

Marty M. Snyder, Supreme Court #11317  
Kansas Attorney General's Office  
120 SW 10<sup>th</sup> St, Second Floor  
Topeka, KS 66612-1597

**BEFORE THE BEHAVIORAL SCIENCES REGULATORY BOARD**

712 South Kansas Avenue  
Topeka, Kansas 66603-3817

In the Matter of )

Cristina M. Ramirez, LMSW )  
License No. 5475 )  
Respondent )  
\_\_\_\_\_ )

**Case No. 06-MS-36**

**CONSENT AGREEMENT AND ORDER**

NOW on this 10<sup>th</sup> day of July, 2006, the above-captioned matter comes before the Kansas Behavioral Sciences Regulatory Board (Board) by agreement of Cristina M. Ramirez (Licensee) and the Kansas Behavioral Sciences Regulatory Board for the purpose of resolving the above-captioned case.

Licensee hereby acknowledges the following:

1. Cristina M. Ramirez is currently, and at all times relevant has been, a Licensed Masters Social Worker within the meaning of the Kansas Social Workers Licensure Act, K.S.A. 65-6301 *et seq.*, and amendments thereto.

2. On or about February 6, 2006, the Board received a report of information concerning Licensee's conduct, alleging Licensee failed to complete her social work documentation including intake assessments and clinical notes when she changed jobs, despite her commitment to do so.

3. The Board conducted an investigation concerning Licensee's alleged violation of statutes and regulations.

4. During the investigation, Licensee was informed of the reported information, was given the opportunity to respond to the allegations and did respond to the allegations in her letter received on April 10, 2006.

5. As a result of the investigation, the Board finds probable cause to believe the following facts:

a. When Licensee terminated her employment with Area Mental Health Center, she agreed to return and complete her case file documentation. After two written requests by the employer, she failed to respond.

b. The employer states Licensee left without completing 417 pieces of documentation causing continuity of care problems and incomplete records for court-ordered treatment of clients.

6. The Board finds that reasonable grounds exist to believe Licensee has committed unprofessional conduct in violation of K.S.A. 65-6311(a) (4) and (6) as defined as follows:

(a) K.A.R. 102-2-7(b) (II) reporting ... incomplete or misleading social work information.

(b) K.A.R. 102-2-7 (w) engaging in professional activities ... involving ... misrepresentation.

However, Licensee and the Board mutually desire to enter into a Consent Agreement and Order in lieu of adjudicative proceedings to resolve the report of alleged violations.

WHEREFORE, Licensee waives all rights to an adjudication of facts and law which

could be determined pursuant to a hearing conducted in accordance with the Kansas Administrative Procedure Act in relation to Case No. 06-MS-36.

WHEREFORE, Licensee waives the right to file a motion for reconsideration and all rights of appeal pursuant to the Kansas Act for Judicial Review in relation to this case.

WHEREFORE, Licensee consents to continuation of her license to practice on the following terms and conditions:

(a) Licensee accepts a formal reprimand for her misconduct as set forth above.

(b) Her license shall continue unrestricted with the following conditions

(1) Within ninety (90) days of the date on the Certificate of Service below, Licensee shall submit to the Board a professional quality ten-page paper containing at least ten references and in APA format on the importance of timely and complete documentation of social work information.

(2) Licensee shall furnish a report to the Board on the status of the timeliness and completeness of her current social work documentation.

(c) Licensee shall be responsible for any costs and expenses incurred in satisfying the terms of this Consent Agreement and Order.

(d) Evidence of Licensee's breach, violation or failure to comply with any of the conditions will result in a hearing, with notice and opportunity to be heard, to determine whether Licensee has in fact breached, violated or failed to comply with any conditions.

(e) Licensee acknowledges that proof submitted to the Board by affidavit or other form of competent evidence that Licensee has breached, violated or failed to meet the conditions of this Consent Agreement and Order shall be good and sufficient evidence to support an alleged violation of breach, violation or non-compliance.

(f) Licensee understands that a notification of this Consent Agreement and Order shall be provided to any other state licensing board if Licensee is also licensed, registered or certified in another state.

(g) Licensee acknowledges an affirmative duty to notify the Board within five (5) days of any changes in personal or professional status which would inhibit compliance with any condition of this Consent Agreement and Order. In such event, a designee of the Board is authorized to modify or amend this Consent Agreement and Order in writing.

(h) If the Board does not approve this Order, Licensee waives any right she may have to object to the composition of any subsequent hearing panel due to hearing panel members having knowledge of matters contained within this Consent Agreement and Order.

(i) This Consent Agreement and Order constitutes the entire agreement between the Licensee and the Behavioral Sciences Regulatory Board and may be modified or amended only by written agreement signed by Licensee and the Board or a designee of the Board.

WHEREFORE, Licensee consents to the submission of this Consent Agreement and Order to the Board's Complaint Review Committee and understands that, upon approval of the Complaint Review Committee, this Consent Agreement and Order will become a Final Order of the Board. The Board has authorized the Complaint Review Committee to determine approval of this Consent Agreement and Order.

WHEREFORE, the Board agrees that, so long as Licensee complies with the above conditions, the Board will not initiate further disciplinary action against Licensee in relation to violations of K.S.A. 65-6311 as defined by K.A.R. 102-2-7 as a result of this proceeding.

WHEREFORE, the Board further agrees that, upon determination of Licensee's compliance with the conditions stated herein, Licensee shall be unconditionally licensed as a Licensed Masters Social Worker.

WHEREFORE, the foregoing provisions are consented to, are hereby made the final Order of the Kansas Behavioral Sciences Regulatory Board and become effective on the date indicated in the Certificate of Service below.

IT IS SO ORDERED.

Wesley C Jones, Ph.D.  
Wesley Jones, Ph.D.  
Chair, Complaint Review Committee

**APPROVED AND CONSENTED TO:**

Cristina M. Ramirez  
Cristina M. Ramirez  
Respondent Licensee

7-3-06  
Date

**APPROVED BY:**

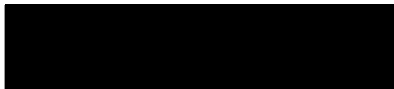
\_\_\_\_\_  
Counsel for Respondent

\_\_\_\_\_  
Date

**Certificate of Service**

This is to certify that on this 13<sup>th</sup> day of July, 2006, a true and correct copy of the above and foregoing Consent Agreement and Order was deposited in the U.S. mail, first class postage prepaid, addressed to:

Cristina M. Ramirez



Roger Skowronski  
For the Behavioral Sciences Regulatory Board