

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

IN RE:
AMY CAMPBELL, R.N.
License No. 026-0025129

)
)
)

Docket No: NU39-0101

STIPULATION AND CONSENT ORDER

STIPULATION

NOW COME the State of Vermont, through Attorney General William H. Sorrell, and Respondent Amy Campbell, R.N. who stipulate and agree as follows:

Board Authority

1. The Vermont State Board of Nursing ["the Board"] has authority to approve consent orders, issue warnings or reprimands, suspend, revoke, limit, condition or prevent the renewal of current or lapsed licenses if, after disciplinary hearing, the Board finds that the Respondent has engaged in unprofessional conduct. 3 V.S.A. §129(a)(5); 3 V.S.A. §814(d); 26 V.S.A. §1582(a).
2. Being unable to practice nursing competently by reason of any cause is unprofessional conduct upon which the Board can base disciplinary action. 26 V.S.A. §1582(a)(3).
3. Inability to practice nursing competently includes the failure to conform to the essential standards of acceptable and prevailing nursing practice. Administrative Rules of the Board of Nursing ("ARBN") Chapter 4, Rule IV(B)(2).

Facts

4. The Respondent (whose address is listed in the database of the Office of Professional Regulation as 11 3rd Level Dr. Apt. 80, Brattleboro, Vermont 05301) is a Registered Nurse under License Number 026-0025129.
5. Respondent was originally licensed on September 16, 1999 and Respondent's license is currently Extended.
6. At all times relevant to these Charges, the Respondent was employed by Springfield Health and Rehabilitation in Springfield, Vermont.

Office of the
ATTORNEY
GENERAL
109 State Street
Montpelier, VT
05609

7. On or about July 26, 2000, Respondent failed to give patient B.W. the correct dose of Oxycontin, three (3) ten (10) mg. doses, and instead gave B.W. only one (1) ten (10) mg. dose.
8. On or about September 27, 2000, Respondent failed to record in the MAR that she gave patient D.G. the required medication(s).
9. On or about September 27, 2000, Respondent failed to record in the MAR that she gave patient Z.V. the required medication(s).
10. As a result of the above-mentioned medication error(s) the Respondent was suspended from dispensing and administering medication(s) until such time that she successfully completed an independent medication course and received a passing grade.
11. Respondent, upon information and belief, did successfully complete the required medication course and received a passing grade.
12. Respondent, upon information and belief, had the suspension removed and began administering medications, without error, for a period of two (2) months.

Charges

13. By committing the above act(s), circumstance(s) and/or omission(s), the Respondent has:
 - a) shown she is unable to practice nursing competently by reason of any cause, in violation of 26 V.S.A. §1582(a)(3), specifically Respondent:
 - i) failed to conform to the essential standards of acceptable and prevailing nursing practice.

Understandings

- A. The Respondent understands that the Board of Nursing must review and accept the terms of the Order set forth below and that if the Board rejects all or any portion of the Order, then this entire document shall be null and void.
- B. The Respondent has read and reviewed this entire document and agrees that it contains the entire agreement between the parties.
- C. The Respondent is not under the influence of any drugs or alcohol at the time this document is being signed.
- D. The Respondent agrees that she has had sufficient opportunity to consult with legal counsel before signing this document.

Office of the
ATTORNEY
GENERAL
109 State Street
Montpelier, VT
05609

- E. The Respondent is voluntarily waiving her right to a contested hearing before the Board of Nursing.
- F. The Respondent agrees that the Order set forth immediately below may be entered by the Board of Nursing.

Consent Order

G. Based on the above stipulations, it is **ADJUDGED** as follows:

- (1) The "Facts" listed above are true; and
- (2) The Respondent has engaged in unprofessional conduct in that the Respondent has:
 - (a) shown she is unable to practice nursing competently by reason of any cause, in violation of 26 V.S.A. §1582(a)(3), specifically Respondent:
 - i) failed to conform to the essential standards of acceptable and prevailing nursing practice.

H. Based on the above stipulation and on the above findings and conclusions of this Board, it is **ORDERED** follows:

The Board hereby **REPRIMANDS** Respondent's license to practice nursing.

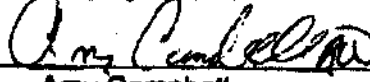
I. This Stipulation and Consent Order is a matter of public record and may be reported to other licensing authorities as provided in 3 V.S.A. §129(a).

J. This Stipulation and Consent Order will remain part of the Respondent's licensing file and may be used in determining sanctions in future disciplinary matters.

AGREED TO:

Date: 4/3/01

**BY: AMY CAMPBELL
RESPONDENT**


Amy Campbell

**AND BY: STATE OF VERMONT
WILLIAM H. SORRELL
ATTORNEY GENERAL**

Date: 4/5/01


George C. Haase IV
Assistant Attorney General

Office of the
ATTORNEY
GENERAL
109 State Street
Montpelier, VT
05609

ACCEPTED AND SO ORDERED:

BOARD OF NURSING

Date: 4-9-01

Diane Dourgievics
Chairperson

Dated entered: 4-12-01

Office of the
ATTORNEY
GENERAL
109 State Street
Montpelier, VT
05609