

**BEFORE THE VIRGINIA BOARD OF NURSING**

**IN RE:**           **SOPHIE ECHO ANDERSON, R.N.**  
**License Number:**           **0001-260091**  
**Issue Date:**               **July 16, 2015**  
**Expiration Date:**           **May 31, 2017**  
**Case Number:**              **171048**

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**NOTICE OF FORMAL ADMINISTRATIVE HEARING  
AND STATEMENT OF ALLEGATIONS**

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**You are hereby notified that a Formal Hearing has been scheduled before the Board of Nursing (“Board”) regarding your license to practice professional nursing in the Commonwealth of Virginia.**

<b>TYPE OF PROCEEDING:</b>	This is a formal administrative hearing before a panel of the Board.
<b>DATE AND TIME:</b>	<b>November 14, 2016 9:00 A.M.</b>
<b>PLACE:</b>	Virginia Department of Health Professions Perimeter Center - 9960 Mayland Drive 2 <sup>nd</sup> Floor - Virginia Conference Center Henrico, Virginia 23233

**LEGAL AUTHORITY AND JURISDICTION:**

1. This formal hearing is being held pursuant to Virginia Code §§ 2.2-4020, 2.2-4024(F), and 54.1-2400(11). This proceeding will be convened as a public meeting pursuant to Virginia Code § 2.2-3700.

2. At the conclusion of the proceeding, the Board is authorized to take any of the following actions:

- Exonerate you;
- Reprimand you;
- Require you to pay a monetary penalty;
- Place you on probation and/or under terms and conditions;
- Suspend your license;
- Revoke your license.

### **ABSENCE OF RESPONDENT AND RESPONDENT'S COUNSEL:**

If you fail to appear at the formal hearing, the Board may proceed to hear this matter in your absence and may take any of the actions outlined above.

### **RESPONDENT'S LEGAL RIGHTS:**

You have the right to the information on which the Board will rely in making its decision, to be represented by counsel at this proceeding, to subpoena witnesses and/or documents, and to present relevant evidence on your behalf.

### **COMMONWEALTH'S EXHIBITS:**

Enclosed is a copy of the documents that will be distributed to the members of the Board and will be considered by the Board when discussing any allegations with you and when deliberating on your case. **These documents are enclosed only with the notice sent by certified mail, which you may be required to claim at the post office. Please bring these documents with you to the formal hearing.**

### **FILING DEADLINES:**

1. Deadline for filing exhibits: November 4, 2016. Submit 15 copies of all documents you want the Board to consider to Darlene Graham, Board of Nursing, 9960 Mayland Drive, Suite 300, Henrico, Virginia 23233. Exhibits may not be sent by facsimile or e-mail.

The Commonwealth must file any objections to your submissions in writing, addressed to Darlene Graham at the Board office, no later than **November 4, 2016**. If no objections have been received by **November 4, 2016**, the evidence will be distributed to the Board members for their review, and will be considered by the Board as evidence when it deliberates upon your case. If the Commonwealth raises objections, you have until **November 4, 2016**, to file your response to the objections, in writing and addressed to Darlene Graham at the Board office. The Chair of the proceeding will rule on the motion.

2. Deadline for filing motions, including requests for continuance or objections to exhibits, in writing, to Darlene Graham at the above address: November 4, 2016. NOTE: Failure to object to the distribution prior to the proceeding will not affect your right to contest any information contained in these documents at the proceeding.

3. Deadline for filing any objections to the Commonwealth's exhibits, in writing, to Darlene Graham at the above address: **November 4, 2016**. If you have not filed any objections by **November 4, 2016**, the exhibits will be distributed to the Board members for their review prior to your hearing, and will be considered by the Board as evidence when it deliberates upon your case. If you do file objections, the Commonwealth has until **November 4, 2016**, to file a response to the objections, in writing and addressed to Darlene Graham at the Board office. The Chair of the proceeding will rule on the motion.

## REQUEST FOR A CONTINUANCE

Absent exigent circumstances, such as personal or family illness, a request for a continuance after **November 4, 2016**, will not be considered. If you obtain counsel, you should do so as soon as possible, as a motion for a continuance due to the unavailability of counsel will not be considered unless received by **November 4, 2016**.

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STATEMENT OF ALLEGATIONS

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The Board alleges that:

1. At all times relevant hereto, Sophie Echo Anderson, R.N., was licensed to practice professional nursing in the Commonwealth of Virginia.

2. Sophie Echo Anderson, R.N. violated Virginia Code § 54.1-3007(2), (5) and (6) and 18 VAC 90-20-300(A)(2)(c) of the Regulations Governing the Practice of Nursing in that between on or about October 3, 2015, and November 16, 2015, during the course of her employment with Inova Fair Oaks Hospital, Fairfax, Virginia, Ms. Anderson diverted controlled medications for her personal and unauthorized use, as evidenced by the following:

a. On or about October 3, 2015, Ms. Anderson withdrew a 1mg syringe of hydromorphone (C-II) at 8:49 a.m. and documented administering 0.5mg to Patient A at 8:51 a.m. Ms. Anderson failed to document wastage of 0.5mg.

b. On or about October 13, 2015, Ms. Anderson withdrew a 4mg syringe of morphine sulfate (C-II) at 8:17 a.m. and documented administering 3mg to Patient B at 8:23 a.m. Ms. Anderson failed to document wastage of 1mg.

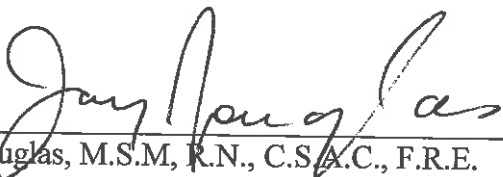
c. On or about November 12, 2015, Ms. Anderson withdrew a 1mg syringe of hydromorphone at 11:20 a.m. and documented administering 0.5mg to Patient C at 11:23 a.m. Ms. Anderson failed to document wastage of 0.5mg.

d. On or about November 16, 2015, Ms. Anderson withdrew a 2mg syringe of lorazepam (C-IV) at 10:29 a.m. and documented administering 1mg to Patient D at 10:33 a.m. Ms. Anderson failed to document wastage of 1mg.

3. Ms. Anderson violated Virginia Code § 54.1-3007(5) and (6) in that on or about November 18, 2015, she reported to duty at Inova Fair Oaks Hospital in an impaired condition. Ms. Anderson was observed having constricted pupils and was unable to focus on her patient's needs. Further, a for-cause drug screen was conducted, which returned a positive result for opiates and benzodiazepines, drugs which were not prescribed to Ms. Anderson.

4. Ms. Anderson violated Virginia Code § 54.1-3007(6) in that she is unsafe to practice professional nursing due to her admitted drug addiction, which includes an addiction to heroin.

See Confidential Attachment I for the names of the patients referenced above.



Jay Douglas, M.S.M., R.N., C.S.A.C., F.R.E.  
Executive Director  
Virginia Board of Nursing

<sup>m</sup>  
October 26, 2016  
Date