

**BEFORE THE KANSAS STATE BOARD OF NURSING**

LANDON STATE OFFICE BUILDING, 900 S.W. JACKSON #1051  
TOPEKA, KANSAS 66612-1230

Filed  
APR 29 2004  
Board of Nursing

**IN THE MATTER OF**  
**Norma Sullivan**  
**LICENSE NO. 13-072111-062**

**CASE NO. 03-472-5**

**CONSENT AGREEMENT TO**  
**SURRENDER AND REVOKE LICENSE AND FINAL ORDER**

Now on this 20<sup>th</sup> day of April, 2004, the Kansas State Board of Nursing, represented by Assistant Attorney General, Betty Wright, and the licensee, Norma Sullivan, hereby enter into this agreement and proffer evidence and the hearing officer adopts those recommendations and makes the following findings of fact and orders:

1. Licensee is licensed as a Registered Nurse through 6/30/2004. The Board has jurisdiction over the licensee and the subject matter of this action.
3. The Board has requested that a petition be filed to take disciplinary action against the licensee's license.
4. Following a petition being filed by the Board, a hearing would also be held at a later date at which time the Board would have to prove that licensee violated K.S.A. 65-1120(a).
5. Licensee has the right to these hearings and the right to seek review of the findings from these hearings in accordance with the Kansas administrative procedure act and the Kansas act for judicial review and civil enforcement of agency actions. Licensee is waiving those rights and knowledgeably and voluntarily entering into this agreement instead of proceeding to these hearings. This agreement will conclude Board action pending at this time against licensee's license.

**AGREED FINDINGS OF FACT**

6. On or about June 14, 2003 the licensee took Lortabs patients at Wesley Medical Center, Wichita, Ks. while employed there as a nurse. The licensee admitted to the diversion

and agreed to enter the [REDACTED]

7. On or about March 10, 2004 the Board of Nursing received a letter from [REDACTED] stating the licensee was out of compliance by working before she had [REDACTED]  
[REDACTED] It appeared when she presented evidence of [REDACTED]  
[REDACTED] that the documents had been forged by the licensee.
8. The licensee further violated the [REDACTED] agreement by working in a nursing agency and not notifying [REDACTED] of the employment as required by the [REDACTED]
9. By entering into this Consent Agreement and consenting to the entry of the Final Order, both parties waive their right to full administrative proceedings pursuant to K.S.A. 65-1120(b) and K.S.A.77-501 *et seq.* and to judicial review.

#### **CONCLUSIONS OF LAW**

10. **Count 1:** Respondent has violated the Kansas Nurse Practice Act(a) K.S.A. 65-1120(a)(6), unprofessional conduct, by drug diversion (K.A.R. 60-3-110(n) and
11. **Count 2:** K.A.R. 60-3-110(d) by inaccurately recording, falsifying, or altering any record of a patient, or agency or of the board.
12. **Count 3:** K.S.A. 65-1120(a)(4) to be unable to practice with skill and safety due to the current abuse of drugs or alcohol.
13. **Count 4:** K.A.R. 60-3-110(s) failing to complete the requirements of the impaired provider program of the Board.

#### **POLICY STATEMENT**

14. The role of Kansas State Board of Nursing is to protect the citizens of Kansas.

#### **DISPOSITION**

15. Licensee will surrender her license to practice nursing in Kansas.
16. Upon signing this agreement and returning it to the Board, licensee shall **return her license card** with the agreement. **Licensee shall not practice nursing in Kansas.**

17. The Board reports this surrender and revocation to data banks, other entities, the Board website and in its newsletter. This is a disciplinary action on her license. The original of this document shall be kept in the Board's agency file and its contents may be disclosed to the public upon request.
18. If licensee does seek reinstatement of her license, the agreed facts are admitted, she has waived her right to a hearing on the facts in this matter, however to receive a reinstatement of her license the licensee will have the opportunity at that time to prove her fitness to practice nursing.
19. One of the requirements for a future reinstatement will be an evaluation by KNAP, and a commitment to abide by any requirements of KNAP.
20. By their signatures, the parties hereby acknowledge this agreement.

IN WITNESS WHEREOF, the parties hereto execute this CONSENT AGREEMENT TO SURRENDER AND REVOKE LICENSE AND FINAL ORDER

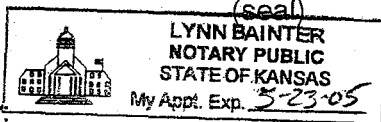
\_\_\_\_\_  
 Terry Beck  
 Hearing Officer

Approved by:

\_\_\_\_\_  
 Norma Sullivan  
 Licensee  
 1528 N Evergreen Lane  
 Wichita, KS 67212

State of Kansas )  
 County of Sedgwick ) SS

Subscribed to before me by Norma Sullivan on this 18<sup>th</sup> day of April, 2004.



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 Signature of Notary Public

Prepared by:

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Betty Wright  
Assistant Attorney General  
900 SW Jackson, Suite 1051  
Topeka, Kansas 66612-1230  
785-296-4325

**CERTIFICATE OF SERVICE**

On the 29<sup>th</sup> day of April, 2004, I mailed a copy of this document to:

Norma Sullivan  
1528 N Evergreen Lane  
Wichita, KS 67212

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Betty Wright