Washington State Nursing Care Quality Assurance Commission
Sanction Standards for ARNP Licensees

Violations Involving Scope/Standards of ARNP Practice
(Reference WAC 246-840-300)

The purpose of these standards is to protect the public of Washington State. These standards are a nonbinding framework to be used as a resource by reviewing commission members, charging panels, and attorneys when sanctioning ARNPs. The hope is that the below violations and associated conditions be applied using a Just Culture methodology**.**

Description of Violation	Aggravating & Mitigating Factors	Harm (Tier)	Charge	Duration of Sanction	Cost Recovery or Fine	Conditions	Time for Completion
Failure to Assess **Single occurrence of failure to document assessment**	**Likely Cause(s) of Error** • Lack of time management skill and/or organizational ability	No or minimal patient harm or low risk of harm	Close Case SOA	n/a 0-3yrs	 Cost recovery of up to $500 per violation *	 1. Successfully complete course on Medical Record Keeping, approved by NCQAC 2. Submit course evaluation	 1.90 days 2. 120 days
Single occurrence of failure to assess or intervene on the patient's behalf Error(s) • Failure to examine patient and establish diagnoses by history, physical examination and	**Likely Cause(s) of Error** • Incomplete patient assessment • Lack of competence • Lack of knowledge • Lack of time management skill and/or organizational ability • Inappropriate clinical judgment	(A)No or minimal patient harm or low risk of harm (B)Patient harm or risk of severe patient harm	SOA/SOC SOA/SOC	0-3 yrs 2-5yrs	Cost recovery/ fine of up to $500 per violation*	1. Successfully complete course work approved by NCQAC 2.Submit course evaluation for approval 3. Commission approval of current and future employment. 4. Restrictions on seeing certain types of patients 5. Practice evaluation	1.90 days 2. 120 days 3. Duration of sanction 4. Duration of sanction 5. 30 days

other methods of assessment <u>1 of the 4 following</u> -Missing assessment -Inappropriate or inaccurate assessment or examination -Lack of recognition of changing condition -Failure to document appropriate assessment		(C)Severe harm or death	SOA/SOC	3 yrs minimum		6. Submission of written practice evaluation OR 7. Suspension of license. If suspended, remedial training would be required prior to reinstatement	6. 60 days 7. RCM discretion
Developing pattern of failure to assess or intervene on the patient's behalf Error(s) • Failure to examine patient and establish diagnoses by history, physical examination and other methods of assessment <u>2 to 4 of the following</u> -Missing assessment -Inappropriate or inaccurate assessment or examination -Lack of recognition of changing condition -Failure to document appropriate assessment	**<u>Likely Cause(s) of Error</u>** • Incomplete patient assessment • Lack of competence • Lack of knowledge • Lack of time management skill and/or organizational ability • Inappropriate clinical judgment • Disregard for patient safety and wellbeing	(A)No or minimal patient harm or low risk of harm (B)Patient harm or risk of severe patient harm (C)Severe harm or death	SOA/SOC SOA/SOC SOA/SOC	0-3 yrs 2-5yrs 3 yrs minimum	Cost recovery/ fine of up to $500 per violation*	1. Successfully complete course work, approved by NCQAC 2. Submit course evaluation for approval 3. Practice evaluation 4. Submission of written practice evaluation 5. Identify a preceptor. 6. Meet with preceptor twice a month and review 10% of charts. Preceptor submit quarterly performance evaluations 7. Commission approval of current and future employment. 8. Restrictions on seeing certain types of patients 9. Random practice reviews and record audits 10. Probation	1.90 days 2.120 days 3. 30 days 4. 60 days 5. 30 days 6. Duration of sanction 7. Duration of sanction 8. Duration of sanction 9. Duration of sanction 10. Duration

						OR 11. Suspension of license. If suspended, remedial training would be required prior to reinstatement	of sanction 11. RCM discretion
Established pattern of failure of assess or intervene on the patient's behalf Error(s) • Failure to examine patient and establish diagnoses by history, physical examination and other methods of assessment -Missing assessment -Inappropriate or inaccurate assessment or examination -Lack of recognition of changing condition -Failure to document appropriate assessment	**<u>Likely Cause(s) of Error</u>** • Incomplete patient assessment • Lack of competence • Lack of knowledge • Lack of time management skill and/or organizational ability • Inappropriate clinical judgment • Disregard for patient safety and wellbeing	(A)No or minimal patient harm or low risk of harm (B)Patient harm or risk of severe patient harm C)Severe harm or death	SOA/SOC SOA/SOC SOA/SOC	0-3 yrs 2-5yrs 3 yrs minimum	No cost recovery**	1. Attend PACE or CPEP course (at own expense) to assess knowledge, clinical judgment, communication and documentation 2.Comply with and complete PACE or CPEP education plan 3. Commission approval of current and future employment. 4. Restrictions on seeing certain types of patients 5. Random practice reviews and record audits 6. Probation OR 7. Suspension of license. If suspended,	1. 90 days 2. Duration of education plan. 3. Duration of sanction 4. Duration of sanction 5. Duration of sanction 6. Duration of sanction 7.RCM discretion

						remedial training would be required prior to reinstatement	
Single significant assessment error or to intervene on the patient's behalf	**<u>Likely Cause(s) of Error</u>** • Incomplete patient assessment • Lack of competence • Lack of knowledge • Lack of time management skill and/or organizational ability • Inappropriate clinical judgment • Disregard for patient safety and wellbeing	(A)No or minimal patient harm or low risk of harm	SOA/SOC	0-3 yrs	No cost recovery**	1. Attend PACE or CPEP course (at own expense) to assess knowledge, clinical judgment, communication and documentation 2.Comply with and complete PACE or CPEP education plan 3. Commission approval of current and future employment. 4. Restrictions on seeing certain types of patients 5. Random practice reviews and record audits 6. Probation OR 7. Suspension of license. If suspended, remedial training would be required prior to reinstatement	1. 90 days 2. Duration of education plan. 3. Duration of sanction 4. Duration of sanction 5. Duration of sanction 6. Duration of sanction 7. RCM discretion
		(B)Patient harm or risk of severe patient harm	SOA/SOC	2-5yrs			
		C)Severe harm or death	SOA/SOC	3 yrs minimum			
<u>Failure to Diagnose</u> **Single occurrence of failure to document diagnose**	**<u>Likely Cause(s) of Error</u>** • Lack of time management skill and/or	No or minimal patient harm or low risk of harm	Close Case SOA	n/a 0-3yrs	Cost recovery of	1. Successfully complete a course on	1.90 days

	organizational ability				up to $500 per violation*	Medical Record Keeping, approved by NCQAC 2. Submit course evaluation	2. 120 days
Single occurrence of failure to diagnose Error(s) • Failure to order, collect, perform and interpret diagnostic tests. <u>1 of the 4 following</u> -Missing diagnosis -Inappropriate or inaccurate diagnosis -Lack of recognition of changing condition -Failure to document rationale for diagnoses	**<u>Likely Cause(s) of Error</u>** • Inadequate or inaccurate patient assessment • Lack of competence • Lack of knowledge • Lack of time management skill and/or organizational ability • Inappropriate clinical judgment • Disregard for patient safety and wellbeing	(A)No or minimal patient harm or low risk of harm (B)Patient harm or risk of severe patient harm C)Severe harm or death	SOA/SOC SOA/SOC SOA/SOC	0-3 yrs 2-5yrs 3 yrs minimum	Cost recovery/ fine of up to $500 per violation*	1. Successfully complete course work, approved by NCQAC. 2. Submit course evaluation for approval 3. Commission approval of current and future employment. 4. Restrictions on seeing certain types of patients 5. Practice evaluation 6. Submission of written practice evaluation 7. Random practice reviews and record audit OR 8. Suspension of license. If suspended, remedial training would be required prior to reinstatement	1.90 days 2. 120 days 3. Duration of sanction 4. Duration of sanction 5. 30 days 6. 60 days 7. Duration of sanction unless modified 8. RCM discretion
Developing pattern of failure to accurately diagnose • Failure to order,	**<u>Likely Cause(s) of Error</u>** • Inadequate or inaccurate patient assessment	(A)No or minimal patient harm or low risk of harm	SOA/SOC	0-3 yrs	Cost recovery/ fine of up to $500 per violation*	1. Successfully complete course work, approved by NCQAC 2. Submit course evaluation for approval 4. Practice evaluation	1.90 days 2. 120 days 4. 30 days

collect, perform and interpret diagnostic tests <u>2 to 4 of the following</u> -Missing diagnosis -Inappropriate or inaccurate diagnosis -Lack of recognition of changing condition -Failure to document rationale for diagnoses	• Lack of competence • Lack of knowledge • Lack of time management skill and/or organizational ability • Inappropriate clinical judgment • Disregard for patient safety and wellbeing	(B)Patient harm or risk of severe patient harm (C)Severe harm or death	SOA/SOC SOA/SOC	2-5yrs 3 yrs minimum		5. Submission of written practice evaluation. 6. Identify a preceptor. 7. Meet with preceptor twice a month and review 10% of charts. Preceptor submit quarterly performance evaluations 8. Commission approval of current and future employment. 9. Restrictions on seeing certain types of patients 10. Random practice reviews and record audits 11. Probation OR 12. Suspension of license. If suspended, remedial training would be required prior to reinstatement	5. 60 days 6. 30 days 7. Duration of sanction 8. Duration of sanction 9. Duration of sanction 10. Duration of sanction 11. Duration of sanction 12. RCM discretion
Established pattern of failure to diagnose • Failure to order, collect, perform and interpret diagnostic	**<u>Likely Cause(s) of Error</u>** • Inadequate or inaccurate patient assessment • Lack of competence	(A)No or minimal patient harm or low risk of harm	SOA/SOC	0-3 yrs	No cost recovery**	1. Attend PACE or CPEP course (at own expense) to assess knowledge, clinical judgment, communication and documentation	1. 90 days

tests -Missing diagnosis -Inappropriate or inaccurate diagnosis -Lack of recognition of changing condition -Failure to document rationale for diagnoses	• Lack of knowledge • Lack of time management skill and/or organizational ability • Inappropriate clinical judgment • Disregard for patient safety and wellbeing	(B)Patient harm or risk of severe patient harm (C)Severe harm or death	SOA/SOC SOA/SOC	2-5yrs 3 yrs minimum		2.Comply with and complete PACE or CPEP education plan 3. Commission approval of current and future employment. 4. Restrictions on seeing certain types of patients 5. Random practice reviews and record audits 6. Probation OR 7. Suspension of license. If suspended, remedial training would be required prior to reinstatement	2. Duration of education plan. 3. Duration of sanction 4. Duration of sanction 5. Duration of sanction 6. Duration of sanction 7. RCM discretion
Single significant diagnosis error	**<u>Likely Cause(s) of Error</u>** • Inadequate or inaccurate patient assessment • Lack of competence • Lack of knowledge • Lack of time management skill and/or organizational ability • Inappropriate clinical judgment • Disregard for patient safety and wellbeing	(A)No or minimal patient harm or low risk of harm (B)Patient harm or risk of severe patient harm	SOA/SOC SOA/SOC	0-3 yrs 2-5yrs	No cost recovery**	1. Attend PACE or CPEP course(at own expense) to assess knowledge, clinical judgment, communication and documentation 2.Comply with and complete PACE or CPEP education plan 3. Commission approval of current and future employment. 4. Restrictions on seeing certain types of	1. 90 days 2. Duration of education plan. 3. Duration of sanction 4. Duration of sanction

		(C)Severe harm or death	SOA/SOC	3 yrs minimum		patients 5. Random practice reviews and record audits 6. Probation OR 7. Suspension of license. If suspended, remedial training would be required prior to reinstatement	5. Duration of sanction 6. Duration of sanction 7.RCM discretion
Failure to treat *(not pertaining to prescriptive and/or dispensing authority)* **Single occurrence of failure to document treatment**	**Likely Cause(s) of Error** • Lack of time management skill and/or organizational ability	No or minimal patient harm or low risk of harm	Close Case SOA	n/a 0-3yrs	Cost recovery of up to $500 per violation*	1. Successfully complete a course on Medical Record Keeping, approved by NCQAC 2. Submit course evaluation	1.90 days 2. 120 days

Single occurrence of failure to treat Error(s) • Failure to identify, develop, document, implement and evaluate plan of care • Failure to document and/or provide rationale therapies according to the standard of care • Failure to monitor the effects of therapies -Inappropriate ordering of laboratory studies -Inappropriate responding to laboratory results • Failure to perform procedures or provide services within scope of practice	**<u>Likely Cause(s) of Error</u>** • Lack of knowledge of appropriate scope of practice • Inadequate or inaccurate patient assessment • Lack of competence (e.g. practicing outside the scope of practice) • Lack of knowledge or competence of safe treatment standards • Lack of time management skill and/or organizational ability • Inappropriate clinical judgment	(A)No or minimal patient harm or low risk of harm	SOA/SOC SOA/SOC	0-3 yrs 2-5 yrs	Cost recovery/ fine of up to $500 per violation*	1. Successfully complete course work, approved by NCQAC 2.Submit course evaluation for approval 3. Commission approval of current and future employment. 4. Restrictions on seeing certain types of patients 5. Practice evaluation 6. Submission of written practice evaluation 7. Restriction on performing certain procedures 8. Random practice reviews and record audits OR 9. Suspension of license. If suspended, remedial training would be required prior to reinstatement	1.90 days 2. 120 days 3. Duration of sanction 4. Duration of sanction 5. 30 days 6. 60 days 7. Duration of sanction 8. Duration of sanction 9. RCM discretion

		(B)Patient harm or risk of severe patient harm (C)Severe harm or death	SOA/SOC	3yrs minimum			
Developing pattern of failure to treat 2-4 incidents of: • Failure to identify, develop, document, implement and evaluate plan of care	**<u>Likely Cause(s) of Error</u>** • Lack of knowledge of appropriate scope of practice • Inadequate or inaccurate patient assessment	(A)No or minimal patient harm or low risk of harm	SOA/SOC	0-3 yrs	Cost recovery / fine of up to $500 per violation*	1. Successfully complete course work, approved by NCQAC 2.Submit course evaluation for approval 3. Practice evaluation 4. Submission of written practice evaluation	1.90 days 2. 120 days 3. 30 days 4. 60 days

• Failure to document and/or provide rationale therapies according to the standard of care • Failure to monitor the effects of therapies -Inappropriate ordering of laboratory studies -Inappropriate responding to laboratory results Failure to perform procedures or provide care services within scope of practice	• Lack of competence (e.g. practicing outside the scope of practice) • Lack of knowledge or competence of safe treatment standards • Lack of time management skill and/or organizational ability • Inappropriate clinical judgment • Disregard for patient safety and wellbeing	(B)Patient harm or risk of severe patient harm C)Severe harm or death	SOA/SOC SOA/SOC	2-5yrs 3 yrs minimum		4. Identify a preceptor. 5. Meet with preceptor twice a month and review 10% of charts. Preceptor submit quarterly performance evaluations 6. Commission approval of current and future employment. 7. Restrictions on seeing certain types of patients 8. Restriction on performing certain procedures 9. Random practice reviews and record audits 10. Probation OR 11. Suspension of license. If suspended, remedial training would be required prior to reinstatement	4. 30 days 5. Duration of sanction 6. Duration of sanction 7. Duration of sanction 8. Duration of sanction 9. Duration of sanction 10. Duration of sanction 11. RCM discretion
Established pattern of failure to treat. <u>5 to 7 incidents of:</u> • Failure to identify, develop, document, implement and	**<u>Likely Cause(s) of Error</u>** • Lack of knowledge of appropriate scope of practice • Inadequate or inaccurate patient	(A)No or minimal patient harm or low risk of harm	SOA/SOC	0-3 yrs	No cost recovery**	1. Attend PACE or CPEP course (at own expense) to assess knowledge, clinical judgment, communication and documentation 2.Comply with and complete PACE or	1. 90 days 2. Duration of education

evaluate plan of care • Failure to document and/or provide rationale therapies according to the standard of care • Failure to monitor the effects of therapies -Inappropriate ordering of laboratory studies -Inappropriate responding to laboratory results Failure to perform procedures or provide care services within the scope of practice	assessment • Lack of competence (e.g. practicing outside the scope of practice) • Lack of knowledge or competence of safe treatment standards • Lack of time management skill and/or organizational ability • Inappropriate clinical judgment • Disregard for patient safety and wellbeing	(B)Patient harm or risk of severe patient harm	SOA/SOC	2-5yrs		CPEP education plan 3. Commission approval of current and future employment. 4. Restrictions on seeing certain types of patients 5. Random practice reviews and record audits. 6. Probation OR 7. Suspension of license. If suspended, remedial training would be required prior to reinstatement	plan. 3. Duration of sanction 4. Duration of sanction 5. Duration of sanction 6. Duration of sanction 7.RCM discretion
		(C)Severe harm or death	SOA/SOC	3 yrs minimum			
Single significant treatment error	**<u>Likely Cause(s) of Error</u>** • Lack of knowledge of appropriate scope of practice • Inadequate or inaccurate patient assessment • Lack of competence	(A)No or minimal patient harm or low risk of harm	SOA/SOC	0-3 yrs	No cost recovery**	1. Attend PACE or CPEP course (at own expense) to assess knowledge, clinical judgment, communication and documentation 2.Comply with and complete PACE or CPEP education plan 3. Commission	1. 90 days 2. Duration of education plan. 3. Duration

	(e.g. practicing outside the scope of practice) • Lack of knowledge or competence of safe treatment standards • Lack of time management skill and/or organizational ability • Inappropriate clinical judgment • Disregard for patient safety and wellbeing	(B)Patient harm or risk of severe patient harm	SOA/SOC	2-5yrs		approval of current and future employment. 4. Restrictions on seeing certain types of patients 5. Restriction on performing certain procedures 6. Random practice reviews and record audits 7. Probation OR 8. Suspension of license. If suspended, remedial training would be required prior to reinstatement	of sanction 4. Duration of sanction 5. Duration of sanction 6. Duration of sanction 7. Duration of sanction 8.RCM discretion
		C)Severe harm or death	SOA/SOC	3 yrs minimum			

Prescriptive and/or Dispensing Authority **Single occurrence of violations of**	**Likely Cause(s) of Error** • Lack of knowledge of appropriate scope of practice • Inadequate or inaccurate patient assessment • Lack of competence	(A)No or minimal patient harm or low risk of harm	Close Case SOA	n/a 0-3yrs	Cost recovery /fine of up to $500 per violation *	1. Successfully complete course work, approved by NCQAC. 2.Submit course evaluation for approval 3. Commission approval of current and	1.90 days 2. 120 days 3. Duration of sanction

prescriptive and/or dispensing authority: Prescribing, dispensing, administering, or distributing drugs in an unsafe manner or without adequate instructions to patients according to acceptable and prevailing standards. Prescribing, dispending, administrating or distributing drugs for other than therapeutic or prophylactic purpose. Prescribing or distributing drugs to individuals who are not patients of the ARNP or who are not within the ARNPs role and population focus.	(e.g. practicing outside the scope of practice) • Lack of knowledge or competence of safe prescribing standards • Lack of time management skill and/or organizational ability • Inappropriate clinical judgment	(B)Patient harm or risk of severe patient harm	SOA/SOC	3-5yrs		future employment. 4. Restrictions on seeing certain types of patients 5. Practice evaluation 6. Submission of written practice evaluation OR 7. Suspension of license. If suspended, remedial training would be required prior to reinstatement	4. Duration of sanction 5. 30 days 6. 60 days 7. RCM discretion
		C)Severe harm or death	SOA/SOC	3yrs minimum			

Developing pattern of violations of prescriptive and/or dispensing authority:	**<u>Likely Cause(s) of Error</u>** • Lack of knowledge of appropriate scope of practice • Inadequate or inaccurate patient assessment • Lack of competence (e.g. practicing outside the scope of practice) • Lack of knowledge or competence of safe prescribing standards • Lack of time management skill and/or organizational ability • Inappropriate clinical judgment • Disregard for patient safety and wellbeing	(A)No or minimal patient harm or low risk of harm	SOA/SOC	0-3yrs	Cost recovery /fine of up to $500 per violation *	1. Successfully complete course work, approved by NCQAC. 2.Submit course evaluation for approval 3. Practice evaluation 4. Submission of written practice evaluation a 5. Identify a preceptor. 6. Meet with preceptor twice a month and review 10% of charts. Preceptor submit quarterly performance evaluations 7. Commission approval of current and future employment. 8. Restrictions on seeing certain types of patients 9. Restriction on performing certain procedures 10. Random practice reviews and record audits 11. Limiting prescriptive authority 12. Obtain an account with PNP, use PNP in practice and mandated to run and document medication profile on every patient. 13. Probation	1.90 days 2. 120 days 3. 30 days 4. 60 days 5. 30 days 6. Duration of sanction 7. Duration of sanction 8. Duration of sanction 9. Duration of sanction 10. Duration of sanction 11. RCM discretion 12. RCM discretion 13. Duration of sanction
		(B)Patient harm or risk of severe patient harm	SOA/SOC	3-5yrs			
		C)Severe harm or death	SOA/SOC	3yrs minimum			

						OR 14. Suspension of license. If suspended, remedial training would be required prior to reinstatement	14. RCM discretion
Established pattern of violations of prescriptive and/or dispensing authority:	**<u>Likely Cause(s) of Error</u>** • Lack of knowledge of appropriate scope of practice • Inadequate or inaccurate patient assessment • Lack of competence (e.g. practicing outside the scope of practice) • Lack of knowledge or competence of safe prescribing standards • Lack of time management skill and/or organizational ability • Inappropriate clinical judgment • Disregard for patient	(A)No or minimal patient harm or low risk of harm	SOA/SOC	0-3 yrs	No cost recovery **	1. Attend PACE or CPEP course (at own expense) to assess knowledge, clinical judgment, communication and documentation 2.Comply with and complete PACE or CPEP education plan 3. Commission approval of current and future employment. 4. Restrictions on seeing certain types of patients 5. Random practice reviews and record audits 6. Limiting prescriptive authority	1. 90 days 2. Duration of education plan. 3. Duration of sanction 4. Duration of sanction 5. Duration of sanction 6. RCM discretion
		(B)Patient harm or risk of severe patient harm	SOA/SOC	2-5yrs			

	safety and wellbeing	C)Severe harm or death	SOA/SOC	3 yrs minimum		7. Obtain an account with PNP, use PNP in practice and mandated to run and document medication profile on every patient. 8. Probation OR 9. Suspension of license. If suspended, remedial training would be required prior to reinstatement	7. RCM discretion 8. Duration of sanction 9. RCM discretion
Single significant error of violations of prescriptive and/or dispensing authority:	**<u>Likely Cause(s) of Error</u>** • Lack of knowledge of appropriate scope of practice • Inadequate or inaccurate patient assessment • Lack of competence (e.g. practicing outside the scope of practice) • Lack of knowledge or competence of safe prescribing standards • Lack of time management skill and/or organizational ability • Inappropriate clinical judgment • Disregard for patient	(A)No or minimal patient harm or low risk of harm	SOA/SOC	0-3 yrs	No cost recovery **	1. Attend PACE or CPEP course (at own expense) to assess knowledge, clinical judgment, communication and documentation 2. Comply with and complete PACE or CPEP education plan 3. Commission approval of current and future employment. 4. Restrictions on seeing certain types of patients 5. Restriction on performing certain procedures 6. Random practice reviews and record	1. 90 days 2. Duration of education plan. 3. Duration of sanction 4. Duration of sanction 5. Duration of sanction 6. Duration of sanction
		(B)Patient harm or risk of severe patient harm	SOA/SOC	2-5yrs			

	safety and wellbeing	C)Severe harm or death	SOA/SOC	3 yrs minimum		audits 7. Limiting prescriptive authority 8. Obtain an account with PNP, use PNP in practice and mandated to run and document medication profile on every patient. 9. Probation OR 10. Suspension of license. If suspended, remedial training would be required prior to reinstatement	7. RCM discretion 8. RCM discretion 9. Duration of sanction 10 .RCM discretion
Falsification of Records **Deliberate changing or falsification of documentation** Error(s) • Documenting care not provided • Charting incorrect patient condition • Charting to cover	**Likely Cause(s) of Error** • Lack of knowledge or competence • Lack of fiduciary concern • Error in performance of procedure or intervention • Disregard for patient safety and wellbeing • Poor judgment	(A)No or minimal patient harm or low risk of harm	SOA/SOC	0-3 yrs	Cost recovery / fine of up to $500 per violation*	1. Successfully complete a course on Medical Record Keeping and a course on Medical Ethics, Boundaries and Professionalism, approved by NCQAC. 2.Submit course evaluation for approval 3. Practice evaluation 4. Submission of written practice	1.90 days 2. 120 days 3. 30 days 4. 60 days
		(B)Patient harm or risk of severe patient harm	SOA/SOC	2-5yrs			

up error or omission		C)Severe harm or death	SOA/SOC	3 yrs minimum		evaluation 5. Identify a preceptor. 6. Meet with preceptor twice a month and review 10% of charts. Preceptor submit quarterly performance evaluations 7. Commission approval of current and future employment. 8. Restrictions on seeing certain types of patients 9. Restriction on performing certain procedures 10. Random practice reviews and record audits 11. Probation OR 12. Suspension of license. If suspended, remedial training would be required prior to reinstatement	5. 30 days 6. Duration of sanction 7. Duration of sanction 8. Duration of sanction 9. Duration of sanction 10. Duration of sanction 11. Duration of sanction 12. RCM discretion
Failure to comply with any term(s) or conditions of a			SOC	Suspension	Fine of up to $1000 per violation	Suspension of license.	

STID or order							
Practice on an Expired License **Practice on an expired license** (having renewed as soon as possible after learning of the expiration)	**Likely Cause(s) of Error** • Failure to have current national certification required for state licensure WAC 246-840-302"An ARNP must maintain current certification by an accredited certifying body as identified in subsection (3) of this section. An ARNP license becomes invalid when the certification expires." • Failure to renew state license based upon not having a current national certification.		Close case SOA		Cost recovery of up to $1000 *	1. Successfully complete a course on Medical Ethics and Professionalism, approved by NCQAC 2. Commission approval of current and future employment. OR 3. Suspension of license. If suspended, remedial training would be required prior to	1.90days 2. Duration of sanction 3. RCM discretion

	-If evidence of an attempt to be fraudulent re: working without a license -prior similar violation, -patient harm or another serious violation occurred during the period of expiration		SOC	0-3 yrs	Fine of up to $1000*	reinstatement 1. Successfully complete a course on Medical Ethics and Professionalism, approved by NCQAC 2. Commission approval of current and future employment. OR 3. Suspension of license. If suspended, remedial training would be required prior to reinstatement	1.90 days 2. Duration of sanction 3. RCM discretion

Definition(s) of charges and conditions described above:

"SOA" is an abbreviation for Statement of Allegations.

"SOC" is an abbreviation for Statement of Charges.

"RCM" is the reviewing commission member.

"Developing a pattern" might include, but are not limited to, several incidents of a failure to assess, diagnosis, treat, or prescribing/dispensing authority.

"Established pattern" might include, but not limited to, previous violations or a large number of instances of failures to assess, diagnosis, treat, or prescribe/dispense appropriately.

"A single significant error" was called out and included in this set of guidelines to follow the violation descriptions included in the RN and LPN sanctioning standards. The conditions associated with this violation are more substantial than the conditions associated with "single occurrence" and thus provides the RCM more discretion as the violation/aggravating/mitigating circumstances warrant.

"Successfully complete course work approved by NCQAC". The RCM will work with the Advanced Practice Advisor to the Nursing Care Quality Assurance Commission to determine the available and appropriate remedial course work content required to fulfill the sanction requirements. The course work will be selected based upon the remedial education (content areas) required by the respondent. The Advanced Practice Advisor will maintain a list and provide to the respondent remedial course(s) approved by the Commission. The respondent is responsible to pay for the remedial course work registration including travel and accommodations, if necessary, to complete the condition.

Examples include but are not limited to:

Course Title	**Link to Course Description and Details**	**Sponsoring Agency**
Managing Difficult Communications in Medical Practice: Controlling Anger, Avoiding Outbursts, Communicating Appropriately	http://casemed.case.edu/cme/activities/intensive_series.cfm 3 day course offered twice yearly 20.75 AMA Category 1 credits $1050	Case Western Reserve University SOM Cleveland, OH
Medical Record Keeping	http://casemed.case.edu/cme/activities/intensive_series.cfm 2 day course offered twice yearly 14 AMA Category 1 credits $1050	Case Western Reserve University SOM Cleveland, OH
Medical Ethics, Boundaries, and	http://casemed.case.edu/cme/activities/intensive_series.cfm	Case Western Reserve University

Professionalism	2 day course offered twice yearly 16 AMA Category 1 credits $1050	SOM Cleveland, OH
Prescribing Controlled Substances	http://www.mc.vanderbilt.edu/root/vumc.php?site=cph&doc=36613 3 day course offered 7 times yearly 21.75 AMA Category 1 credits $2500	Center for Professional Health at Vanderbilt University Medical Center
Maintaining Proper Boundaries	http://www.mc.vanderbilt.edu/root/vumc.php?site=cph&doc=36613 3 day course offered 5 times yearly 22.75 AMA Category 1 credits $2500	Center for Professional Health at Vanderbilt University Medical Center
Controlled Substance Prescribing	http://casemed.case.edu/cme/activities/intensive_series.cfm 4 day course offered twice yearly 42 AMA Category 1 credits $1050	Case Western Reserve University SOM Cleveland, OH
Appropriate Prescribing of Controlled Substances	John Holbrook PhD 678 547 6237 Individual and online course work	Center for Substance Education at Mercer University Southern School of Pharmacy Atlanta, GA
Professional Boundaries	http://www.innersolutionsforsuccess.com/boundaries.htm 3 day course 42 AMA Category 1 credits $2500	Inner Solutions for Success, LLC Chula Vista, CA
Stress, Coping and Communication	http://www.innersolutionsforsuccess.com/coping.htm 3 day course offered 3 times a year 38 AMA Category 1 credits $2500	Inner Solutions for Success, LLC Chula Vista, CA
Medical Record Keeping	http://www.paceprogram.ucsd.edu/record.aspx 2 day course offered 5 times a year 17 AMA Category 1 credits $1300	PACE Program At USCS San Diego, CA
Prescribing Course	http://www.paceprogram.ucsd.edu/prescribing.aspx 3 day course offered 5 times a year 23.75 AMA Category 1 credits $1800	PACE Program At USCS San Diego, CA
Professional Boundaries	http://www.paceprogram.ucsd.edu/boundaries.aspx 3 day course offered 7 times a year 38.75 AMA Category 1 credits	PACE Program At USCS San Diego, CA

	$2800	
Anger Management	http://www.paceprogram.ucsd.edu/anger.aspx 3 day course offered 5 times a year 30.5 AMA Category 1 credits $2800	PACE Program At USCS San Diego, CA
Clinician-Patient Communication	http://www.paceprogram.ucsd.edu/patientcom.aspx 1 day course offered 6 times a year $500	PACE Program At USCS San Diego, CA
Nursing Ethics and Professionalism	https://professionalboundaries.com/nurse-ethics-course.php 2 day course offered twice year (+3 hr pre-course reading) 17 CE credits $395	Professional Boundaries, Inc.
Maintaining Proper Boundaries	http://santecenter.com/training/courses/ 3 day course offered 5 times a year 21 AMA Category 1 credits $2300	University of Texas Southwestern Medical Center and Sante Institute of Professional Education and Research Argyle, TX
Patient, system, or disease specific courses available if violation warrants.	Examples include: Arrhythmias and The Heart The Interface of Medical Illness and Depression Emergency Medicine: Moving Forward Geriatric Update for the PCP Internal Medicine Review for Nurse Practitioners Emerging Diagnostic and Screening Strategies for Breast Cancer Annual Pain Management Symposium Overview of Perioperative Medicine Clinical Update in Thrombosis and Anticoagulation	

"Practice evaluation". Respondent shall submit to a thorough practice review by an evaluator approved in advance by the NCQAC.

The evaluator shall be a licensed ARNP or physician in the state of Washington with at least ten I0 years of experience in the specific field of practice. The evaluator shall not have open disciplinary complaints or be subject to disciplinary action. The evaluation shall include but not be limited to oral exchanges with the Respondent to thoroughly review Respondent's knowledge and observations of patient assessments plans and interventions. The respondent shall provide a copy of the order to the evaluator prior to the evaluation process.

The Respondent shall cause the evaluator to submit a written evaluation report of the practice review to NCQAC within 60 days of the effective date of the order or within thirty 30 days of the resumption of active practice if not currently in active practice. The evaluation report shall include any and all recommendations for the correction or improvement of Respondent's practice and skills and shall have attached all documents related to the practice review including correspondence regarding the practice review between Respondent and the evaluator.

"Preceptor". Within 60 days of the effective date of the order or within 60 days of the resumption of active practice if not currently in active practice the Respondent shall engage the services of a preceptor who shall be a licensed ARNP or physician currently licensed in the state of Washington and approved in advance by the NCQAC. Respondent shall consult with the preceptor to review cases of current patients. The role of the preceptor is to provide oversight to ensure that patients meet the "restrictions of seeing certain types of patients" condition and to ensure that the proper level of skill and judgment is being exercised in all cases and to provide written reports to the NCQAC concerning compliance with the order including recommendations contained in the practice evaluation report. In the event the approved preceptor is temporarily unavailable a back-up practice monitor who meets the provisions of this section shall serve as substitute. Prior to entering into a practice monitor agreement Respondent shall provide a copy of the Order to the preceptor. The written agreement shall be filed with the NCQAC within 7 business days of its execution.

"Random practice reviews and record audits". NCQAC investigators may be sent out to the practice site of the Respondent to interview colleagues, patients, and staff; and perform record audits. Investigators will provide data obtained during the review to the Advanced Practice Advisor to the Nursing Care Quality Assurance Commission and/or the RCM for clinical review.

"Attend PACE or CPEP course (at own expense) to assess knowledge, clinical thinking, judgment, communication, and documentation" AND "Comply with and complete PACE or CPEP education plan".
General remedial continuing education is not sufficient. The Respondent requires remedial education/evaluation, participating in a program designed to meet remedial needs of independent providers. The Respondent is required to cover all expenses associated with this condition.

- Center for Personalized Education for Physicians (CPEP) in Denver
    - Two day on-site (in Denver) personal assessment/evaluation. Includes a variety of activities that evaluate medical knowledge, clinical judgment, communication and documentation. Some specialties complete a multi-choice exam, assessment fetal monitoring strip, ECG, cognitive function. CPEP is able to determine if the respondent lacks knowledge, application/critical thinking, or documentation. Three potential outcomes may occur following assessment: Respondent has appropriate level of skill; Respondent requires focused help; or Respondent requires a structured educational plan. A tailored plan is developed and the Respondent's progress is monitored by CPEP remotely via both mailed submissions and use of an onsite preceptor.
    - The two days Denver assessment costs approximately $8600, development of a plan $1600-1900, monitoring of plan $695-795/month. Average monitoring time is 12-15 months, but can be completed in 9-12 months if Respondent is highly motivated.
    - CPEP does offer an ethics and boundary course as well.
- Physician Assessment and Clinical Education Program (PACE) at USCD in San Diego
    - One week comprehensive skills and knowledge assessment. Respondent is assessed as they assess and evaluate 10-12 pts. PACE provides NCQAC a 40-50 page report of their findings. PACE then sets up an educational plan based upon the report.
    - The one week course is approximately $7000.

*rationale for reducing the standard cost recovery/fine of $1000 to $500 – the remedial coursework can be costly and the respondent may likely have to travel out-of-state to the 1-3 day(s) course, adding to the total cost associated with the condition.

**rationale for omitting the standard cost recovery/fine of $1000 – the CPEP and PACE programs are costly ($6000-10,000) and require the respondent to travel out-of-state to undergoing the onsite assessment.

Source Documents used to develop the Sanction Standards for Charging ARNP Licensees:

State of Washington WAC 246-840-300. Advanced Registered Nurse Practitioner Scope

National Organization of Nurse Practitioner Faculty, Core Competencies for Nurse Practitioners. April 2011.

National Council of State Boards of Nursing, NCSBN Model of Nursing Practice Act and Model Nursing Administrative Rules. Jan 2011.

Directory of Physician Assessment and Remedial Education programs, Created by the Federation of State Medical Boards. Oct 2012. http://www.fsmb.org/pdf/RemEdProg.pdf

Center for Personalized Education for Physicians. Denver CO. www.cpepdoc.org

PACE Program. San Diego CA. www.paceprogram.ucsd.edu

Just Culture. www.justculture.org