

STATE OF CONNECTICUT
DEPARTMENT OF PUBLIC HEALTH
BUREAU OF HEALTH SYSTEM REGULATION
DIVISION OF MEDICAL QUALITY ASSURANCE

In re: Lois Hiers

Petition No. 950127-10-014

CONSENT ORDER

WHEREAS, Lois Hiers of Bronx, New York (hereinafter "respondent") has been issued license number R36593 to practice as a registered nurse by the Department of Public Health (hereinafter "the Department") pursuant to Chapter 378 of the Connecticut General Statutes, as amended; and,

WHEREAS, the Department alleges that:

1. Between approximately August of 1993 and August of 1994, while working as a nurse at Mediplex of Newington, Connecticut, respondent stole one or more prescription pads belonging to Dr. Andrew Schachter, a physician at the facility.
2. During said time period, forged one or more prescriptions on prescription blanks with the names of Dr. Franklin Lee and Dr. Schachter preprinted at the top, in order to fraudulently procure the controlled substances Fastin and/or Motrin.
3. During said time period, respondent committed insurance fraud by causing her group insurance carrier to pay for one or more of the aforementioned fraudulent prescriptions.
4. The above described facts constitute grounds for disciplinary action pursuant to Connecticut General Statutes Section 20-99, including but not limited to 20-99(b)(2) and/or 20-99(b)(6).

ENCLOSURE

WHEREAS, respondent, in consideration of this Consent Order, has chosen not to contest the above allegations of wrongdoing but, while admitting no guilt or wrongdoing, agrees that for purposes of this or any future proceedings before the Connecticut Board of Examiners for Nursing (hereinafter "the Board") the above allegations in this Consent Order shall have the same effect as if proven and ordered after a full hearing held pursuant to §19a-9, §19a-14, and §20-99 of the General Statutes of Connecticut.

NOW THEREFORE, pursuant to §19a-17 and §20-99 of the Connecticut General Statutes, as amended, respondent hereby stipulates and agrees to the following:

1. That she waives her right to a hearing on the merits of this matter.
2. That she hereby voluntarily surrenders her license to practice as a registered nurse to the Board and the Department.
3. That she understands and agrees that if she applies for a new license or to reinstate her registered nurse license at any time in the future, the allegations set forth above in this Consent Order shall be deemed true.
4. That she waives any right to hearing she may have regarding any request that her license be reinstated or that a new license be issued and also waives any right that she may have to appeal or otherwise challenge the disposition of any such request.
5. That she understands and agrees that this Consent Order is a public document and the case file in this Petition Number 950127-10-014 is a public record.
6. That this Consent Order is effective on the date it is executed by the Board.

7. That this Consent Order is a revocable offer of settlement which may be modified by mutual agreement or withdrawn by the Department at any time prior to its being executed by the last signatory.
8. That respondent permits a representative of the Legal Office of the Office of Special Services of the Department to present this Consent Order and the factual basis for this Consent Order to the Board. Respondent understands that the Board has complete and final discretion as to whether an executed Consent Order is approved or accepted.
9. That respondent has the right to consult with an attorney prior to signing this document.

I, Lois Hiers, have read the above Consent Order, and I stipulate and agree to the terms as set forth therein. I further declare the execution of this Consent Order to be my free act and deed.

Lois Hiers
Lois Hiers

Subscribed and sworn to before me this 17th day of June 1996.

JENNIE ALVIRA
Notary Public State of New York
No. 01AL5023576
Qualified in Richmond County
Term Expires February 7, 1998

Jennie Alvira
Notary Public or person authorized
by law to administer an oath or
affirmation

The above Consent Order having been presented to the duly appointed agent of the Commissioner of the Department of Public Health on the 18 day of June 1996, it is hereby accepted.

Stanley K. Peck (w)
Stanley K. Peck, Director
Division of Medical Quality Assurance

The above Consent Order having been presented to the duly appointed agent of the Board of Examiners for Nursing on the 19th day of June 1996, it is hereby ordered and accepted.

Nancy S. Stefan
Connecticut Board of Examiners for Nursing