

STATEMENT OF ALLEGATIONS

ASHLI O'LEARY

Registration number #026687

IT IS ALLEGED THAT:

1. At all material times, Ashli O'Leary ("**Ms. O'Leary**") was duly registered with the College of Nursing of New Brunswick (which was at all material times called the Nurses Association of New Brunswick), as a Registered Nurse.
2. At all material times, Ms. O'Leary was employed by the [] ("**the Program**") as a Registered Nurse.
3. From approximately June 1, 2023 to June 3, 2024, Ms. O'Leary committed acts of professional misconduct as defined in subsection 2(1) of the **Nurses Act** in that, while working as a Registered Nurse for the Program, she digressed from established or recognized professional standards or rules of practice of the profession, including but not limited to the **Standards of Practice for Registered Nurses**, the **Standards for Documentation**, the **Standards for the Nurse-Client Relationship**, and the Canadian Nurses Association's 2017 **Code of Ethics for Registered Nurses**, and she engaged in dishonesty and conduct unbecoming a nurse, as provided by subparagraphs 28(1)(a)(ii) and 28(1)(a)(iv) of the **Nurses Act**, in one or more of the following ways:
 - a. Ms. O'Leary falsified records relating to her nursing practice by documenting that she attended numerous in-home patient visits and/or that she made patient telephone calls that she did not attend or make and which in fact did not occur.
 - b. Ms. O'Leary falsified records relating to her nursing practice by documenting that she attended numerous in-home patient visits, when in fact she made telephone calls to these patients and did not attend in-home visits.
 - c. Ms. O'Leary falsified records relating to a total of four hundred and twenty-six (426) in-home patient visits and one hundred eleven (111) patient telephone calls.
 - d. Ms. O'Leary submitted information to the Program misrepresenting that she had attended visits and made calls to patients which she had not attended or made, and she received and accepted payment from the Program for nursing services which she knew she did not provide.
4. Ms. O'Leary failed to practice ethically and with accountability to her clients and to her employer, as required by standard 1 of the **Standards of Practice for Registered Nurses**.

5. Ms. O'Leary failed to practice in accordance with relevant legislation, standards, and employer policies, including the Program's policies, as required by standard 1.2 of the ***Standards of Practice for Registered Nurses***.
6. Ms. O'Leary failed to practice in accordance with the Canadian Nurses Association's 2017 ***Code of Ethics for Registered Nurses***, as required by standard 1.3 of the ***Standards of Practice for Registered Nurses***.
7. Ms. O'Leary failed to exercise reasonable judgment, as required by standard 2.5 of the ***Standards of Practice for Registered Nurses***.
8. Ms. O'Leary failed to maintain accurate and timely documentation, as required by standard 2.9 of the ***Standards of Practice for Registered Nurses*** and standard 2.1 of the ***Standards for Documentation***.
9. Ms. O'Leary failed to demonstrate a professional presence and/or model professional behaviour, as required by standard 3.1 of the ***Standards of Practice for Registered Nurses***.
10. Ms. O'Leary failed to ensure that the nurse-client relationship and nursing strategies were developed for the purpose of promoting the health and well-being of the client and not to meet her own need(s), as required by section 2.10 of the ***Standards for the Nurse-Client Relationship***.
11. Ms. O'Leary failed to document accurate, pertinent, and/or comprehensive information concerning the condition of the client, the client's needs, the nursing interventions, and the associated response, as required by Standard 1 of the ***Standards for Documentation***.
12. Ms. O'Leary failed to accurately document all aspects of the nursing process and/or the nursing care she provided, as required by standard 1.1 of the ***Standards for Documentation***.
13. Ms. O'Leary failed to document the nursing care provided when using virtual and telecommunication technologies, as required by standard 1.12 of the ***Standards for Documentation***.
14. Ms. O'Leary failed to document according to professional and ethical standards and relevant employer policies, including the Program's policies, as required by standard 2 of the ***Standards for Documentation***.
15. Ms. O'Leary failed to document the date and time that care was provided, as required by standard 2.3 of the ***Standards for Documentation***.
16. Ms. O'Leary failed to correct mistaken entries, as required by standard 2.6 of the ***Standards for Documentation***.

17. Ms. O'Leary failed to conduct herself according to ethical responsibilities and practice standards as required by Part 1, section A, item 1 of the Canadian Nurses Association's 2017 **Code of Ethics for Registered Nurses**.
18. Ms. O'Leary failed to practise according to the values and responsibilities in the 2017 **Code of Ethics for Registered Nurses** and in keeping with the professional standards, laws, and regulations supporting ethical practice, as required by Part 1, section G, item 1 of the Canadian Nurses Association's 2017 **Code of Ethics for Registered Nurses**.
19. Ms. O'Leary was dishonest and failed to practice with integrity in all her professional interactions, contrary to Part 1, section G, item 2 of the Canadian Nurses Association's 2017 **Code of Ethics for Registered Nurses**.
20. By falsifying records relating to her nursing practice and receiving and accepting payment from the Program for nursing services which she knew she did not provide, Ms. O'Leary engaged in fraudulent, dishonest, and unethical behaviour.