

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

**FILED**

**APR 26 2011**

**IN THE MATTER OF  
JARED W. COBLE  
License No. 23-34080-032**

**KSBN**

**Case No. 05-557-8, 10-307-8, 10-1079-7**

**PROPOSED DEFAULT ORDER TO REVOKE LICENSE**

NOW ON THIS 26<sup>th</sup> day of April, 2011, petitioner, the Kansas State Board of Nursing, appears by disciplinary counsel, Alma A. Heckler, for a Hearing on the Petition. Respondent does not appear.

Wherefore, the Presiding Officer finds as follows:

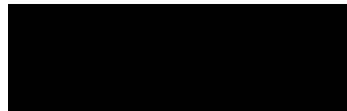
1. Respondent is licensed to practice nursing in Kansas through 3/31/2012. The Kansas State Board of Nursing has jurisdiction over the Respondent and the subject matter of this action.
2. Respondent was sent a copy of the petition and notice of this hearing to respondent's last known address and service is proper. Respondent does not appear.
3. Petitioner moves for issuance of a proposed default order revoking respondent's license. The petitioner's request is granted by default pursuant to K.S.A. 77-520.
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.
6. Costs of the action of \$70 are assessed to respondent to be paid to the board by cash or money order within 30 days of the effective date of this order.
7. Respondent shall immediately forward his or her original Kansas licensed practical nurse license to the Kansas State Board of Nursing.

8. This Proposed Default Order shall become effective seven days after service or ten days after mailing of this order unless the Respondent files a written motion with the Board stating why the Proposed Default Order should be vacated and the order is then vacated.

9. If this Proposed Default Order becomes effective, the Respondent's request for administrative hearing is dismissed pursuant to K.S.A. 77-520(d).

10. Disciplinary counsel shall mail a copy of this proposed default order to respondent's last known address.

**IT IS SO ORDERED.**



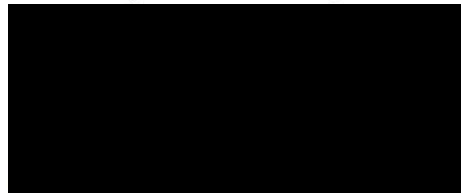
Sandra L. Sharon, Presiding Officer  
Office of Administrative Hearings  
1020 S Kansas Ave.  
Topeka, KS 66612-1327

**NOTICE**

Pursuant to K.S.A. 77-527, either party may request a review of this order by filing a petition for review with the Kansas State Board of Nursing. The petition for review shall state its basis. A petition for review must be filed within 7 days from the date this order becomes effective. Failure to timely request a review by the Kansas State Board of Nursing may preclude further judicial review. The petition for review shall be mailed or personally delivered to: State Board of Nursing - Legal Division, Landon State Office Building, 900 SW Jackson, Ste 1051, Topeka, KS 66612-1230.

Pursuant to K.S.A. 77-530, if neither party requests a review by the Kansas State Board of Nursing, then this initial order becomes final and binding on both parties on the 30<sup>th</sup> day following its service.

Pursuant to K.S.A. 77-531, if the initial order is served by mail, three days are added to the time limits set out above.



Alma A. Heckler, #11555  
Disciplinary Counsel  
Kansas State Board of Nursing  
900 S.W. Jackson, Suite #1051  
Topeka, KS 66612-1230  
785-296-4325

CERTIFICATE OF SERVICE

I certify that on the 26th day of April, 2011, the foregoing copy of the Proposed Default Order Revoking License was served by depositing the same in the United States Mail, first-class postage prepaid, addressed to the following:

Jared W. Coble  
PO Box 422  
Baldwin City, KS 66006



Alma A. Heckler  
Assistant Attorney General

**BEFORE THE KANSAS STATE BOARD OF NURSING**

Landon State Office Building, 900 S.W. Jackson #1051  
Topeka, Kansas 66612-1230

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JARED W. COBLE  
License No. 23-34080-032**

**Case No. 05-557-8, 10-307-8, 10-1079-7**

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**FEB 28 2011**

**KSBN**

**PETITION**

COMES NOW the petitioner, the Kansas State Board of Nursing, by and through Assistant Attorney General assigned to the Board, Alma A. Heckler, and for its cause of action states that:

1. Respondent, Jared W. Coble, is licensed to practice nursing in Kansas through 3/31/2012. The Board has jurisdiction over the respondent and the subject matter of this action.
2. Respondent's address of record is PO Box 422, Baldwin City, KS 66006.
3. After an investigation, the Board's investigative committee found reasonable grounds to believe that the respondent violated the Kansas Nurse Practice Act, K.S.A. 65-1120, and referred this matter for further proceedings.
4. The Kansas State Board of Nursing has the authority under K.S.A. 74-1106 et seq. to examine, license and renew license for duly qualified applicants and may limit, deny, suspend or revoke a license or authorization to practice nursing, may issue a public or private censure and levy administrative fines consistent with K.S.A. 74-1110, if a violation of K.S.A. 65-1120(a) is established.

**FACTS COMMON TO ALL COUNTS**

5. The facts below are common to all counts:
  - (a) In Case No. 05-557-8 the respondent filed an original application for licensure with a misdemeanor conviction in February of 1998 for theft. He was convicted as a juvenile. He was approved for a license but respondent was told by letter from the Kansas Board of Nursing in July 2005, he must report his misdemeanor conviction on all future renewals or reinstatements.

(b) In Case No. 10-307-8 the respondent applied for renewal of his license in 2010 and failed to report his misdemeanor conviction on his first and second drafts of his application.

(c) In Case No. 10-1079-7 the respondent the Board received evidence the respondent while employed at Aldersgate Village in Topeka, Kansas from June 2008 to June 2009, was terminated due to excessive absenteeism and was not eligible for rehire. Facility also found that the respondent committed two medical errors; to include medications not given to patients and not signed for or otherwise documented.

(d) In the same Board case, 10-1079-7, the respondent was next employed by Pinnacle Ridge Nursing and Rehabilitation in Olathe, Kansas from October 2009 to July 2010. He was confronted on July 27, 2010 about his failure to take a requested urine drug screen and missing narcotics on July 26, 2010. Respondent refused to submit to a urine drug screen and reported to the Director of Nursing and Unit Manager that he would "spill" drugs such as hydrocodone. Respondent also failed to follow policies on infection control, medication administration and again had problems with absentism. Respondent immediately resigned on July 27, 2010.

#### VIOLATIONS

6. Respondent has violated the Kansas Nurse Practice Act as follows:

Count 1: K.S.A. 65 1120(a)(4) to be unable to practice with skill and safety due to current abuse of drugs or alcohol;

Count 2: K.S.A. 65 – 1120(a)(6), unprofessional conduct by inaccurately recording, falsifying, or altering any record of a patient or agency or of the board; K.A.R. 60-3-110(d).

Count 3: K.S.A.65-1120(a)(1), to be guilty of fraud or deceit in practicing nursing or in procuring or attempting to procure a license to practice nursing.

Count 4: K.S.A. 65-1120(a)(3), Professional Incompetency by K.S.A. 65-1120(e)(1), one or more instances involving failure to adhere to the applicable standard of care to a degree which constitutes gross negligence, as determined by the board.

Count 5: K.S.A. 65-1120(a)(6), unprofessional conduct by K.A.R. 60-3-110(a)  
Performing acts beyond the authorized scope of the level of nursing for which the individual is licensed.

Count 6: K.S.A. 65-1120(a)(6), unprofessional conduct by K.A.R. 60-3-110(c),  
failing to take appropriate action or to follow policies and procedures in the practice situation designed to safeguard each patient.

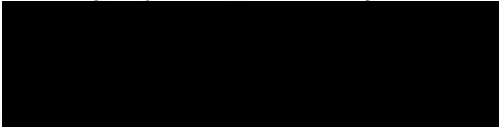
Count 7: K.S.A. 65-1120(a)(6), unprofessional conduct by K.A.R. 60-3-110(n),  
diverting drugs, supplies, or property of any patient or agency.

WHEREFORE, petitioner requests a finding that the respondent has violated the Nurse Practice Act, that respondent's license to practice nursing in Kansas be revoked, and that costs of this action be assessed to the respondent in the amount of \$70.00.

Respectfully submitted,

Derek Schmidt  
Kansas Attorney General

By:

  
Alma A. Heckler, #11555  
Assistant Attorney General  
Kansas State Board of Nursing  
Landon State Office Building  
900 SW Jackson #1051  
Topeka, KS 66612