



I do hereby certify this to be a complete, accurate, and true copy of the document which is on file or is of record in the offices of the Texas Board of Nursing.  
*Katherine A. Thomas*  
Executive Director of the Board

BEFORE THE TEXAS BOARD OF NURSING

\*\*\*\*\*

In the Matter of Registered Nurse           §        AGREED  
License Number 744630                       §  
issued to SARA ANGELICA WARREN       §        ORDER

On this day the Texas Board of Nursing, hereinafter referred to as the Board, considered the matter of SARA ANGELICA WARREN, Registered Nurse License Number 744630, hereinafter referred to as Respondent.

Information received by the Board produced evidence that Respondent may have violated Section 301.452(b)(2),(8)&(10), Texas Occupations Code. Respondent waived representation by counsel, informal proceedings, notice and hearing, and agreed to the entry of this Order offered on February 3, 2011, by Katherine A. Thomas, MN, RN, Executive Director, subject to ratification by the Board.

FINDINGS OF FACT

1. Prior to the institution of Agency proceedings, notice of the matters specified below in these Findings of Fact was served on Respondent and Respondent was given an opportunity to show compliance with all requirements of the law for retention of the license(s).
2. Respondent waived representation by counsel, informal proceedings, notice and hearing, and agreed to the entry of this Order.
3. Respondent is currently licensed to practice professional nursing in the State of Texas.
4. Respondent received a Baccalaureate Degree in Nursing from Rogers University, Claremore, Oklahoma on May 10, 1997. Respondent was licensed to practice professional nursing in the State of Texas on July 16, 2007.
5. Respondent's complete professional nursing employment history is unknown.

6. On or about April 29, 2010, while holding a license as a Registered Nurse in the State of Texas, Respondent submitted an online renewal application to the Texas Board of Nursing - Registered Nurse in which Respondent provided false, deceptive, and/or misleading information, in that she answered "no" to the following question:

"Has any licensing authority refused to issue you a license or ever revoked, annulled, cancelled, accepted surrender of, suspended, placed on probation, refused to renew a nursing license, certificate or multi-state privilege held by you not or previously, or ever fined, censured, reprimanded or otherwise disciplined you?"

On or about September 10, 2009, Respondent's license to practice professional nursing in the State of Washington, RN00153305, was issued a Final Order of Default and Indefinitely Suspended, Master Case No. M2009-365 for failing to comply with Stipulation To Informal Disposition No. M2008-117945 entered into and agreed to by Respondent on July 14, 2008 and accepted by the State Of Washington, Department Of Health, Nursing Care Quality Assurance Commission on July 31, 2008. Respondent's conduct was deceiving and may have affected the Board's decision to license her.

7. In response to Finding of Fact Number Six (6), Respondent states she accepts responsibility for providing false information regarding her Washington State License. Respondent further states that at the time her main focus was on being able to maintain her Texas License and was not fully aware of the ramifications of her actions.
8. On or about September 10, 2009, while holding Registered Nurse License Number 744630 issued by the Texas Board of Nursing, Respondent's license to practice professional nursing in the State of Washington, RN00153305, was issued a Final Order of Default and Indefinitely Suspended, Master Case No. M2009-365 for failing to comply with Stipulation To Informal Disposition No. M2008-117945 entered into and agreed to by Respondent on July 14, 2008 and accepted by the State Of Washington, Department Of Health, Nursing Care Quality Assurance Commission on July 31, 2008. State Of Washington, Department Of Health, Nursing Care Quality Assurance Commission Final Order of Default, Master Case No. M2009-365, dated September 10, 2009 and Stipulation To Informal Disposition No. M2008-117945 Order No. 0029000019 dated July 31, 2008, is attached and incorporated, as part of this pleading.
9. In response to Finding of Fact Number Eight (8), Respondent states she regrets not complying with the Stipulations from Washington State in a timely manner and did not realize her inaction would be so costly.
10. Charges were filed on May 3, 2010.
11. First Amended Formal Charges were filed on January 5, 2011,

12. Charges were mailed to Respondent on May 4, 2010.
13. First Amended Formal Charges were mailed to Respondent on January 6, 2011.

#### CONCLUSIONS OF LAW

1. Pursuant to Texas Occupations Code, Sections 301.451-301.555, the Board has jurisdiction over this matter.
2. Notice was served in accordance with law.
3. The evidence received is sufficient to prove violation of Section 301.452(b)(2),(8)&(10), Texas Occupations Code and 22 TEX. ADMIN. CODE §217.12(6)(H)&(I).
4. The evidence received is sufficient cause pursuant to Section 301.452(b), Texas Occupations Code, to take disciplinary action against Registered Nurse License Number 744630, heretofore issued to SARA ANGELICA WARREN, including revocation of Respondent's license(s) to practice nursing in the State of Texas.

#### ORDER

IT IS THEREFORE AGREED and ORDERED, subject to ratification by the Texas Board of Nursing, that RESPONDENT SHALL receive the sanction of a WARNING WITH FINE AND STIPULATIONS, and RESPONDENT SHALL comply in all respects with the Nursing Practice Act, Texas Occupations Code, §§301.001 *et seq.*, the Rules and Regulations Relating to Nurse Education, Licensure and Practice, 22 TEX. ADMIN. CODE §211.1 *et seq.* and this Order.

IT IS FURTHER AGREED and ORDERED that, while under the terms of this Order, this Order SHALL apply to any and all future licenses issued to Respondent to practice nursing in the State of Texas.

IT IS FURTHER AGREED and ORDERED that this Order SHALL be applicable to Respondent's nurse licensure compact privileges, if any, to practice nursing in the State of Texas.

IT IS FURTHER AGREED and ORDERED that while Respondent's license(s) is/are

encumbered by this Order, Respondent may not work outside the State of Texas pursuant to a nurse licensure compact privilege without the written permission of the Texas Board of Nursing and the Board of Nursing in the party state where Respondent wishes to work.

IT IS FURTHER AGREED that:

(1) RESPONDENT SHALL, within one (1) year of entry of this Order, successfully complete a course in Texas nursing jurisprudence and ethics. RESPONDENT SHALL obtain Board approval of the course prior to enrollment only if the course is not being offered by a pre-approved provider. Home study courses and video programs will not be approved. In order for the course to be approved, the target audience shall include nurses. It shall be a minimum of six (6) hours in length. The course's content shall include the Nursing Practice Act, standards of practice, documentation of care, principles of nursing ethics, confidentiality, professional boundaries, and the Board's Disciplinary Sanction Policies regarding: Sexual Misconduct; Fraud, Theft and Deception; Nurses with Substance Abuse, Misuse, Substance Dependency, or other Substance Use Disorder; and Lying and Falsification. Courses focusing on malpractice issues will not be accepted. RESPONDENT SHALL CAUSE the sponsoring institution to submit a Verification of Course Completion form, provided by the Board, to the Office of the Board to verify RESPONDENT'S successful completion of the course. This course shall be taken in addition to any other courses stipulated in this Order, if any, and in addition to any continuing education requirements the Board has for relicensure. *Board-approved courses may be found at the following Board website address:* <http://www.bon.state.tx.us/disciplinaryaction/stipscourses.html>.

(2) RESPONDENT SHALL, within one (1) year of entry of this Order, successfully complete the course "Sharpening Critical Thinking Skills," a 3.6 contact hour online program provided by the National Council of State Boards of Nursing (NCSBN) Learning Extension. In order to receive credit for completion of this program, RESPONDENT SHALL SUBMIT the continuing education certificate of completion for this program to the Board's office, to the attention of Monitoring. This course is to be taken in addition to any continuing education requirements the Board may have for relicensure. *Information regarding this workshop may be found at the following web address: <http://learningext.com/hives/a0f6f3e8a0/summary>.*

(3) RESPONDENT SHALL pay a monetary fine in the amount of two hundred and fifty dollars (\$250.00). RESPONDENT SHALL pay this fine within forty-five (45) days of entry of this Order. Payment is to be made directly to the Texas Board of Nursing in the form of cashier's check or U.S. money order. Partial payments will not be accepted.

**IT IS FURTHER AGREED, SHOULD RESPONDENT PRACTICE AS A NURSE IN THE STATE OF TEXAS, RESPONDENT WILL PROVIDE DIRECT PATIENT CARE AND PRACTICE IN A HOSPITAL, NURSING HOME, OR OTHER CLINICAL SETTING AND RESPONDENT MUST WORK IN SUCH SETTING A MINIMUM OF SIXTY-FOUR (64) HOURS PER MONTH UNDER THE FOLLOWING STIPULATIONS FOR ONE (1) YEAR(S) OF EMPLOYMENT. THE LENGTH OF THE STIPULATION PERIOD WILL BE EXTENDED UNTIL SUCH TWELVE (12) MONTHS HAVE ELAPSED. PERIODS OF UNEMPLOYMENT OR OF EMPLOYMENT THAT DO NOT REQUIRE THE USE OF A REGISTERED NURSE (RN) LICENSE WILL NOT APPLY TO THIS STIPULATION PERIOD:**

(4) RESPONDENT SHALL notify each present employer in nursing of this Order of the Board and the stipulations on RESPONDENT'S license. RESPONDENT SHALL present a complete copy of this Order and all Proposals for Decision issued by the Administrative Law Judge, if any, to each present employer within five (5) days of receipt of this Order. RESPONDENT SHALL notify all future employers in nursing of this Order of the Board and the stipulations on RESPONDENT'S license. RESPONDENT SHALL present a complete copy of this Order and all Proposals for Decision issued by the Administrative Law Judge, if any, to each future employer prior to accepting an offer of employment.

(5) RESPONDENT SHALL CAUSE each present employer in nursing to submit the Notification of Employment form, which is provided to the Respondent by the Board, to the Board's office within ten (10) days of receipt of this Order. RESPONDENT SHALL CAUSE each future employer to submit the Notification of Employment form, which is provided to the Respondent by the Board, to the Board's office within five (5) days of employment as a nurse.

(6) RESPONDENT SHALL be supervised by a Registered Nurse who is on the premises. The supervising nurse is not required to be on the same unit or ward as RESPONDENT, but should be on the facility grounds and readily available to provide assistance and intervention if necessary. The supervising nurse shall have a minimum of two (2) years experience in the same or similar practice setting to which the Respondent is currently working. RESPONDENT SHALL work only regularly assigned, identified and predetermined unit(s). RESPONDENT SHALL NOT be employed by a nurse registry, temporary nurse employment agency, hospice, or home health agency. RESPONDENT SHALL NOT be self-employed or contract for services. Multiple employers are prohibited.

(7) RESPONDENT SHALL CAUSE each employer to submit, on forms provided to the Respondent by the Board, periodic reports as to RESPONDENT'S capability to practice nursing. These reports shall be completed by the Registered Nurse who supervises the RESPONDENT. These reports shall be submitted by the supervising nurse to the office of the Board at the end of each three (3) month period for one (1) year(s) of employment as a nurse.

IT IS FURTHER AGREED, that upon full compliance with the terms of this Order, all encumbrances will be removed from RESPONDENT'S license(s) to practice nursing in the State of Texas and RESPONDENT shall be eligible for nurse licensure compact privileges, if any.

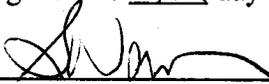
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RESPONDENT'S CERTIFICATION

I understand that I have the right to legal counsel prior to signing this Agreed Order. I waive representation by counsel. I have reviewed this Order. I neither admit nor deny the violations alleged herein. By my signature on this Order, I agree to the Findings of Fact, Conclusions of Law, Order, and any conditions of said Order, to avoid further disciplinary action in this matter. I waive judicial review of this Order. I understand that this Order is subject to ratification by the Board. When this Order is ratified, the terms of this Order become effective, and a copy will be mailed to me. I understand that if I fail to comply with all terms and conditions of this Order, I will be subject to investigation and disciplinary sanction, including revocation of my license(s) to practice nursing in the State of Texas, as a consequence of my noncompliance.

Signed this 19<sup>th</sup> day of April, 2011.



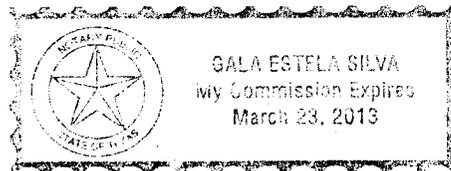
SARA ANGELICA WARREN, Respondent

Sworn to and subscribed before me this 19<sup>th</sup> day of April, 2011.

SEAL



Notary Public in and for the State of Texas



WHEREFORE, PREMISES CONSIDERED, the Texas Board of Nursing does hereby ratify and adopt the Agreed Order that was signed on the 19<sup>th</sup> day of April, 2011, by SARA ANGELICA WARREN, Registered Nurse License Number 744630, and said Order is final.

Effective this 14<sup>th</sup> day of June, 2011.



Katherine A. Thomas  
Katherine A. Thomas, MN, RN  
Executive Director on behalf  
of said Board



STATE OF WASHINGTON  
DEPARTMENT OF HEALTH  
Olympia, Washington 98504

RE: Sara A. Warren  
Master Case No.: M2009-365  
Docket No.:  
Document: Final Order of Default

Regarding your request for information about the above-named practitioner, certain information may have been withheld pursuant to Washington state laws. While those laws require that most records be disclosed on request, they also state that certain information should not be disclosed.

The following information has been withheld: **NONE**

If you have any questions or need additional information regarding the information that was withheld, please contact:

Customer Service Center  
P.O. Box 47865  
Olympia, WA 98504-7865  
Phone: (360) 236-4700  
Fax: (360) 586-2171

You may appeal the decision to withhold any information by writing to the Deputy Secretary, Department of Health, P.O. Box 47890, Olympia, WA 98504-7890.

**STATE OF WASHINGTON  
DEPARTMENT OF HEALTH  
NURSING CARE QUALITY ASSURANCE COMMISSION**

In the Matter of

No. M2009-365

**SARA A. WARREN**  
Credential No. RN.RN.00153305

Respondent

**FINDINGS OF FACT,  
CONCLUSIONS OF LAW AND  
FINAL ORDER OF DEFAULT  
(Failure to Respond)**

This matter is before the Presiding Officer, on designation by the Nursing Care Quality Assurance Commission (Commission), for final order of default. Based on the record, the Presiding Officer issues the following:

**1. FINDINGS OF FACT**

1.1 On March 10, 2004, the state of Washington issued Respondent a credential to practice as a registered nurse. Respondent's credential expired on April 27, 2009, but is subject to renewal.

1.2 On July 31, 2008, the Commission entered a Stipulation to Informal Disposition In the Matter of Sara A. Warren, No. M2008-117945 (2008 Stipulation). The 2008 Stipulation required Respondent to comply with among other terms and conditions the following:

A. Within six (6) months from the effective date of this Stipulation, Respondent shall provide evidence to the Commission that she has successfully completed thirty-six (36) hours of course-work, pre-approved by the Commission of its designee, in the areas of documentation, medication administration and legal issues (twelve (12) hours in each area). The course-work must be taken at an accredited educational institution or through a program otherwise approved by the Commission. Respondent shall provide the Commission with proof of completion of such course-work within thirty (30) days of such completion. (Paragraph 2.1 of the 2008 Stipulation)

1.3 On February 6, 2009, the compliance officer for the Commission sent a letter to Respondent stating that she was out of compliance with paragraph 2.1 of the

2008 Stipulation. The letter gave Respondent until February 20, 2009 to come into compliance with the stipulation.

1.4 As of May 1, 2009, Respondent remains out of compliance with the terms and/or conditions of the 2008 Stipulation.

1.5 On July 16, 2009, the Commission served Respondent with a copy of the following documents at Respondent's last known address:

- A. Statement of Charges;
- B. Notice of Your Legal Rights;
- C. Answer to Statement of Charges and Request for Settlement and Hearing (Answer).

1.6 The Answer was due in the Adjudicative Clerk Office by August 5, 2009. RCW 18.130.090.

1.7 The Adjudicative Clerk Office has not received the Answer. On August 7, 2009, the Adjudicative Clerk Office issued a Notice of Failure to Respond.

1.8 The Commission has no reason to believe Respondent is now on active military service.

## 2. CONCLUSIONS OF LAW

2.1 The Commission has jurisdiction over Respondent and over the subject matter of this case, RCW 18.130.040.

2.2 Respondent did not file a request for hearing within the time allowed. RCW 18.130.090(1). Respondent is in default, and the Commission may issue a final order based on the evidence presented. RCW 18.130.090(1) and RCW 34.05.440.

2.3 Respondent has committed unprofessional conduct in violation of RCW 18.130.180(9).

2.4 The above violation provides grounds for imposing sanctions under RCW 18.130.160.

## 3. COMPLIANCE WITH SANCTION RULES

3.1 The disciplinary authority applies WAC 246-16-800, *et seq.*, to determine appropriate sanctions. WAC 246-16-800(2)(b)(iv) provides that "indefinite suspension may be imposed in default and waiver of hearing orders."

3.2 The sanction of indefinite suspension adequately addresses the alleged facts of this case.

#### 4. ORDER

The COMMISSION ORDERS:

4.1 The credential to practice as a registered nurse in the state of Washington held by Respondent shall be and is hereby INDEFINITELY SUSPENDED with no right to petition for reinstatement of credential until Respondent has complied with the all terms and/or conditions of the July 31, 2008 Stipulation to Informal Disposition, No. M2008-117945.

#### 5. NOTICE TO PARTIES

This Order will be reported to the Health Integrity and Protection Databank (45 CFR Part 61), the National Practitioner Databank (45 CFR Part 60) and elsewhere as required by law. It is a public document and will be placed on the Department of Health's website and otherwise disseminated as required by the Public Records Act (Chap. 42.56 RCW) and the Uniform Disciplinary Act RCW 18.130.110.

Respondent may file a petition for reconsideration. RCW 34.05.470. The petition must be filed within ten (10) days of service of this Order with:

Adjudicative Clerk Office  
Adjudicative Service Unit  
PO Box 47879  
Olympia, WA 98504-7879

and a copy must be sent to:

State of Washington  
Department of Health  
Legal Services Office  
PO Box 47873  
Olympia WA 98504-7873

The petition must state the specific grounds upon which reconsideration is requested and the relief requested. The petition for reconsideration is considered denied twenty (20) days after the petition is filed if the Adjudicative Clerk Office has not

responded to the petition or served written notice of the date by which action will be taken on the petition.

A petition for judicial review must be filed and served within thirty (30) days after service of this Order. RCW 34.05.542. The procedures are identified in chapter 34.05 RCW, Part V, Judicial Review and Civil Enforcement. A petition for reconsideration is not required before seeking judicial review. If a petition for reconsideration is filed, however, the thirty (30) day period will begin to run upon the resolution of that petition, RCW 34.05.470(3).

The Order remains in effect even if a petition for reconsideration or petition for review is filed. "Filing" means actual receipt of the document by the Adjudicative Clerk Office, RCW 34.05.010(6). This Order was "served" upon you on the day it was deposited in the United States mail, RCW 34.05.010(19).

DATED: September 10, 2009, 2009.

STATE OF WASHINGTON  
DEPARTMENT OF HEALTH  
NURSING CARE QUALITY ASSURANCE  
COMMISSION

  
\_\_\_\_\_  
PRESIDING OFFICER

PRESENTED BY:

Patricia M Stuart  
PATRICIA M. STUART, WSBA #20250  
DEPARTMENT OF HEALTH STAFF ATTORNEY

9-8-09  
\_\_\_\_\_  
DATE



STATE OF WASHINGTON  
DEPARTMENT OF HEALTH  
Olympia, Washington 98504

RE: Sara A. Warren  
Master Case No. M2009-365  
Docket No.:  
Document: Statement of Charges

Regarding your request for information about the above-named practitioner, certain information may have been withheld pursuant to Washington state laws. While those laws require that most records be disclosed on request, they also state that certain information should not be disclosed.

The following information has been withheld: **NONE**

If you have any questions or need additional information regarding the information that was withheld, please contact:

Customer Service Center  
P.O. Box 47865  
Olympia, WA 98504-7865  
Phone: (360) 236-4700  
Fax: (360) 586-2171

You may appeal the decision to withhold any information by writing to the Deputy Secretary, Department of Health, P.O. Box 47890, Olympia, WA 98504-7890.

STATE OF WASHINGTON  
DEPARTMENT OF HEALTH  
NURSING CARE QUALITY ASSURANCE COMMISSION

In the Matter of

**SARA A. WARREN**  
Credential No. RN.RN.00153305

Respondent

No. M2009-365

**STATEMENT OF CHARGES**

**FILED**  
JUL 17 2009  
Adjudicative Clerk

The Health Services Consultant of the Nursing Care Quality Assurance Commission (Commission), on designation by the Commission, makes the allegations below, which are supported by the evidence contained in case no. 2009-134696.

**1. ALLEGED FACTS**

1.1 On March 10, 2004, the state of Washington issued Respondent a credential to practice as a registered nurse. Respondent's credential expired on April 27, 2009, but is subject to renewal.

1.2 On July 31, 2008, the Commission entered a Stipulation to Informal Disposition In the Matter of Sara A. Warren, No. M2008-117945 (2008 Stipulation). The 2008 Stipulation required Respondent to comply with among other terms and conditions the following:

A. Within six (6) months from the effective date of this Stipulation, Respondent shall provide evidence to the Commission that she has successfully completed thirty-six (36) hours of course-work, pre-approved by the Commission or its designee, in the areas of documentation, medication administration and legal issues (twelve (12) hours in each area). The course-work must be taken at an accredited educational institution or through a program otherwise approved by the Commission. Respondent shall provide the Commission with proof of completion of such course-work within thirty (30) days of such completion. (Paragraph 2.1 of the 2008 Stipulation)

1.3 On February 6, 2009, the compliance officer for the Commission sent a letter to Respondent stating that she was out of compliance with paragraph 2.1 of the

2008 Stipulation. The letter gave Respondent until February 20, 2009 to come into compliance with the stipulation.

1.4 As of May 1, 2009, Respondent remains out of compliance with the terms and/or conditions of the 2008 Stipulation.

## 2. ALLEGED VIOLATIONS

2.1 Based on the Alleged Facts, Respondent has committed unprofessional conduct in violation of RCW 18.130.180(9), which provides:

**RCW 18.130.180 Unprofessional conduct.** The following conduct, acts, or conditions constitute unprofessional conduct for any license holder under the jurisdiction of this chapter:

...

(9) Failure to comply with an order issued by the disciplining authority or a stipulation for informal disposition entered into with the disciplining authority;

....

2.2 The above violation provides grounds for imposing sanctions under RCW 18.130.160.

## 3. NOTICE TO RESPONDENT

The charges in this document affect the public health, safety and welfare. The Health Services Consultant of the Commission directs that a notice be issued and served on Respondent as provided by law, giving Respondent the opportunity to defend against these charges. If Respondent fails to defend against these charges, Respondent shall be subject to discipline and the imposition of sanctions under Chapter 18.130 RCW.

DATED: July 16, 2009.

STATE OF WASHINGTON  
DEPARTMENT OF HEALTH  
NURSING CARE QUALITY ASSURANCE  
COMMISSION

  
MARY DALE  
HEALTH SERVICES CONSULTANT

  
CALLIE A. CASTILLO, WSBA # 38214  
ASSISTANT ATTORNEY GENERAL

**STATE OF WASHINGTON  
DEPARTMENT OF HEALTH  
NURSING CARE QUALITY ASSURANCE COMMISSION**

In the Matter of

**SARA A. WARREN**  
Credential No. RN.RN.00153305

Respondent

No. M2008-117945

**STIPULATION TO INFORMAL  
DISPOSITION**

**1. STIPULATION**

The parties to the above-entitled matter stipulate as follows:

1.1 Sara A. Warren, Respondent, is informed and understands that the Health Services Consultant of the Nursing Care Quality Assurance Commission (Commission), on designation by the Commission, has made the following allegations.

A. On March 10, 2004, the state of Washington issued Respondent a credential to practice as a registered nurse. Respondent's credential is currently active.

B. During approximately September 2007 through November 2007, Respondent worked as a nurse in a hospital.

C. An internal investigation confirmed that Respondent was dispensing ten (10) times the number of orally-administered narcotics compared with the average number dispensed by other nurses.

D. The investigation also confirmed that most of the orally-administered narcotics dispensed were not charted as having been administered to patients.

1.2 Respondent is informed and understands that the Commission has alleged that the conduct described above, if proven, would constitute a violation of RCW 18.130.180(4), (7) and/or WAC 246-840-710(2)(b), and (c).

1.3 The parties wish to resolve this matter by means of a Stipulation to Informal Disposition pursuant to RCW 18.130.172(1).

1.4 Respondent agrees to be bound by the terms and conditions of the Stipulation to Informal Disposition.

1.5 This Stipulation to Informal Disposition is of no force and effect and is not binding on the parties unless and until it is accepted by the Commission.

1.6 Respondent does not admit any of the allegations in the Statement of Allegations and Summary of Evidence or in paragraph 1.1 above. This Stipulation to Informal Disposition shall not be construed as a finding of unprofessional conduct or inability to practice.

1.7 This Stipulation to Informal Disposition is not formal disciplinary action. However, it is subject to the federal reporting requirements pursuant to Section 1128E of the Social Security Act and 45 CFR Part 61 and any other applicable interstate/national reporting requirements. It is a public document and will be available on the Department of Health web site.

1.8 This Stipulation to Informal Disposition is releasable to the public upon request pursuant to the Public Records Act, chapter 42.56 RCW. The Statement of Allegations and Summary of Evidence and the Stipulation to Informal Disposition shall remain part of Respondent's file and cannot be expunged.

1.9 The Commission agrees to forego further disciplinary proceedings concerning the allegations contained in paragraph 1.1 above.

1.10 Respondent agrees to successfully complete the terms and conditions of this informal disposition.

1.11 Respondent is advised and understands that a violation of the provisions of Section 2 of this Stipulation to Informal Disposition, if proved, would constitute grounds for discipline under RCW 18.130.180 and the imposition of sanctions under RCW 18.130.160.

## 2. INFORMAL DISPOSITION

Pursuant to RCW 18.130.172(2) and based upon the above stipulation, the parties agree to the following Informal Disposition:

2.1 Within six (6) months from the effective date of this Stipulation, Respondent shall provide evidence to the Commission that she has successfully completed thirty-six (36) hours of course-work, pre-approved by the Commission or its designee, in the areas of documentation, medication administration, and legal issues (twelve (12) hours in each area). The course-work must be taken at an accredited educational institution or through

a program otherwise approved by the Commission. Respondent shall provide the Commission with proof of completion of such course-work within thirty (30) days of such completion.

2.2 Respondent shall reimburse costs to the Commission in the amount of five hundred dollars (\$500.00) which must be received by the Commission within six (6) months from the effective date of this Stipulation. The reimbursement shall be paid by certified or cashier's check or money order, made payable to the Department of Health and mailed to the Department of Health, Nursing Care Quality Assurance Commission at PO Box 1099, Olympia, Washington 98507-1099.

2.3 All documentation required by this Stipulation shall be mailed to Nursing Care Quality Assurance Commission, PO Box 47864, Olympia WA 98504-7864.

2.4 Respondent shall obey all federal, state and local laws and all administrative rules governing the practice of the profession in Washington.

2.5 Respondent shall assume all costs of complying with this Stipulation to Informal Disposition.

2.6 If Respondent violates any provision of this Stipulation to Informal Disposition in any respect, the Commission may take further action against Respondent's credential.

2.7 Respondent shall inform the Commission and the Adjudicative Clerk Office in writing, of changes in her residential and/or business address within thirty (30) days of such change.

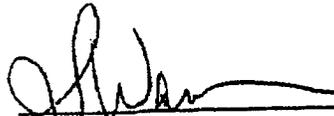
2.8 The effective date of this Stipulation to Informal Disposition is the date the Adjudicative Clerk Office places the signed Stipulation to Informal Disposition into the U.S. mail. If required, Respondent shall not submit any fees or compliance documents until after the effective date of this Stipulation to Informal Disposition.

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I, SARA A. WARREN, Respondent, certify that I have read this Stipulation to Informal Disposition in its entirety; that my counsel of record, if any, has fully explained the legal significance and consequence of it; that I fully understand and agree to all of it; and that it may be presented to the Commission without my appearance. If the Commission accepts the Stipulation to Informal Disposition, I understand that I will receive a signed copy.



SARA A. WARREN  
RESPONDENT

7/14/08  
DATE

\_\_\_\_\_, WSBA #  
ATTORNEY FOR RESPONDENT

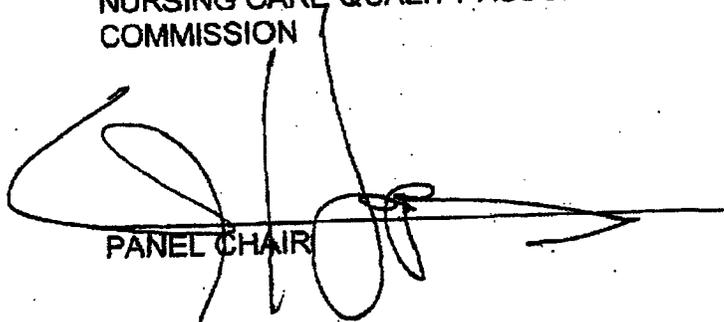
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DATE

**3. ACCEPTANCE**

The Commission accepts this Stipulation to Informal Disposition. All parties shall be bound by its terms and conditions.

DATED: July 31, 2008, 2008.

STATE OF WASHINGTON  
DEPARTMENT OF HEALTH  
NURSING CARE QUALITY ASSURANCE  
COMMISSION

  
\_\_\_\_\_

PANEL CHAIR

PRESENTED BY:

Patricia M Stuart  
PATRICIA M. STUART, WSBA #20250  
DEPARTMENT OF HEALTH STAFF ATTORNEY

7-29-08  
DATE



STATE OF WASHINGTON  
DEPARTMENT OF HEALTH  
Olympia, Washington 98504

RE: Sara A. Warren  
Master Case No.: M2008-117945  
Docket No.:  
Document: Statement of Allegations

Regarding your request for information about the above-named practitioner, certain information may have been withheld pursuant to Washington state laws. While those laws require that most records be disclosed on request, they also state that certain information should not be disclosed.

The following information has been withheld: **NONE**

If you have any questions or need additional information regarding the information that was withheld, please contact:

Customer Service Center  
P.O. Box 47865  
Olympia, WA 98504-7865  
Phone: (360) 236-4700  
Fax: (360) 586-2171

You may appeal the decision to withhold any information by writing to the Deputy Secretary, Department of Health, P.O. Box 47890, Olympia, WA 98504-7890.

STATE OF WASHINGTON  
DEPARTMENT OF HEALTH  
NURSING CARE QUALITY ASSURANCE COMMISSION

In the Matter of

**SARA A. WARREN**  
Credential No. RN.RN.00153305

Respondent

No. M2008-117945

**STATEMENT OF ALLEGATIONS  
AND SUMMARY OF EVIDENCE**

FILED  
AUG 04 2008  
Adjudicative Clerk Office

The Health Services Consultant of the Nursing Care Quality Assurance Commission (Commission), on designation by the Commission, makes the allegations below, which are supported by evidence contained in case no. 2007-47601.

**1. ALLEGED FACTS**

1.1 On March 10, 2004, the state of Washington issued Respondent a credential to practice as a registered nurse. Respondent's credential is currently active.

1.2 During approximately September 2007 through November 2007, Respondent worked as a nurse in a hospital.

1.3 An internal investigation confirmed that Respondent was dispensing ten (10) times the number of orally-administered narcotics compared with the average number dispensed by other nurses.

1.4 The investigation also confirmed that most of the orally-administered narcotics dispensed were not charted as having been administered to patients.

**2. SUMMARY OF EVIDENCE**

- 2.1 Respondent's written statement.
- 2.2 Hospital patient and medication records.
- 2.3 Witness statements.

**3. ALLEGED VIOLATIONS**

3.1 The facts alleged in Section 1, if proven, would constitute unprofessional conduct in violation of RCW 18.130.180(4), (7) and/or WAC 246-840-710(2)(b) and (c) which provide in part:

**RCW 18.130.180 Unprofessional conduct.** The following conduct, acts, or conditions constitute unprofessional conduct for any license holder or applicant under the jurisdiction of this chapter:

...

(4) Incompetence, negligence, or malpractice which results in injury to a patient or which creates an unreasonable risk that a patient may be harmed. The use of a nontraditional treatment by itself shall not constitute unprofessional conduct, provided that it does not result in injury to a patient or create an unreasonable risk that a patient may be harmed;

...

(7) Violation of any state or federal statute or administrative rule regulating the profession in question, including any statute or rule defining or establishing standards of patient care or professional conduct or practice;

....

**WAC 246-840-710 Violations of standards of nursing conduct or practice.**

The following conduct may subject a nurse to disciplinary action under the Uniform Disciplinary Act, chapter 18.130 RCW:

...

(2) Failure to adhere to the standards enumerated in WAC 246-840-700 which may include, but are not limited to:

...

(b) Willfully or repeatedly failing to report or document a client's symptoms, responses, progress, medication, or other nursing care accurately and/or legibly;

(c) Willfully or repeatedly failing to make entries, altering entries, destroying entries, making incorrect or illegible entries and/or making false entries in employer or employee records or client records pertaining to the giving of medication, treatments, or other nursing care;

....

**4. NOTICE TO RESPONDENT**

4.1 The Commission has determined that this case may be appropriate for resolution through a Stipulation to Informal Disposition pursuant to RCW 18.130.172(2). A proposed Stipulation to Informal Disposition is attached, which contains the disposition the Commission believes is necessary to address the conduct alleged in this Statement of Allegations and Summary of Evidence.

4.2 If Respondent agrees that the disposition imposed by the Stipulation to Informal Disposition is appropriate, Respondent should sign and date the Stipulation to

Informal Disposition and return it within fourteen (14) days to the Department of Health Legal Service Office at PO Box 47873, Olympia, WA 98504-7873.

4.3 If Respondent does not agree that the terms and conditions contained in the Stipulation to Informal Disposition are appropriate, Respondent should contact Patricia Stuart, Department of Health Staff Attorney, PO Box 47873, Olympia, WA 98504-7873, (360) 236-4687 within fourteen (14) days.

4.4 If Respondent does not respond within fourteen (14) days, the Commission will assume Respondent has declined to resolve the allegations by means of a Stipulation to Informal Disposition.

4.5 If Respondent declines to resolve the allegations by means of a Stipulation to Informal Disposition pursuant to RCW 18.130.172(2), the Commission may proceed to formal disciplinary action against Respondent by filing a Statement of Charges, pursuant to RCW 18.130.172(3).

4.6 The cover letter enclosed with this Statement of Allegations and Summary of Evidence was mailed to the name and address currently on file for Respondent's credential. Respondent must notify, in writing, the Commission if Respondent's name and/or address changes.

DATED: June 19, 2008.

STATE OF WASHINGTON  
DEPARTMENT OF HEALTH  
NURSING CARE QUALITY ASSURANCE  
COMMISSION

Mary Dale  
MARY DALE  
HEALTH SERVICES CONSULTANT

Patricia M Stuart  
PATRICIA M. STUART, WSBA #20250  
DEPARTMENT OF HEALTH STAFF ATTORNEY