

**CONSENT AGREEMENT
BETWEEN
MARGARET GANNON
AND
THE STATE BOARD OF SPEECH-LANGUAGE PATHOLOGY AND
AUDIOLOGY**

This CONSENT AGREEMENT is entered into by and between MARGARET GANNON (hereinafter "MS. GANNON"), and THE STATE BOARD OF SPEECH-LANGUAGE PATHOLOGY AND AUDIOLOGY (hereinafter "BOARD"), the state agency charged with enforcing Chapter 4753 of the Ohio Revised Code and all rules promulgated thereunder.

Ms. Gannon voluntarily enters into this CONSENT AGREEMENT being fully informed of her rights under Chapter 119 of the Ohio Revised Code, including the right to representation by counsel and the right to a formal adjudication hearing on the issues which are subject of this CONSENT AGREEMENT.

This CONSENT AGREEMENT contains the entire agreement between the parties, there being no other agreement of any kind, verbal or otherwise, which varies the terms of this CONSENT AGREEMENT.

This CONSENT AGREEMENT is entered into on the basis of the following stipulations, admissions and understandings:

1. The Board is empowered by Chapter 4753 of the Ohio Revised Code and the rules promulgated there under to discipline a Speech-Language Pathologist or Audiologist for violations of that chapter and rules.
 2. The Board enters into this Consent Agreement in lieu of further formal proceedings. The Board expressly reserves the right to institute additional formal proceedings based upon any other violations of Chapter 4753 of the Ohio Revised Code and all rules promulgated thereunder.
 3. Ms. Gannon admits the following events:
 - a) Ms. Gannon received discipline by the Colorado Department of Education on September 12, 1996.
 - b) The discipline was based upon the finding that she had not conducted staff meetings, had not completed the IEPs in a timely manner, had falsified the signatures of teachers, mental health workers, and parents on the IEPs .
 - c) Ms. Gannon applied for licensure as a Speech-Language Pathologist in the State of Ohio on November 19, 2001.
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4. Ms. Gannon wishes to settle this matter in lieu of a hearing pursuant to Ohio Revised Code, Chapter 119.

Wherefore, in consideration of the foregoing and mutual promises hereinafter set forth, and in lieu of any further formal proceeding at this time, Ms. Gannon knowingly and voluntarily agrees with the Board to the following terms and conditions:

- A. The Board shall issue Ms. Gannon a license to practice as a Speech-Language Pathologist upon completion of all of the following conditions:
 1. Ms. Gannon shall meet with the Executive Director of the Board for discussion of the laws and rules applicable to the practice of speech-language pathology in Ohio, including the Code of Ethics.
 2. Ms. Gannon shall secure a Board approved supervisor who, in writing, agrees to provide the supervision required to satisfy the probationary conditions set forth in division (B), below.
- B. Upon the Board's issuance of a license to her, Ms. Gannon shall comply with the following probationary conditions for a period of twelve months:
 1. For practice in a school setting
 - a. Before Ms. Gannon practices she shall, in consultation with her approved supervisor, prepare a plan of action for the completion of the IEP's of students assigned to her care, which plan of action shall specify the relative time frame and necessary steps for conducting staff meetings, completing IEP's in a timely manner, and obtaining the signatures of all necessary parties. The plan, signed by both Ms. Gannon and the approved supervisor, shall be sent to the Board office.
 - b. At least quarterly, or more frequently at the discretion of the approved supervisor, Ms. Gannon shall meet with her approved supervisor to review and discuss her compliance with the plan of action. The approved supervisor shall recommend any actions to improve compliance with the plan and submit a written progress note to the Board no later than each of the following dates: December 31, 2002, March 30, 2003, June 30, 2003, and September 31, 2003.
 2. For practice outside of the school setting:
 - a. Before Ms. Gannon practices she shall, in consultation with her approved supervisor, prepare a plan of action for the completion of all progress notes and billing records in a timely manner. The plan, signed by both Ms. Gannon and the approved supervisor, shall be sent to the Board office.
 - b. The requirements of (1)(b), above, shall also apply.

- C. Ms. Gannon shall henceforth comply with Chapter 4753 of the Ohio Revised Code and all other federal and state statutes and rules governing the practice of Speech-Language Pathology in the state of Ohio
- D. Ms. Gannon waives all her rights under Chapter 119 of the Ohio Revised Code, as they relate to matters which are the subject of this CONSENT AGREEMENT.
- E. Ms. Gannon agrees that any breach of this CONSENT AGREEMENT shall be deemed to be a violation of a lawful order given by the Board, pursuant to Ohio Revised Code Section 4753.10(M).

If, in the discretion of the Board, Ms. Gannon, appears to have breached any terms or condition of this CONSENT AGREEMENT, the Board reserves the right to institute formal disciplinary proceedings against her. Any action initiated by the Board based on alleged violation of this CONSENT AGREEMENT shall comply with the Administrative Procedures Act, Chapter 119, Ohio Revised Code.

This CONSENT AGREEMENT shall be considered a public record as that term is used in Section 149.43, Ohio Revised Code. Further, this information may be reported to appropriate organizations, data banks and governmental bodies. Ms. Gannon acknowledges that her social security number will be used if this information is reported.

Ms. Gannon acknowledges that she has had the opportunity to ask questions concerning the terms of this CONSENT AGREEMENT and that all questions asked have been answered in a satisfactory manner.

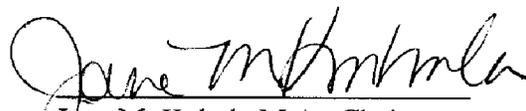
Ms. Gannon understands that this CONSENT AGREEMENT is subject to ratification by the Board prior to the signature of the Chairperson and shall become effective upon the last date of signature below.


Margaret Gannon

Date: 9-26-02

Attorney

Date: _____


Jane M. Kukula M.A., Chair
State Board of Speech-Language
Pathology and Audiology

Date: 10-2-02


Barbara J. Petrella
Assistant Attorney General

Date: 10-2-02