

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

IN RE:)
DEBI M. WILLIAMS) **Docket No. 2020-30**
License No. 026.0139288)

VOLUNTARY INDEFINITE SUSPENSION STIPULATION

NOW COMES the State of Vermont, by and through State Prosecuting Attorney, Traci Leibowitz, and the Respondent, Debi M. Williams, who stipulate and agree as follows:

1. To moot summary suspension proceedings under 3 V.S.A. § 814(c) in the matter captioned above, the State and Respondent request that license no. 026.0139288 be voluntarily suspended, for an indefinite period, pending adjudication of the above-captioned matter on the merits.
2. This Stipulation is neither an admission of responsibility by the Respondent nor a concession by the State of Vermont that its Request for Summary Suspension is not well-founded
3. Proceedings on the merits should be promptly instituted and determined.
4. Respondent understands that this agreement is a matter of public record and that this suspension pending adjudication on the merits may be reported to other licensing authorities as provided in 3 V.S.A. 129(a)(6).

ORDER

The Board of Nursing hereby suspends license no. 026.0139288 pending adjudication on the merits of the matter captioned above.

AGREED TO:

STATE OF VERMONT
SECRETARY OF STATE

Dated: April 27, 2020

By: 
Traci Leibowitz
State Prosecuting Attorney
89 Main Street, 3rd Floor
Montpelier, VT 05602
(802) 828-0041
traci.leibowitz@vermont.gov

DEBI M. WILLIAMS
RESPONDENT

Dated: 4-27-20

By: Debi M. Williams
Debi M. Williams

APPROVED AND SO ORDERED:

Dated: 5/4/2020

By: [Signature]
Board Chair

Date of Entry: 5/5/2020

There being a declared state of emergency, the Director of Professional Regulation finds that the Board cannot reasonably, safely, and expeditiously convene a quorum to transact business. By her signature, the Director enters the above Order on behalf of the Board.

- Act 91 (2020), Sec. 20(a) (eff. March 30, 2020)

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IN RE:	)	
DEBI M. WILLIAMS	)	Docket No. 2020-_____
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REQUEST FOR SUMMARY SUSPENSION

NOW COMES the State of Vermont, by and through State Prosecuting Traci Leibowitz, and petitions the Board of Nursing to summarily suspend the license of Debi M. Williams, Registered Nurse. In support of such petition, the State alleges the following:

Board Authority

1. The Vermont Board of Nursing (the “Board”) has jurisdiction to investigate and adjudicate allegations of unprofessional conduct committed by nurses pursuant to 3 V.S.A. §§ 129, 129a; 26 V.S.A. Chapter 28; the Administrative Rules of the Board of Nursing (“ARBN”); and the Rules of the Office of Professional Regulation.
2. The Board of Nursing is authorized by 3 V.S.A. § 814 to summarily suspend the license of a nurse when it finds that the public health, safety, or welfare imperatively requires emergency action.

Statement of Facts

3. Debi M. Williams (“Respondent”) of Coshocton, Ohio is licensed by the State of Vermont as a Registered Nurse (“RN”) under license number 026.0139288. This license was originally issued June 13, 2019, and expires on March 31, 2021.
4. At all relevant times, Respondent was employed as a travel nurse by Planet Healthcare.
5. Beginning on July 1, 2019, Respondent was on assignment at Central Vermont Home Health & Hospice (the “Facility”) serving home health patients.
6. On February 3, 2020, Respondent conducted a discharge visit with a home health client (the “Patient”). As part of the discharge visit, Respondent conducted a medication review.
7. The Patient had two bottles of oxycodone that he no longer wanted to keep in his possession. The Patient had been prescribed oxycodone for pain but he rarely used the medication.

8. Respondent offered to take possession of the oxycodone and dispose of it for the Patient.
9. The Patient obliged and handed over more than fifty (50) 5-milligram oxycodone pills to Respondent.
10. Respondent failed to document taking possession of the medication from the Patient. Respondent did not document where, when, or how the medication was disposed.
11. On February 4, 2020, the Patient mentioned to another staff person ("Staff Person") from the Facility that Respondent had taken possession of the oxycodone for disposal.
12. The Staff Person reported this to a supervisor at the Facility because this procedure for medication disposal does not comport with Facility protocols, which prohibit staff members from taking medication out of patients' homes.
13. Respondent admitted to taking possession of the Patient's oxycodone, but offered conflicting explanations about where she disposed of the medication.
14. On February 13, 2020, Respondent's contract with the Facility was terminated.

Violation One: 26 V.S.A. §1582(a)(2) Diverting or attempting to divert drugs or equipment or supplies for unauthorized use.

15. The State re-alleges and incorporates Paragraphs 3 through 14 above.
16. As an RN, Respondent shall not divert or attempt to divert drugs, equipment, or supplies for unauthorized use.
17. Respondent diverted or attempted to divert drugs for unauthorized use as demonstrated in Paragraphs 3 through 14 above.
18. The act(s), omission(s), and/or circumstance(s) described above constitute grounds for summary suspension because Respondent has committed unprofessional conduct in violation of 26 V.S.A. §1582(a)(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: (1) performance of unsafe or unacceptable patient or client care.

19. The State re-alleges and incorporates Paragraphs 3 through 14 above.
20. As an RN, Respondent has an obligation to provide safe and acceptable patient care.

21. Respondent provided unsafe and unacceptable patient care by engaging in the conduct described in Paragraphs 3 through 14 above.
22. The act(s), omission(s), and/or circumstance(s) described above constitute grounds for summary suspension because Respondent has committed unprofessional conduct in violation of 3 V.S.A. §129a(b)(1).

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

23. The State re-alleges and incorporates Paragraphs 3 through 14 above.
24. As an RN, Respondent is required to refrain from engaging in conduct of a character likely to deceive, defraud, or harm the public.
25. Respondent engaged in conduct of a character likely to deceive, defraud, or harm the public as demonstrated in Paragraphs 3 through 14 above.
26. The act(s), omission(s), and/or circumstance(s) described above constitute grounds for summary suspension because the Respondent has committed unprofessional conduct in violation of 26 V.S.A. §1582(a)(3).

Violation Four: 3 V.S.A. §129a(a)(15) Failing to exercise independent professional judgment in the performance of licensed activities when that judgment is necessary to avoid action repugnant to the obligations of the profession.

27. The State re-alleges and incorporates Paragraphs 3 through 14 above.
28. As an RN, Respondent is required to exercise his or her own independent professional judgment in the performance of licensed activities when that judgment is necessary to avoid action repugnant to the obligations of the profession.
29. Respondent's conduct in Paragraphs 3 through 14 above demonstrate Respondent's failure to exercise his or her own professional judgment in the performance of licensed activities when that judgment is necessary to avoid action repugnant to the obligations of the profession.
30. 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)(15).
31. Respondent's conduct in paragraphs 3 through 19 above demonstrate that Respondent failed to comply with this requirement.

32. The act(s), omission(s), and/or circumstance(s) described above constitute grounds for summary suspension because the Respondent has committed unprofessional conduct in violation of 26 V.S.A. §1582(a)(3).

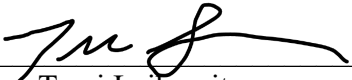
Relief Requested

33. Respondent currently has an unencumbered license. Members of the public, patients, and potential patients have no way of learning of Respondent's unsafe behavior and will remain unprotected pending suspension of Respondent's license. The facts as set forth above establish that emergency action is imperative to protect the public health, safety, or welfare of the people of the State of Vermont.

WHEREFORE, the State of Vermont respectfully requests that pursuant to 3 V.S.A. § 814(c), the Respondent's registered nursing license, number 026.0139288, be summarily suspended, pending a hearing on the merits.

DATED at Montpelier, Vermont this 17th day of April, 2020.

STATE OF VERMONT
SECRETARY OF STATE

By: 

Traci Leibowitz
State Prosecuting Attorney
(802) 828-0041
traci.leibowitz@vermont.gov