Dear Attorney Newman:

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*

Cc: Kristin Donnelly, Case Manager
Hannah Waite, Esq., Respondent's Attorney

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

IN RE:	)	
JENNIE STODDARD	)	DOCKET NO. 2025-106
License No. 026.0024873	)	

UNOPPOSED PETITION TO REMOVE CONDITIONS

Respondent, Jennie Stoddard, hereby petitions the Vermont Board of Nursing (the “Board”) to remove the conditions placed upon her license pursuant to the Stipulation and Consent Order (the “Stipulation”) previously entered in this matter.

The Stipulation provides that Respondent may petition to have the conditional status of her license removed when she has completed all conditions set forth in the Stipulation. Paragraphs B.3 and B.9. The conditions imposed were for Respondent to complete required coursework, to be four hours of pre-approved courses. Respondent has completed that coursework, as confirmed by her case manager. *See Exhibit A* (email from case manager confirming coursework was completed).

Undersigned counsel conferred with Zoe Newman, the prosecutor, who has represented that she does not oppose this Petition.

Because Respondent has completed all required conditions, she respectfully requests that her license be restored to full, unconditioned status.

DATED at Burlington, Vermont this 10th day of September, 2025.

JENNIE STODDARD

By: /s/ Hannah C. Waite
Hannah C. Waite, Esq.
SHEEHEY FURLONG & BEHM P.C.
30 Main Street, 6th Floor
PO Box 66
Burlington, VT 05402
(802) 865-6315
hwaite@sheeheyvt.com

From: **Donnelly, Kristin** <Kristin.Donnelly@vermont.gov>
Date: Tue, Sep 2, 2025 at 8:27 AM
Subject: Re: case # 2025-106
To: Jennie Stoddard <stoddardjennie429@gmail.com>

Hi Jennie,

Thank you for sending these through. I've updated your file and this completes the education requirements of your Order. Please refer to your Order for how to remove conditions from your license.

Thank you,

Kristin Donnelly
Case Manager
Vermont Secretary of State
Office of Professional Regulation
89 Main Street 3rd Floor Montpelier, VT 05620-3402
☎ (802) 828-1635 Fax: (802) 828-2389
<https://sos.vermont.gov/opr>

From: Jennie Stoddard <stoddardjennie429@gmail.com>
Sent: Tuesday, September 2, 2025 7:29 AM
To: Donnelly, Kristin <Kristin.Donnelly@vermont.gov>
Subject: Fwd: case # 2025-106

You don't often get email from stoddardjennie429@gmail.com. [Learn why this is important](#)
EXTERNAL SENDER: Do not open attachments or click on links unless you recognize and trust the sender.

----- Forwarded message -----

From: Jennie Stoddard <stoddardjennie429@gmail.com>

Date: Mon, Sep 1, 2025 at 8:43 PM

Subject: case # 2025-106

To: <kristin.donnelly@vermony.goc>

Cc: Hannah Waite <HWaite@sheeheyvt.com>

Kristin.

Attached are the completion of the approved courses. The Wellnurse course did not provide me with a certificate. I am sending you all that I have. If you have any questions, please let me know.

Respectfully

Jennie Stoddard

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

IN RE: JENNIE STODDARD License No. 026.0024873	))))	Docket No. 2025-106
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STIPULATION AND CONSENT ORDER

STIPULATION

NOW COME the State of Vermont, by and through Prosecuting Attorney Zoe Newman and Respondent Jennie Stoddard, by and through her attorney Hannah Waite, Esq., who hereby stipulate and agree as follows:

Board Authority

1. The Board has the authority to issue warnings or reprimands; suspend, revoke, limit, or condition current licenses; or prevent the renewal of lapsed licenses if, after a 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. Jennie Stoddard (Respondent) of Charlestown, New Hampshire is licensed by the State of Vermont as a Registered Nurse (RN) under license number 026.0024873. This license was first issued on July 9, 1999 and expires on March 31, 2027.
3. At all times relevant, Respondent was employed as a RN by a hospital (Hospital) in Windsor County, Vermont.
4. On November 12, 2024, Respondent administered medication to a patient without first completing the five rights of medication administration, which required Respondent to make sure she had the right patient, the right drug, the right time, the right dose, and the right route.
5. Respondent meant to administer a saline flush to the patient, however, instead, intravenously administered Daratumumab/Hyalu-U-Fihj 1800/MG3000, a chemotherapy agent, which was ordered for a different patient.

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6. The Daratumumab was meant to be administered as a subcutaneous infusion and was not meant to be administered intravenously.
7. When administered intravenously, Daratumumab must be diluted and, at the dosage listed, given to the patient over a minimum timespan of three hours.
8. Respondent became aware she had administered the wrong medication only when the patient began complaining about a burning sensation, which prompted her to look at the used syringe and see that the syringe was marked as a chemotherapy agent.
9. Additionally, the used syringe was labeled with the specific drug name, the name and date of birth of a different patient along with the name of the ordering physician.
10. As a result of Respondent's medication administration error, the patient was transferred to the Emergency Department and admitted overnight.
11. In an interview with OPR Investigator M.D., Respondent explained that Hospital procedures had changed recently, and stated: "yes, I grabbed the drug . . . no, I didn't identify it because I thought I was doing normal saline and I administered it, but I feel it was a really bad systems error...also[.]"

Violation One: 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: failure to conform to the essential standards of acceptable and prevailing practice.

12. Paragraphs 2 through 11 above are incorporated herein.
13. The essential standards of acceptable and prevailing practice require RNs to perform the five rights – the right patient, the right drug, the right time, the right dose, and the right route – prior to administering medication.
14. Paragraphs 2 through 11 demonstrate that Respondent failed to conform to the essential standards of acceptable and prevailing practice when Respondent failed to perform the five rights prior to administering medication, which resulted in Respondent administering the wrong medication to a patient.
15. 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(b)(2).

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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: performance of unsafe or unacceptable patient or client care.

16. Paragraphs 2 through 11 above are incorporated herein.
17. As a licensed RN, Respondent was prohibited from performance of unsafe or unacceptable patient care.
18. Paragraphs 2 through 11 demonstrate that Respondent failed to provide safe or acceptable patient care when Respondent failed to perform the five rights before administering medication, which resulted in unsafe and unacceptable patient care and the patient's overnight admission to the Emergency Room.
19. 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(b)(1).

Understandings

20. Respondent admits the facts above are true and the conditions below are necessary to protect the public.
21. 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.
22. 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.
23. Respondent has read and reviewed this entire document and agrees it contains the entire agreement between the parties.
24. Respondent is not under the influence of any drugs or alcohol at the time of signing this Stipulation and Consent Order.
25. 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.
26. Respondent voluntarily waives the right to a contested hearing before the Board and waives any right to appeal from this Stipulation and Consent Order.

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27. Respondent understands that she is responsible for all compliance costs associated with this Stipulation and Consent Order.
28. Respondent agrees the Board may enter the Order set forth below.

ORDER

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

- A. The Board of Nursing hereby **WARNS** Respondent's license.
- B. The Board hereby **CONDITIONS** Respondent's RN license **commencing on the date of entry** of this Stipulation and Consent Order. The **CONDITIONS** shall be as follows:
 1. Re-issuance of License. Upon the commencement of these conditions, Respondents shall be issued a license labeled "conditioned."
 2. License Renewal. This Order does not automatically extend the licenses and Respondents must comply with the requirements for license renewal.
 3. Length of Time of Conditions Imposed. The conditions shall remain in place until Respondents have completed all conditions as ordered.
 4. Monitoring. The Office of Professional Regulation, through the Enforcement Case Manager, shall be responsible for monitoring Respondents' compliance with these Conditions. All reports and/or correspondence regarding compliance with these conditions shall be submitted to the Case Manager in accordance with the Conditions listed below.
 5. Required Coursework. Respondent shall, within ninety (90) days following the entry of this Order, at her own expense, complete four (4) hours of pre-approved courses, which must include the following topics and minimum hours per topic: 1. medication administration (minimum two hours) and 2. Wellness and/or self-care (minimum two hours). For pre-approval, Respondent must submit to the Case Manager the name of each course, the name of the sponsoring organization, and a description of the course content and/or syllabus. Respondent must achieve a passing score on the post-tests for the courses, and submit test results, workbooks completed in full and in a satisfactory manner, and certificates of completion to the Office of Professional Regulation.

Failure to complete the courses within the prescribed timeframe shall constitute a violation of this Order. The coursework may not be counted toward any continuing education requirement of licensure.

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6. Notification to Other States. In the event Respondent is licensed in Nursing in any other state(s), Respondent must inform the licensing board of the state(s) in which Respondent is licensed of the conditional status of Respondent's Vermont license within thirty (30) days of the date of entry of this Order.

7. Costs. Respondent shall bear all costs of complying with this Consent Order.

8. 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 resolved.

9. Completion of Conditional License Period. Respondent shall submit a petition to the Docket Clerk to remove any and all conditions from Respondent's license. The State will support or oppose Respondent's petition. The Board will conduct a hearing if necessary. Respondent bears the burden and must present proof that 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, Respondents must comply with all Statutes and Rules governing the practice of the profession.
- D. Any violation of this Order or continued violation of the applicable Statutes and Rules governing the profession may be a basis for additional disciplinary action.
- E. 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 Respondents' licensing files and may be used for purposes of determining sanctions in any future disciplinary matter.

AGREED TO:

STATE OF VERMONT
SECRETARY OF STATE

Dated: August 5, 2025

By: *Zoe Newman*
Zoe Newman
Prosecuting Attorney

COUNSEL FOR RRESPONDENT

Dated: August 1, 2025

By: /s/ Hannah C. Waite
Hannah Waite, Esq.

STATE OF VERMONT



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

Dated: 8/1/2025

APPROVED AND SO ORDERED:

Dated: 8/13/2025

Date of Entry: 8/13/2025

RESPONDENT

By: 
Jennie Stoddard

VERMONT BOARD OF NURSING

Signed by:
By: William James Floyd III
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Chairperson

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

IN RE: JENNIE STODDARD License No. 026.0024873	))))	Docket No. 2025-106
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SPECIFICATION OF CHARGES

NOW COMES the State of Vermont (State) and makes the following charges against Registered Nurse Jennie Stoddard:

Board Authority

1. The Board has the authority to issue warnings or reprimands; suspend, revoke, limit, or condition current licenses; or prevent the renewal of lapsed licenses if, after a 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

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5. Respondent meant to administer a saline flush to the patient, however, instead, intravenously administered Daratumumab/Hyalu-U-Fihj 1800/MG3000, a chemotherapy agent, which was ordered for a different patient.
6. The Daratumumab was meant to be administered as a subcutaneous infusion and was not meant to be administered intravenously.
7. When administered intravenously, Daratumumab must be diluted and, at the dosage listed, given to the patient over a minimum timespan of three hours.

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9. Additionally, the used syringe was labeled with the specific drug name, the name and date of birth of a different patient along with the name of the ordering physician.
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Violation One: 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: failure to conform to the essential standards of acceptable and prevailing practice.

12. The State re-alleges and incorporates Paragraphs 2 through 11 above.
13. The essential standards of acceptable and prevailing practice require RNs to perform the five rights – the right patient, the right drug, the right time, the right dose, and the right route – prior to administering medication.
14. Paragraphs 2 through 11 demonstrate that Respondent failed to conform to the essential standards of acceptable and prevailing practice when Respondent failed to perform the five rights prior to administering medication, which resulted in Respondent administering the wrong medication to a patient.
15. 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(b)(2).

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: performance of unsafe or unacceptable patient or client care.

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19. 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(b)(1).

Relief Requested

WHEREFORE, the State of Vermont respectfully requests that the Board revoke, suspend, condition, or otherwise discipline Respondent's RN license.

DATED this 25th day of June, 2025.

STATE OF VERMONT
SECRETARY OF STATE

By: Zoe Newman
Zoe Newman
Prosecuting Attorney
Zoe.newman@vermont.gov

STATE OF VERMONT



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