

# BRITISH COLUMBIA COLLEGE OF NURSING PROFESSIONALS

## CITATION

(Section 37 of the *Health Professions Act*, RSBC 1996, chapter 183)

**TO:** Amanda Parniak

**TAKE NOTICE** that a Panel of the Discipline Committee of the British Columbia College of Nursing Professionals (BCCNP) will conduct a hearing into your conduct and competence as a registered nurse registrant under s.38 of the *Health Professions Act* (the Act).

The hearing will be held at the offices of BCCNP, 900 – 200 Granville Street, Vancouver, British Columbia on **February 12 – February 14, 2020**, commencing at 10:00 a.m.

You are requested to attend the hearing, and have the right to be represented by legal counsel and to submit evidence. However, if you fail to attend the hearing, the Panel will proceed with the hearing in your absence, and, without further notice to you, may take any action that it is authorized to take under the Act.

The purpose of the hearing is to inquire into your conduct as follows:

1. On or about November 21, 2017, you diverted a narcotic, hydromorphone, from patient JM, contrary to one or more of the following Professional Standards and/or Practice Standards: the *Professional Responsibility and Accountability* Professional Standard, the *Client-Focused Provision of Service* Professional Standard, the *Ethical Practice* Professional Standard, the *Documentation* Practice Standard, the *Medication Administration* Practice Standard, the *Medication Inventory Management* Practice Standard, and the *Privacy and Confidentiality* Practice Standard.

This conduct also constitutes unprofessional conduct, or breach of the Act or bylaws, under s.39 (1) of the Act.

2. On or about November 21, 2017, you falsified medication documentation for a narcotic, hydromorphone, in relation to patient JM, contrary to one or more of the following Professional Standards and/or Practice Standards: the *Professional Responsibility and Accountability* Professional Standard, the *Client-Focused Provision of Service* Professional Standard, the *Ethical Practice* Professional Standard, the *Documentation* Practice Standard, the *Medication Administration* Practice Standard, the *Medication Inventory Management* Practice Standard, and the *Privacy and Confidentiality* Practice Standard.

This conduct also constitutes unprofessional conduct, or breach of the Act or bylaws, under s.39 (1) of the Act.

3. Between approximately March 4, 2018 and March 8, 2018, on multiple occasions, you diverted a narcotic, hydromorphone, from patient RN, contrary to one or more of the following Professional Standards and/or Practice Standards: the *Professional Responsibility and Accountability* Professional Standard, the *Client-Focused Provision of Service* Professional Standard, the *Ethical Practice* Professional Standard, the *Documentation* Practice Standard, the *Medication Administration* Practice Standard, the *Medication Inventory Management* Practice Standard, and the *Privacy and Confidentiality* Practice Standard.

This conduct also constitutes unprofessional conduct, or breach of the Act or bylaws, under s.39 (1) of the Act.

4. Between approximately March 4, 2018 and March 8, 2018, on multiple occasions, you falsified medication documentation for a narcotic, hydromorphone, in relation to patient RN, contrary to one or more of the following Professional Standards and/or Practice Standards: the *Professional Responsibility and Accountability* Professional Standard, the *Client-Focused Provision of Service* Professional Standard, the *Ethical Practice* Professional Standard, the *Documentation* Practice Standard, the *Medication Administration* Practice Standard, the *Medication Inventory Management* Practice Standard, and the *Privacy and Confidentiality* Practice Standard.

This conduct also constitutes unprofessional conduct, or breach of the Act or bylaws, under s.39 (1) of the Act.

5. Between approximately March 5, 2018 and March 8, 2018, on multiple occasions, you diverted a narcotic, hydromorphone, from patient AL, contrary to one or more of the following Professional Standards and/or Practice Standards: the *Professional Responsibility and Accountability* Professional Standard, the *Client-Focused Provision of Service* Professional Standard, the *Ethical Practice* Professional Standard, the *Documentation* Practice Standard, the *Medication Administration* Practice Standard, the *Medication Inventory Management* Practice Standard, and the *Privacy and Confidentiality* Practice Standard.

This conduct also constitutes unprofessional conduct, or breach of the Act or bylaws, under s.39 (1) of the Act.

6. Between approximately March 5, 2018 and March 8, 2018, on multiple occasions, you falsified medication documentation for a narcotic, hydromorphone, in relation to patient AL, contrary to one or more of the following Professional Standards and/or Practice Standards: the *Professional Responsibility and Accountability* Professional Standard, the *Client-Focused Provision of Service* Professional Standard, the *Ethical Practice* Professional Standard, the *Documentation* Practice Standard, the *Medication*

*Administration Practice Standard, the Medication Inventory Management Practice Standard, and the Privacy and Confidentiality Practice Standard.*

This conduct also constitutes unprofessional conduct, or breach of the Act or bylaws, under s.39 (1) of the Act.

7. On or about October 17, 2017, on multiple occasions, you diverted a narcotic, hydromorphone, from patient WP, contrary to one or more of the following Professional Standards and/or Practice Standards: the *Professional Responsibility and Accountability Professional Standard*, the *Client-Focused Provision of Service Professional Standard*, the *Ethical Practice Professional Standard*, the *Documentation Practice Standard*, the *Medication Administration Practice Standard*, the *Medication Inventory Management Practice Standard*, and the *Privacy and Confidentiality Practice Standard*.

This conduct also constitutes unprofessional conduct, or breach of the Act or bylaws, under s.39 (1) of the Act.

8. On or about October 17, 2017, on multiple occasions, you falsified medication documentation for a narcotic, hydromorphone, in relation to patient WP, contrary to one or more of the following Professional Standards and/or Practice Standards: the *Professional Responsibility and Accountability Professional Standard*, the *Client-Focused Provision of Service Professional Standard*, the *Ethical Practice Professional Standard*, the *Documentation Practice Standard*, the *Medication Administration Practice Standard*, the *Medication Inventory Management Practice Standard*, and the *Privacy and Confidentiality Practice Standard*.

This conduct also constitutes unprofessional conduct, or breach of the Act or bylaws, under s.39 (1) of the Act.

9. On or about October 20, 2017, on multiple occasions, you diverted a narcotic, hydromorphone, from patient RH, contrary to one or more of the following Professional Standards and/or Practice Standards: the *Professional Responsibility and Accountability Professional Standard*, the *Client-Focused Provision of Service Professional Standard*, the *Ethical Practice Professional Standard*, the *Documentation Practice Standard*, the *Medication Administration Practice Standard*, the *Medication Inventory Management Practice Standard*, and the *Privacy and Confidentiality Practice Standard*.

This conduct also constitutes unprofessional conduct, or breach of the Act or bylaws, under s.39 (1) of the Act.

10. On or about October 20, 2017, on multiple occasions, you falsified medication documentation for a narcotic, hydromorphone, in relation to patient RH, contrary to one or more of the following Professional Standards and/or Practice Standards: the *Professional Responsibility and Accountability Professional Standard*, the *Client-Focused Provision of Service Professional Standard*, the *Ethical Practice Professional Standard*,

the *Documentation Practice Standard*, the *Medication Administration Practice Standard*, the *Medication Inventory Management Practice Standard*, and the *Privacy and Confidentiality Practice Standard*.

This conduct also constitutes unprofessional conduct, or breach of the Act or bylaws, under s.39 (1) of the Act.

11. Between approximately October 31, 2017 and November 1, 2017, on multiple occasions, you diverted a narcotic, hydromorphone, from patient WB, contrary to one or more of the following Professional Standards and/or Practice Standards: the *Professional Responsibility and Accountability Professional Standard*, the *Client-Focused Provision of Service Professional Standard*, the *Ethical Practice Professional Standard*, the *Documentation Practice Standard*, the *Medication Administration Practice Standard*, the *Medication Inventory Management Practice Standard*, and the *Privacy and Confidentiality Practice Standard*.

This conduct also constitutes unprofessional conduct, or breach of the Act or bylaws, under s.39 (1) of the Act.

12. Between approximately October 31, 2017 and November 1, 2017, on multiple occasions, you falsified medication documentation for a narcotic, hydromorphone, in relation to patient WB, contrary to one or more of the following Professional Standards and/or Practice Standards: the *Professional Responsibility and Accountability Professional Standard*, the *Client-Focused Provision of Service Professional Standard*, the *Ethical Practice Professional Standard*, the *Documentation Practice Standard*, the *Medication Administration Practice Standard*, the *Medication Inventory Management Practice Standard*, and the *Privacy and Confidentiality Practice Standard*.

This conduct also constitutes unprofessional conduct, or breach of the Act or bylaws, under s.39 (1) of the Act.

13. On or about October 18, 2017, on multiple occasions, you diverted a narcotic, hydromorphone, from patient JA, contrary to one or more of the following Professional Standards and/or Practice Standards: the *Professional Responsibility and Accountability Professional Standard*, the *Client-Focused Provision of Service Professional Standard*, the *Ethical Practice Professional Standard*, the *Documentation Practice Standard*, the *Medication Administration Practice Standard*, the *Medication Inventory Management Practice Standard*, and the *Privacy and Confidentiality Practice Standard*.

This conduct also constitutes unprofessional conduct, or breach of the Act or bylaws, under s.39 (1) of the Act.

14. On or about October 18, 2017, on multiple occasions, you falsified medication documentation for a narcotic, hydromorphone, in relation to patient JA, contrary to one or more of the following Professional Standards and/or Practice Standards: the

*Professional Responsibility and Accountability Professional Standard, the Client-Focused Provision of Service Professional Standard, the Ethical Practice Professional Standard, the Documentation Practice Standard, the Medication Administration Practice Standard, the Medication Inventory Management Practice Standard, and the Privacy and Confidentiality Practice Standard.*

This conduct also constitutes unprofessional conduct, or breach of the Act or bylaws, under s.39 (1) of the Act.

15. On or about October 24, 2017, on multiple occasions, you diverted a narcotic, hydromorphone, from patient NL, contrary to one or more of the following Professional Standards and/or Practice Standards: the *Professional Responsibility and Accountability Professional Standard, the Client-Focused Provision of Service Professional Standard, the Ethical Practice Professional Standard, the Documentation Practice Standard, the Medication Administration Practice Standard, the Medication Inventory Management Practice Standard, and the Privacy and Confidentiality Practice Standard.*

This conduct also constitutes unprofessional conduct, or breach of the Act or bylaws, under s.39 (1) of the Act.

16. On or about October 24, 2017, on multiple occasions, you falsified medication documentation for a narcotic, hydromorphone, in relation to patient NL, contrary to one or more of the following Professional Standards and/or Practice Standards: the *Professional Responsibility and Accountability Professional Standard, the Client-Focused Provision of Service Professional Standard, the Ethical Practice Professional Standard, the Documentation Practice Standard, the Medication Administration Practice Standard, the Medication Inventory Management Practice Standard, and the Privacy and Confidentiality Practice Standard.*

This conduct also constitutes unprofessional conduct, or breach of the Act or bylaws, under s.39 (1) of the Act.

17. On or about October 31, 2017, you diverted a narcotic, hydromorphone, from patient JB, contrary to one or more of the following Professional Standards and/or Practice Standards: the *Professional Responsibility and Accountability Professional Standard, the Client-Focused Provision of Service Professional Standard, the Ethical Practice Professional Standard, the Documentation Practice Standard, the Medication Administration Practice Standard, the Medication Inventory Management Practice Standard, and the Privacy and Confidentiality Practice Standard.*

This conduct also constitutes unprofessional conduct, or breach of the Act or bylaws, under s.39 (1) of the Act.

18. On or about October 31, 2017, you falsified medication documentation for a narcotic, hydromorphone, in relation to patient JB, contrary to one or more of the following

Professional Standards and/or Practice Standards: the *Professional Responsibility and Accountability* Professional Standard, the *Client-Focused Provision of Service* Professional Standard, the *Ethical Practice* Professional Standard, the *Documentation* Practice Standard, the *Medication Administration* Practice Standard, the *Medication Inventory Management* Practice Standard, and the *Privacy and Confidentiality* Practice Standard.

This conduct also constitutes unprofessional conduct, or breach of the Act or bylaws, under s.39 (1) of the Act.

19. On or about October 25, 2017, you diverted a narcotic, hydromorphone, from patient WF, contrary to one or more of the following Professional Standards and/or Practice Standards: the *Professional Responsibility and Accountability* Professional Standard, the *Client-Focused Provision of Service* Professional Standard, the *Ethical Practice* Professional Standard, the *Documentation* Practice Standard, the *Medication Administration* Practice Standard, the *Medication Inventory Management* Practice Standard, and the *Privacy and Confidentiality* Practice Standard.

This conduct also constitutes unprofessional conduct, or breach of the Act or bylaws, under s.39 (1) of the Act.

20. On or about October 25, 2017, you falsified medication documentation for a narcotic, hydromorphone, in relation to patient WF, contrary to one or more of the following Professional Standards and/or Practice Standards: the *Professional Responsibility and Accountability* Professional Standard, the *Client-Focused Provision of Service* Professional Standard, the *Ethical Practice* Professional Standard, the *Documentation* Practice Standard, the *Medication Administration* Practice Standard, the *Medication Inventory Management* Practice Standard, and the *Privacy and Confidentiality* Practice Standard.

This conduct also constitutes unprofessional conduct, or breach of the Act or bylaws, under s.39 (1) of the Act.

21. On or about November 5, 2017, on multiple occasions, you diverted a narcotic, hydromorphone, from patient JP, contrary to one or more of the following Professional Standards and/or Practice Standards: the *Professional Responsibility and Accountability* Professional Standard, the *Client-Focused Provision of Service* Professional Standard, the *Ethical Practice* Professional Standard, the *Documentation* Practice Standard, the *Medication Administration* Practice Standard, the *Medication Inventory Management* Practice Standard, and the *Privacy and Confidentiality* Practice Standard.

This conduct also constitutes unprofessional conduct, or breach of the Act or bylaws, under s.39 (1) of the Act.

22. On or about November 5, 2017, on multiple occasions, you falsified medication documentation for a narcotic, hydromorphone, in relation to patient JP, contrary to one or more of the following Professional Standards and/or Practice Standards: the *Professional Responsibility and Accountability* Professional Standard, the *Client-Focused Provision of Service* Professional Standard, the *Ethical Practice* Professional Standard, the *Documentation* Practice Standard, the *Medication Administration* Practice Standard, the *Medication Inventory Management* Practice Standard, and the *Privacy and Confidentiality* Practice Standard.

This conduct also constitutes unprofessional conduct, or breach of the Act or bylaws, under s.39 (1) of the Act.

23. Between approximately October 31, 2017 and November 1, 2017, on multiple occasions, you diverted a narcotic, hydromorphone, from patient CM, contrary to one or more of the following Professional Standards and/or Practice Standards: the *Professional Responsibility and Accountability* Professional Standard, the *Client-Focused Provision of Service* Professional Standard, the *Ethical Practice* Professional Standard, the *Documentation* Practice Standard, the *Medication Administration* Practice Standard, the *Medication Inventory Management* Practice Standard, and the *Privacy and Confidentiality* Practice Standard.

This conduct also constitutes unprofessional conduct, or breach of the Act or bylaws, under s.39 (1) of the Act.

24. Between approximately October 31, 2017 and November 1, 2017, on multiple occasions, you falsified medication documentation for a narcotic, hydromorphone, in relation to patient CM, contrary to one or more of the following Professional Standards and/or Practice Standards: the *Professional Responsibility and Accountability* Professional Standard, the *Client-Focused Provision of Service* Professional Standard, the *Ethical Practice* Professional Standard, the *Documentation* Practice Standard, the *Medication Administration* Practice Standard, the *Medication Inventory Management* Practice Standard, and the *Privacy and Confidentiality* Practice Standard.

This conduct also constitutes unprofessional conduct, or breach of the Act or bylaws, under s.39 (1) of the Act.

25. On or about November 29, 2017, on multiple occasions, you withdrew a narcotic, hydromorphone, while not on duty, contrary to one or more of the following Professional Standards and/or Practice Standards: the *Professional Responsibility and Accountability* Professional Standard, the *Client-Focused Provision of Service* Professional Standard, the *Ethical Practice* Professional Standard, the *Documentation* Practice Standard, the *Medication Administration* Practice Standard, the *Medication Inventory Management* Practice Standard, and the *Privacy and Confidentiality* Practice Standard.

This conduct also constitutes unprofessional conduct, or breach of the Act or bylaws, under s.39 (1) of the Act.

26. On or about January 17, 2018, on multiple occasions, you withdrew a narcotic, hydromorphone, while not on duty, contrary to one or more of the following Professional Standards and/or Practice Standards: the *Professional Responsibility and Accountability* Professional Standard, the *Client-Focused Provision of Service* Professional Standard, the *Ethical Practice* Professional Standard, the *Documentation* Practice Standard, the *Medication Administration* Practice Standard, the *Medication Inventory Management* Practice Standard, and the *Privacy and Confidentiality* Practice Standard.

This conduct also constitutes unprofessional conduct, or breach of the Act or bylaws, under s.39 (1) of the Act.

27. On or about January 23, 2018, on multiple occasions, you withdrew a narcotic, hydromorphone, while not on duty, contrary to one or more of the following Professional Standards and/or Practice Standards: the *Professional Responsibility and Accountability* Professional Standard, the *Client-Focused Provision of Service* Professional Standard, the *Ethical Practice* Professional Standard, the *Documentation* Practice Standard, the *Medication Administration* Practice Standard, the *Medication Inventory Management* Practice Standard, and the *Privacy and Confidentiality* Practice Standard.

This conduct also constitutes unprofessional conduct, or breach of the Act or bylaws, under s.39 (1) of the Act.

28. On or about January 24, 2018, on multiple occasions, you withdrew a narcotic, hydromorphone, while not on duty, contrary to one or more of the following Professional Standards and/or Practice Standards: the *Professional Responsibility and Accountability* Professional Standard, the *Client-Focused Provision of Service* Professional Standard, the *Ethical Practice* Professional Standard, the *Documentation* Practice Standard, the *Medication Administration* Practice Standard, the *Medication Inventory Management* Practice Standard, and the *Privacy and Confidentiality* Practice Standard.

This conduct also constitutes unprofessional conduct, or breach of the Act or bylaws, under s.39 (1) of the Act.

29. On or about February 27, 2018, you withdrew a narcotic, hydromorphone, while not on duty, contrary to one or more of the following Professional Standards and/or Practice Standards: the *Professional Responsibility and Accountability* Professional Standard, the *Client-Focused Provision of Service* Professional Standard, the *Ethical Practice* Professional Standard, the *Documentation* Practice Standard, the *Medication Administration* Practice Standard, the *Medication Inventory Management* Practice Standard, and the *Privacy and Confidentiality* Practice Standard.



This conduct also constitutes unprofessional conduct, or breach of the Act or bylaws, under s.39 (1) of the Act.

30. On or about March 23, 2018, on multiple occasions, you withdrew a narcotic, hydromorphone, while not on duty, contrary to one or more of the following Professional Standards and/or Practice Standards: the *Professional Responsibility and Accountability* Professional Standard, the *Client-Focused Provision of Service* Professional Standard, the *Ethical Practice* Professional Standard, the *Documentation* Practice Standard, the *Medication Administration* Practice Standard, the *Medication Inventory Management* Practice Standard, and the *Privacy and Confidentiality* Practice Standard.

This conduct also constitutes unprofessional conduct, or breach of the Act or bylaws, under s.39 (1) of the Act.

31. On or about October 25 and October 26, 2017, you withdrew a narcotic, hydromorphone, in multiple doses, using multiple transactions, not more than 5 minutes apart, for the same patient, contrary to one or more of the following Professional Standards and/or Practice Standards: the *Professional Responsibility and Accountability* Professional Standard, the *Client-Focused Provision of Service* Professional Standard, the *Ethical Practice* Professional Standard, the *Documentation* Practice Standard, the *Medication Administration* Practice Standard, the *Medication Inventory Management* Practice Standard, and the *Privacy and Confidentiality* Practice Standard.

This conduct also constitutes unprofessional conduct, or breach of the Act or bylaws, under s.39 (1) of the Act.

32. On or about November 6, November 7, November 13, November 16, November 24, November 26 and November 29, 2017, you withdrew a narcotic, hydromorphone, in multiple doses, using multiple transactions, not more than 5 minutes apart, for the same patient, contrary to one or more of the following Professional Standards and/or Practice Standards: the *Professional Responsibility and Accountability* Professional Standard, the *Client-Focused Provision of Service* Professional Standard, the *Ethical Practice* Professional Standard, the *Documentation* Practice Standard, the *Medication Administration* Practice Standard, the *Medication Inventory Management* Practice Standard, and the *Privacy and Confidentiality* Practice Standard.

This conduct also constitutes unprofessional conduct, or breach of the Act or bylaws, under s.39 (1) of the Act.

33. On or about December 14, December 15 and December 31, 2017, you withdrew a narcotic, hydromorphone, in multiple doses, using multiple transactions, not more than 5 minutes apart, for the same patient, contrary to one or more of the following Professional Standards and/or Practice Standards: the *Professional Responsibility and Accountability* Professional Standard, the *Client-Focused Provision of Service* Professional Standard, the *Ethical Practice* Professional Standard, the *Documentation* Practice

Standard, the *Medication Administration Practice Standard*, the *Medication Inventory Management Practice Standard*, and the *Privacy and Confidentiality Practice Standard*.

This conduct also constitutes unprofessional conduct, or breach of the Act or bylaws, under s.39 (1) of the Act.

34. On or about January 4, January 8, January 12, January 15, January 17, January 23, January 24, January 27 and January 30, 2018, you withdrew a narcotic, hydromorphone, in multiple doses, using multiple transactions, not more than 5 minutes apart, for the same patient, contrary to one or more of the following Professional Standards and/or Practice Standards: the *Professional Responsibility and Accountability Professional Standard*, the *Client-Focused Provision of Service Professional Standard*, the *Ethical Practice Professional Standard*, the *Documentation Practice Standard*, the *Medication Administration Practice Standard*, the *Medication Inventory Management Practice Standard*, and the *Privacy and Confidentiality Practice Standard*.

This conduct also constitutes unprofessional conduct, or breach of the Act or bylaws, under s.39 (1) of the Act.

35. On or about February 1, February 5, February 8, February 13, February 14, February 16 and February 20, 2018, you withdrew a narcotic, hydromorphone, in multiple doses, using multiple transactions, not more than 5 minutes apart, for the same patient, contrary to one or more of the following Professional Standards and/or Practice Standards: the *Professional Responsibility and Accountability Professional Standard*, the *Client-Focused Provision of Service Professional Standard*, the *Ethical Practice Professional Standard*, the *Documentation Practice Standard*, the *Medication Administration Practice Standard*, the *Medication Inventory Management Practice Standard*, and the *Privacy and Confidentiality Practice Standard*.

This conduct also constitutes unprofessional conduct, or breach of the Act or bylaws, under s.39 (1) of the Act.

36. On or about March 3, March 6, March 9, March 12, March 13, March 17, March 21 and March 22, 2018, you withdrew a narcotic, hydromorphone, in multiple doses, using multiple transactions, not more than 5 minutes apart, for the same patient, contrary to one or more of the following Professional Standards and/or Practice Standards: the *Professional Responsibility and Accountability Professional Standard*, the *Client-Focused Provision of Service Professional Standard*, the *Ethical Practice Professional Standard*, the *Documentation Practice Standard*, the *Medication Administration Practice Standard*, the *Medication Inventory Management Practice Standard*, and the *Privacy and Confidentiality Practice Standard*.

This conduct also constitutes unprofessional conduct, or breach of the Act or bylaws, under s.39 (1) of the Act.

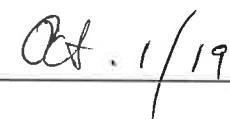
The Discipline Committee is constituted under the Act and BCCNP's bylaws. You are referred to sections 37 to 40 of the Act, and sections 341 to 347 and Schedules H and I of the bylaws.

**FURTHER TAKE NOTICE** that after a hearing under s.38 of the Act, the Discipline Committee may make such determinations and orders under s.39 of the Act as it considers appropriate.

This Citation is issued at the direction of BCCNP's Inquiry Committee under s.37 of the Act.

**BRITISH COLUMBIA COLLEGE OF NURSING  
PROFESSIONALS**

  
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Cynthia Johansen  
Registrar/CEO

  
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Date