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

IN RE:	)	
DENNISE D. DEMERS	)	**Docket No. 2014-658**
License No. 026.0050648	)	

SECOND MODIFICATION STIPULATION AND CONSENT ORDER

STIPULATION

NOW COME the State of Vermont, by and through State Prosecuting Attorney Elizabeth A. St. James, and the Respondent, Dennise D. Demers, RN, 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. § 1582; the Administrative Rules of the Board of Nursing (the "ARBN"); and the Rules of the Office of Professional Regulation.

Stipulated Facts

2. Dennise D. Demers (the "Respondent") of Hardwick, Vermont is licensed by the State of Vermont as a Registered Nurse under license number 026.0050648. This license was originally issued on or about October 22, 2009 and is currently set to expire on or about March 31, 2021.

3. On June 14, 2016, the Board entered a Modification Stipulation and Consent Order in the above docket number reinstating Respondent's license with conditions (the "2016 Order"). Respondent had previously surrendered her license after several serious medication administration errors. *See* Attachment A, incorporated by reference herein.

4. The 2016 Order required Respondent to obtain an independent evaluation prior to obtaining nursing employment. Such evaluation must indicate Respondent does not pose a risk to the safety, health, or welfare of Respondent's potential patients. Respondent has satisfied this condition.

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5. On October 28, 2019, Respondent requested modification of paragraphs A.2. and A.10 of the October 2016 Order. Respondent provided support from a prospective employer in seeking these modifications. The State assents to Respondent's request with the conditions outlined below.

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

6. The State re-alleges and incorporates Paragraphs 2 through 5 above.

7. As a Registered Nurse, Respondent is prohibited from engaging in conduct of a character likely to deceive, defraud, or harm the public.

8. Attachment A demonstrates that Respondent engaged in conduct of a character likely to deceive, defraud, or harm the public.

9. 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 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.

10. The State re-alleges and incorporates Paragraphs 2 through 5 above.

11. As a Registered Nurse, Respondent is prohibited from 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.

12. Attachment A demonstrates that Respondent willfully made or filed false reports or records in the practice of the profession; willfully impeded or obstructed the proper making or filing of reports or records; or willfully failed to file the proper reports or records.

13. 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(a)(7).

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: (1) performance of unsafe or unacceptable patient or client care.

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1. The State re-alleges and incorporates Paragraphs 2 through 5 above.

2. As a Registered Nurse, Respondent has an obligation to provide safe and acceptable patient care.

3. Attachment A demonstrates that Respondent failed to provide safe and acceptable patient care.

4. The act(s), omission(s), and/or circumstance(s) described above constitute grounds for discipline because Respondent has committed unprofessional conduct in violation of 3 V.S.A. §129a(b)(1).

Violation Four: 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 essential standards of acceptable and prevailing practice.

5. The State re-alleges and incorporates Paragraphs 2 through 46 above.

6. As a Registered Nurse, Respondent is expected to conform to the essential standards of acceptable and prevailing practice.

7. Attachment A demonstrates that Respondent failed to conform to the essential standards of acceptable and prevailing practice.

8. The act(s), omission(s), and/or circumstance(s) described above constitute grounds for discipline because Respondent has committed unprofessional conduct in violation of 3 V.S.A. §129a(b)(2).

9.

Understandings

14. Respondent admits the facts as outlined above are true and the Board may find that the Respondent engaged in unprofessional conduct.

15. Respondent understands that the Nursing 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.

16. 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.

17. Respondent has read and reviewed this entire document and agrees that it contains the entire agreement between the parties.

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18. Respondent is not under the influence of any drugs or alcohol at the time she signs this Stipulation and Consent Order.

19. 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.

20. Respondent voluntarily waives her right to a contested hearing before the Board of Nursing and waives any right to appeal from this Stipulation and Consent Order.

21. Respondent agrees that the Order set forth below may be entered by the Board.

ORDER

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

A. The Board of Nursing hereby **MODIFIES** the **Modification Stipulation and consent Order under Docket No. 2014-658, entered on June 14, 2016,** (Attachment A) as follows:

1. Paragraph A.2. of the Order, page 3, shall read: Length of Time of Conditions Imposed. The conditions shall remain in place until Respondent has completed all conditions ordered. Respondent shall be subject to the conditions until Respondent completes a minimum of three (3) years of supervised nursing in which Respondent works at least forty (40) hours every two (2) weeks as a nurse. Part time hours of fewer than forty (40) hours every two (2) weeks shall be credited on a prorated basis. **Respondent shall be prohibited from working more than forty-five (45) hours per week.**

2. Paragraph A.10. of the Order, page 6, shall read: Practice Under Supervision. **While Respondent is employed at the Community Health Services of Lamoille Valley, she shall practice as a nurse only in a setting where she has direct supervision by a licensed registered nurse in good standing with the Board for at least 75% of her supervised practice. The other 25% of her supervised practice may be supervised by an M.D. as necessary. Should Respondent's position at Community Health Services Lamoille Valley no longer require a small amount of supervision by an M.D., or should Respondent no longer work for Community Health Services of Lamoille Valley, Respondent must have direct supervision for her entire shift by a licensed registered nurse that is in good standing with the Board.**

B. All other provisions of the Modification Stipulation and Consent Order under Docket No. 2014-658 entered June 14, 2016, remain in full force and effect.

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C. Notwithstanding any provision above, the Respondent must continue to meet all Board requirements for maintaining a license, license renewal and license reinstatement.

D. 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).

E. 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: 11/25/19

By: Elizabeth A. St. James
Elizabeth A. St. James
State Prosecuting Attorney

DENNISE D. DEMERS
RESPONDENT

Dated: 11/25/19

By: Dennise D. Demers

APPROVED AND SO ORDERED:

VERMONT BOARD OF NURSING

Dated: 12.9.2019

By: Chairperson

Date of Entry: 12·10·19 BK

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SECRETARY OF STATE
OFFICE OF PROFESSIONAL REGULATION
BOARD OF NURSING

IN RE:	)	M2013-33
DENNISE D. DEMERS	)	**Docket No. 2014-658**
License No. 026.0050648	)	

MODIFICATION STIPULATION AND CONSENT ORDER

STIPULATION

NOW COME the State of Vermont, by and through State Prosecuting Attorney S. Lauren Hibbert, and the Respondent, Dennise D. Demers, RN, 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. § 1582; the Administrative Rules of the Board of Nursing (the "ARBN"); and the Rules of the Office of Professional Regulation.

Stipulated Facts

2. Dennise D. Demers (the "Respondent") of Hardwick, Vermont is licensed by the State of Vermont as a Registered Nurse under license number 026.0050648. This license was originally issued on or about October 22, 2009 and is currently set to expire on or about March 31, 2017. Respondent's license is currently conditioned pursuant to docket number 2011-789/M2013-33.

3. At all times relevant, Respondent was employed at Berlin Health and Rehab (the "Facility"), located in Berlin, Vermont.

4. On September 29, 2014, Respondent withdrew Vicodin from the Pyxis machine for Patient 1. Administration of the Vicodin is not documented in the Medication Administration Record.

5. On September 30, 2014, On September 30, 2014, RN V.B. observed Respondent in her wasting of a number of pills for Patient 1, who was not present on the unit at the time. V.B. was unable to determine the identity of each of the pills, but documented that she witnessed the waste of 2 tablets of Vicodin.

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ATTACHMENT A

6. V.B. became concerned that she unwittingly signed for medication that was not actually wasted.

7. V.B. asked two staff people to help her look in the sharps container for the wasted Vicodin. Two sharps containers were searched, including the one were the Respondent allegedly wasted the Vicodin and the additionally the sharps container from the med cart Respondent used on September 30, 2014. There was no Vicodin found in either sharps container.

8. Respondent completed a pain assessment for Patient 1 on September 30, 2014 when Patient 1 was not present on the unit and Respondent had not seen or spoken with Patient 1.

9. Respondent admitted that she does not always do rounds on her patients before preparing their medications.

10. On or about April 12, 2016, the Board approved a Stipulation and Consent Order on the basis of the above facts. Within the Stipulation and Consent Order, Respondent voluntarily surrendered her license. Respondent requests reinstatement from that stipulation. The State assents with the conditions outlined below.

Violations

11. 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:

    a. 26 V.S.A. § 1582(a)(7) (Engages in conduct of a character likely to deceive, defraud or harm the public);

    b. 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);

    c. 3 V.S.A. § 129a(b)(1) and (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: (1) performance of unsafe or unacceptable patient or client care; or (2) failure to conform to the essential standards of acceptable and prevailing practice); and

    d. 3 V.S.A. § 129a(a)(3) (Failing to comply with provisions of federal or state statutes or rules governing the practice of the profession).

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Understandings

12. Respondent admits the facts as outlined above are true and the Board may find that the Respondent engaged in unprofessional conduct.

13. Respondent understands that the Nursing 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.

14. 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.

15. Respondent has read and reviewed this entire document and agrees that it contains the entire agreement between the parties.

16. Respondent is not under the influence of any drugs or alcohol at the time she signs this Stipulation and Consent Order.

17. 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.

18. Respondent voluntarily waives her right to a contested hearing before the Board of Nursing and waives any right to appeal from this Stipulation and Consent Order.

19. Respondent agrees that the Order set forth below may be entered by the Board.

ORDER

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

A. The Board of Nursing hereby **CONDITIONS** Respondent's license for a **MINIMUM OF THREE (3) YEARS** commencing with the date of reinstatement. The conditions will be as follows:

1. Re-issuance of License. Upon the commencement of these conditions, 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 ordered. Respondent shall be subject to the conditions until Respondent completes a **minimum of three (3) years** of supervised nursing in which Respondent works at least forty (40) hours every two (2) weeks as a nurse. Part time hours of fewer than forty (40) hours every two (2) weeks shall be

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credited on a prorated basis. Respondent shall be prohibited from working more than forty (40) hours per week.

3. Independent Evaluation: Within 45 days of this Order and prior to obtaining nursing employment, Respondent shall obtain an independent evaluation report by a licensed professional specializing in drug and alcohol abuse pre-approved by the Board ("Independent Evaluator") and who has verified receipt of this Order, the results of which must indicate that Respondent does not present a risk to the safety, health or welfare of Respondent's potential patients;

4. Completion of Substance Abuse Counseling, Treatment Plan, Treatment Reports and recovery groups. If recommended by Independent Evaluator, Respondent shall enter into and continue substance abuse counseling and comply with substance abuse treatment plan until the pre-approved treating professional certifies in writing to the Board that such counseling is no longer necessary.

   Respondent shall authorize Respondent's treating professional to submit to the Board **monthly** reports on forms issued by the Board. Respondent shall authorize Respondent's treating professional to provide all information requested by the Nursing Board, either orally or in writing, at any time during the period this Consent Order is in effect.

   If recommended by Independent Evaluator, Respondent shall participate as recommended by Respondent's treating professional in substance abuse recovery group(s), and shall submit **quarterly** reports documenting such attendance on forms issued by the Board.

5. Random Drug and Alcohol Testing.
   Respondent shall submit to random drug and alcohol screenings at the request of the Board or its designee. Respondent shall designate a person or entity that has been pre-approved by the Board or its designee to administer random drug and alcohol screens. All testing shall be done on a random, unannounced basis and analyzed by a lab qualified to analyze samples for forensic purposes and approved by the Board. All urine specimens collected for tests shall be collected in an observed setting. All screens shall be negative.

   Failure to appear for, refusal to provide, adulteration of, dilution of, or tampering with a sample for any urine screen shall cause that screen to be presumed positive. Any positive screen shall constitute a violation of this Order.

6. Abstain from Drug and Alcohol Use. Respondent shall abstain completely from the consumption or possession of alcohol and drugs.

7. Drug Use Exception. Respondent may take scheduled/controlled medications lawfully prescribed for a bona fide illness or condition by a health care practitioner disclosed to the Board in writing by Respondent within forty-eight (48) hours of the

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prescription. Respondent health care practitioner shall inform the Board, in writing and on appropriate letterhead, of knowledge of Respondent's substance abuse issue(s) within seven (7) days of entering into the practitioner/patient relationship. Additionally, the practitioner shall inform the Board of all scheduled/controlled medications prescribed – and the anticipation of how long such prescriptions will need to be taken – within seven (7) days of the prescription.

The Board or its designee may request that the practitioner document the necessity for the prescribed scheduled/controlled medications or other medications known to have abuse potential. It is not anticipated that Respondent would be prescribed scheduled/controlled medication during the term of this Consent Order for a period greater than fourteen (14) days, but if so, then the conditions herein may be revoked by the Board.

Respondent shall provide the Board with a current medication list of any medications taken on a scheduled or as-needed basis on forms issued by the Board within seven (7) days of the date of reinstatement and shall update this list within forty-eight (48) hours of any change in these medications.

8. Notification to Employers/Nursing School. Respondent shall provide a copy of this Stipulation and Consent Order to all employers in any current or future setting in which Respondent practices as a nurse 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 nursing employment, Respondent shall cause Respondent's immediate supervisor to submit to the Board an employer agreement form approved by the Board, 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 a nursing 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 Board a nursing program agreement form approved by the Board, acknowledging receipt of the Stipulation and Consent Order and the ability of the program to comply with the conditions in the Consent Order during clinical experience.

9. Reports from Employers/Program Director. Within one (1) month of the date of reinstatement or within one (1) month of the commencement of nursing employment and monthly thereafter, Respondent shall cause every nursing employer Respondent has worked for during the month to submit to the Board an evaluation of Respondent's work performance and attendance during that month. Moreover, on a quarterly basis, these reports shall include the results of the employer's medication audits of Respondent's medication administration and practices. In the event Respondent is attending a nursing program, Respondent shall cause the Program Director to submit to the Board, on a monthly basis, a written evaluation of Respondent's performance and attendance. These reports shall be submitted in

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writing on forms issued by the Board. All employer reports shall indicate satisfactory performance (ie., consistently meeting all standards of nursing practice) and attendance.

10. Practice Under Supervision. Respondent shall practice as a nurse only in a setting where Respondent has direct supervision for the entire shift by a licensed registered nurse that is in good standing with the Board.

11. Administration of Medications. Respondent is prohibited from administering any controlled substances. This condition may be removed only by Respondent filing a petition with the Board after Respondent has worked as a nurse for six (6) months for at least forty (40) hours every two weeks (or the part time equivalent) after the date of reinstatement.

    In any such petition, Respondent must demonstrate, to the satisfaction of the Nursing Board or its designee, that Respondent can safely and competently administer such medications. Respondent must include appropriate support from Respondent's treating professional and employer or nursing school administrator and a description of the documentation and inventory control procedures in place.

    The removal of this prohibition shall not automatically result in the reinstatement of all medication privileges. The Board may gradually restore those privileges through whatever intermediary steps it determines are appropriate.

12. Types of Employment Prohibited. Respondent shall not work in a supervisory role. Respondent shall not work for a nurse registry, traveling nurse agency, float-pool, home health care agency, temporary nursing employment agency, or as a private duty nurse or personal care provider requiring a nursing or nursing assistant license during the effective period of this Consent Order.

13. Interview with the Board or its Designee. Respondent shall appear in person for interviews with the Board or its designee upon request.

14. 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. The Board will approve out-of-state nursing practice so long as Respondent can still comply with the provisions of this Consent Order. If Respondent receives discipline on a nursing 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.

15. 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

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forty-eight (48) hours of any change in employment (including resignation or termination), personal address, or telephone number.

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

17. License Renewal. This Order does not automatically extend the license and Respondent must comply with the requirements for license renewal.

18. Release of Information Forms. This Order requires Respondent to authorize drug and/or alcohol treatment providers to report information in verbal and/or written format and/or to discuss Respondent and any and all treatment rendered to Respondent for drugs and/or alcohol with the Board or its designee. Any and all of this information may be provided to the Office of Professional Regulation investigators, and that the information may be used for further prosecutions if so warranted or if the Office of Professional Regulation determines that said information violates the terms of this Order or any rules or laws governing the profession of nursing.

    Respondent is entitled to revoke this consent at any time. However, any revocation shall be considered a violation of this Order. This consent expires when the conditions are removed from Respondent's nursing license.

    This Stipulation and Consent Order shall itself constitute a valid written consent pursuant to the requirements of 42 C.F.R. § 2.31.Respondent understands that Respondent's treatment provider may require Respondent's to sign a separate and distinct consent meeting the requirements of 42 C.F.R. § 2.31.

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

20. 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 concluded.

21. Completion of Conditional License Period. Respondent must petition the Board, or its designee, to remove any and all conditions on Respondent's license. Respondent must present proof that Respondent has fully complied with the terms of this Order. Respondent must also present proof of successful substance abuse rehabilitation, that Respondent poses no danger to the public or the practice of nursing, and that Respondent can safely and competently perform the duties of a licensed nurse.

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B. Notwithstanding any provision above, the Respondent must continue to meet all Board requirements for maintaining a license, license renewal and license reinstatement.

C. 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).

D. 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:

Dated: 6/10/16

STATE OF VERMONT
SECRETARY OF STATE

By: _____
S. Lauren Hibbert
State Prosecuting Attorney

DENNISE D. DEMERS
RESPONDENT

Dated: 6/9/2016

By: _____
Dennise D. Demers

APPROVED AS TO FORM:

Dated: 6/9/2016

ATTORNEY FOR RESPONDENT

By: _____
Brooks McArthur, Esq.

APPROVED AND SO ORDERED:

Dated: 6/13/16

VERMONT BOARD OF NURSING

By: Janine Carr
Chairperson

Date of Entry 6/14/16

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