

Rex G. Beasley #08777
Assistant Attorney General
Kansas State Board of Nursing
Landon State Office Building
900 SW Jackson, Suite 551-S
Topeka, Kansas 66612-1230

BEFORE THE KANSAS STATE BOARD OF NURSING
LANDON STATE OFFICE BUILDING
900 S.W. JACKSON, #551-S
TOPEKA, KANSAS 66612-1230
(785) 296-8401

IN THE MATTER)
)
OF) Case No: 97-0264-5
)
DEBRA DENHAM)
LICENSE NO. 13-040133-092)

FINAL ORDER

ON THE day of February 1999 this matter came on for hearing before Terry E. Beck the Board's designated Hearing Officer. Debra Denham, hereinafter referred to as "Respondent", appeared by and through her attorney Donald E. Jensen. The Kansas State Board of Nursing hereinafter referred to as the "Board" appeared by and through Assistant Attorney General Rex G. Beasley, Disciplinary Counsel for the Board.

THEREUPON the parties announced that they have entered into a Consent Agreement which is attached hereto. The parties requested that the Consent Agreement be approved and that this Final Order be entered.

THEREUPON the Hearing officer made the following fact, and conclusions of law, and entered the following Final Order:

1. The Kansas State Board of Nursing has jurisdiction over the Respondent and the subject matter.

2. Respondent was licensed to practice as a registered professional nurse (R.N.) in the State of Kansas having been issued license number 13-040133-092 with an expiration date of September 30, 1996. Respondent allowed her license to lapse. Respondent filed a reinstatement application on May 28, 1997. The Board reinstated Respondent until September 30, 1998. Prior to the expiration of that license the Board received an application from Respondent for the renewal of her license. Because of a pending disciplinary action Respondent's renewal application was not processed and she was not given a new license. However, by operation of K.S.A. 77-511(d), Respondent's privileges to practice nursing were extended.

3. Respondent has committed numerous acts in violation of K.S.A. 65-1113, *et seq.*, as follows:

a. Respondent submitted an application for nursing employment to a prospective employer on November 10, 1996. In that application Respondent falsely, fraudulently, and with the intent to deceive stated that she had a nursing license with a expiration date of 9-30-98. Respondent was employed to provide home health nursing services to Medicare and Medicaid recipients and others.

b. After a routine audit disclosed that Respondent was not licensed she falsely, fraudulently, and with the intent to deceive submitted a photocopy of an altered license. The copy Respondent submitted was a photocopy of her old license which had expired in September 1996. The expiration date of "9 96" shown on the old license was altered to read "9 98."

c. During her employment Respondent was responsible for providing regular Wellness Monitoring/Supervisory services to several Medicare and Medicaid patients. Respondent falsely, fraudulently, and with the intent to deceive submitted reports of, and bills for, regular Wellness Monitoring/Supervisory visits which had not taken place.

d. An audit revealed that, at a minimum, Respondent over billed on 50% of her patients and that 10% of her billings were for services which were not provided. Other inconstancies were also found.

e. Respondent submitted a reinstatement application to the Board in May of 1997. In the application Respondent falsely, fraudulently, and with the intent to deceive, failed to disclose her nursing employment from October 1, 1996 through May 28, 1997.

f. In case number 97-0533-5 Respondent was charged with, and fined for, practicing nursing without a valid Kansas nursing license for eight months, from October 1, 1996 to May 28, 1997.

4. Respondent's actions constitute violations of the Kansas Nurse Practice Act K. S. A. 65-1120(a)(1); K. S. A. 65-1120(a)(3); K. S. A. 65-1120(a)(6); K. S. A. 65-1120(a)(7); and other applicable rules, regulations and guidelines, and the public's trust, for which she should be disciplined.

5. In lieu of proceeding to a full administrative hearing, the parties entered into the Consent Agreement which is hereby approved.

6. Respondent stipulated that she violated the Kansas Nurse Practice Act as alleged and that she should be disciplined.

7. Respondent is aware that she has certain rights in this matter which may include the right to a formal hearing; the right to see and hear the evidence against her and to cross-examine witnesses against her; the right to present witnesses and evidence on her behalf; and the right to seek reconsideration, review or appeal of the findings from the hearing in this matter. Respondent knowingly and intelligently waived, or gave up, her rights and entered into the Consent Agreement and consented to the entry of this Final Order to resolve this matter instead of proceeding to hearing.

8. By entering into the Consent Agreement and consenting to the entry of this Final Order, both parties waived their right to full administrative proceedings pursuant to K.S.A. 65-1120(b) and K.S.A. 77-5501 *et. seq.* and to judicial review.

9. Based upon the stipulations and commitments of Respondent in the Consent Agreement, and pursuant to the disciplinary remedies available in K.S.A. 65-1120, the Respondent's license should be renewed until September 30, 2000 but the license should be immediately **suspended and limited** for the period of licensure. The suspension of Respondent's license shall be stayed allowing Respondent to practice nursing subject to the following terms and conditions:

(a) Respondent will pay an administrative fine pursuant to K. S. A. 74-1110 of \$3,000.00. Said fine must be paid in full within one year of the date this Final Order is signed by the Hearing Officer.

(b) Respondent shall immediately inform all employers, prospective employers, and the director of any nursing education program in which she teaches, of this Consent Agreement and the Final Order. Within 14 days of the Final Order, and within 14 days of any change of nursing employment Respondent shall cause her nursing employer

to notify the Board in writing of the employer's receipt of copies of this Consent Agreement and the Final Order. Respondent shall also cause her employer(s) to provide quarterly reports for the period of her licensure. The reports shall be prepared by Respondent's immediate supervisor or by an R.N. who evaluates her performance on a regular basis. Such reports shall include information regarding attendance, performance and documentation. The quarterly reports shall be due, February 20, 1999, April 20, 1999, July 20, 1999, and September 20, 1999, January 20, 2000, April 20, 2000, July 20, 2000, and September 20, 2000. If Respondent is not employed as a nurse for a period of time included in this schedule she shall immediately inform the Board and the Board may, at its discretion, extend the reporting requirements of this paragraph so that the Board can obtain reports concerning Respondent's nursing performance. Respondent's employer may submit copies of employee evaluations conducted during a quarter in lieu of a report for that quarter. These reports or evaluations shall be sent by the employer or person conducting the evaluation to the attention of the Board's Practice Specialist, Kansas State Board of Nursing, Landon State Office Building, 900 S.W. Jackson, Suite 551-S, Topeka, Kansas 66612-1230.

(c) Respondent shall comply with all laws and regulations governing the practice of nursing.

(d) Respondent shall sign any release(s) necessary so that all, reports, or evaluations may be forwarded to the Kansas State Board of Nursing to the attention of the Board's Practice Specialist. The revocation of any release will be a breach of this Consent Agreement and the Final Order.

(e) Respondent shall notify the Board's Practice Specialist of the name of her employer and immediate supervisor within 14 days of the Final Order and within 14 days of any change of employment or change in immediate supervisor.

(f) Respondent shall notify the Board's Practice Specialist of any changes in her name, address, and phone number. All such notifications shall be made within 14 days of such a change.

(g) Respondent shall immediately notify the Board of any violation of this Consent Agreement or the Final Order.

(h) Respondent shall immediately surrender all evidence of licensure to the Board. The Board will send Respondent a new license card which shall be issued with an "S" and an "L" placed in the status code portion of the license card to indicate that action has been taken against her license.

(i) Respondent shall not, under any circumstances, misrepresent her licensure status.

(j) Respondent shall not seek or accept employment with a nursing registry, a temporary nursing service or agency, a home health care service or agency, or as a private duty nurse.

(k) Respondent shall report in person for appointment with the Board staff upon request.

(l) Respondent shall not commit any act which would be a crime under federal law or, if it occurred in Kansas, would be a crime under Kansas law. If Respondent is charged with such a crime she shall immediately notify the Board in writing

of any formal charge(s) against her and also promptly notify the Board in writing of the resolution of the charge(s).

(m) Respondent shall work only under the supervision of a registered professional nurse in a structured setting. Such supervising registered professional nurse shall, at the time of said supervision, hold an active, unencumbered Kansas nursing license.

10. Any further fraudulent or deceptive acts or omissions by Respondent will be a violation of the Consent Agreement and this Final Order, and may, at the sole discretion of the Board, constitute conclusive and irrefutable proof that Respondent should not be licensed to practice nursing, and will justify immediate action to revoke Respondent's license to practice nursing; and may, also constitute independent grounds for additional discipline. Within 48 hours of any request, Respondent shall surrender her license to the Board if the Board, after any investigation, determines that Respondent has violated the terms and conditions of the Consent Agreement or this Final Order. If Respondent's fails to surrender her license to the Board within 48 hours of a request as provided above, the Board will be authorized and justified in taking emergency action against her pursuant to K.S.A. 77-537. Furthermore, in the event the Board should move for an order lifting the stay the only issue will be whether Respondent has strictly complied with every term and condition of the Consent Agreement and this Final Order.

11. Any unsatisfactory reports from Respondent's supervisor in nursing, or any reports of a reportable incident under Risk Management Law, or a violation of the Kansas Nurse Practice Act, or failure to comply with any of the conditions of the Consent Agreement or this Final Order may, at the sole discretion of the Board, constitute a breach of the Consent Agreement and this Final Order, and may result in further proceedings against Respondent under the Kansas Administrative Procedures Act.

12. Each and every condition outlined in the Consent Agreement and this Final Order is mandatory and if Respondent fails to meet any one of the conditions the Board will proceed to cause a petition or other proceedings to be filed in this matter and that a full adjudicative proceeding will follow; as a result Respondent may be fined and her license may be denied, suspended, limited, revoked, pursuant to K.S.A. 65-1120 or K.S.A. 74-1110.

13. All stipulations, agreements and admissions made in the Consent Agreement are binding upon the Respondent in the event it is necessary to hold any further hearing in this or any other proceedings.

14. This is a disciplinary action and will be reported to the National Council of State Boards of Nursing data bank. Pursuant to K.S.A. 45-215 *et seq.*, the signed original of the Consent Agreement and this Final Order shall remain in the custody of the Board as public records.

15. In deciding to enter into the Consent Agreement and consenting to the entry of this Final Order the Respondent relied upon her own knowledge and judgment, and that of her attorney, and did not rely on any statement, representation or promise from the Board or anyone acting on its behalf. Respondent entered into the Consent Agreement and consented to the entry of this Final Order freely, knowingly, and voluntarily, and without any coercion, pressure, or duress from the Board of anyone on its behalf.

16. The Consent Agreement will be subject to and governed by the laws of the State of Kansas.

17. Neither the Consent Agreement or this Final Order are intended to be, nor will they operate as, a waiver or estoppel of the Board's right to take action against Respondent for any act or omission not specifically made a part of the Consent Agreement or this Final Order. Nothing in

the Consent Agreement or this Final Order shall be construed to deny the Board jurisdiction to investigate and prosecute other alleged violations of the Nurse Practice Act regardless of when they occur(ed) or when called to the attention of the Board. Each and every term and condition imposed in the Consent Agreement and this Final Order is mandatory and Respondent is required to comply with each and every one. An express or implied waiver of one or more conditions shall not operate as a waiver of any other nor constitute an estoppel or bar to the enforcement of any other term or condition of the Consent Agreement of this Final Order.

18. Respondent will be responsible for payment of any costs associated with compliance with the Consent Agreement and this Final Order. It is Respondent's responsibility to insure that all reports required to be submitted to the Board, including those from her employer or other third party, are submitted in a timely manner.

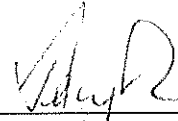
19. Respondent shall pay costs in the sum of \$35.00 Said payment shall be made to the Board in cash or money order and shall be paid within 30 days of the entry of this Final Order.

20. Consistent with the intent of the parties that the Consent Agreement and this Final Order apply to the next licensing period, the next license which may be granted to Respondent shall be subject to the same terms, limitations and conditions contained in the Consent Agreement and this Final Order. Provided however the Board may waive any or all of the reporting requirements. Nothing contained in the Consent Agreement or this Final Order will grant Respondent any right to automatic license renewal.

21. Respondent read and understood the Consent Agreement and this Final Order and is bound by their terms. The Consent Agreement constitutes the entire agreement of the parties and may not be modified except in writing and approved by all parties.

IT IS SO ORDERED.

Dated this 22 day of February , 1999



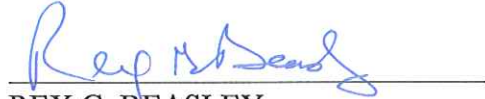
TERRY E. BECK
HEARING OFFICER

APPROVED:



DONALD E. JENSEN
Attorney for Respondent

DATE February 11, 1999



REX G. BEASLEY
Assistant Attorney General
Disciplinary Counsel

DATE February 12, 1999

CERTIFICATE OF SERVICE

I hereby certify that on the 22nd day of February, 1999 I deposited a true and correct copy of the Consent Agreement and Final Order in the United States Mail, first class postage prepaid to the following:

Debra Denham
PO Box 456
Haysville, Kansas 67060

Mr. Donald Jensen
Cosgrove, Webb & Oman
1100 Nations Bank Tower
514 Kansas Avenue
Topeka, Kansas 66603

and hand delivered a copy to

Rex G. Beasley
Assistant Attorney General
Kansas State Board of Nursing
Landon State Office Building
900 SW Jackson Suite 551-S
Topeka, Kansas 66612-1230



Diane M. Glym, J.D., R.N.
Practice Specialist

Rex G. Beasley #08777
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IN THE MATTER)
)
OF) Case No: 97-0264-5
)
DEBRA DENHAM)
LICENSE NO. 13-040133-092)

CONSENT AGREEMENT

COME NOW the Petitioner, the Kansas State Board of Nursing (hereinafter referred to as the "Board") by and through Assistant Attorney General Rex G. Beasley, and Debra Denham, (hereinafter referred to as Respondent), personally and by and through her attorney Donald E. Jensen, with the intent and purpose of settling all issues currently before the Board without the necessity of a formal hearing, and respectfully request that the Board, or its designee, approve this Consent Agreement and enter the Final Order presented herewith as the resolution of this case.

NATURE OF THE CASE

Respondent was licensed to practice as a registered professional nurse (R.N.) in the State of Kansas having been issued license number 13-040133-092 with an expiration date of September 30, 1996. Respondent allowed her license to lapse. Respondent filed a reinstatement application on May 28, 1997. The Board reinstated Respondent until September 30, 1998. Prior

to the expiration of that license the Board received an application from Respondent for the renewal of her license. Because of a pending disciplinary action Respondent's renewal application was not processed and she was not given a new license. However, by operation of K.S.A. 77-511(d), Respondent's privileges to practice nursing were extended.

The Board the received information, conducted an investigation, determined, and alleges that Respondent has committed numerous acts in violation of K.S.A. 65-1113, *et seq.*, as follows:

- a. Respondent submitted an application for nursing employment to a prospective employer on November 10, 1996. In that application Respondent falsely, fraudulently, and with the intent to deceive stated that she had a nursing license with a expiration date of 9-30-98. Respondent was employed to provide home health nursing services to Medicare and Medicaid recipients and others.
- b. After a routine audit disclosed that Respondent was not licensed she falsely, fraudulently, and with the intent to deceive submitted a photocopy of an altered license. The copy Respondent submitted was a photocopy of her old license which had expired in September 1996. The expiration date of "9 96" shown on the old license was altered to read "9 98."
- c. During her employment Respondent was responsible for providing regular Wellness Monitoring/Supervisory services to several Medicare and Medicaid patients. Respondent falsely, fraudulently, and with the intent to deceive submitted reports of, and bills for, regular Wellness Monitoring/Supervisory visits which had not taken place.

d. An audit revealed that, at a minimum, Respondent over billed on 50% of her patients and that 10% of her billings were for services which were not provided. Other inconstancies were also found.

e. Respondent submitted a reinstatement application to the Board in May of 1997. In the application Respondent falsely, fraudulently, and with the intent to deceive, failed to disclose her nursing employment from October 1, 1996 through May 28, 1997.

f. In case number 97-0533-5 Respondent was charged with, and fined for, practicing nursing without a valid Kansas nursing license for eight months, from October 1, 1996 to May 28, 1997.

g. Respondent's actions constitute violations of the Kansas Nurse Practice Act K. S. A. 65-1120(a)(1); K. S. A. 65-1120(a)(3); K. S. A. 65-1120(a)(6); K. S. A. 65-1120(a)(7); and other applicable rules, regulations and guidelines, and the public's trust, for which she should be disciplined.

STIPULATION OF FACTS AND AGREEMENT

In lieu of proceeding to a full administrative hearing, the parties agree to enter into and be bound by the following admissions and stipulations, and this agreement.

1. Respondent stipulates that she violated the Kansas Nurse Practice Act as alleged above and that she should be disciplined.

2. Respondent is aware that she has certain rights in this matter which may include the right to a formal hearing; the right to see and hear the evidence against her and to cross-examine witnesses against her; the right to present witnesses and evidence on her behalf; and the right to seek reconsideration, review or appeal of the findings from the hearing in this matter.

Respondent knowingly and intelligently waives, or gives up, her rights and enters into this Consent Agreement and consents to the entry of a Final Order to resolve this matter instead of proceeding to hearing.

3. 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. 77-5501 *et. seq.* and to judicial review.

4. Based upon the stipulations and commitments of Respondent herein, and pursuant to the disciplinary remedies available in K.S.A. 65-1120, the parties agree that Respondent's license should be renewed until September 30, 2000 but the license should be immediately **suspended and limited** for the period of licensure. The suspension of Respondent's license shall be stayed allowing Respondent to practice nursing subject to the following terms and conditions:

(a) Respondent will pay an administrative fine pursuant to K. S. A. 74-1110 of \$3,000.00. Said fine must be paid within one year of the date the Final Order is signed by the Hearing Officer.

(b) Respondent shall immediately inform all employers, prospective employers, and the director of any nursing education program in which she teaches, of this Consent Agreement and the Final Order. Within 14 days of the Final Order, and within 14 days of any change of nursing employment Respondent shall cause her nursing employer to notify the Board in writing of the employer's receipt of copies of this Consent Agreement and the Final Order. Respondent shall also cause her employer(s) to provide quarterly reports for the period of her licensure. The reports shall be prepared by Respondent's immediate supervisor or by an R.N. who evaluates her performance on a regular basis. Such reports shall include information regarding attendance, performance

and documentation. The quarterly reports shall be due, February 20, 1999, April 20, 1999, July 20, 1999, and September 20, 1999, January 20, 2000, April 20, 2000, July 20, 2000, and September 20, 2000. If Respondent is not employed as a nurse for a period of time included in this schedule she shall immediately inform the Board and the Board may, at its discretion, extend the reporting requirements of this paragraph so that the Board can obtain reports concerning Respondent's nursing performance. Respondent's employer may submit copies of employee evaluations conducted during a quarter in lieu of a report for that quarter. These reports or evaluations shall be sent by the employer or person conducting the evaluation to the attention of the Board's Practice Specialist, Kansas State Board of Nursing, Landon State Office Building, 900 S.W. Jackson, Suite 551-S, Topeka, Kansas 66612-1230.

(c) Respondent shall comply with all laws and regulations governing the practice of nursing.

(d) Respondent shall sign any release(s) necessary so that all, reports, or evaluations may be forwarded to the Kansas State Board of Nursing to the attention of the Board's Practice Specialist. The revocation of any release will be a breach of this Consent Agreement and the Final Order.

(e) Respondent shall notify the Board's Practice Specialist of the name of her employer and immediate supervisor within 14 days of the Final Order and within 14 days of any change of employment or change in immediate supervisor.

(f) Respondent shall notify the Board's Practice Specialist of any changes in her name, address, and phone number. All such notifications shall be made within 14 days of such a change.

(g) Respondent shall immediately notify the Board of any violation of this Consent Agreement or the Final Order.

(h) Respondent shall immediately surrender all evidence of licensure to the Board. The Board will send Respondent a new license card which shall be issued with an "S" and an "L" placed in the status code portion of the license card to indicate that action has been taken against her license.

(i) Respondent shall not, under any circumstances, misrepresent her licensure status.

(j) Respondent shall not seek or accept employment with a nursing registry, a temporary nursing service or agency, a home health care service or agency, or as a private duty nurse.

(k) Respondent shall report in person for appointment with the Board staff upon request.

(l) Respondent shall not commit any act which would be a crime under federal law or, if it occurred in Kansas, would be a crime under Kansas law. If Respondent is charged with such a crime she shall immediately notify the Board in writing of any formal charge(s) against her and also promptly notify the Board in writing of the resolution of the charge(s).

(m) Respondent shall work only under the supervision of a registered professional nurse in a structured setting. Such supervising registered professional nurse shall, at the time of said supervision, hold an active, unencumbered Kansas nursing license.

5. Respondent admits and agrees that any further fraudulent or deceptive acts or omissions by her will be a violation of this Consent Agreement and the Final Order, and may, at

the sole discretion of the Board, constitute conclusive and irrefutable proof that Respondent should not be licensed to practice nursing, and will justify immediate action to revoke her license to practice nursing; and may, also constitute independent grounds for additional discipline.

Respondent agrees that within 48 hours of any request, she will surrender her license to the Board if the Board, after any investigation, determines that she has violated the terms and conditions of this Consent Agreement or the Final Order. Respondent further agrees that, if she fails to surrender her license to the Board within 48 hours of a request as provided above, the Board will be authorized and justified in taking emergency action against her pursuant to K.S.A. 77-537. Furthermore, in the event the Board should move for an order lifting the stay the only issue will be whether Respondent has strictly complied with every term and condition of this Consent Agreement and the Final Order.

6. Respondent understands that any unsatisfactory reports from her supervisor in nursing, or any reports of a reportable incident under Risk Management Law, or a violation of the Kansas Nurse Practice Act, or failure to comply with any of the conditions of this Consent Agreement or the Final Order may, at the sole discretion of the Board, constitute a breach of this Consent Agreement and the Final Order, and may result in further proceedings against Respondent under the Kansas Administrative Procedures Act.

7. Respondent further understands that each and every condition outlined in this Consent Agreement and the Final Order is mandatory and if she fails to meet any one of the conditions the Board will proceed to cause a petition or other proceedings to be filed in this matter and that a full adjudicative proceeding will follow. Respondent further understands that as a result she may be fined and her license may be suspended or, revoked, pursuant to K.S.A. 65-1120 or K.S.A. 74-1110.

8. It is understood that this agreement is subject to the approval of the Board. Should the Board, or its designee, modify or change the agreement in any manner unsatisfactory to either party, or disapprove it, either party may withdraw its consent and this document, and all agreements herein shall be void, and the matter will proceed to hearing. However, once approved, all stipulations, agreements and admissions made herein are binding upon the Respondent in the event it is necessary to hold any further hearing in this or any other proceedings.

9. The Parties understand and acknowledge that this is a disciplinary action and will be reported to the National Council of State Boards of Nursing data bank, and that pursuant to K.S.A. 45-215 *et seq.*, the signed original of this Consent Agreement and the Final Order shall remain in the custody of the Board as public records.

10. In deciding to enter into this Consent Agreement and consenting to the entry of the Final Order the Respondent relied upon her own knowledge and judgment, and that of her attorney, and did not rely on any statement, representation or promise from the Board or anyone acting on its behalf. Respondent further acknowledges that she entered into this Consent Agreement and consented to the entry of the Final Order freely, knowingly, and voluntarily, and without any coercion, pressure, or duress from the Board of anyone on its behalf.

11. This Consent Agreement will be subject to and governed by the laws of the State of Kansas.

12. Respondent acknowledges and agrees that neither this Consent Agreement or the Final Order are intended to be, nor will they operate as, a waiver or estoppel of the Board's right to take action against Respondent for any act or omission not specifically made a part of the Consent Agreement or the Final Order, and that nothing in this Consent Agreement or the Final

Order shall be construed to deny the Board jurisdiction to investigate and prosecute other alleged violations of the Nurse Practice Act regardless of when they occur(ed) or when called to the attention of the Board. Respondent acknowledges that each and every term and condition imposed in this Consent Agreement and the Final Order is mandatory and that she is required to comply with each and every one. An express or implied waiver of one or more conditions shall not operate as a waiver of any other nor constitute an estoppel or bar to the enforcement of any other term or condition of this Consent Agreement or the Final Order.

13. Respondent acknowledges and understands that she will be responsible for payment of any costs associated with compliance with this Consent Agreement and the Final Order, and that it is her responsibly to insure that all reports required to be submitted to the Board, including those from her employer or other third party, are submitted in a timely manner.

14. Respondent will pay costs in the sum of \$35.00 Said payment shall be made to the Board in cash or money order and shall be paid within 30 days of the entry of the Final Order.

15. It is the intent of the parties that this Consent Agreement and the Final Order apply to the next licensing period. Accordingly, Respondent agrees and consents that the next license which may be granted to her will be subject to the same terms, limitations and conditions contained in this Consent Agreement and the Final Order. Provided however the Board may waive any or all of the reporting requirements. Respondent acknowledges and agrees that nothing contained in this Consent Agreement or the Final Order will grant her any right to automatic license renewal.

16. By signing this Consent Agreement and consenting to the entry of the Final Order, Respondent acknowledges that she has read and understands the this Consent Agreement and the Final Order, and agrees to be bound by their terms. This Consent Agreement constitutes the

entire agreement of the parties and may not be modified except in writing and approved by all parties.

IN WITNESS WHEREOF, the parties hereto execute this Consent Agreement and request that the Final Order be entered.

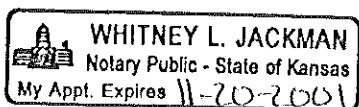
Debra J Denham
DEBRA DENHAM
Respondent

DATE February 10, 1999

STATE OF KANSAS)
)
COUNTY OF 36) SS

Subscribed and Sworn to before me, this 10 day of February, 1999.

Whitney L Jackman
Signature of Notary Public



APPROVED



DONALD E. JENSEN
Attorney for Respondent

DATE February 11, 1999



REX G. BEASLEY
Assistant Attorney General
Disciplinary Counsel

DATE February 12, 1999