

**BEFORE THE BOARD OF PHARMACY EXAMINERS  
OF THE STATE OF IOWA**

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Re: )  
Pharmacist License of )  
**LAURA L. DICKINSON** ) **STATEMENT OF CHARGES**  
License No. 16852 )  
Respondent )

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*COMES NOW*, the Complainant, Lindy A. Pearson, and states:

1. She is the Chief Investigator for the Iowa Board of Pharmacy Examiners and files this Statement of Charges solely in her official capacity.
2. The Board has jurisdiction in this matter pursuant to Iowa Code Chapters 155A and 272C (1995).
3. On February 27, 1987, Laura L. Dickinson, the Respondent, was issued license number 16852 by the Board to engage in the practice of pharmacy, subject to the laws of the State of Iowa and the rules of the Board.
4. License number 16852 is current and active until June 30, 1996.
5. Respondent currently resides at 7041 Plum Drive, Urbandale, Iowa 50322.
6. Respondent was employed as the pharmacist in charge of the Walgreen Pharmacy #1908, 2843 Ingersoll Avenue, Des Moines, Iowa 50312, from December 13, 1990, to July 25, 1995. Respondent is currently employed as the pharmacist in charge of the Walgreen Pharmacy #359, 2545 East Euclid Avenue, Des Moines, Iowa 50317.

**COUNT I**

The Respondent is charged under Iowa Code § 155A.12(1) (1995) and 657 Iowa Administrative Code §§ 9.1(4)(c), 9.1(4)(j), and 9.1(4)(u) with engaging in a practice harmful to the public by failing to prevent a medication dispensing error on or about April 5, 1991.

## COUNT II

The Respondent is charged under Iowa Code § 155A.12(1) (1995) and 657 Iowa Administrative Code §§ 9.1(4)(c), 9.1(4)(j), and 9.1(4)(u) with engaging in a practice harmful to the public by failing to prevent unauthorized dispensing of a generic drug to patient "A.H." in 1992.

## COUNT III

The Respondent is charged under Iowa Code § 155A.12(1) (1995) and 657 Iowa Administrative Code §§ 9.1(4)(c), 9.1(4)(j), and 9.1(4)(u) with engaging in a practice harmful to the public by failing to prevent a medication dispensing error on or about January 25, 1993.

## COUNT IV

The Respondent is charged under Iowa Code § 155A.12(1) (1995) and 657 Iowa Administrative Code §§ 9.1(4)(c), 9.1(4)(j), and 9.1(4)(u) with engaging in a practice harmful to the public by failing to prevent a medication dispensing error on December 19, 1994.

## COUNT V

The Respondent is charged under Iowa Code § 155A.12(1) (1995) and 657 Iowa Administrative Code §§ 9.1(4)(c), 9.1(4)(j), and 9.1(4)(u) with engaging in a practice harmful to the public by failing to prevent a medication dispensing error on July 17, 1995.

## COUNT VI

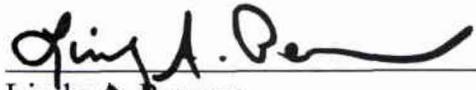
The Respondent is charged under Iowa Code §§ 155A.12(1) and 155A.12(2) (1995) and 657 Iowa Administrative Code §§ 6.1, 8.1, 8.5(4), 8.19, 8.20, 9.1(4)(b), 9.1(4)(c), 9.1(4)(j), 9.1(4)(u), and 9.1(4)(w) with failure to ensure that all pharmacists at Walgreens Pharmacy # 1908 effectively utilized patient information; conducted prospective drug use review; and provided oral patient counseling; which resulted in or contributed to the medication dispensing errors contained in Counts I, III, IV, and V.

## THE CIRCUMSTANCES

The Board has received investigative information which alleges the following:

1. Respondent was employed as the pharmacist in charge of the Walgreen Pharmacy #1908 from on or before December 13, 1990, until July 25, 1995.
2. Dispensing errors are alleged to have occurred at Walgreens Pharmacy # 1908 on the following dates: April 5, 1991, and January 25, 1993.
3. Alleged unauthorized generic drug substitution occurred at Walgreens Pharmacy # 1908 for patient "A.H." in 1992.
4. Additional dispensing errors are alleged to have occurred at Walgreens Pharmacy # 1908 on the following dates: December 19, 1994, and July 17, 1995.

WHEREFORE, the Complainant prays that a hearing be held in this matter and that the Board take such action as it may deem to be appropriate under the law.

  
Lindy A. Pearson  
Chief Investigator

On this 23rd day of February, 1996, the Iowa Board of Pharmacy Examiners found probable cause to file this Statement of Charges and to order a hearing in this case.

  
Marian L. Roberts, Chairperson  
Iowa Board of Pharmacy Examiners  
Executive Hills West  
1209 East Court Avenue  
Des Moines, Iowa 50319

cc: Linny Emrich  
Assistant Attorney General  
Office of the Attorney General  
Hoover State Office Building  
Des Moines, Iowa 50319

**BEFORE THE BOARD OF PHARMACY EXAMINERS  
OF THE STATE OF IOWA**

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Re: Pharmacist License of  
**LAURA L. DICKINSON**  
License No. 16852  
Respondent

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**STIPULATION  
AND  
CONSENT ORDER**

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On this 3rd day of February, 1998, the Iowa Board of Pharmacy Examiners and Laura L. Dickinson, of 4606 94th Place, Des Moines, Iowa, each hereby agree with the other and stipulate as follows:

The licensee disciplinary hearing pending before the Iowa Board of Pharmacy Examiners, on the allegations specified in the Statement of Charges filed against Respondent on February 23, 1996, shall be resolved without proceeding to hearing, as the parties have agreed to the following Stipulation and Consent Order:

1. That Respondent was issued a license to practice pharmacy in Iowa on the 27th day of February, 1987, by examination as evidenced by Pharmacist License Number 16852, which is recorded in the permanent records of the Iowa Board of Pharmacy Examiners.
2. That Iowa Pharmacist License Number 16852 issued to Respondent is active and current until June 30, 1998.
3. That the Iowa Board of Pharmacy Examiners has jurisdiction over the parties and the subject matter herein.

4. A Statement of Charges was filed against Respondent on February 23, 1996.

5. This Stipulation and Consent Order is entered into in order to resolve a disputed claim and constitutes no admission on the part of the Respondent.

6. Respondent's license shall be placed on probation until July 1, 2000, with the following conditions, beginning on the date this Stipulation and Consent Order is accepted by the Board:

a. Within thirty (30) days of the date of approval of this Stipulation and Consent Order by the Board, the Respondent shall submit to the Board, for its approval, a written policy and procedure for documenting, resolving, and preventing medication dispensing errors in the practice of pharmacy. The policy and procedure shall include a written protocol which describes the procedure for Respondent to follow when a dispensing error occurs. The policy and procedure shall also require that all records of Respondent's dispensing errors be consistently and periodically evaluated by the Respondent as part of a cycle of continuous quality improvement. Following review and approval by the Board, the Respondent agrees to adopt, implement, and adhere to this policy and procedure whenever engaging in the practice of pharmacy.

b. Within sixty (60) days of the date of approval of this Stipulation and Consent Order by the Board, the Respondent will provide her written policies and procedures for the following: (a) dispensing accuracy; (b) obtaining, recording, and maintaining patient information; (c) patient counseling; (d) prospective drug use review; and (e) drug product selection. Following review and approval by the Board, the Respondent agrees to adopt, implement, and adhere to these policies and procedures whenever engaging in the practice of pharmacy.

c. Within one (1) year of the date of approval of this Stipulation and Consent Order by the Board, the Respondent shall complete continuing pharmacy education (CPE) or other formal, structured education in medication dispensing errors. The

education shall be *not less than* six (6) hours in length and shall be pre-approved by the Board. Documentation of satisfactory completion of the education shall be submitted to the Board. This education is in addition to the thirty (30) hours of continuing pharmacy education required every two years for license renewal.

d. Within one (1) year of the date of approval of this Stipulation and Consent Order by the Board, the Respondent shall complete continuing pharmacy education (CPE) or other formal, structured education in patient counseling. The education shall be *not less than* six (6) hours in length and shall be pre-approved by the Board. Documentation of satisfactory completion of the education shall be submitted to the Board. This education is in addition to the thirty (30) hours of continuing pharmacy education required every two years for license renewal.

e. Within one (1) year of the date of approval of this Stipulation and Consent Order by the Board, the Respondent shall complete continuing pharmacy education (CPE) or other formal, structured education in pharmacy management. The education shall be *not less than* six (6) hours in length and shall be pre-approved by the Board. Documentation of satisfactory completion of the education shall be submitted to the Board. This education is in addition to the thirty (30) hours of continuing pharmacy education required every two years for license renewal.

f. During probation, Respondent shall inform the board in writing within ten (10) days of any change of home address, place of employment, home telephone number, or work telephone number.

g. During probation, Respondent shall report to the board or its designee quarterly. Said report shall be in writing. The report shall include the Respondent's place of employment, current address, and any further information deemed necessary by the board from time to time.

7. The Respondent shall obey all federal and state laws, rules, and regulations substantially related to the practice of pharmacy.

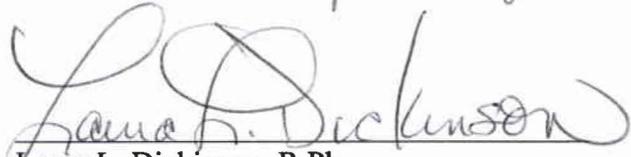
8. Respondent shall notify all present and prospective employers of the resolution of this case and the terms, conditions, and restrictions imposed on Respondent by this document. Within thirty (30) days after approval of this Stipulation and Consent Order by the Board, and within fifteen (15) days of undertaking new employment as a pharmacist, Respondent shall cause her pharmacy employer to report to the Board in writing acknowledging that the employer has read this document and understands it.

9. Respondent may appear before the Board to request removal of the probation after one year of probation has been successfully completed and after all continuing pharmacy education or other formal, structured education required under the terms of this Stipulation and Consent Order has been satisfactorily completed and submitted to the Board.

10. This proposed settlement is subject to approval of a majority of the full Board. If the Board fails to approve this proposed settlement, it shall be of no force or effect to either party. If the Board approves this Stipulation and Consent Order, it shall be the full and final resolution of this matter.

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11. This Stipulation and Consent Order is voluntarily submitted by Respondent to the Board for its consideration on the 30<sup>th</sup> day of January, 1998.

  
Laura L. Dickinson, R.Ph.  
Respondent

Subscribed and Sworn to before me on this 30<sup>th</sup> day of January, 1998.



  
NOTARY PUBLIC IN AND FOR THE  
STATE OF IOWA

12. This Stipulation and Consent Order is accepted by the Iowa Board of Pharmacy Examiners on the 3rd day of February, 1998.

  
PHYLLIS A. OLSON, Chairperson  
Iowa Board of Pharmacy Examiners  
Executive Hills West  
1209 East Court Avenue  
Des Moines, Iowa 50319

**BEFORE THE IOWA BOARD OF PHARMACY**

Re:	)	Case No. 2007-25
Pharmacist License of	)	
<b>LAURA DICKINSON,</b>	)	<b>STATEMENT OF CHARGES</b>
License No. 16852,	)	
Respondent.	)	

**COMES NOW**, the Complainant, Lloyd K. Jessen, and states:

1. He is the Executive Director for the Iowa Board of Pharmacy (hereinafter referred to as the "Board") and files this Statement of Charges solely in his official capacity.
2. The Board has jurisdiction in this matter pursuant to Iowa Code Chapters 155A and 272C (2007).
3. On February 27, 1987 the Board issued Laura Dickinson (hereinafter, "Respondent"), after examination, a license to engage in the practice of pharmacy in Iowa, as evidenced by license number 16852, subject to the laws of the State of Iowa and the rules of the Board.
4. Respondent's Iowa pharmacist license is current and active through June 30, 2008.
5. Respondent's address is 5822 S Winwood Drive, Johnston, Iowa 50131.
6. At all material times, Respondent was employed by Walgreens as a pharmacy supervisor. Her responsibilities included supervision of Walgreens store #5362 located at 1330 East University, Des Moines, IA 50322.

**A. CHARGES**

**COUNT I – LACK OF PROFESSIONAL COMPETENCY**

Respondent is charged with a lack of professional competency, in violation of Iowa Code § 155A.12(1) (2007) and 657 Iowa Administrative Code § 36.1(4)(b), as demonstrated by willful and repeated departures from, and a failure to conform to, the minimal standard and acceptable and prevailing practice of pharmacy in the state of Iowa.

## COUNT II – WILLFULLY MAKING FALSE STATEMENT

Respondent is charged pursuant Iowa Code §§ 124.306, 155A.12(1) and 155A.23(2) (2007), and 657 Iowa Administrative Code §§ 36.1(4)(j) and (u), with willfully making a false statement in a record required by Iowa Code chapter 155A (2007).

## COUNT III – SUBVERTING A BOARD INVESTIGATION

Respondent is charged pursuant to Iowa Code §§ 155A.12(1) (2007) and 657 Iowa Administrative Code § 36.1(4)(z), with subverting a Board investigation by, among other things, attempting to conceal losses of controlled substances and altering inventory records of controlled substances.

## COUNT IV – FAILURE TO NOTIFY BOARD

Respondent is charged pursuant to Iowa Code §§ 155A.12(1), and 155A.19(3)(f) (2007), and 657 Iowa Administrative Code §§ 10.16 and 34.1(4)(j) and (u), with failing to notify the Board of significant losses of controlled substances.

## COUNT V – FAILURE TO REPORT ACTS AND OMISSIONS

Respondent is charged pursuant Iowa Code § 155A.12(1), and 657 Iowa Administrative Code §§ 36.2(3) and 34.1(4)(u), with failing to report acts and omissions of a person licensed to practice pharmacy.

## COUNT VI – FAILURE TO MAINTAIN ACCURATE RECORDS

Respondent is charged pursuant Iowa Code §§ 124.306, 155A.12(1) and (4)(c), §§ 155A.23(12) and (13) (2007), and 657 Iowa Administrative Code §§ 10.34 and 36.1(4)(j), (u), (ac) and (ag), with failing to create and maintain complete and accurate records of purchases, sale and disposal of drugs, including controlled substances.

## **B. CIRCUMSTANCES**

Circumstances supporting the above charges are set forth in Attachment A.

Wherefore, the Complainant prays that a hearing be held in this matter and that the Board take such action as it may deem to be appropriate under the law.

  
Lloyd K. Jessen  
Executive Director

On this 5 day of Oct. 2007, the Iowa Board of Pharmacy found probable cause to file this Statement of Charges and to order a hearing in this case.

  
PAUL ABRAMOWITZ, Chairperson  
Iowa Board of Pharmacy  
400 SW Eighth Street, Suite E  
Des Moines, Iowa 50309-4688

cc: Scott M. Galenbeck  
Assistant Attorney General  
Hoover State Office Building  
Des Moines, Iowa

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**BEFORE THE IOWA BOARD OF PHARMACY**

Re:	)	Case No. 2007-25
Pharmacist License of	)	
<b>LAURA DICKINSON</b>	)	<b>STIPULATION</b>
License No. 16852	)	<b>AND</b>
Respondent	)	<b>CONSENT ORDER</b>
	)	

Pursuant to Iowa Code §§ 17A.10 and 272C.3(4) (2007), the Iowa Board of Pharmacy (hereinafter, “the Board”) and Laura Dickinson (hereinafter, “Respondent”), enter into the following Stipulation and Consent Order settling a licensee disciplinary proceeding currently pending before the Board.

Allegations specified in a Statement of Charges filed against Respondent shall be resolved without proceeding to hearing, as the Board and Respondent stipulate as follows:

1. Respondent was issued a license to practice pharmacy in Iowa on February 27, 1987, following examination, as evidenced by Pharmacist License Number 16852, which is recorded in the permanent records of the Board.
2. The Iowa Pharmacist License issued to and held by Respondent is active and current until June 30, 2008.
3. Respondent was, at all times material to the Statement of Charges, employed as a pharmacy supervisor by Walgreens.
4. A Statement of Charges was filed against Respondent on October 25, 2007.
5. The Board has jurisdiction over the parties and jurisdiction over the subject matter of these proceedings.
6. Respondent has chosen not to contest, in a contested case proceeding, the

allegations set forth in the Statement of Charges. Respondent acknowledges that the allegations, if proven in such a proceeding, would constitute grounds for the discipline described herein.

7. On the date of the Board's approval of this Stipulation and Consent Order, Respondent's license shall be placed on probation. The period of probation shall be not less than three (3) years. Respondent's period of probation shall begin on the date of this order and continue for three years or until Respondent has been employed as a pharmacist in Iowa for three years subsequent to commencement of probation. Only those time periods during which Respondent is employed as a pharmacist in Iowa shall count toward satisfaction of the probation requirement. After the first year of probation is complete, Respondent may approach the Board for early termination of this Stipulation and Consent Order.

8. Probation is granted under the following conditions, which Respondent agrees to follow:

a. Within six (6) months after the date of the Board's approval of this Stipulation and Consent Order, Respondent shall complete not less than fifteen (15) hours of formal, structured continuing pharmacy education ("CPE") which shall be pre-approved by the Board. The CPE shall include not less than four (4) hours concentrated on controlled substances record-keeping, including completion of the required biennial controlled substances inventory. Upon completion of the 15 hours of CPE, documentation of satisfactory completion shall be promptly submitted to the Board. This CPE shall be in addition to – not in lieu of – the

thirty (30) hours of continuing pharmacy education required every two years for license renewal.

b. Within sixty (60) days after the date of the Board's approval of this Stipulation and Consent Order, Respondent will submit to the Board *typewritten*<sup>1</sup> pharmacy policies and procedures for the following: (1) controlled substances record-keeping, including completion of the required biennial controlled substances inventory and (2) maintaining adequate supervision and control of controlled substances. Following review and approval by the Board, Respondent agrees to adopt, implement, and adhere to these policies and procedures in her current employment setting and whenever engaging in the practice of pharmacy – unless specific policies and procedures adopted by her employer prevent such adherence.

c. Respondent shall inform the Board, in writing, of any change of home address, place of employment, home telephone number, or work telephone number, within ten (10) days of such a change.

d. During probation, Respondent shall report to the Board or its designee quarterly, in writing. The report shall include Respondent's place of employment, current address, *Respondent's most recent efforts to implement the provisions of this Stipulation and Consent Order, by date*, and any further information deemed necessary by the Board from time to time.

e. Respondent shall not serve as a preceptor.

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<sup>1</sup> For the purposes of this order, "typewritten" policies may be generated on computer word-processing equipment.

f. Respondent shall notify all present employers and prospective employers (no later than at the time of an employment interview), including any pharmacist-in-charge, of the resolution of this case and the terms, conditions, and restrictions imposed on Respondent by this Stipulation and Consent Order.

g. Within thirty (30) days after approval of this Stipulation and Consent Order by the Board, and within fifteen (15) days of undertaking new employment as a pharmacist, Respondent shall cause his present pharmacy employer, and any pharmacist-in-charge he works under, to report to the Board in writing acknowledging that the employer and the pharmacist-in-charge have read this document and understand it.

h. Respondent shall appear informally before the Board, upon the request of the Board, for the purpose of reviewing his performance as a pharmacist during his probationary period. Respondent shall be given reasonable notice of the date, time, and place for the appearances.

i. Respondent shall obey all federal and state laws, rules, and regulations substantially related to the practice of pharmacy.

9. Should the Respondent violate or fail to comply with any of the terms or conditions of this Stipulation and Consent Order, the Board may initiate action to revoke or suspend the Respondent's Iowa pharmacist license or to impose other licensee discipline as authorized by Iowa Code chapters 272C and 155A (2005) and 657 IAC 36.

10. This Stipulation and Consent Order is the resolution of a contested case. By entering into this Stipulation and Consent Order, Respondent waives all rights to a

waives any objections to this Stipulation and Consent Order.

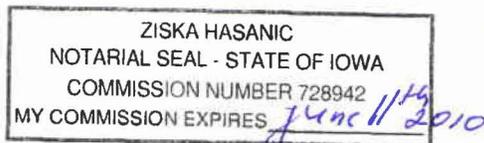
11. This proposed settlement is subject to approval by a majority of the full Board. If the Board fails to approve this settlement, it shall be of no force or effect to either the Board or Respondent. If the Board approves this Stipulation and Consent Order, it shall be the full and final resolution of this matter.

12. The Board's approval of this Stipulation and Consent Order shall constitute a FINAL ORDER of the Board in a disciplinary action.

This Stipulation and Consent Order is voluntarily submitted by Respondent to the Board for its consideration on the 29 day of April 2008.

  
Laura Dickinson, R.Ph.  
Respondent

Subscribed and sworn to before me by Laura Dickinson on this 29<sup>th</sup> day of April 2008.



  
NOTARY PUBLIC IN AND FOR  
THE STATE OF IOWA

This Stipulation and Consent Order is accepted by the Iowa Board of Pharmacy on the 4 day of June 2008.

  
Leman E. Olson, Chairperson  
Iowa Board of Pharmacy  
400 SW Eighth Street, Suite E  
Des Moines, Iowa 50309-4688

Des Moines, Iowa 50309-4688

cc: Scott M. Galenbeck  
Assistant Attorney General  
Office of the Attorney General  
Hoover State Office Building  
Des Moines, Iowa 50319

Kevin Reynolds  
Kimberly Bartosh  
317 Sixth Avenue, Suite 1200  
Des Moines, IA 50309

Dickinson settlement 4-08

BEFORE THE BOARD OF PHARMACY STATE OF IOWA

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IN THE MATTER OF THE STIPULATION AND CONSENT ORDER AGAINST

LAURA L. DICKINSON, R.Ph., RESPONDENT

2007-25

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TERMINATION ORDER

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**DATE: June 4, 2011**

1. On June 4, 2008, a Stipulation and Consent Order was issued by the Iowa Board of Pharmacy placing the license to practice pharmacy, number 16852 issued to Laura L. Dickinson on February 27, 1987, on probation for a period of three years under certain terms and conditions.

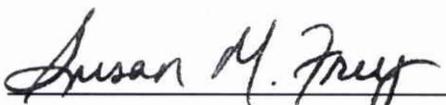
2. Respondent has successfully completed the probation as directed.

3. The Board directed that the probation placed upon the Respondent's license to practice pharmacy should be terminated.

**IT IS HEREBY ORDERED:**

That the probation placed upon the Respondent's license to practice pharmacy is terminated, and the license is returned to its full privileges free and clear of all restrictions.

**IOWA BOARD OF PHARMACY**



Susan M. Frey, Board Chairperson  
400 SW 8<sup>th</sup> Street, Suite E  
Des Moines, Iowa 50309-4688

**BEFORE THE IOWA BOARD OF PHARMACY**

Re:	)	Case No. 2009-45
Pharmacist License of	)	
<b>LAURA L. DICKINSON</b>	)	<b>STATEMENT OF CHARGES</b>
License No. 16852,	)	
Respondent.	)	

**COMES NOW**, the Complainant, Lloyd K. Jessen, and states:

1. He is the Executive Director for the Iowa Board of Pharmacy (hereinafter, "Board") and files this Statement of Charges solely in his official capacity.
2. The Board has jurisdiction in this matter pursuant to Iowa Code Chapters 155A and 272C (2009).
3. On February 27, 1987, the Board issued Laura L. Dickinson ("Respondent"), after examination a license to engage in the practice of pharmacy as evidenced by license number 16852, subject to the laws of the State of Iowa and the rules of the Board.
4. Respondent's pharmacist license is current and active until June 30, 2012. Respondent's most recent address of record is 5822 South Winwood Drive, Johnston, Iowa.
5. At all times material to this statement of charges, Respondent was employed as the pharmacist in charge at Walgreens, 4415 Douglas Avenue, Des Moines, Iowa 50310.

**A. CHARGE**

**COUNT I – LACK OF PROFESSIONAL COMPETENCY**

Respondent is charged under Iowa Code § 155A.12(1) (2007) and 657 Iowa Administrative Code § 36.1(4)(b) with a lack of professional competency as demonstrated by willful and repeated departures from, and a failure to conform to, the minimal standard and acceptable and prevailing practice of pharmacy in the state of Iowa.

## B. CIRCUMSTANCES

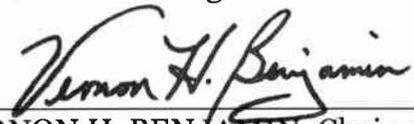
An investigation was commenced May 1, 2009, which revealed the following:

1. At all times material to this statement of charges, Respondent was the pharmacist in charge at Walgreens #07452, 4415 Douglas Avenue, Des Moines, Iowa 50310.
2. A Walgreens pharmacy patient was prescribed Xeloda, 4600 mg per day (2300 mg, twice daily), with the prescription being called in and correctly recorded by Walgreens.
3. Nevertheless, the patient was dispensed tablets and instructions that resulted in the patient receiving a dose of 600 mg per day (300 mg, twice daily).
4. The dispensing error occurred twice. On the second refill, the prescription was correctly filled, resulting in discovery of the error. The patient received a non-therapeutic dose for two months.
5. The prescribed Xeloda dosage, 4600 mg per day, is a standard dosage for a person of the patient's size, undergoing treatment for pancreatic cancer.

Wherefore, the Complainant prays that a hearing be held in this matter and that the Board take such action as it may deem to be appropriate under the law.

  
LLOYD K. JESSEN  
Executive Director

On this 20 day of July 2010, the Iowa Board of Pharmacy found probable cause to file this Statement of Charges and to order a hearing in this case.

  
VERNON H. BENJAMIN, Chairperson  
Iowa Board of Pharmacy  
400 SW Eighth Street, Suite E  
Des Moines, Iowa 50309-4688

cc: Scott M. Galenbeck  
Assistant Attorney General  
Hoover State Office Building  
Des Moines, Iowa

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**BEFORE THE IOWA BOARD OF PHARMACY**

Re:	)	Case No. 2009-159
Pharmacist License of	)	
<b>LAURA L. DICKINSON</b>	)	<b>STATEMENT OF CHARGES</b>
License No. 16852,	)	
Respondent.	)	

**COMES NOW**, the Complainant, Lloyd K. Jessen, and states:

1. He is the Executive Director for the Iowa Board of Pharmacy (hereinafter, "Board") and files this Statement of Charges solely in his official capacity.
2. The Board has jurisdiction in this matter pursuant to Iowa Code Chapters 155A and 272C (2009).
3. On February 27, 1987, the Board issued Laura L. Dickinson ("Respondent"), after examination, a license to engage in the practice of pharmacy as evidenced by license number 16852, subject to the laws of the State of Iowa and the rules of the Board.
4. Respondent's pharmacist license is current and active until June 30, 2012.
5. Respondent's address of record is 5822 South Winwood Drive, Johnston, Iowa.
6. At all times material to this statement of charges, Respondent was employed as the pharmacist in charge at Walgreens, 4415 Douglas Avenue, Des Moines, Iowa 50310.

**A. CHARGES**

**COUNT I – LACK OF PROFESSIONAL COMPETENCY**

Respondent is charged under Iowa Code § 155A.12(1) (2009) and 657 Iowa Administrative Code § 36.1(4)(b) with a lack of professional competency as demonstrated by willful and repeated departures from, and a failure to conform to, the minimal standard and acceptable and prevailing practice of pharmacy in the state of Iowa.

## COUNT II – ALTERING DRUG STRENGTH WITHOUT PERMISSION

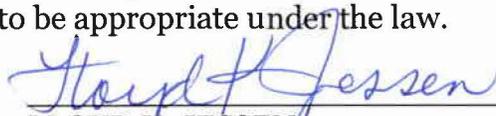
Respondent is charged under Iowa Code § 155A.12(1) (2009) and 657 Iowa Administrative Code §§ 10.21(5) and 36.1(4)(u) with altering the dispensed strength of a controlled substance prescription without obtaining the permission of the prescriber.

### B. CIRCUMSTANCES

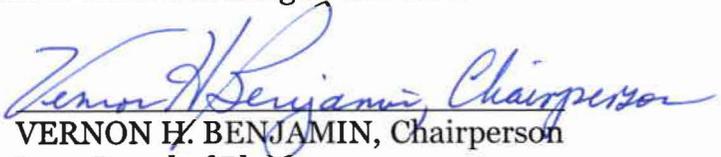
An investigation was commenced December 3, 2009, which revealed the following:

1. At all times material to this statement of charges, Respondent was the pharmacist in charge at Walgreens #07452, 4415 Douglas Avenue, Des Moines, Iowa 50310.
2. A Walgreens pharmacy patient received two prescriptions for Oxycontin. The first, Oxycontin 80mg (#90) to be taken three times per day, was correctly filled and dispensed.
3. A second prescription, to be used by the patient in conjunction with the first, was filled incorrectly. The second script called for Oxycontin 20mg (#120), to be taken three times daily in doses of 20mg, 40mg and 20mg. The prescriber's intention was to have the patient take – by combining the two prescriptions – 100mg Oxycontin in the morning, 120mg mid-day, and 100mg in the evening.
4. When filling the second prescription, pharmacist Kyle Rotert learned that the patient's insurer would not cover the Oxycontin 20mg #120 during a 30 day period. Without contacting the prescriber, Rotert split the second prescription into two parts and dispensed oxycodone 20mg ER #60, to be taken morning and evening, and Oxycontin 40mg #30 to be taken mid-day.
5. The fill of the second prescription was reviewed by pharmacist Matt Sales. Sales did not contact the patient's prescriber.
6. When, prior to the completion of the 30 day period, the patient contacted the prescriber seeking more medication, the prescriber learned that the patient had been taking two Oxycontin 40mg tablets at mid day, in addition to an Oxycontin 80mg tablet, for a total dosage of 160mg.
7. After learning the second prescription had not been correctly filled, the prescriber attempted to contact the Walgreens pharmacist who dispensed the Oxycontin. Walgreens would not provide the name of the pharmacist or agree to have the pharmacist return the prescriber's call.
8. The patient does not recall being counseled by a pharmacist regarding the differences between the actual prescription and the medication as dispensed.

Wherefore, the Complainant prays that a hearing be held in this matter and that the Board take such action as it may deem to be appropriate under the law.

  
\_\_\_\_\_  
LLOYD K. JESSEN  
Executive Director

On this 28 day of Sept. 2010, the Iowa Board of Pharmacy found probable cause to file this Statement of Charges and to order a hearing in this case.

A handwritten signature in blue ink that reads "Vernon H. Benjamin, Chairperson". The signature is written in a cursive style.

VERNON H. BENJAMIN, Chairperson  
Iowa Board of Pharmacy  
400 SW Eighth Street, Suite E  
Des Moines, Iowa 50309-4688

cc: Scott M. Galenbeck  
Assistant Attorney General  
Hoover State Office Building  
Des Moines, Iowa

DickinsonIII-SOC 7-10.doc

**BEFORE THE IOWA BOARD OF PHARMACY**

Re:	)	Case No. 2010-45
Pharmacist License of	)	
<b>LAURA L. DICKINSON</b>	)	<b>STATEMENT OF CHARGES</b>
License No. 16852,	)	
Respondent.	)	

**COMES NOW**, the Complainant, Lloyd K. Jessen, and states:

1. He is the Executive Director for the Iowa Board of Pharmacy (hereinafter, "Board") and files this Statement of Charges solely in his official capacity.
2. The Board has jurisdiction in this matter pursuant to Iowa Code Chapters 155A and 272C (2011).
3. On February 27, 1987, the Board issued Laura L. Dickinson ("Respondent"), after examination, a license to engage in the practice of pharmacy as evidenced by license number 16852, subject to the laws of the State of Iowa and the rules of the Board.
4. Respondent's pharmacist license is current and active until June 30, 2012.
5. Respondent's address of record is 5822 South Winwood Drive, Johnston, Iowa.
6. At all times material to this statement of charges, Respondent was employed as the pharmacist in charge at Walgreens Pharmacy, 4415 Douglas Avenue, Des Moines, Iowa 50310.

**A. CHARGE**

**COUNT I – LACK OF PROFESSIONAL COMPETENCY**

Respondent is charged under Iowa Code § 155A.12(1) (2011) and 657 Iowa Administrative Code § 36.1(4)(b) with lack of professional competency as demonstrated by Respondent's (a) substantial deviation from the standards of learning and skill ordinarily possessed and applied by other Iowa pharmacists, (b) failure to exercise in a substantial respect that degree of care which is ordinarily exercised by an Iowa pharmacist and (c) willful and repeated departures from, and a failure to conform to, the minimal standard and acceptable and prevailing practice of pharmacy in the state of Iowa.

## B. CIRCUMSTANCES

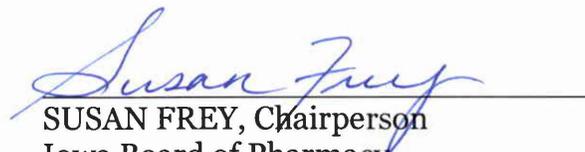
An investigation was commenced on April 21, 2010, which revealed the following:

1. At all material times, Respondent was employed as the pharmacist in charge at Walgreens Pharmacy, 4415 Douglas Avenue, Des Moines, Iowa 50310
2. On April 6, 2010, a patient's wife picked up and paid for her husband's prescriptions at Respondent's pharmacy.
3. Subsequently, while filling her husband's medication reminder, the patient's wife noticed that she had received from the pharmacy an extra bottle of prescription drugs. The extra bottle was labeled for and intended for a patient other than her husband.
4. After complaining to the pharmacy regarding the error, the patient's wife was refunded the purchase price of the extra medication. When the patient's wife then sought out a pharmacist to discuss her concern that a dangerous dispensing error had occurred, the pharmacist she spoke to did not appear to take the error seriously.

WHEREFORE, the Complainant prays that a hearing be held in this matter and that the Board take such action as it may deem to be appropriate under the law.

  
LLOYD K. JESSEN  
Executive Director

On this 29 day of June 2011, the Iowa Board of Pharmacy found probable cause to file this Statement of Charges and to order a hearing in this case.

  
SUSAN FREY, Chairperson  
Iowa Board of Pharmacy  
400 SW Eighth Street, Suite E  
Des Moines, Iowa 50309-4688

cc: Scott M. Galenbeck  
Assistant Attorney General  
Hoover State Office Building  
Des Moines, Iowa 50319

BEFORE THE IOWA BOARD OF PHARMACY

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Re:	)	Case Nos. 2009-45, 2009-159, and 2010-45
Pharmacist License of	)	
<b>LAURA L. DICKINSON,</b>	)	<b>SETTLEMENT AGREEMENT</b>
License No. 16852,	)	<b>AND</b>
Respondent.	)	<b>FINAL ORDER</b>

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Pursuant to Iowa Code §§ 17A.10 and 272C.3(4) (2011), the Iowa Board of Pharmacy and Laura L. Dickinson, Respondent, enter into the following Settlement Agreement and Final Order to settle a licensee disciplinary proceeding currently pending before the Board.

The allegations contained in a Statement of Charges against Respondent shall be resolved without proceeding to hearing, as the Board and Respondent stipulate as follows:

1. Respondent was issued Pharmacist License No. 16852. That license is active and current until June 30, 2014.
2. A Statement of Charges was filed against Respondent on July 20, 2010, September 28, 2010, and June 29, 2011.
3. At all times relevant to the Statement of Charges, Respondent was employed as the pharmacist in charge at Walgreens Pharmacy, 4415 Douglas Avenue, Des Moines, Iowa.
4. The Board has jurisdiction over the parties and the subject matter of these proceedings.

5. Respondent has chosen not to contest the allegations in the Statements of Charges. This agreement is a settlement of a contested matter and does not constitute an admission of any fault or liability by the Respondent. Respondent acknowledges that the allegations, if proven in a contested case proceeding, would constitute grounds for the discipline agreed to in this Order.
6. Respondent shall submit a \$2000.00 civil penalty to the Board. This civil penalty shall be made payable to the Treasurer of Iowa and mailed to the executive director of the Board within twenty (20) days of the date this Settlement Agreement is approved by the Board. All civil penalty payments shall be deposited into the State of Iowa's general fund.
7. Respondent is currently not practicing pharmacy. However, Respondent agrees that on the date she returns to the practice of pharmacy, her license shall be placed on probation for a period of one (1) year, subject to the following terms:
  - a. Respondent agrees that prior to assuming a position as a PIC, she shall successfully re-take and pass the MPJE. In the event Respondent fails to fulfill this requirement, the Board will issue a notice to Respondent that the license will be suspended within twenty days of the date the notice is served on Respondent. That suspension will occur automatically and without further Board action, unless Respondent files with the Board a request for hearing on the notice within ten days of the date the notice is served.
  - b. Respondent shall, within thirty (30) days of the date she assumes a position as a PIC, submit to the Board for its approval policies and

procedures regarding handling of dispensing errors and customer complaints. Respondent agrees to comply with these policies and procedures whenever employed as a pharmacist in charge and whenever engaging in the practice of pharmacy in a pharmacy which has no conflicting policies and procedures.

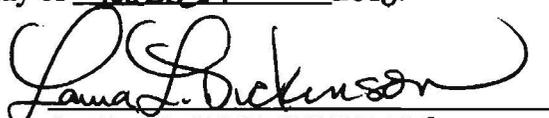
- c. Respondent shall comply with all applicable Iowa pharmacy law and rules and all related federal requirements for controlled substances.
- d. Respondent shall submit quarterly reports to the Board. The reports shall be filed not later than December 5, March 5, June 5 and September 5 of each calendar year. These reports shall include Respondent's place of employment; current address; a narrative discussing Respondent's current compliance with the terms of this Settlement Agreement and Final Order; and any further information requested by the Board.
- e. Respondent shall notify all employers and prospective employers (no later than at the time of an employment interview), including any pharmacist-in-charge, of this Settlement Agreement and Final Order, including the terms, conditions and restrictions imposed on Respondent by this Order.
- f. Within thirty (30) days after approval of this Settlement Agreement and Final Order by the Board, and within fifteen (15) days of undertaking new employment as a pharmacist, Respondent is responsible for ensuring her pharmacy employer, and any pharmacist-in-charge she works under, to report to the Board in writing acknowledging that the employer and the pharmacist-in-charge have read this document and understand it.

- g. Upon the Board's request, Respondent shall appear informally before the Board for the purpose of reviewing her performance as a pharmacist and compliance with her probation. Respondent shall be given reasonable notice of the date, time, and place for the appearances.
  - h. Only the periods of time during which Respondent is actively practicing as a pharmacist in Iowa shall apply to the duration of the probation, unless otherwise approved by the Board.
  - i. Respondent shall inform the Board in writing of any change of home address, place of employment, home telephone number, or work telephone number, within ten (10) days of such a change.
8. Should Respondent violate or fail to comply with any of the terms and conditions of this Settlement Agreement and Final Order, the Board may initiate action to revoke or suspend Respondent's Iowa pharmacist license or to impose other licensee discipline as authorized by Iowa Code chapters 272C and 155A (2011) and 657 IAC 36.
9. This Settlement Agreement and Final Order is the resolution of a contested case. By entering into this Settlement Agreement and Final Order, Respondent waives all rights to a contested case hearing on the allegations contained in the Statement of Charges, and waives any objections to this Final Order.
10. The State's legal counsel may present this Settlement Agreement and Final Order to the Board.
11. This Settlement Agreement and Final Order is subject to approval by a majority of the full Board. If the Board fails to approve this settlement, it shall be of no

force or effect to either the Board or Respondent. If the Board approves this Settlement Agreement and Final Order, it shall be the full and final resolution of this matter.

12. The Board's approval of this Settlement Agreement and Final Order shall constitute a FINAL ORDER of the Board.

This Settlement Agreement and Final Order is voluntarily submitted by Respondent to the Board for its consideration on the 7<sup>th</sup> day of March 2013.

  
LAURA L. DICKINSON, RPh  
Respondent

This Stipulation and Consent Order is accepted by the Iowa Board of Pharmacy on the 13<sup>th</sup> day of March 2012.

  
SUSAN M. FREY, Chairperson  
Iowa Board of Pharmacy  
400 SW Eighth Street, Suite E  
Des Moines, Iowa 50309-4688

cc: Theresa O=Connell Weeg  
Assistant Attorney General  
Office of the Attorney General  
Hoover State Office Building  
Des Moines, Iowa 50319

Kevin M. Reynolds  
WHITFIELD & EDDY, P.L.C.  
317 6<sup>th</sup> Ave., Suite 1200  
Des Moines, IA 50309

**BEFORE THE BOARD OF PHARMACY STATE OF IOWA**

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**IN THE MATTER OF THE STIPULATION AND CONSENT ORDER AGAINST**

**LAURA L. DICKINSON, R.Ph., RESPONDENT**

**2009-45, 2009-159, AND 2010-45**

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**TERMINATION ORDER**

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**DATE: March 29, 2014**

1. On March 13, 2012, a Stipulation and Consent Order was issued by the Iowa Board of Pharmacy placing the license to practice pharmacy, number 16852 issued to Laura L. Dickinson on February 27, 1987, on probation for a period of one year under certain terms and conditions.

2. Respondent has successfully completed the probation as directed.

3. The Board directed that the probation placed upon the Respondent's license to practice pharmacy should be terminated.

**IT IS HEREBY ORDERED:**

That the probation placed upon the Respondent's license to practice pharmacy is terminated, and the license is returned to its full privileges free and clear of all restrictions.

**IOWA BOARD OF PHARAMCY**



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Edward Maier, Board Chairperson  
400 SW 8<sup>th</sup> Street, Suite E  
Des Moines, Iowa 50309-4688