

**PERMANENT VOLUNTARY SURRENDER
ISLANDE PIERRE
LP52899**

Gary N. Hicks, MS, RN, CEN, CNE
President, Maryland Board of Nursing
4140 Patterson Avenue
Baltimore, Maryland 21215-2254

Re: **Islande Pierre, LP52899**
Permanent Voluntary Surrender of Licensed Practical Nursing License

Dear Mr. Hicks,

I agree to permanently voluntarily surrender my license to practice as a licensed practical nurse ("LPN"), License Number LP52899, in the State of Maryland. By voluntarily surrendering my Maryland LPN license, I understand that I may not engage in the practice as an LPN, with or without compensation, as defined in the Maryland Nurse Practice Act ("the Act"), Md. Code Ann., Health Occ. §§ 8-101 *et seq.* (2021 Repl. Vol.) and the Board's regulations, Code of Maryland Regulations ("COMAR") 10.27.01 *et seq.*

My practice was brought to the attention of the Maryland Board of Nursing ("the Board") as follows:

On July 25, 2013, I submitted an application to the Board for Exam for Licensed Practical Nursing licensure ("LPN Application"). On my LPN Application, I indicated that I graduated for a practical nursing school in Virginia ("LPN School") in 2013. The director of the nursing program ("Program Director") at my LPN School signed my LPN application indicating that I had completed the full 13 month program in nursing that began on 09/19/2011 and ended on 12/21/2012 and that the program was certified by the Board of Nursing. I signed my LPN application affirming that I was applying for examination in accordance with the Maryland Nurse Practice Act and the Board's regulations and affirming that the contents of my LPN application were true and correct. I admitted to the Board Investigator that I did not go to any medical or clinical facility to complete my clinical training in maternity, pediatrics, nursing fundamentals, mental health, and geriatrics. However, my LPN School transcripts indicated that I completed the 200 hours of clinical training (combined) in maternity, pediatrics, nursing fundamentals, mental health, and geriatrics nursing. The Maryland Board of Nursing contacted all five clinical facilities listed on my LPN transcript and were told that the facilities did not have a contract and/or agreements with my LPN school to allow students to participate in LPN clinical training. One of the facilities listed on my transcript told the Board that they do not provide any medical services or employ any nursing staff. On May 15, 2012, the Virginia Board of Nursing issued a Consent Order which withdrew my LPN's School approval to operate and ordered that the LPN School cease operations no later than June 30, 2013.

On January 31, 2022, the Board issued an "Order for Summary Suspension of Licensed Practical Nurse License" ("Summary Suspension"), pursuant to Section 10-226 (c)(2) of the Administrative Procedure Act, summarily suspending my LPN license. After a Show Cause hearing, on February 23, 2022, the Board issued an "Order Continuing Summary Suspension of

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Registered Nurse License and Multi-State Licensing Privilege to Practice Registered Nursing Pursuant to Section 10-226 (c)(2) of the Administrative Procedure Act” (“Order Continuing Summary Suspension”).

On January 31, 2022, the Board issued a Notice of Agency Action - Charges Under the Maryland Nurse Practice Act (the “Charges”), charging my LPN license with violations under Health Occ. § 8-316(a) (1) (“fraudulently or deceptively obtains or attempts to obtain a license for the applicant or for another”); (25) (“engages in conduct that violates the professional code of ethics”) with underlying violations of COMAR 10.27.19.02 B(1) (“a nurse may, when acting in the capacity or identity of a licensed nurse knowingly participate in or condone dishonesty, fraud, deceit, or misrepresentation”); and, (30) (“violates regulations adopted by the Board or an order from the Board”) with underlying violations of COMAR 10.27.01.05 B(1)(b) (“meet all requirements for a high school diploma or its equivalent and complete satisfactorily and meet all requirements for a diploma from a licensed practical nursing education program in any other state, territory, or country determined by the Board to be substantially equivalent^[1] to the licensed practical nursing education programs approved in this State at the time of the applicant’s graduation”). On or about March 1, 2022, the Respondent filed a timely request for hearing on the summary suspension and pending charges.

In lieu of proceeding to an evidentiary hearing on the Charges and Suspension, I agree to the **PERMANENT VOLUNTARY SURRENDER** of my LPN license. I agree that the Board has enough evidence to prove by a preponderance of the evidence the above violations cited in the Charges issued on January 31, 2022 and the merits of the Order for Summary Suspension, and may sanction my LPN license accordingly, pursuant to Health Occ. § 8-316(a) and COMAR 10.27.26. I understand that, by executing this Permanent Voluntary Surrender, I am waiving the right, now and in the future, to any evidentiary hearing at which I would have the right to counsel, to confront witnesses, to give testimony, to call witnesses on my own behalf, and to contest the facts summarized in this Permanent Voluntary Surrender, and at which I would have the right to all other substantive and procedural protections provided by law, including the right to appeal.

In executing this agreement to permanently surrender my LPN license, I agree that I will

¹ COMAR 10.27.01.01 C. provides: “Substantially equivalent” means a registered nursing or licensed practical nursing education program that:

- (1) Contains theoretical learning experiences and related clinical learning experiences that include direct patient care within various settings consistent with program objectives, outcomes, or competencies conducted either concurrently with or after the theoretical learning experience; and
- (2) Meets the curriculum requirement for Maryland schools of nursing at the time of the applicant’s graduation, including, but not limited to:
 - (c) Didactic and clinical instruction in nursing care of families and clients throughout the life span in a variety of care settings requiring nursing measures appropriate for: ...
 - (d) Didactic and clinical instructional content that includes, but is not limited to, the areas of:
 - (i) Medical and surgical nursing;
 - (ii) Maternal and child health;
 - (iii) Psychiatric nursing; and
 - (iv) Geriatric nursing;

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never be eligible for reinstatement of my LPN license in the State of Maryland.

I understand that this Permanent Voluntary Surrender shall become a **PUBLIC RECORD** and shall become effective on the date of the Board's acceptance of the Permanent Voluntary Surrender. I agree that this Permanent Voluntary Surrender may be released or published by the Board as a final decision and order, on the Board's website and as otherwise permitted, under the Public Information Act, Md. Code Ann., Gen. Prov. §§ 4-101 *et. seq.* (2019). I expressly consent to the publication of this Permanent Voluntary Surrender, including any and all information that is protected from disclosure under federal and state law.

I acknowledge that I may not rescind this Permanent Voluntary Surrender in part or in its entirety for any reason whatsoever. I understand the nature and effect of both the Board's actions and this Permanent Voluntary Surrender fully. Finally, I wish to make clear that I have had an opportunity to discuss this matter with legal counsel and that I willingly, knowingly, and voluntarily sign this Permanent Voluntary Surrender.

Sincerely,


Islande Pierre

05/10/2022
Date

NOTARIZATION

STATE OF MARYLAND

COUNTY OF BALTIMORE

I HEREBY CERTIFY that on this 10 day of May, 2022, before me, a Notary Public of the State of MARYLAND of the County afore-said, personally appeared **ISLANDE PIERRE** and declared and affirmed under penalties of perjury that signing the foregoing **Permanent Voluntary Surrender** was her voluntary act and deed.

BRIAN K SCOTT
NOTARY PUBLIC - MARYLAND
BALTIMORE COUNTY
COMMISSION EXPIRES
02 JUN 2024


Notary Public

My commission expires: 02 Jun 24

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ACCEPTANCE

ON BEHALF OF THE MARYLAND BOARD OF NURSING, on this 1st day of June, 2022, ISLANDE PIERRE'S PERMANENT VOLUNTARY SURRENDER of her Licensed Practical Nurse license, License Number LP52899, in the State of Maryland is hereby accepted.

Gary N. Hicks, MS, RN, CEN, CNE
The Board President's Signature
Appears on the Original Document

Maryland Board of Nursing