

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

IN RE:)
KAREN ST. PETER) Docket No. NU 41-1204
License No: 026-0011268)

STIPULATION AND CONSENT ORDER

STIPULATION

NOW COMES the State of Vermont, through the State Prosecuting Attorney, Edward G. Adrian, and the Respondent, Karen St. Peter, 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; the Administrative Rules of the Board of Nursing ("ARBN"); and the Rules of the Office of Professional Regulation.
2. Failure to comply with the provisions of state statutes or rules governing the practice of the profession is unprofessional conduct upon which the Board can base disciplinary action. 3 V.S.A. §129a(a)(3).
3. Failing to practice competently by way of failure to conform to the essential standards of acceptable and prevailing practice is unprofessional conduct upon which the Board can base disciplinary action. 3 V.S.A. §129a(b)(2).

Facts

4. Karen St. Peter (the "Respondent"), is licensed in the State of Vermont as a Registered Nurse under license number 026-0011268. This license was originally issued on April 30, 1983 and is currently set to expire on March 31, 2007.
5. At all times relevant, the Respondent was employed as a R.N. by the West Rutland School District, located in Rutland, Vermont.
6. The West Rutland School District requires parental permission prior to the administration of over the counter medication. Typically, parents sign a form at the

STATE OF VERMONT



Prosecuting Attorney
Office of
Professional Regulation
Montpelier, VT 05602

beginning of the school year to allow for the administration of common over the counter medications such as Tylenol and Benadryl.

7. On six occasions, Respondent administered medication to students that did not have a signed parental permission slip on file. On all six occasions, the medication administered was Tylenol.

8. On one occasion during the 2004-2005 school year, Respondent received a telephone call from a parent asking her to meet a student who needed a wheelchair, at the bus. Respondent did this, and was away from the office for approximately 5 minutes while leaving the door to the nurse's office, and medicine cabinet unlocked.

Charges

9. The acts, omissions and/or circumstances described above constitute grounds for discipline because Respondent violated:

- (i) 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); and
- (ii) 26 V.S.A. § 129a(b)(2)(failure to conform to the essential standards of acceptable and prevailing practice).

Understandings

10. 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.

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

12. The Respondent is not under the influence of any drugs or alcohol at the time this document is being signed.

13. The Respondent agrees that she has had sufficient opportunity to consult with legal counsel before signing this document.

14. The Respondent is voluntarily waiving her right to a contested hearing before the Board of Nursing.

15. The Respondent agrees that the Order set forth below may be entered by the Board of Nursing.

ORDER

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

STATE OF VERMONT



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Office of
Professional Regulation
Montpelier, VT 05602

- A. The "Facts" listed above are true; and
B. The Respondent's actions described above demonstrate grounds for discipline because the Respondent violated:

- (i) 3 V.S.A. §129a(a)(3) (Failure to comply with the provisions of state statutes or rules governing the practice of the profession); and
(ii) 3 V.S.A. §129a(b)(2) (Failure to conform to the essential standards of acceptable and prevailing conduct).

C. Based on the above stipulation and on the above Findings and Conclusions of this Board, it is **ORDERED** as follows:

The Respondent's license is hereby **REPRIMANDED**.

D. If the Respondent's license expires while this Order is still in effect, this Order does not automatically extend the license.

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 will remain part of the Respondent's licensing file and may be used for purposes of determining sanctions in any future disciplinary matter.

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

H. 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).

I. 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: 7/27/05

By: [Signature]
Edward G. Adrian
State Prosecuting Attorney

KAREN ST. PETER
RESPONDENT

Dated: 7/21/05

By: [Signature]
Karen St. Peter

STATE OF VERMONT



Prosecuting Attorney
Office of
Professional Regulation
Montpelier, VT 05602

APPROVED AND SO ORDERED: VERMONT BOARD OF NURSING

Dated: 8-8-05

By: Sinda Rice
Chairperson

Date of Entry: 8/12/05

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Prosecuting Attorney
Office of
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Montpelier, VT 05602

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

IN RE:)
KAREN ST. PETER) Docket No: NU 41-1204
License No. 026-0011268)

SPECIFICATION OF CHARGES

NOW COMES the State of Vermont and makes the following Charges against the Respondent, Karen St. Peter, R.N.:

Board Authority

1. The Vermont State Board of Nursing ("the Board") has authority to issue warnings or reprimands, suspend, revoke, limit, 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)(5); 3 V.S.A. §814(d); 26 V.S.A. §1582(a); 26 V.S.A. §1595; the Administrative Rules of the Board of Nursing; and the Rules of the Office of Professional Regulation.

Facts

2. Karen St. Peter (the "Respondent"), is licensed in the State of Vermont as a Licensed Registered Nurse under license number 026-0011268. This license was originally issued on April 30, 1983 and is currently set to expire on March 31, 2007.

3. At all times relevant, the Respondent was employed as a R.N. by the West Rutland School District, located in Rutland, Vermont.

4. The West Rutland School District requires parental permission prior to the administration of over the counter medication. Typically, parents sign a form at the beginning of the school year to allow for the administration of common over the counter medications such as Tylenol and Benadryl.

5. On six occasions, Respondent administered medication to students that did not have a signed parental permission slip on file. On all six occasions, the medication administered was Tylenol.

6. On one occasion during the 2004-2005 school year, Respondent received a telephone call from a parent asking her to meet a student who needed a wheelchair, at the bus. Respondent did this, and was away from the office for approximately 5 minutes while leaving the door to the nurse's office, and medicine cabinet unlocked.

STATE OF VERMONT



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7. Respondent was terminated from her position with the West Rutland School District as a result of the above acts.

Charges

8. The acts, omissions and/or circumstances described above constitute grounds for discipline because Respondent violated:

- (i) 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); and
- (ii) 26 V.S.A. § 129a(b)(2)(failure to conform to the essential standards of acceptable and prevailing practice).

Relief Requested

WHEREFORE, the license of Karen St. Peter should be revoked, suspended, reprimanded, conditioned or otherwise disciplined.

Dated at Montpelier, Vermont this 17th day of June 2005.

STATE OF VERMONT
SECRETARY OF STATE

By:

Edward G. Adrian
State Prosecuting Attorney

nu.stpeter.soc

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