



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 § AGREED ORDER
Privilege to Practice from Missouri Registered §
Nurse License Number 2010035962 and Texas §
Registered Nurse License Number 976524 §
issued to SUZANNE L. JONES §

On this day the Texas Board of Nursing, hereinafter referred to as the Board, considered the matter of SUZANNE L. JONES, Registered Nurse License Number 976524, hereinafter referred to as Respondent.

Information received by the Board produced evidence that Respondent may be subject to discipline pursuant to Section 301.452(b)(13), Texas Occupations Code.

Respondent waived notice and hearing and agreed to the entry of this Agreed Order approved by Katherine A. Thomas, MN, RN, FAAN, Executive Director, on February 3, 2020.

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 notice and hearing, and agreed to the entry of this Agreed Order.
3. Respondent's license to practice as a professional nurse in the State of Texas is in current status.
4. Respondent received an Associate Degree in Nursing from Shelby State Community College, Memphis, Tennessee, on December 1, 1999. Respondent was licensed to practice professional nursing in the State of Texas on September 6, 2019.
5. Respondent's nursing employment history includes:

9/2015 – 12/2016	Registered Nurse	Park Manor of Humble Humble, Texas
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Respondent's nursing employment history continued:

12/2016 – 4/2017	Registered Nurse	Regent Care Center Kingwood, Texas
4/2017 – 10/2017	Registered Nurse	Park Manor of Humble Humble, Texas
10/2017 – 2/2019	Registered Nurse	Epic Health Services North Houston, Texas
4/2019 – Present	Registered Nurse	United Healthcare North Houston, Texas

6. At the time of the initial incident, Respondent was employed as a Registered Nurse with Park Manor of Humble, Humble, Texas, and had been in that position for one (1) year.
7. On or about September 18, 2016, while working at Park Manor of Humble, Humble, Texas, using a Privilege to Practice registered/professional nursing from Missouri, Respondent failed to document the urine characteristics and urine output of Patient SPF as well as the size and patency of the patient's indwelling catheter in the medical record. Respondent's conduct created an incomplete medical record.
8. In response to Finding of Fact Number Seven (7), Respondent states her documentation of the incident was appropriate.
9. On or about September 3, 2019, Respondent was issued an Eligibility Agreed Order through an Order of the Board. On or about November 18, 2019, Respondent successfully completed the terms of the Order. A copy of the September 3, 2019, Order is attached and incorporated herein by reference as part of this Agreed Order.
10. On or about October 15, 2019, Respondent completed a Board approved course in sharpening critical thinking skills, which would have been a requirement of this Agreed Order.
11. On or about November 16, 2019, Respondent completed a Board-approved course in Texas Nursing Jurisprudence and Ethics, which would have been a requirement of this Agreed Order.

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(s) of 22 TEX. ADMIN. CODE §§217.11(1)(D), and Section 301.452(b)(13).
4. The evidence received is sufficient cause pursuant to Section 301.452(b)(13), Texas Occupations Code, to take disciplinary action against Registered Nurse License Number 976524, heretofore issued to SUZANNE L. JONES.
5. Pursuant to Section 301.463(d), Texas Occupations Code, this Agreed Order is a settlement agreement under Rule 408, Texas Rules of Evidence, in civil or criminal litigation.

TERMS OF ORDER

I. **SANCTION AND APPLICABILITY**

IT IS THEREFORE AGREED and ORDERED that RESPONDENT SHALL receive the sanction of **REMEDIAL EDUCATION** in accordance with the terms of this Order.

- A. This Order SHALL apply to any and all future licenses issued to RESPONDENT to practice nursing in the State of Texas.
- B. This Order SHALL be applicable to RESPONDENT'S nurse licensure compact privileges, if any, to practice nursing in the State of Texas.
- C. As a result of this Order, RESPONDENT'S license(s) will be designated "single state" and RESPONDENT may not work outside the State of Texas in another nurse licensure compact party state.

II. COMPLIANCE WITH LAW

While under the terms of this Order, RESPONDENT agrees to comply in all respects with the Nursing Practice Act, Texas Occupations Code, §§301.001 *et seq.*, the Rules and Regulations Relating to Nursing Education, Licensure and Practice, 22 TEX. ADMIN. CODE §§211.1 *et seq.*, and this Agreed Order.

III. UNDERSTANDING BOARD ORDERS

Within thirty (30) days of entry of this Order, RESPONDENT must successfully complete the Board's online course, "Understanding Board Orders", which can be accessed on the Board's website from the "Discipline & Complaints" drop-down menu or directly at: <http://www.bon.texas.gov/UnderstandingBoardOrders/index.asp>. Upon successful completion, RESPONDENT must submit the course verification at the conclusion of the course, which automatically transmits the verification to the Board.

IV. REMEDIAL EDUCATION COURSE(S)

In addition to any continuing education requirements the Board may require for licensure renewal, RESPONDENT SHALL successfully complete the following remedial education course(s) **within one (1) year of the effective date of this Order, unless otherwise specifically indicated:**

- A. **A Board-approved course in nursing documentation** that shall be a minimum of six (6) hours in length. The course's content shall include: nursing standards related to accurate and complete documentation; legal guidelines for recording; methods and processes of recording; methods of alternative record-keeping; and computerized documentation. Home study courses and video programs will not be approved.

In order to receive credit for completion of this/these course(s), RESPONDENT SHALL CAUSE the instructor to submit a Verification of Course Completion form or SHALL submit the continuing education certificate, as applicable, to the attention of Monitoring at the Board's office. RESPONDENT SHALL first obtain Board approval of any course prior to enrollment if the course is not being offered by a pre-approved provider.

Information about Board-approved courses and Verification of Course Completion forms are available from the Board at www.bon.texas.gov/compliance.

V. RESTORATION OF UNENCUMBERED LICENSE(S)

Upon full compliance with the terms of this Agreed Order, all encumbrances will be removed from RESPONDENT'S license(s) and/or privilege(s) to practice nursing in the State of Texas and, subject to meeting all existing eligibility requirements in Texas Occupations Code Chapter 304, Article III, RESPONDENT may 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 Order. I waive representation by counsel. I have reviewed this Order. I neither admit nor deny the violation(s) alleged herein. By my signature on this Order, I agree to the entry of this 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 becomes effective upon acceptance by the Executive Director on behalf of the Texas Board of Nursing 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 possible revocation of my license(s) and/or privileges to practice nursing in the State of Texas, as a consequence of my noncompliance.

Signed this 14th day of May, 2020.

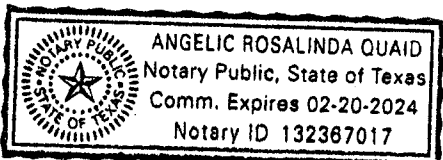
Suzanne L. Jones
SUZANNE L. JONES, RESPONDENT

Sworn to and subscribed before me this 14th day of May, 2020.

SEAL

Angelic Rosalinda Quaid

Notary Public in and for the State of TEXAS



WHEREFORE, PREMISES CONSIDERED, the Executive Director, on behalf of the Texas Board of Nursing does hereby ratify and adopt the Agreed Order that was signed on the 14th day of May, 2020, by SUZANNE L. JONES, Registered Nurse License Number 976524, and said Agreed Order is final.

Effective this 18th day of May, 2020.



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



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
SUZANNE L JONES,
PETITIONER for Eligibility for Licensure

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ELIGIBILITY
AGREED ORDER

On this day the Texas Board of Nursing, hereinafter referred to as the Board, consider the Endorsement Application, which has been processed as a Petition for Declaratory Order, herein referred to as the Petition, pursuant to 22 TEX. ADMIN. CODE §217.5(f) & §213.30, and supporting documents filed by SUZANNE L JONES, hereinafter referred to as PETITIONER, requesting a determination of eligibility for licensure in compliance with Sections 301.252, 301.257 and 301.260, Texas Occupations Code, and the Board's Rules at 22 TEX. ADMIN. CODE §217.5(f) and §213.30, together with any documents and information gathered by staff and Petitioner's Certification contained herein.

Information received by the Board produced evidence that Petitioner may be ineligible for licensure pursuant to Sections 301.452(b)(8) and 301.453, Texas Occupations Code.

Petitioner waived notice and hearing and agreed to the entry of this Eligibility Agreed Order approved by Katherine A. Thomas, MN, RN, FAAN, Executive Director, on June 20, 2019.

FINDINGS OF FACT

1. On or about November 9, 2018, Petitioner submitted the Petition requesting a determination of eligibility for licensure.
2. Petitioner received an Associate Degree in Nursing from Southwest Community College, Memphis, Tennessee, on May 1, 2000.
3. Petitioner completed the Petition and answered Yes to the question which reads as follows: *"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*

professional license, certificate or multi-state privilege held by you now or previously, or ever fined, censured, reprimanded or otherwise disciplined you?"

4. On October 10, 2014, Petitioner was issued a Settlement Agreement by the Missouri State Board of Nursing. A copy of the October 10, 2014, Settlement Agreement is attached and incorporated, by reference, as part of this Order.
5. After considering the action taken by the Missouri State Board of Nursing, along with Petitioner's subsequent conduct, the Executive Director is satisfied that Petitioner should be able to meet the requirements of the Nursing Practice Act, the Board's Rules and Regulations, and generally accepted standards of nursing practice.
6. The Executive Director considered evidence of Petitioner's past behavior in light of the factors set out in 22 TEX. ADMIN. CODE §213.27 and determined that Petitioner currently demonstrates the criteria required for licensure.
7. The Executive Director's review of the grounds for potential ineligibility has been made on the basis of Petitioner's disclosures.
8. Petitioner has been advised by the Board that any information found to be incomplete, incorrect or misleading to the Board or a subsequent discovery of a basis of ineligibility will be considered by the Board and may result in an ultimate determination of ineligibility or the later revocation of a license obtained through fraud or deceit.
9. Petitioner shall immediately notify the Board of any fact or event that could constitute a ground of ineligibility for licensure under Section 301.452(b), Texas Occupations Code.

CONCLUSIONS OF LAW

1. Pursuant to Texas Occupations Code, Sections 301.451-301.555, the Board has jurisdiction over this matter.
2. On or about November 9, 2018, Petitioner submitted the Petition requesting a determination of eligibility for licensure in compliance with Sections 301.252, 301.257, and 301.260, Texas Occupations Code, and the Board's Rules at 22 TEX. ADMIN. CODE §217.5(f) and §213.30.
3. Petitioner's history reflects conduct which may constitute grounds for denial of a license under Section 301.452(b)(8), Texas Occupations Code.
4. The Board may probate the denial of a license under conditions for a specified term pursuant to Section 301.453, Texas Occupations Code.

5. The Board may license an individual upon evaluation of the factors in 22 TEX. ADMIN. CODE §213.27, and pursuant to 22 TEX. ADMIN. CODE §213.33, if the Board is satisfied that the individual is able to consistently conform her conduct to the requirements of the Nursing Practice Act, the Board's Rules and Regulations, and generally accepted standards of nursing practice.
6. This Order is conditioned upon the accuracy and completeness of Petitioner's disclosures. Any subsequently discovered discrepancies will result in investigation and possible disciplinary action, up to revocation of Petitioner's license(s).

TERMS OF ORDER

I. ELIGIBILITY FOR LICENSURE AND APPLICABILITY

IT IS THEREFORE AGREED and ORDERED that the PETITION is hereby **GRANTED**, and upon payment of any required fees and meeting all other applicable requirements, PETITIONER SHALL be issued the applicable license to practice nursing in the State of Texas in accordance with the terms of this Order.

- A. Until successfully completed, any and all licenses issued to Petitioner shall be subject to the terms of this Order.
- B. This Order SHALL be applicable to PETITIONER'S nurse licensure compact privileges, if any, to practice nursing in the State of Texas.
- C. As a result of this Order, PETITIONER'S license will be designated "single state" and PETITIONER may not work outside the State of Texas in another nurse licensure compact party state.

II. COMPLIANCE WITH LAW

While under the terms of this Order, PETITIONER agrees to comply in all respects with the Nursing Practice Act, Texas Occupations Code, §§301.001 *et seq.*, the Rules and Regulations Relating to Nursing Education, Licensure and Practice, 22 TEX. ADMIN. CODE §§211.1 *et seq.*, and this Eligibility Agreed Order.

III. REMEDIAL EDUCATION COURSE(S)

In addition to any continuing education requirements the Board may require for licensure renewal, PETITIONER SHALL successfully complete the following remedial education course(s) **within one (1) year of licensure, unless otherwise specifically indicated:**

- A. **A Board-approved course in Texas nursing jurisprudence and ethics** that 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. Home study and video programs will not be approved.
- B. **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/these course(s), PETITIONER SHALL CAUSE the instructor to submit a Verification of Course Completion form or SHALL submit the continuing education certificate, as applicable, to the attention of Monitoring at the Board's office. PETITIONER SHALL first obtain Board approval of any course prior to enrollment if the course is not being offered by a pre-approved provider. *Information about Board-approved courses and Verification of Course Completion forms are available from the Board at www.bon.texas.gov/compliance.*

IV. SUBSEQUENT CRIMINAL PROCEEDINGS

IT IS FURTHER AGREED, should the PETITIONER'S conduct, as outlined in the findings of fact of this Eligibility Agreed Order, result in subsequent judicial action, including a deferred disposition, PETITIONER may be subject to further disciplinary action, up to, and including, revocation of PETITIONER'S license(s) to practice nursing in the State of Texas.

V. RESTORATION OF UNENCUMBERED LICENSE(S)

Upon full compliance with the terms of this Eligibility Agreed Order, all encumbrances will be removed from PETITIONER'S license(s) to practice nursing in the State of Texas and, subject to meeting all existing eligibility requirements in Texas Occupations Code Chapter 304, Article III, PETITIONER may be eligible for nurse licensure compact privileges, if any.

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PETITIONER'S CERTIFICATION

I am the Petitioner in this matter. I have fully and truthfully disclosed all of my past conduct which could constitute grounds for licensure ineligibility, and I have caused a complete and accurate criminal history to be submitted to the Texas Board of Nursing from each jurisdiction in which I have been adjudged guilty by way of conviction or deferred order. I certify that my past behavior, except as disclosed in my application/petition, has been in conformity with the Board's character rule. I have provided the Board with complete and accurate documentation of my past conduct in violation of the penal law of any jurisdiction which was disposed of through any procedure short of conviction, such as: conditional discharge, deferred adjudication or dismissal. I have no criminal prosecution pending in any jurisdiction.

In connection with my application, I acknowledge that I have read and I understand Sections 301.157(d), 301.252, 301.253, 301.257, 301.258, 301.260, 301.452, and 301.453, Texas Occupations Code, and Chapter 53, Section 53.001 *et seq.*, Texas Occupations Code, and 22 TEX. ADMIN. CODE §§213.27, 213.28, 213.29, and 213.30. I agree with all terms of this Order, including the Findings of Fact and Conclusions of Law and any stipulations as set out in this Order. I acknowledge that this Order is stipulated and I understand that I am not eligible to receive a Temporary Permit to practice nursing. I agree to inform the Board of any other fact or event that could constitute a ground for denial of licensure prior to accepting any license from the Texas Board of Nursing.

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) and/or nurse licensure compact privileges, if any, to practice nursing in the State of Texas, as a consequence of my noncompliance.

I understand that I can be represented by an attorney in this matter. I waive representation by counsel, notice, administrative hearing, and judicial review of this Order and request that the Texas Board of Nursing ratify this Order.

Signed this 26th day of August, 2019.

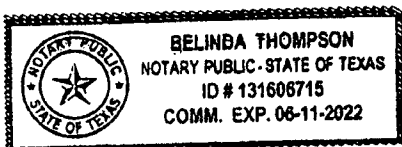
Suzanne Jones, RN
SUZANNE L JONES, Petitioner

Sworn to and subscribed before me this 26th day of August, 2019.

SEAL


B Thompson

Notary Public in and for the State of Texas



WHEREFORE, PREMISES CONSIDERED, the Executive Director, on behalf of the Texas Board of Nursing does hereby ratify and adopt the Eligibility Agreed Order that was signed on the 26th day of August, 2019, by SUZANNE L JONES, PETITIONER for Eligibility for Licensure, and said Eligibility Agreed Order is final.

Effective this 3rd day of September, 2019.



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

**SETTLEMENT AGREEMENT BETWEEN MISSOURI STATE BOARD
OF NURSING AND SUZANNE JONES, RN 2010035962**

Case Number 2013-001492

Comes now Suzanne Jones (Licensee) and the Missouri State Board of Nursing (Board) and enter into this Settlement Agreement for the purpose of resolving the question of whether Licensee's license to practice as a registered professional nurse will be subject to discipline.

Pursuant to the terms of §536.060 RSMo, the parties hereto waive the right to a hearing by the Administrative Hearing Commission of the State of Missouri and, additionally, the right to a disciplinary hearing before the Board under §621.110 RSMo and stipulate and agree that a final disposition of this matter may be effectuated as described herein.

Licensee acknowledges that she understands the various rights and privileges afforded her by law, including the right to a hearing of the charges against her; the right to appear and be represented by legal counsel; the right to have all charges against her proven upon the record by competent and substantial evidence; the right to cross-examine any witnesses appearing at the hearing against her; the right to a decision upon the record by a fair and impartial administrative hearing commissioner concerning the charges pending against her and, subsequently, the right to a disciplinary hearing before the Board at which time she may present evidence in mitigation of discipline; and the right to seek to recover attorney's fees incurred in defending this action against her license. Being aware of these rights provided her by operation of law, Licensee knowingly and voluntarily waives each and every one of these rights and freely enters into this Settlement Agreement and agrees to abide by the terms of this document, as they pertain to her.

Licensee acknowledges that she has received a copy of the investigative report and other documents relied upon by the Board in determining there was cause for discipline, along with

citations to law and/or regulations the Board believes were violated. For the purpose of settling this dispute, Licensee stipulates that the factual allegations contained in this Settlement Agreement are true and stipulates with the Board that Licensee's license to practice as a registered professional nurse, license number RN 2010035962, is subject to disciplinary action by the Board in accordance with the provisions of Chapters 621 and 335, RSMo.

The parties stipulate and agree that the disciplinary order agreed to by Licensee and the Board in a Joint Agreed Disciplinary Order is based only on the agreement set out in the Joint Stipulation of Facts and Joint Conclusions of Law herein. Licensee understands that the Board may take further disciplinary action against his/her license based on facts or conduct not specifically mentioned in this document that are either now known to the Board or may be discovered

Joint Stipulation of Facts

1. The State Board of Nursing is an agency of the State of Missouri created and established pursuant to §335.021 RSMo for the purpose of executing and enforcing provisions of Chapter 335 RSMo; the Nursing Practice Act.

2. Suzanne Jones is licensed by the Board as a registered professional nurse, license number RN 2010035962. Licensee's license is current and active and was so at all times relevant herein.

3. At all times relevant, Licensee was employed by SSM DePaul Health Center (DePaul) in Bridgeton, Missouri. All of the following incidents occurred there and patients and others will only be referred to by their initials.

4. On December 21, 2012, a patient was discharged from DePaul with an IV still in place. DePaul policies require all IVs be removed prior to discharge. Licensee signed off on a patient's discharge from DePaul documenting that the IV was discontinued by two RNs, but let

the patient leave with an IV still in place.

5. Licensee admitted to the Board's investigator that she signed off on the discharge of the patient without confirming that the IV had been removed.

6. On January 19, 2013, Licensee withdrew hydromorphone for patient 52765720 at 1215. Licensee did not document the medication as given until 1433. Licensee held onto the medication for two (2) hours before administering it.

7. On January 19, 2013, Licensee withdrew hydromorphone for patient 57765720 at 1722. Licensee did not document the medication as given until 1829. Licensee held onto the medication for one (1) hour before administering it.

8. On January 19, 2013, Licensee withdrew one oxycodone tablet for patient 52973729 at 1612. There was no record of the administration of the oxycodone.

9. On January 22, 2013, Licensee withdrew one (1) hydrocodone tablet for patient 52774526 at 0926. Licensee did not document the medication as given until 1051. Licensee held onto the medication for over one (1) hour before administering it.

10. On January 28, 2013, Licensee withdrew one (1) Alprazolam tablet for patient 53201807 at 0918. Licensee did not document the medication as given until 1058. Licensee held onto the medication for over one (1) hour before administering it.

11. On January 28, 2013, Licensee withdrew morphine for patient 53199438 at 1104. Licensee did not document the medication as given until 1317. Licensee held onto the medication for two (2) hours before administering it.

12. On January 30, 2013, Licensee withdrew hydromorphone for patient 53096693 at 1342 and documented the medication as given at 1446. Licensee held onto the medication for over one (1) hour before administering it. Licensee also withdrew hydromorphone for patient

53096693 at 1751 and documented the medication as given at 1931. Licensee again held onto the medication for over one (1) hour before administering it.

13. On February 2, 2013, Licensee withdrew hydromorphone for patient 53367489 at 1313, documented the medication as given at 1317, and documented the waste of the remainder of the medication at 1612. Licensee held onto the medication for over three (3) hours before wasting it. Licensee also withdrew hydromorphone for patient 53367489 at 1451 and documented the medication as given at 1806. Licensee held onto the medication for over three (3) hours before administering it.

14. On February 11, 2013, Licensee withdrew hydromorphone for patient 53621275 at 1003 and documented the medication as given at 1150. Licensee held onto the medication for over one (1) hour before administering it. Licensee also withdrew hydromorphone for patient 53621275 at 1317 and documented the medication as given at 1511. Licensee held onto the medication for over one (1) hour before administering it. Licensee also withdrew hydromorphone for patient 53621275 at 1619 and documented the medication as given at 1809. Licensee again held onto the medication for over one (1) hour before administering it.

15. On February 13, 2013, Licensee withdrew hydromorphone for patient 53675538 at 0739 and documented the medication as given at 0902. Licensee held onto the medication for over one (1) hour before administering it. Licensee also withdrew hydromorphone for patient 53675538 at 0938 and documented the medication as given at 1104. Licensee held onto the medication for over one (1) hour before administering it.

16. On February 17, 2013, Licensee withdrew hydromorphone for patient 53732483 at 1158. Licensee did not document the medication as given until 1350. Licensee held onto the medication for over one (1) hour before administering it.

17. On February 13, 2013, Licensee withdrew morphine for patient 53691086 at 1129.

There was no record of the administration or waste of the morphine.

18. Alprazolam is a controlled substance pursuant to §195.017.8(2)(a), RSMo.

19. Hydrocodone is a controlled substance pursuant to §195.017.4(1)(a)j, RSMo.

20. Hydromorphone is a controlled substance pursuant to §195.017.4(1)(a)k, RSMo.

21. Morphine is a controlled substance pursuant to §195.017.4(1)(a)m, RSMo.

22. Oxycodone is a controlled substance pursuant to §195.017.4(1)(a)n, RSMo.

23. Licensee demonstrated inconsistent practice related to medication administration and waste.

24. Accurate documentation related to medication administration is an essential function of being a nurse as poor documentation can jeopardize patient health and safety.

25. Licensee's conduct, as described herein, constitutes incompetency, misconduct and misrepresentation in the performance of the functions and duties of a nurse, giving cause to discipline her nursing license.

26. Licensee's conduct, as described herein, constitutes a violation of a professional trust or confidence, giving cause to discipline her nursing license.

Joint Conclusions of Law

1. Cause exists for Petitioner to take disciplinary action against Licensee's license under §335.066.2(5) and (12) RSMo Cum. Supp 2012, which states in pertinent part:

2. The board may cause a complaint to be filed with the administrative hearing commission as provided by chapter 621, RSMo, against any holder of any certificate of registration or authority, permit or license required by sections 335.011 to 335.096 or any person who has failed to renew or has surrendered his or her certificate of registration or authority, permit or license for any one or any combination of the following causes:

(5) Incompetency, misconduct, gross negligence, fraud, misrepresentation or dishonesty in the performance of the functions or duties of any profession licensed or regulated by sections 335.011 to 335.096;

(12) Violation of any professional trust or confidence[.]

Joint Agreed Disciplinary Order

1. Based upon the foregoing, the parties mutually agree and stipulate that the following shall constitute the disciplinary order entered by the Board in this matter under the authority of §621.045.3, RSMo.

2. Licensee's license to practice as a registered professional nurse in the State of Missouri, License Number RN 2010035962, is hereby placed on **PROBATION** for a period of one (1) year under the following terms and conditions:

GENERAL REQUIREMENTS

- A. Licensee shall meet with the Board or its professional staff at such times and places as required by the Board. The Board shall provide Licensee with notice of the dates, times and locations of regularly scheduled meetings at the time this executed Settlement Agreement is provided to Licensee. If Licensee does not receive notice of the dates, times and locations of her regularly scheduled meeting with the Board within one (1) month after the effective date of this Settlement Agreement, Licensee shall contact the Board office at: **Missouri State Board of Nursing, P.O. Box 656, Jefferson City, Missouri 65102, or by telephone at: (573) 751-0681**. In addition to these regularly scheduled meetings, Licensee shall meet with the Board or its professional staff at any other time, as required by the Board.
- B. Licensee shall meet in person with the Board's Discipline Administrator to review the terms and conditions of the probation at such date, time and place as designated by the Board's Discipline Administrator.
- C. Licensee shall submit documents showing compliance with the requirements of this Settlement Agreement to the Board when requested and within the time limit the Board requests.
- D. Licensee shall inform the Board within ten (10) working days of any change of home address or home telephone number.

- E. Licensee shall not violate the Nursing Practice Act, Chapter 335 RSMo, as amended, shall renew her license within five (5) working days and shall not allow her license to lapse. Licensee may place her license on inactive or retired status. The conditions of discipline will continue to apply if the license is inactive or retired.
- F. Licensee shall bear all costs of complying with this Settlement Agreement.
- G. Licensee shall obey all federal, state and local laws, and all rules and regulations governing the practice of nursing in this state.
- H. Licensee is responsible for insuring that all quarterly reports due pursuant to these conditions are submitted to the Board on a quarterly basis.

EMPLOYMENT REQUIREMENTS

- A. Licensee shall keep the State Board of Nursing informed of her current place of employment and of any changes in her place of employment by notifying the Board within ten (10) working days of such a change. This form is located at <http://pr.mo.gov/boards/nursing/Change-Form.pdf>
- B. Licensee shall provide a copy of this Settlement Agreement to any current employer and to any potential employer. Licensee shall provide a copy of this Settlement Agreement to her current employer as soon as she receives it and no later than during her next work shift or her employer's next working day, whichever is sooner. In addition, Licensee shall provide a copy of this Settlement Agreement to any potential employer prior to acceptance of any offer of employment.
- C. Licensee shall cause an evaluation, using the form supplied by the Board, from each and every employer to be completed for the Board at least quarterly, with due dates to be determined by the Board. The evaluation form shall be completed by Licensee's supervisor within a four-week period prior to the date it is due. If Licensee ends employment with an employer, Licensee shall, in addition, request that a final evaluation form from that supervisor to be submitted to the Board within a six-week period following the last day of employment. This evaluation shall be an evaluation of Licensee's job performance and shall be sent to: State Board of Nursing, ATTN: Discipline Administrator, P.O. Box 656, Jefferson City, Missouri 65102. The preferred method of submitting the evaluation is that the evaluation is sent directly by the employer. The Licensee may submit the form to the Board; however; Board staff may verify with the employer the authenticity of the evaluation submitted by Licensee. This form may be found at <http://pr.mo.gov/nursing-monitoring.asp>
- D. If Licensee is not employed at any time during the period of discipline, Licensee shall instead submit a "Statement of Unemployment" form stating the period(s) of unemployment. This form is located on the Board of Nursing Website at the address

provided in paragraph C above.

- E. Licensee shall execute any release or provide any other authorization necessary for the Board to obtain records of Licensee's employment during the period covered by this Settlement Agreement.

EMPLOYMENT RESTRICTIONS

- A. Licensee may not serve on the administrative staff, as a member of the faculty or as a preceptor at any school of professional or practical nursing.
- B. Licensee shall only work as a nurse where there is on-site supervision by someone with the authority to send Licensee home. Licensee shall not work in home health care, hospice or durable medical equipment.
- C. Licensee shall not work in a healthcare-related position for a temporary employment agency or as a healthcare related independent contractor.

CONTINUING EDUCATION

- A. Licensee shall complete the following modules offered at Assessment Technologies Institute at <https://www.atitesting.com/Home.aspx>:
- Medication Administration 1
 - Medication Administration 2 (oral, ophthalmic, optic, nasal, inhalation, topical, vaginal, and rectal medication)
 - Medication Administration 3 (injections)
 - Medication Administration 4 (intravenous administration)
- B. Specific information regarding these classes will be provided by the Discipline Administrator at Licensee's initial meeting with the Board.
- C. Licensee shall submit proof of completion of these classes to the Board during the first year of the disciplinary period. A specific due date will be determined by the Board after the discipline goes into effect.
- D. Failure to obtain the required contact hours by the due date shall constitute a violation of the terms of discipline.
3. The Board will maintain this Settlement Agreement as an open and public record of

the Board as required by law. The Board will report this Settlement Agreement to data banks, other

appropriate entities and in its newsletter. (This is a disciplinary action against licensee's license.) The original of this document shall be kept in the Board's file and its contents shall be disclosed to the public upon proper request.

4. The terms of this Settlement Agreement are contractual, legally enforceable and binding, not merely recital. Except as otherwise contained herein, neither this Settlement Agreement nor any of its provisions may be changed, waived, discharged or terminated, except by an instrument in writing signed by the party against whom the enforcement of the change, waiver, discharge or termination is sought.

5. Upon the expiration of said discipline, Licensee's license as a registered professional nurse in Missouri shall be fully restored if all other requirements of law have been satisfied; provided, however, that in the event the Board determines that the licensee has violated any term or condition of this Settlement Agreement, the Board may, in its discretion, after an evidentiary hearing, vacate and set aside the discipline imposed herein and may suspend, revoke or otherwise lawfully discipline the licensee.

6. No order shall be entered by the Board pursuant to the preceding paragraph of this Settlement Agreement without notice and an opportunity for hearing before the Board in accordance with the provisions of Chapter 536, RSMo.

7. If the Board determines that Licensee has violated a term or condition of this Settlement Agreement, which violation would also be actionable in a proceeding before the Administrative Hearing Commission or the Circuit Court, the Board may elect to pursue any lawful remedies or procedures afforded it and is not bound by this Settlement Agreement in its determination of appropriate legal actions concerning that violation. If any alleged violation of this Settlement Agreement occurred during the disciplinary period, the Board may choose to

conduct a hearing before it either during the disciplinary period, or as soon thereafter as a hearing can be held to determine whether a violation occurred and, if so, it may impose further discipline. Licensee agrees and stipulates that the Board has continuing jurisdiction to hold a hearing to determine if a violation of this Settlement Agreement has occurred.

8. Licensee, together with her heirs and assigns and her attorney(s), do hereby waive, release, acquit and forever discharge the Board, its respective members and any of its employees, agents or attorneys, including any former Board members, employees, agents and attorneys, of, or from, any liability, claim, actions, causes of action, fees, costs and expenses and compensation, including, but not limited to, any claims for attorney's fees and expenses, including any claims pursuant to § 536.087, RSMo, or any claim arising under 42 U.S.C. § 1983, which may be based upon, arise out of, or relate to any of the matters raised in this case, its settlement or from the negotiation or execution of its settlement. Licensee acknowledges that this paragraph is severable from the remaining portions of this Settlement Agreement in that it survives in perpetuity even in the event that any court of law deems this Settlement Agreement or any portion thereof void or unenforceable.

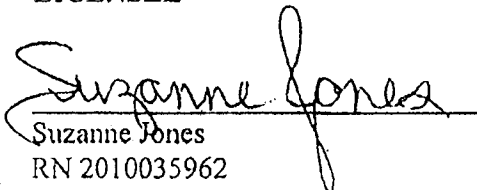
9. The State of Missouri is a member of the Nurse Licensure Compact. Pursuant to the Compact, while on probation with their home state, a licensee loses their multi-state privileges. Therefore, the Licensee may not work outside the State of Missouri pursuant to a multistate licensure privilege without written permission of the Missouri State Board of Nursing and the Board of Nursing in the party state where the Licensee wishes to work.

10. Licensee understands that she may, either at the time the Settlement Agreement is signed by all parties or within fifteen (15) days thereafter, submit the agreement to the Administrative Hearing Commission for determination that the facts agreed to by the parties

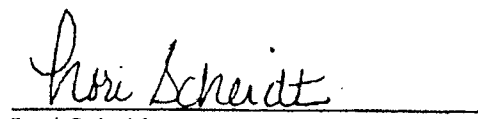
constitute grounds for disciplining Licensee's license. If Licensee desires the Administrative Hearing Commission to review this Agreement, Licensee may submit her request to:
Administrative Hearing Commission, Truman State Office Building, P.O. Box 1557, Jefferson City, Missouri 65102.

11. If Licensee requests review, this Settlement Agreement shall become effective on the date the Administrative Hearing Commission issues its order finding that the Settlement Agreement sets forth cause for disciplining Licensee's license. If Licensee does not request review by the Administrative Hearing Commission, the Settlement Agreement goes in to effect 15 days after the document is signed by the Executive Director of the Board.

LICENSEE


Suzanne Jones
RN 2010035962

BOARD


Lori Scheidt
Executive Director
State Board of Nursing

Date 9/17/14

Date 09/25/2014

Complaint No. 2013-001492

EFFECTIVE
DATE
10.10.2014
MISSOURI BOARD OF NURSING

RECEIVED
SEP 25 2014
MISSOURI BOARD OF NURSING