

**STATE OF CONNECTICUT  
DEPARTMENT OF PUBLIC HEALTH  
HEALTHCARE SYSTEMS BRANCH**

In Re: Karrie Ellis, A.P.R.N.

Petition No. 2009-200916

**CONSENT ORDER**

WHEREAS, Karrie Ellis, A.P.R.N. (hereinafter "respondent") of Simsbury, Connecticut has been issued license number 001155 to practice as an advanced practice registered nurse by the Department of Public Health (hereinafter "the Department") pursuant to Connecticut General Statutes Chapter 378.

WHEREAS, the Department alleges:

1. At all times herein mentioned, respondent worked as an A.P.R.N. at InterCommunity Mental Health Group (hereinafter "the facility.")
2. In or about 2008 respondent ordered scheduled IV medications (hereinafter "the medication") and had them delivered to her residence. Respondent transported the medication in her automobile without appropriate security to the facility. She then gave the unsecured medication to a registered nurse who placed them in a medicine storage area. Neither the medication nor the names of the patients who received the medication were placed in a log book.
3. Respondent's conduct as described above fell below the standard of care in that she:
  - a. stored the medication in her residence which was unsecured and unattended;
  - b. transported the medication in an unsecured and inappropriate manner;
  - c. failed to maintain receipt and disposition records for the medication; and/or,
  - d. failed to place the names of the patients who received the medication in a log book at the facility.
4. The above described facts constitute grounds for disciplinary action pursuant to Connecticut General Statutes §20-99(a) and the Regulations of Connecticut State Agencies §§21a-262-2(c) and (d), 21a-262-6(b) and (c), and/or 21a-262-10(b), (c), and (d).

WHEREAS, respondent, in consideration of this Consent Order, does not admit violating any statute or regulation including Connecticut General Statutes §20-99(b). Respondent further agrees that this Consent Order shall have the same effect as if ordered after a full hearing pursuant to Connecticut General Statutes §§19a-9, 19a-10, and 20-99(a).

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

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1. Respondent waives her right to a hearing on the merits of this matter.
2. Respondent shall comply with all federal and state statutes and regulations applicable to her profession.
3. Respondent shall pay a civil penalty of one thousand dollars (\$1,000.00) by certified or cashier's check payable to "Treasurer, State of Connecticut." The check shall reference the Petition Number on the face of the check, and shall be payable at the time respondent submits the executed Consent Order to the Department.
4. Respondent's license number 001155 to practice as a nurse in the State of Connecticut is hereby placed on probation for six months under the following terms and conditions:
  - A. Respondent shall attend and successfully complete coursework in proper prescribing practices and documentation standards, pre-approved by the Department. Within 15 days of the completion of such coursework, respondent shall provide the Department with proof, to the Department's satisfaction, of the successful completion of such courses.
  - B. Respondent shall provide a copy of this Consent Order to all current and future employers for the duration of her probation.
  - C. Respondent shall not be employed as a nurse for a personnel provider service, assisted living services agency, homemaker - home health aide agency, or home health care agency, and shall not be self-employed as a nurse for the period of her probation.
  - D. If respondent pursues further training or is engaged in an educational program at the time of the Consent Order in a subject area regulated by the Department, respondent shall provide a copy of this Consent Order to the educational institution or, if not an institution, to respondent's instructor. Such institution or instructor shall notify the Department of receipt of the Consent Order within fifteen (15) days of receipt.
  - E. All reports required by the terms of this Consent Order shall be due according to a schedule to be established by the Department of Public Health.
  - F. All correspondence and reports shall be addressed to:

Bonnie Pinkerton, R.N.  
Department of Public Health  
Practitioner Licensing and Investigations  
410 Capitol Avenue, MS #12HSR  
P.O. Box 340308  
Hartford, CT 06134-0308
5. Any violation of the terms of this Consent Order without prior written approval by the Board shall constitute grounds for the Department to seek revocation of respondent's nursing license following

notice and an opportunity to be heard.

6. Any extension of time or grace period for reporting granted by the Board shall not be a waiver or preclude the Board's right to take action at a later time. The Board shall not be required to grant future extensions of time or grace periods.
7. Legal notice of any action shall be deemed sufficient if sent to respondent's last known address of record reported to the Practitioner Licensing and Investigations Section of the Healthcare Systems Branch of the Department.
8. This Consent Order is effective on the first day of the month immediately following the month in which this Consent Order is approved and accepted by the Board.
9. Respondent agrees that this Consent Order is a public document, and the Department's allegations contained in this Consent Order shall be deemed true in any subsequent proceeding before the Board in which (1) her compliance with this same order is at issue, or (2) her compliance with §20-99(b) of the General Statutes of Connecticut and the Regulations of Connecticut State Agencies, as amended, is at issue. Further, respondent understands that any discipline imposed by this Consent Order shall be reported to the National Practitioner Data Bank.
10. If respondent violates any term of this Consent Order, respondent agrees immediately to refrain from practicing as an advanced practice registered nurse, upon request by the Department, with notice to the Board, for a period not to exceed 45 days. During that time period, respondent further agrees to cooperate with the Department in its investigation of the violation. Respondent shall submit to and complete a medical, psychiatric or psychological evaluation, if requested to do so by the Department and she shall submit the results of the evaluation directly to the Department. Respondent further agrees that failure to cooperate with the Department in its investigation during said 45 day period shall constitute grounds for the Department to seek a summary suspension of respondent's license. In any such summary action, respondent stipulates that failure to cooperate with the Department's investigation shall be considered by the Board and shall be given due weight by the Board in determining whether respondent's conduct constitutes a clear and immediate danger as required pursuant to Connecticut General Statutes §§4-182(c) and 19a-17(c). The Department and respondent understand that the Board has complete and final discretion as to whether a summary suspension is ordered.
11. If respondent is not employed as a nurse for thirty (30) consecutive days or longer, respondent shall provide the Department with written notice. Such periods of times shall not be counted in reducing the probationary period covered by this Consent Order and such terms shall be held in abeyance. During

such time period, respondent shall not be responsible for complying with the terms of probation of this Consent Order. If respondent resumes the practice of nursing, respondent shall provide the Department with thirty (30) days prior written notice. Respondent shall not return to the practice of nursing without written pre-approval from the Department. Respondent agrees that the Department, in its complete discretion, may require additional documentation from respondent and/or require respondent to satisfy other conditions or terms as a condition precedent to respondent's return to practice. If requested by the Department, respondent further agrees to complete the following:

- a. attend and successfully complete coursework, remediation, and/or retraining pre-approved by the Department. Upon completion, respondent shall provide the Department with proof, to the Department's satisfaction, of successful completion.

Respondent understands that any return to the practice of nursing without pre-approval from the Department shall constitute a violation of this Consent Order and may subject the respondent to further disciplinary action.

12. If, during the period of probation, respondent practices nursing outside Connecticut, she shall provide written notice to the Department concerning such employment. During such time period, respondent shall not be responsible for complying with the terms of probation of this Consent Order, and such time period shall not be counted in reducing the probationary period covered by this Consent Order. Respondent may comply with the terms of probation while practicing outside Connecticut if pre-approved by the Department. In the event respondent intends to return to the practice of nursing in Connecticut, respondent shall provide the Department with thirty (30) days prior written notice and agrees to comply with all terms and conditions contained in paragraph 4 above.
13. If respondent violates any term of this Consent Order, said violation may also constitute grounds for the Department to seek a summary suspension of respondent's license before the Board.
14. This Consent Order and terms set forth herein are not subject to reconsideration, collateral attack or judicial review under any form or in any forum. Respondent understands that this Consent Order shall not be subject to modification as a result of any claim that the terms contained herein may result in action by third parties, including, but not limited to, healthcare facilities and/or credentialing or licensure boards. Respondent assumes all responsibility for assessing such actions prior to the execution of this document. Further, this Consent Order is not subject to appeal or review under the provisions of Chapters 54 and 368a of the General Statutes of Connecticut, provided that this stipulation shall not deprive respondent of any other rights that respondent may have under the laws of the State of Connecticut or of the United States.

15. Respondent permits a representative of the Department to present this Consent Order and the factual basis for this Consent Order to the Board. The Department and respondent understand that the Board has complete and final discretion as to whether an executed Consent Order is approved or accepted.
16. 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 being executed by the last signatory.
17. Respondent has had the opportunity to consult with an attorney prior to signing this document.
18. The execution of this document has no bearing on any criminal liability without the written consent of the Director of the Medicaid Fraud Control Unit or the Bureau Chief of the Division of Criminal Justice's Statewide Prosecution Bureau. The purpose of this Consent Order is to resolve the pending administrative license disciplinary petition only, and is not intended to affect any civil or criminal liability or defense.
19. This Consent Order embodies the entire agreement of the parties with respect to this case. All previous communications or agreements regarding the subject matter of this consent order, whether oral or written, between the parties are superseded unless expressly incorporated herein or made a part hereof.

I, Karrie L. Ellis, A.P.R.N., have read the above Consent Order, and I agree to the terms set forth therein. I further declare the execution of this Consent Order to be my free act and deed.

Karrie L. Ellis  
Karrie L. Ellis

Subscribed and sworn to before me this 12<sup>th</sup> day of May, 2011.

Philip M. Walker  
Notary Public or person authorized  
by law to administer an oath or affirmation  
COMMISSIONER OF THE SUPERIOR COURT

The above Consent Order having been presented to the duly appointed agent of the Commissioner of the Department of Public Health on the 16<sup>th</sup> day of June, 2011, it is hereby accepted.

Jennifer Filippone  
Jennifer Filippone, Section Chief,  
Practitioner Licensing and Investigations  
Healthcare Systems Branch

The above Consent Order having been presented to the duly appointed agent of the Connecticut Board of Examiners for Nursing on the 20<sup>th</sup> day of July, 2011, it is hereby ordered and accepted.

BY: Patricia C. Bufford  
Connecticut Board of Examiners for Nursing



# STATE OF CONNECTICUT

DEPARTMENT OF PUBLIC HEALTH

February 2, 2012

Karrie Ellis, APRN  
10 Hallview Drive  
Simsbury, CT 06070

Re: Consent Order  
Petition No. 2009-200916  
License No. 001155

Dear Ms. Ellis:

Please accept this letter as notice that you have satisfied the terms of your license probation, effective February 1, 2012.

Notice will be sent to the Department's Licensure and Registration section to remove all restrictions from your license related to the above-referenced Consent Order.

Please be certain to retain a copy of this letter as documented proof that you have completed your license probation.

Thank you for your cooperation during this process, and good luck to you in the future.

Very truly yours,

Bonnie Pinkerton, RN, Nurse Consultant  
Practitioner Licensing and Investigations Section

cc: J. Filippone  
J. Wojick



Phone: (860) 509-7400  
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P.O. Box 340308 Hartford, CT 06134  
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