

COMMONWEALTH OF MASSACHUSETTS

THIS IS NOTICE OF THE REGULARLY SCHEDULED MEETING OF THE
BOARD OF REGISTRATION IN NURSING

Wednesday January 9, 2013
9 a.m. to 12:30 p.m.

239 Causeway Street ~ 4th Floor ~ Room 417A
Boston, Massachusetts 02114

Agenda
As of 1/3/2013 9:53 AM

Time	Item #	Item	Exhibits	Staff Contact
9:00 a.m.	I.	Call to Order		
	II.	Approval of Agenda	Agenda	
	III.	Adjudicatory Session	Closed Session	
	IV.	G.L. c. 112, § 65C Session	Closed Session	
9:20 a.m.	V.	Approval of Minutes A. December 12, 2012 Regularly Scheduled Meeting B. December 12, 2012 Adjudicatory Session C. December 12, 2012 65C Session	Minutes Minutes Minutes	
	VI.	Reports A. Chairperson and Board Members' Reports B. Executive Director's Report C. Staff Report 1. Deputy Executive Director 2. Policy and Research 3. Practice 4. Education 5. Complaint Resolution 6. SARP 7. Probation Monitor	none report report report report report report report	RH CR CS LT JMP AF/HC VIIDM/CJ KF

	Item #	Item	Exhibits	Staff Contact
	X.	Practice None		
	XI.	Education A. 244 CMR 6.04(1)(c) & (f) notifications: 1. McCann Technical School, Practical Nursing Program 2. UMass Lowell, Baccalaureate Degree RN program	Memo	JMP
	XII.	Announcements/Other		
12:30 pm	XIII.	Adjournment		

**COMMONWEALTH OF MASSACHUSETTS
BOARD OF REGISTRATION IN NURSING**
239 Causeway Street, Room 417A
Boston, MA 02114

Minutes of the Regularly Scheduled Board Meeting
Wednesday, January 9, 2013

Board Members Present

S. Kelly, RN/NP, Chair
M. Beal, RN/NM
P. Gales, RN
J. Killion, LPN
B. Levin, RN
C. Lundeen, RN
A. Peckham, RN
E. Richard Rothmund, Public Member
C. Simonian, PharmD, RPh

Board Members Not Present

K. Gehly, RN/NP, Vice Chair
J. Roy, RN
C. Tebaldi, RN/NP

Board Staff Present

R. Harb, RN, Executive Director
H. Cambra, RN, JD, Complaint Resolution Coordinator
A. Fein, RN, JD, Complaint Resolution Coordinator
V. Iyawe, RN, SARP Coordinator
D. McLellan, RN, SARP Coordinator
J. Pelletier, RN, Nursing Education Coordinator (in at 12 noon)
C. Robertson, RN, Deputy Executive Director
C. Silveira, RN, Assistant Director for Policy and Research
M. Strachan, JD, Board Counsel
L. Talarico, RN/NP, Nursing Practice Coordinator (in at 12 noon)
C. Jackson, BA, SARP/MPRS Coordinator

Board Staff Not Present

V. Berg, JD, Board Counsel
T. Westgate, Paralegal

Guests

See attached list.

TOPIC:

Call to Order

DISCUSSION:

A quorum of the Board was present.

ACTION:

At 9.05 a.m., S. Kelly, Chairperson, called the January 9, 2013 Regularly Scheduled Board Meeting to order.

TOPIC:

Approval of the Agenda

DISCUSSION:

A. Fein, CRC requested that topic of agenda section X be changed to Reports of Incidents at Baystate Medical Center and agenda item X.1, Response to Board Request for Information about Reports of Incidents at Baystate Medical Center be added to this section.

ACTION:

Motion by B. Levin, seconded by E. Richard Rothmund, and unanimously passed to approve the agenda as revised.

TOPIC:

Adjudicatory Session

DISCUSSION:

None

ACTION:

Motion by B. Levin, seconded by M. Beal, and unanimously passed by roll call vote to go into Adjudicatory Session at 9:06 a.m. to discuss decisions in pending adjudicatory matters.

Adjudicatory Session 9:06 a.m. to 9:25 a.m.

TOPIC:

G.L. c. 112, s. 65C Session

DISCUSSION:

None

ACTION:

Motion by B. Levin, seconded by J. Killion, and unanimously passed by roll call vote to go into G.L. c. 112, s. 65C Session at 9:25 a.m. to discuss negotiated settlements of complaints.

G.L. c. 112, s. 65C Session 9:25 a.m. to 9:27 a.m.

TOPIC:

Approval of Minutes:

1. Approval of the Minutes of the December 12, 2012, Regularly Scheduled Board Meeting
2. Approval of the Minutes of the December 12, 2012, Adjudicatory Session
3. Approval of the Minutes of the December 12, 2012, 65C Session

DISCUSSION:

2. M. Strachan asked members to defer the Minutes of the December 12, 2012, Adjudicatory Session

ACTION:

Motion by C. Lundeen, seconded by A. Peckham, and unanimously passed to accept the Minutes of the December 12, 2012, Regularly Scheduled Board Meeting.

Motion by M. Beal, seconded by B. Levin, and unanimously deferred the Minutes of the December 12, 2012, Adjudicatory Session.

Motion by P. Gales, seconded by B. Levin, and unanimously passed to accept the Minutes of the December 12, 2012, 65C Session.

TOPIC:

Reports

- A. Chairperson and Board Members' Reports
- B. Executive Director's Report
- C. Staff Reports
 - 1. Deputy Executive Director
 - 2. Associate Director for Policy and Research
 - 3. Practice
 - 4. Education
 - 5. Complaint Resolution
 - 6. SARP
 - 7. Probation Monitor

DISCUSSION:

- A. Chairperson and Board Members Reports:
- B. Executive Director's Report: Board members reviewed R. Harb's previously distributed report
- C. Staff Reports:
 - 1. No report
 - 2. Board members reviewed C. Silveira's previously distributed report. Ms. Silveira also reported at the meeting that she has been invited to represent nursing regulation as a panel member at the 2013 Long-term Care Conference hosted by the National Council of State Boards of Nursing.
 - 3. Board members reviewed L. Talarico's previously distributed report.
 - 4. Board members reviewed J. Pelletier's previously distributed report.
 - 5. Board members reviewed A. Fein's and H. Cambra's and previously distributed report
 - 6. Board members reviewed V. Iyawe's and D. Mclellan's previously distributed report
 - 7. Board members reviewed K. Fishman's previously distributed report

ACTION:

- A. So noted.
- B. So noted.
- C. So noted.

TOPIC:

Consensus Agenda

- A. NCSBN Update
- B. Coalition for the Prevention of Medical Errors Update

DISCUSSION:

- A. Board members reviewed L. Talarico's previously distributed memo
- B. Board members were provided the latest report and minutes from the Coalition for the Prevention of Medical Errors.

ACTION:

- A. Accepted by consensus
- B. Accepted by consensus

TOPIC:

- A. Resolution of Pending Board Complaints
 - 1. D. Osterman, LN67304, NUR-2011-0258
 - 2. M. Connell, RN174407, NUR-2011-0279
 - 3. K. Doherty, LN52975, NUR-2011-0287
 - 4. J. Brancaccio, RN161669, NUR-2012-0181
 - 5. M. Kashmanian, RN232150, NUR-2012-0184
 - 6. A. Kamau, RN2274707, LN85697, NUR-2012-0224
 - 7. M. York, RN2268638, NUR-2012-0146
 - 8. E. Fader, LN53959, NUR-2012-0147
 - 9. A. Greene, RN283387, NUR-2012-0090
 - 10. C. Georgiadis, LN62552, NUR-2012-0156
 - 11. D. George, RN273140, NUR-2012-0249
 - 12. P. Duffy, RN136322, NUR-2011-0222
 - 13. E. Novak-Gathro, RN143159, NUR-2012-0121
 - 14. E. Aborgah, LN63477, NUR-2012-0161
 - 15. A. Kassirer, RN/NP233244, NUR-2012-0176
- B. Resolution of Pending Board Staff Assignments
 - 1. C. Faulkner, LN28767, SA-INV2614
 - 2. K. Sampson, LN86929, SA-INV-2615
 - 3. K.A. Krawczyk, LN88078, SA-INV-2616
 - 4. K. Longo, LN65871, SA-INV-2617
 - 5. J.K. Lowmwa, LN86378, SA-INV-2619
 - 6. F. Saitoto, LN66501, SA-INV-2618

DISCUSSION:

Compliance Officers and the Complaint Resolution Coordinators presented their previously distributed Investigative Reports for Board Review and Action together with relevant clarifications, supplemental information and revised Complaint Resolution Coordinators' recommendations as necessary, if any.

ACTION:

- A. Resolution of Pending Board Complaints
 - 1. D. Osterman, LN67304, NUR-2011-0258 – Motion by E.R. Rothmund, seconded by P. Gales and voted unanimously to refer the complaint to the Office of Prosecutions for issuance of an OTSC and adjudication. Alternatively, in final settlement of this matter the Licensee may also be offered a STANDARD CONSENT AGREEMENT FOR SURRENDER of her LPN license for an indefinite period with reinstatement requirements that also include the standard criminal activity related requirements, a standard mental health evaluation, documentation of her successful completion of six (6) contact hours on Legal and Ethical Aspects of Nursing, and a POST-SURRENDER PROBATION for at least one (1) year.

2. M. Connell, RN174407, NUR-2011-0279 – Motion by E.R. Rothmund, seconded by J. Killion and voted unanimously to refer the complaint to the Office of Prosecutions for issuance of an OTSC and adjudication. Alternatively, in final settlement of this matter the Licensee may also be offered SARP if determined eligible or a STANDARD CONSENT AGREEMENT FOR SURRENDER of her RN license for an indefinite period with reinstatement requirements that also include the standard either/or substance abuse related requirements, the standard criminal activity related requirements, documentation of her successful completion of six (6) contact hours on Professional Boundaries, six (6) contact hours on Legal and Ethical Aspects of Nursing, and three (3) contact hours on Critical Thinking and Judgment in Nursing Practice, and a STANDARD POST-SURRENDER PROBATION as the Board may determine necessary at the time of reinstatement for the protection of the public.
3. K. Doherty, LN52975, NUR-2011-0287- Motion by E.R. Rothmund, seconded by M. Beal and voted unanimously to DISMISS the complaint without prejudice based on insufficient evidence to establish the allegations as presented.
4. J. Brancaccio, RN161669, NUR-2012-0181- Motion by B. Levin, seconded by J. Killion and voted unanimously to DISMISS the complaint without prejudice based on discipline not warranted.
5. M. Kashmanian, RN232150, NUR-2012-0184- Motion by B. Levin, seconded by P. Gales and voted unanimously to refer the complaint to the Office of Prosecutions for issuance of an OTSC and adjudication. Alternatively, in final settlement of this matter the Licensee may also be offered a STANDARD CONSENT AGREEMENT FOR PROBATION of her RN license for six (6) months that also requires documentation of her successful completion of six (6) contact hours on Medication Administration and Documentation in Nursing including a component on Maintaining the Security of Controlled Substances, three (3) contact hours on Legal and Ethical Aspects of Nursing, and three (3) contact hours on Critical Thinking and Judgment in Nursing Practice.
6. A. Kamau, RN2274707, LN85697, NUR-2012-0224 – Motion by C. Simonian, seconded by J. Killion and voted unanimously to DISMISS the complaint without prejudice with a *NON-DISCIPLINARY CAUTION* that all nurses licensed by the Board are required to adhere to the standards of nursing practice for medication administration and documentation that includes, among other essential elements, accurate verification of a valid order from an authorized prescriber.
7. M. York, RN2268638, NUR-2012-0146 – Motion by E.R. Rothmund, seconded by P. Gales and voted unanimously to refer the complaint to the Office of Prosecutions for issuance of an OTSC and adjudication. Alternatively, in final settlement of this matter the Licensee may also be offered a STANDARD CONSENT AGREEMENT FOR PROBATION of her RN license for six (6) months that also requires documentation of her successful completion of six (6) contact hours on Medication Administration and Documentation in Nursing, three (3) contact hours on Legal and Ethical Aspects of Nursing, three (3) contact hours on Critical Thinking, Judgment and Clinical Reasoning in Nursing Practice, and six (6) contact hours on Nursing Management of the Patient with Diabetes.
8. E. Fader, LN53959, NUR-2012-0147 – Motion by J. Killion, seconded by P. Gales and voted unanimously to refer the complaint to the Office of Prosecutions for issuance of an OTSC and adjudication. Alternatively, in final settlement of this matter the Licensee may also be offered a STANDARD CONSENT AGREEMENT FOR PROBATION of her LPN license for six (6) months that also requires documentation of her successful completion of six (6) contact hours on Medication Administration and Documentation in Nursing, three (3) contact hours on Legal and Ethical Aspects of Nursing, three (3) contact hours on Critical Thinking, Judgment and Clinical

Reasoning in Nursing Practice, and six (6) contact hours on Nursing Management of the Patient with Diabetes.

9. A. Greene, RN283387, NUR-2012-0090 – Motion by E.R. Rothmund, seconded by C. Simonian and voted unanimously to refer the complaint to the Office of Prosecutions for issuance of an OTSC and adjudication. Alternatively, in final settlement of this matter the Licensee may also be offered SARP if determined eligible or a STANDARD CONSENT AGREEMENT FOR SURRENDER of her RN license for an indefinite period with reinstatement requirements that also include the standard either/or substance abuse related requirements, the standard criminal activity related requirements, documentation of her successful completion of six (6) contact hours on Medication Administration and Documentation in Nursing, three (3) contact hours on Legal and Ethical Aspects of Nursing, three (3) contact hours on Pain Management in Nursing and three (3) contact hours on Critical Thinking and Judgment in Nursing Practice, and a STANDARD POST-SURRENDER PROBATION for at least one (1) year.
10. C. Georgiadis, LN62552, NUR-2012-0156 – Motion by E.R. Rothmund, seconded by J. Killion and voted unanimously to DISMISS the complaint without prejudice with a *NON-DISCIPLINARY CAUTION* that all nurses licensed by the Board are required to adhere to the standards of nursing practice for medication administration and documentation that requires, among other essential elements, that a medication may only be administered to a patient by a licensed nurse based on a valid order from an authorized prescriber.
11. D. George, RN273140, NUR-2012-0249 – Motion by E.R. Rothmund, seconded by P. Gales and voted unanimously to DISMISS this complaint without prejudice based on insufficient evidence to substantiate the allegations presented by the complaint.
12. P. Duffy, RN136322, NUR-2011-0222- Motion by E.R. Rothmund, seconded by B. Levin and voted unanimously to refer the complaint to the Office of Prosecutions for issuance of an OTSC and adjudication. Alternatively, in final settlement of this matter the Licensee may also be offered a STANDARD CONSENT AGREEMENT FOR SURRENDER of her RN license for at least five (5) years with reinstatement conditions to also include the standard criminal activity related requirements.
13. E. Novak-Gathro, RN143159, NUR-2012-0121- Motion by B. Levin, seconded by J. Killion and voted unanimously to refer the complaint to the Office of Prosecutions for issuance of an OTSC and adjudication. Alternatively, in final settlement of this matter the Licensee may also be offered a STANDARD CONSENT AGREEMENT FOR SURRENDER of her RN license for at least six (6) months with reinstatement requirements that also include documentation of his/her successful completion of six (6) contact hours on Use of Physical and Chemical Restraints, six (6) contact hours on Patient's Rights, three (3) contact hours on Patient Abuse, three (3) contact hours on Legal and Ethical Aspects of Nursing, and three (3) contact hours on Critical Thinking and Judgment in Nursing Practice. The SURRENDER period to be followed by a standard PROBATION for one (1) year. Also, refer this incident to the Department of Health Care Quality.
14. E. Aborgah, LN63477, NUR-2012-0161- Motion by E.R. Rothmund, seconded by B. Levin and voted unanimously to refer the complaint to the Office of Prosecutions for issuance of an OTSC and adjudication. Alternatively, in final settlement of this matter the Licensee may also be offered a STANDARD CONSENT AGREEMENT FOR SURRENDER of her LPN license for at least one (1) day with reinstatement requirements that also include documentation of her successful completion of six (6) contact hours in Therapeutic Patient Communication, six (6) contact hours in Patient Abuse, three (3) contact hours on Medication Administration and Documentation in Nursing, three (3) contact hours on Legal and Ethical Aspects of Nursing, and three (3) contact hours on Critical Thinking and Judgment in Nursing Practice. The SURRENDER period to be followed by a standard PROBATION for one (1) year.

15. A. Kassirer, RN/NP233244, NUR-2012-0176- Motion by J. Killion, seconded by E.R. Rothmund and voted with C. Lundeen opposed to refer the complaint to the Office of Prosecutions for issuance of an OTSC and adjudication. Alternatively, in final settlement of this matter the Licensee may also be offered a STANDARD CONSENT AGREEMENT FOR PROBATION of her RN license and Advanced Practice Authorization for six (6) months that also requires documentation of her successful completion of at least one (1) contact hour in Use of Social Media in Nursing, three (3) contact hours on Legal and Ethical Aspects of Nursing, three (3) contact hours on Critical Thinking and Judgment in Nursing Practice, and completion of the NCSBN's Learning Extension course entitled Patient Privacy (5.4 contact hours).

B. Resolution of Pending Board Staff Assignments

1. C. Faulkner, LN28767, SA-INV2614 – Motion by J. Killion, seconded by B. Levin and voted unanimously that based on the fundamental and pivotal nature of the practice breakdown presented by the conduct that gave rise to the Staff Assignment, recognition of the system factors that contributed to the negative outcome that resulted and other substantiated mitigating circumstances, CLOSE the Staff Assignment and OPEN a complaint with authority to DISMISS the complaint with a *NON-DISCIPLINARY CAUTION* that all nurses licensed by the Board are required to adhere to the standards of nursing practice for medication administration that include, but not limited to, the nurse's confirmation when transcribing a medication order and prior to administering any medication ordered that the order specifically designates the frequency of administration, among other required elements.
2. K. Sampson, LN86929, SA-INV-2615 – Motion by E.R. Rothmund, seconded by B. Levin and voted unanimously that based on the fundamental and pivotal nature of the practice breakdown presented by the conduct that gave rise to the Staff Assignment, recognition of the system factors that contributed to the negative outcome that resulted and other substantiated mitigating circumstances, CLOSE the Staff Assignment and OPEN a complaint with authority to DISMISS the complaint with a *NON-DISCIPLINARY CAUTION* that all nurses licensed by the Board are required to adhere to the standards of nursing practice for medication administration that include, but not limited to, the nurse's confirmation when transcribing a medication order and prior to administering any medication ordered that the order specifically designates the frequency of administration, among other required elements.
3. K.A. Krawczyk, LN88078, SA-INV-2616 – Motion by E.R. Rothmund, seconded by B. Levin and voted unanimously that based on the fundamental and pivotal nature of the practice breakdown presented by the conduct that gave rise to the Staff Assignment, recognition of the system factors that contributed to the negative outcome that resulted and other substantiated mitigating circumstances, CLOSE the Staff Assignment and OPEN a complaint with authority to DISMISS the complaint with a *NON-DISCIPLINARY CAUTION* that all nurses licensed by the Board are required to adhere to the standards of nursing practice for medication administration that include, but not limited to, the nurse's confirmation when transcribing a medication order and prior to administering any medication ordered that the order specifically designates the frequency of administration, among other required elements.
4. K. Longo, LN65871, SA-INV-2617 – Motion by E.R. Rothmund, seconded by J. Killion and voted unanimously that based on the fundamental and pivotal nature of the practice breakdown presented by the incidents that gave rise to the Staff Assignment, the Licensee's failure to understand reliably her practice breakdown, recognition of the system factors that contributed to the negative outcome that resulted, other substantiated mitigating circumstances, and the Licensee's subsequent series of improper nursing practices that resulted in her termination from the facility in February 2012, CLOSE the Staff Assignment and OPEN a complaint with authority to refer the complaint to the Office of Prosecutions for issuance of an OTSC and adjudication.

Alternatively, in final settlement of the complaint the Licensee may also be offered a STANDARD CONSENT AGREEMENT for a *NON-DISCIPLINARY* STAYED PROBATION of her LPN license for a one (1) year period that incorporates the Board's standard probation agreement requirements regarding practice setting restrictions, supervisor verification, supervision and performance evaluations, active practice and continuing education related conditions, as well as documentation of her successful completion of six (6) contact hours on Medication Administration and Documentation, six (6) contact hours on Prevention of Medication Errors, three (3) contact hours on Critical Thinking and Clinical Reasoning, and three (3) contact hours on Legal and Ethical Aspects of Nursing Practice.

5. J.K. Lowmwa, LN86378, SA-INV-2619 – Motion by E.R. Rothmund, seconded by B. Levin and voted unanimously that based on the fundamental and pivotal nature of the practice breakdown presented by the conduct that gave rise to the Staff Assignment, recognition of the system factors that contributed to the negative outcome that resulted and other substantiated mitigating circumstances, CLOSE the Staff Assignment and OPEN a complaint with authority to DISMISS the complaint with a *NON-DISCIPLINARY* CAUTION that all nurses licensed by the Board are required to adhere to the standards of nursing practice for medication administration that include, but not limited to, the nurse's confirmation when transcribing a medication order and prior to administering any medication ordered that the order specifically designates the frequency of administration, among other required elements.
6. F. Saitoto, LN66501, SA-INV-2618 – Motion by B. Levin, seconded by J. Killion and voted unanimously that based on the fundamental and pivotal nature of the practice breakdown presented by the conduct that gave rise to the Staff Assignment, recognition of the system factors that contributed to the negative outcome that resulted and other substantiated mitigating circumstances, CLOSE the Staff Assignment and OPEN a complaint with authority to DISMISS the complaint with a *NON-DISCIPLINARY* CAUTION that all nurses licensed by the Board are required to adhere to the standards of nursing practice for medication administration that include, but not limited to, the nurse's confirmation when transcribing a medication order and prior to administering any medication ordered that the order specifically designates the frequency of administration, among other required elements.

RECESS 10:30 a.m. – 10:45 a.m.

TOPIC:

Requested Information about Reports of Incidents at Baystate Medical Center

DISCUSSION:

A. Fein, CRC distributed and presented a memorandum summarizing the preliminary information gathered about incidents that occurred at Baystate Medical Center that were reported to the Board during January 1, 2011 through October 23, 2012. The Board members reviewed and discussed the information obtained to date, initial conclusions, initiated actions and recommendations and that were detailed in the memorandum.

ACTION:

After carefully considering the preliminary information about incidents that occurred at Baystate reported to the Board during January 1, 2011 through October 23, 2012, motion by E.R. Rothmund, seconded by J. Killion and voted unanimously to refer these matters to the Division of Health Care Quality and the Drug Control Program for review, as the Board continues to address the reported practices of the individual nurses.

TOPIC:

Education

244 CMR 6.04(1)(c) & (f) notifications:

1. McCann Technical School, Practical Nursing Program
2. UMass Lowell, Baccalaureate Degree RN program

DISCUSSION:

Members reviewed J. Pelletier's previously distributed memo.

ACTION:

Motion by E. Rothmund, seconded by B. Levin, and unanimously voted to Find compliance with regulation 244 CMR 6.04(1)(c) & (f) in the notification of the appointment of: Susan Watson, MSN, RN, Practical Nursing Director (Program Administrator), McCann Technical School; and Jacqueline Dowling, PhD, RN, Interim Chair, Department of Nursing (Program Administrator), UMass Lowell.

TOPIC:

Announcements

DISCUSSION:

L. Talarico announced that the Public Health Council, at their meeting January 9, 2012 unanimously approved final revisions to the Department of Public Health (DPH) Drug Control Program regulations at 105 CMR 700.000 and 105 CMR 721.000 related to nurse midwife prescriptive practice. The revised regulations implement Chapter 24 of the Acts of 2012, signed into law February 2, 2012 enabling certified nurse midwives (CNM) to issue prescriptions without a supervising physician or physician-nurse guidelines and to order and interpret tests and therapeutics. The revisions remove the requirement for written guidelines and physician supervision of CNM prescriptive practice. In her presentation Dr. M. Biondolillo, Bureau Director, informed the Public Health Council that the Board of Registration in Nursing is the regulatory agency that determines matters relating to scope of practice for all Advanced Practice Registered Nurses (APRN) and that pursuant to M.G.L. c.112, s. 80B, the Boards of Nursing and Medicine are required to concur only on matters related to APRN prescribing. She also advised members that parallel regulation revisions are ongoing at the Nursing and Medicine Boards to ensure compliance with Chapter 24 of the Acts of 2012, including the Nursing Board's defining "clinical relationship", consistent with statutory guidance.

ACTION:

So noted

TOPIC:

Adjournment

DISCUSSION:

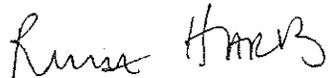
None

ACTION:

Motion by M. Beal, seconded by B. Levin, and passed unanimously to adjourn the meeting at 12:25 p.m.

DRAFT as of 2/14/2013 3:34 PM

Respectfully submitted by:

A handwritten signature in cursive script that reads "Rula Harb".

Rula Harb, MS, RN, Executive Director
Board of Registration in Nursing

Reviewed by: Mary Strachan, Board Counsel
Board of Registration in Nursing