

**State of Vermont
Board of Nursing**

In re: Michael Amoah
License Number: 075.0145728
Docket Number: 2025-107

Order to Remove Conditions

On **February 9, 2026**, the Board of Nursing considered Michael Amoah's request for Removal of Conditions imposed on his license pursuant to a Stipulation and Consent Order effective October 14, 2025, under Docket Number 2025-107. The conditions included successful completion of continuing education. Mr. Amoah 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 Michael Amoah's license to practice as a Licensed Nursing Assistant.

Vermont Office of Professional Regulation

Signed by: William James Floyd III Date: 2/10/2026
3B82E78300124BE.
Board of Nursing Chair

Date of Entry: 02/11/2026 / /

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

IN RE:)
MICHAEL AMOAH) **Docket No. 2025-107**
License No. 075.0145728)
)

STIPULATION AND CONSENT ORDER

NOW COMES the State of Vermont (State), by and through Prosecuting Attorney Zoe Newman, and Respondent Michael Amoah 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. Michael Amoah (Respondent) of Essex Junction, Vermont is licensed by the State of Vermont as a Licensed Nursing Assistant (LNA) under license number 075.0145728. This license was first issued on August 13, 2024 and expires on November 30, 2026.
3. At all times relevant, Respondent was employed as an LNA by a Nursing Home (Nursing Home), in Chittenden County, Vermont.
4. A Hoyer lift is a specialized device designed to safely transfer individuals with limited mobility between locations and, in a Nursing Home setting, may be required by a patient care plan.
5. On October 4, 2024, LNA B.H. witnessed Respondent pick up a Nursing Home resident and move her without using a Hoyer lift, despite the resident's care plan, which required a Hoyer lift.
6. In the moment, LNA B.H. told Respondent that he needed to use the Hoyer lift for the resident but he ignored her statement and continued to lift and transfer the resident using only his body.
7. That same evening, Residential Care Assistant (RCA) A.M. witnessed Respondent ignore a different patient's care plan, which required a Hoyer lift, and, instead, used his arms to lift and transfer the second patient.

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8. On October 6, 2024, Respondent texted and called RCA A.M. asking her to tell the Nursing Home that RCA A.M. and Respondent had worked together to transfer the second patient using a Hoyer lift, on October 4, 2024.
9. In response, RCA A.M. told Respondent she would not lie for him and she told Respondent to tell the truth.
10. Both LNA B.H. and RCA A.M. told OPR Investigator M.D. that they had previously witnessed Respondent transfer patients without a Hoyer lift despite the patients' care plans requiring the use of a Hoyer lift.
11. On October 8, 2024, Respondent was terminated from Nursing Home for not following Nursing Home policy pertaining to safe transfers and safety rules.

Violation One: 26 V.S.A. § 1582(a)(3) Engaging in conduct of a character likely to deceive, defraud, or harm the public.

12. Paragraphs 2 through 11 above are incorporated herein.
13. As a licensed LNA, Respondent was prohibited from engaging in conduct of a character likely to deceive, defraud, or harm the public.
14. Paragraphs 2 through 11 demonstrate that Respondent engaged in conduct of a character likely to deceive, defraud, or harm the public when Respondent asked a coworker to tell the Nursing Home that she and Respondent used the Hoyer lift to transfer a patient when Respondent had transferred the patient alone and without the aid of a Hoyer lift.
15. The act(s), omission(s), and/or circumstance(s) described above constitute grounds for discipline because Respondent committed unprofessional conduct in violation of 26 V.S.A. § 1582(a)(3).

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 LNA, Respondent was prohibited from performance of unsafe or unacceptable patient care.
18. Paragraphs 2 through 11 demonstrate that Respondent failed to practice competently by failing to provide safe or acceptable patient care when Respondent failed to use a Hoyer lift for transfer with two separate patients, both of whom were care planned for a Hoyer lift.

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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).

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.
27. Respondent understands that he 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 **ASSESSES AN ADMINISTRATIVE PENALTY IN THE AMOUNT OF TWO HUNDRED AND FIFTY DOLLARS (\$250.00)]** against Respondent. This penalty is to be paid within sixty (60) days of the date of entry of this Order.

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C. The Board hereby **CONDITIONS** Respondent's LNA license, **commencing on the date of entry**, as follows:

1. Re-issuance of License. Upon the commencement of these conditions and the renewal of Respondent's license, if expired, 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 as ordered.
3. Monitoring. The Office of Professional Regulation, through the Enforcement Case Manager, shall be responsible for monitoring Respondent's 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.
4. Notification to Employers/Educational Programs. Respondent shall provide a copy of this Stipulation and Consent Order to all employers in any current or future setting in which Respondent practices the profession 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 employment in the profession, Respondent shall cause Respondent's immediate supervisor to submit to the Case Manager an employer agreement form, 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 an educational 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 Case Manager a program agreement form provided by the Case Manager, acknowledging receipt of the Stipulation and Consent Order and the ability of the program to comply with the conditions in the Consent Order during the clinical experience.

5. Required Coursework. Respondent shall, within ninety (90) days following the entry of this Order, at his own expense, complete eight (8) hours of pre-approved courses, which must include the following topics: 1. Nursing Ethics, 2. Professional Accountability in Nursing, and 3. Safe Patient Transfers. 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. 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 practice provided Respondent can still comply with the requirements of this Consent Order. If Respondent receives discipline on a professional 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.
7. 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.
8. Notification to Other States. In the event Respondent is licensed 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.
9. License Renewal. This Order does not automatically extend the license and Respondent must comply with the requirements for license renewal.
10. Costs. Respondent shall bear all costs of complying with this Consent Order.
11. 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.
12. 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.

- D. Notwithstanding any provision above, the Respondent must continue to meet all requirements for maintaining a license, license renewal and license reinstatement.
- 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).
- F. This Stipulation and Consent Order applies to all licenses this Board issues to Respondent, including future licenses, as provided in 3 V.S.A. § 129(I).

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G. 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.

AGREED TO:

STATE OF VERMONT
SECRETARY OF STATE

Dated: 9/9/25

By: *Zoe Newman*
Zoe Newman
Prosecuting Attorney

RESPONDENT

Dated: 9/9/2025

By: *[Signature]*
Michael Amoah

APPROVED AND SO ORDERED:

VERMONT BOARD OF NURSING

Dated: 10/13/2025

By: *[Signature]*
William James Floyd III
Chairperson

Date of Entry: 10/14/25

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BOARD OF NURSING**

IN RE:	)	
MICHAEL AMOAH	)	Docket No. 2025-107
License No. 075.0145728	)	
	)	

SPECIFICATION OF CHARGES

NOW COMES the State of Vermont (State) and makes the following charges against
Licensed Nursing Assistant Michael Amoah:

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

2. Michael Amoah (Respondent) of Essex Junction, Vermont is licensed by the State of Vermont as a Licensed Nursing Assistant (LNA) under license number 075.0145728. This license was first issued on August 13, 2024 and expires on November 30, 2026.
3. At all times relevant, Respondent was employed as an LNA by a Nursing Home (Nursing Home), in Chittenden County, Vermont.
4. A Hoyer lift is a specialized device designed to safely transfer individuals with limited mobility between locations and, in a Nursing Home setting, may be required by a patient care plan.
5. On October 4, 2024, LNA B.H. witnessed Respondent pick up a Nursing Home resident and move her without using a Hoyer lift, despite the resident's care plan, which required a Hoyer lift.
6. In the moment, LNA B.H. told Respondent that he needed to use the Hoyer lift for the resident but he ignored her statement and continued to lift and transfer the resident using only his body.
7. That same evening, Residential Care Assistant (RCA) A.M. witnessed Respondent ignore a different patient's care plan, which required a Hoyer lift, and, instead, used his arms to lift and transfer the second patient.

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8. On October 6, 2024, Respondent texted and called RCA A.M. asking her to tell the Nursing Home that RCA A.M. and Respondent had worked together to transfer the second patient using a Hoyer lift, on October 4, 2024.
 9. In response, RCA A.M. told Respondent she would not lie for him and she told Respondent to tell the truth.
 10. Both LNA B.H. and RCA A.M. told OPR Investigator M.D. that they had previously witnessed Respondent transfer patients without a Hoyer lift despite the patients' care plans requiring the use of a Hoyer lift.
 11. On October 8, 2024, Respondent was terminated from Nursing Home for not following Nursing Home policy pertaining to safe transfers and safety rules.
- Violation One: 26 V.S.A. § 1582(a)(3) Engaging in conduct of a character likely to deceive, defraud, or harm the public.**
12. The State re-alleges and incorporates Paragraphs 2 through 11 above.
 13. As a licensed LNA, Respondent was prohibited from engaging in conduct of a character likely to deceive, defraud, or harm the public.
 14. Paragraphs 2 through 11 demonstrate that Respondent engaged in conduct of a character likely to deceive, defraud, or harm the public when Respondent asked a coworker to tell the Nursing Home that she and Respondent used the Hoyer lift to transfer a patient when Respondent had transferred the patient alone and without the aid of a Hoyer lift.
 15. The act(s), omission(s), and/or circumstance(s) described above constitute grounds for discipline because Respondent committed unprofessional conduct in violation of 26 V.S.A. § 1582(a)(3).

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

16. The State re-alleges and incorporates Paragraphs 2 through 11 above.
17. As a licensed LNA, Respondent was required to conform to the essential standards of acceptable and prevailing practice, specifically, Respondent was required to follow resident care plans and facility policies pertaining to transfer of residents.
18. Paragraphs 2 through 11 demonstrate that Respondent failed to conform to the essential standards of acceptable and prevailing practice when Respondent failed to

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follow resident care plans and facility policies pertaining to transfer of residents and transferred two residents using only his body instead of the required Hoyer lift.

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)(2).

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: performance of unsafe or unacceptable patient or client care.

20. The State re-alleges and incorporates Paragraphs 2 through 11 above.
21. As a licensed LNA, Respondent was prohibited from performance of unsafe or unacceptable patient care.
22. Paragraphs 2 through 11 demonstrate that Respondent failed to practice competently by failing to provide safe or acceptable patient care when Respondent failed to use a Hoyer lift for transfer with two separate patients, both of whom were care planned for a Hoyer lift.
23. 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 LNA license.

DATED this 26th day of June, 2025.

STATE OF VERMONT
SECRETARY OF STATE

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

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