

**BEFORE THE KANSAS STATE BOARD OF NURSING**  
Landon State Office Building, 900 S.W. Jackson #1051  
Topeka, Kansas 66612-1230

**IN THE MATTER OF  
RAMONA HERREN  
LICENSE NO. 13-66631-032**

**CASE NO. 03-187-0**

Filed  
DFC: 2/2003  
Board of Nursing


**PROPOSED DEFAULT ORDER REVOKING LICENSE**

**NOW ON THIS** 2nd day of December, 2003, petitioner appears by disciplinary counsel, Betty Wright, for a pre-hearing conference on the petition. Respondent does not appear.

Wherefore, the hearing officer finds as follows:

1. Respondent was licensed as a R.N. through 3/31/04. The board has jurisdiction over this matter.
2. Petitioner sent a copy of the petition and notice of this hearing to respondent's last known address and service is proper.
3. Petitioner moves for issuance of a proposed default order revoking the respondent's license.
4. The petition is hereby granted and incorporated into this order as if set forth herein.  
Respondent violated the Nurse Practice Act as alleged in the petition.
5. Per petitioner's request, respondent's license to practice nursing is revoked. Respondent may not practice nursing in Kansas. Respondent is to mail the license card to the board immediately.
6. Respondent shall pay the costs of the action of \$70.
7. Disciplinary counsel shall mail a copy of this order to respondent's last known address.

**IT IS SO ORDERED**



---

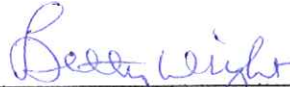
Terry E. Beck  
Hearing Officer

**NOTICE**

This is a proposed default order pursuant to K.S.A. 77-520. This order becomes effective if respondent does not file a written motion requesting that this order be vacated with the board at:

State Board of Nursing –Legal Division  
Landon State Office Building  
900 SW Jackson, Ste 1051  
Topeka, KS 66612-1230

within seven days after the day this order is mailed. If a motion is timely filed, then a hearing will be set and notice given to respondent to appear. Another order will then be issued either vacating or affirming this order.



---

Betty Wright #14785  
Disciplinary Counsel  
900 S.W. Jackson, Suite #1051  
Topeka, Kansas 66612-1230  
785/296-4325

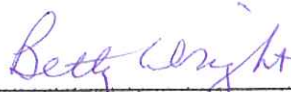
**CERTIFICATE OF SERVICE**

On the 2<sup>nd</sup> day of December, 2003, I deposited a copy of this notice and the above-referenced pleading with the United States Postal Service, postage pre-paid, addressed to:

Ramona Herren  
1099 Kelsey Drive  
Lexington, KY 40504

Ramona Herren  
214 W 7th  
Mt. Carmel, IL 62863

Ramona Herren  
219 E. South Street  
Olathe, KS 66062



---

Betty Wright, Assistant Attorney General

**BEFORE THE KANSAS STATE BOARD OF NURSING**  
Landon State Office Building, 900 S.W. Jackson #1051  
Topeka, Kansas 66612-1230

Filed  
NOV - 7 2003  
Board of Nursing

IN THE MATTER OF  
**RAMONA HERREN**  
LICENSE NO. 13-066631-032

CASE NO. 03-187-0

**PETITION**

**COMES NOW** the petitioner, the Board of Nursing, by and through disciplinary counsel, Betty Wright, and for its cause of action states that:

1. Respondent is licensed in Kansas as an RN until 3/31/04.
2. Respondent's address of record is 219 E. South Street, Olathe, KS 66062.
3. The Kansas State Board of Nursing has the authority under K.S.A. 74-1106 *et seq.* to examine, license and renew licenses for duly qualified applicants and may limit, deny, suspend or revoke a license or authorization to practice nursing or may issue a public or private censure if a violation of K.S.A. 65-1120(a) is established.
4. After an investigation, the Board's investigative committee found reasonable grounds for believing that respondent violated The Kansas Nurse Practice Act and referred the matter for further proceedings.

**FACTS COMMON TO ALL COUNTS**

5. The respondent has a disciplinary action in Missouri, Case 03-0006 BN. The Missouri Consent Order, effective 3/13/03 stated that the licensee was employed by StarMed staffing, Overland Park and was assigned to work at Independence Regional Health Center. On 3/21/01 the licensee altered a prescription for her for Histussin HC cough syrup, by changing the number of refills on the prescription. On 3/25/02 licensee altered a prescription written for her for Vicodin with no refills, to show refills. The pharmacist caught the alteration.

**COUNTS**

**COUNT I:** K. S. A. 65-1120(a) provides that it is a ground for denial of a license if the applicant is found: To have a license to practice nursing as a registered nurse or as a practical

nurse denied, revoked, limited or suspended, or to be publicly or privately censured, by a licensing authority of another state, agency of the United States government, territory of the United States or country or to have other disciplinary action taken against the applicant or licensee by a licensing authority of another state, agency of the United States government, territory of the United States or country. A certified copy of the record or order of public or private censure, denial, suspension, limitation, revocation or other disciplinary action of the licensing authority of another state, agency of the United States government, territory of the United States or country shall constitute prima facie evidence of such a fact for purposes of this paragraph.

**COUNT II:** To be guilty of unprofessional conduct as defined by rules and regulations of the Board; K.A.R. 60-3-110(d) inaccurately recording, falsifying, or altering any record of a patient or agency or of the Board.

**WHEREFORE,** petitioner requests a finding that the respondent violated The Kansas Nurse Practice Act, for revocation or other sanctions of respondent's license and sanctions, and for the \$70.00 costs of this action to be assessed to respondent.

Respectfully submitted,

Phill Kline  
Attorney General

By: \_\_\_\_\_

  
Betty Wright #14785  
Assistant Attorney General  
Kansas State Board of Nursing  
785-296-4325