

PERMANENT VOLUNTARY SURRENDER
SAFFIE DAFFIA
LP54555

Gary N. Hicks, MS, RN, CEN, CNE
President, Maryland Board of Nursing
4140 Patterson Avenue
Baltimore, Maryland 21215-2254

**RE: Permanent Surrender of License to Practice as a Licensed Practical Nurse
License Number LP54555**

Dear Mr. Hicks:

I agree to permanently voluntarily surrender my license to practice as a licensed practical nurse ("LPN") in the State of Maryland, license number LP54555 to the Maryland Board of Nursing (the "Board"). I understand that, as of the effective date of this Permanent Voluntary Surrender, I may not practice as an LPN, with or without compensation, as it is defined in the Maryland Nurse Practice Act (the "Act"), Md. Code Ann., Health Occ. §§ 8-101 *et seq.*, and the Board's regulations, COMAR 10.27.01 *et seq.* In other words, I understand that, as of the effective date of this Permanent Voluntary Surrender, I am in the same position as an unlicensed individual.

I understand that this Permanent Voluntary Surrender shall become a **PUBLIC** record and shall become effective on the date of the Board's acceptance of it. I understand and agree that this letter may be released or published by the Board as a final decision and order under the Public Information Act, Md. Code Ann., Gen. Prov. §§ 4-101 *et seq.* (2014). I expressly consent to the publication of this Permanent Voluntary Surrender, including any and all information that may be protected from disclosure under federal and state law.

My practice was brought to the attention of the Maryland Board of Nursing ("the Board") as follows:

On or about July 21, 2016, I submitted an online Maryland Application for Exam of LPN License ("LPN Application"). On the LPN Application, I indicated that I graduated from an LPN program located in Woodbridge, Virginia (the "LPN School")¹ on June 28, 2013.

¹ On July 21, 2010, the Virginia Board of Nursing approved a Consent Order, signed by the Director, which ordered the LPN School placed on Conditional Provisional Approval. On May 15, 2012, the VA Board approved a Consent Order, signed by the Director, which ordered the withdrawal of approval of the LPN School to operate as a practical nursing education program and further ordered that the LPN School shall cease operations no later than June 30, 2013 and shall not admit any new or transfer students.

DAFFIA, Saffie (LP54555)
Permanent Voluntary Surrender

My Official Transcript from the LPN School signed by the Program Director (“Director”)² indicates that I attended the school from April 16, 2012, to June 18, 2013 and completed a total of 1700 contact hours, including 400 clinical hours in Fundamentals of Nursing, medical-surgical nursing, geriatric nursing, maternity nursing, pediatric nursing, and mental health nursing at several clinical agencies in Virginia and Washington, D.C.

On June 6, 2019, I was issued a Maryland LPN license, which is scheduled to expire on April 28, 2023.

Board investigators verified that none of the clinical agencies identified in the LPN School transcript had a contract with the LPN School to offer clinical training. During my interview with Board investigators I admitted I was currently working as an LPN for an agency.

On March 3, 2022, the Board issued an Order for Summary Suspension of Licensed Practical Nurse License Pursuant to Section 10-226(c)(2) of the Administrative Procedure Act (“Order of Summary Suspension”), which ordered the immediate suspension of my LPN license. After a show cause hearing held on March 23, 2022, the Board issued an Order Continuing the Summary Suspension of Licensed Practical Nurse License on March 23, 2022.

On March 3, 2022, the Board issued a Notice of Agency Action – Charges Under the Maryland Nurse Practice Act (“Charges”), charging my LPN license with violations under:

§ 8-316 (a) *In general.* – Subject to the hearing provisions of § 8-317 of this subtitle, the Board may . . . reprimand any licensee, place any licensee on probation, or suspend or revoke the license of a licensee if the . . . licensee:

- (1) Fraudulently or deceptively obtains or attempts to obtain a license for the applicant or for another;
 - (2) Fraudulently or deceptively uses a license;
 - (25) Engages in conduct that violates the professional code of ethics; *to wit*, Code of Maryland Regulations (“COMAR”) 10.27.19.02
- (B) A nurse may not, when acting in the capacity or identity of a licensed nurse:
- (1) Knowingly participate in or condone dishonesty, fraud, deceit, or misrepresentation;

² On or about July 8, 2021, in the U.S. District Court of Maryland, Director was indicted on charges of Conspiracy to Commit Health Care Fraud; Conspiracy to Commit False Statements Relating to Health Care Matters and False Statements Relating to Health Care Matters. According to the Criminal Complaint, Director conspired with two other individuals and submitted false statements relating to health care matters by working together to sell fraudulent transcripts and diplomas that indicate that various individuals completed necessary courses and clinical hours to obtain nursing degrees and coached these unqualified individuals to pass the nursing board exam.

DAFFIA, Saffie (LP54555)
Permanent Voluntary Surrender

- (30) Violates regulations adopted by the Board or an order from the Board; *to wit,*

COMAR 10.27.01.05

- B. An applicant for the licensed practical nurse licensure examination shall:

- (1) Meet all requirements for a high school diploma or its equivalent and complete satisfactorily and meet all requirements for a diploma from:

- (b) A licensed practical nursing education program in any other state, territory, or country determined by the Board to be substantially equivalent^[3] to the licensed practical nursing education programs approved in this State at the time of the

³ COMAR 10.27.01.01(C) provides: "Substantially equivalent" means a registered nursing or licensed practical nursing education program that:

- (1) Contains theoretical learning experiences and related clinical learning experiences that include direct patient care within various settings consistent with program objectives, outcomes, or competencies conducted either concurrently with or after the theoretical learning experience; and
- (2) Meets the curriculum requirements for Maryland schools of nursing at the time of the applicant's graduation, including, but not limited to:
- (a) The appropriate level of the graduate's intended scope of practice;
- (b) Didactic and clinical learning experiences that are diverse and consistent with program objectives, outcomes, or competencies;
- (c) Didactic and clinical instruction in nursing care of families and clients throughout the life span in a variety of care settings requiring nursing measures appropriate for:
- (i) The maintenance or restoration of mental and physical health;
- (ii) Preventive, rehabilitative, and curative aspects of health care;
- (iii) Biophysical, psychosocial, cultural, and spiritual components of health and illness; and
- (iv) Professional issues content; and
- (d) Didactic and clinical instructional content that includes, but is not limited to, the areas of:
- (i) Medical and surgical nursing;
- (ii) Maternal and child health;
- (iii) Psychiatric nursing; and
- (iv) Geriatric nursing.

DAFFIA, Saffie (LP54555)
Permanent Voluntary Surrender

applicant's graduation[.]

I understand that if an evidentiary hearing were to be held, the Board would have sufficient evidence to find that I violated the above provisions cited in the Charges, to affirm the merits of the Order for Summary Suspension, to conclude as a matter of law that I violated the Act, and to sanction my license accordingly pursuant to § 8-316. Thus, it is my wish to surrender my Maryland LPN license at this time.

In executing this agreement to permanently surrender my LPN license to the Board, I wish to make it clear that I have voluntarily, knowingly, and freely chosen to submit this Permanent Voluntary Surrender. I understand that, by executing this Permanent Voluntary Surrender, I am waiving the right, now and in the future, to any evidentiary hearing at which I would have the right to counsel, to confront witnesses, to give testimony, to call witnesses on my own behalf, and to all other substantive and procedural protections provided by law, including the right to appeal.

In executing this agreement to permanently surrender my LPN license, I agree that I will never be eligible for reinstatement of my LPN license, license number LP5455, in the State of Maryland. I agree and understand that if I ever decide to re-apply for licensure as an LPN in Maryland, I will approach the Board in the same posture as an unlicensed individual applying for initial licensure. I understand that it will be my burden, as an applicant for licensure, to demonstrate that I meet all the Board's requirements for issuance of an initial license that exist at the time I apply and that I am fit for licensure in Maryland.

I agree and understand that, in considering whether to grant any future application for licensure, the Board may review my entire Board file, including this Voluntary Surrender and any information that the Board receives after execution of this document, and require me to undergo medical, psychological, and/or psychiatric evaluations and drug and alcohol to determine my fitness to have a license. I further agree and understand that, if I submit an application for licensure, the Board would have sufficient evidence to find that I have violated Health Occ. § 8-316(a)(3) ("Is disciplined by a licensing . . . authority in this state . . . for an act that would be grounds for disciplinary action under the Board's disciplinary statutes") on the basis of this Voluntary Surrender, and may exercise its discretion to deny my application, grant my application without discipline, or grant my application with discipline, including, but not limited to, probation with terms and conditions. I understand that the Board is not required to grant a new license to me.

DAFFIA, Saffie (LP54555)
Permanent Voluntary Surrender

I acknowledge that I may not rescind this Permanent Voluntary Surrender in part or in its entirety for any reason whatsoever. I understand the nature and effect of both the Board's actions and this Permanent Voluntary Surrender fully. Finally, I wish to make clear that I have had an opportunity to discuss this matter with legal counsel and that I willingly, knowingly, and voluntarily sign this Permanent Voluntary Surrender.

Sincerely,

Saffie Daffia 6/10/2022
Saffie Daffia, LP54555 Date

NOTARIZATION

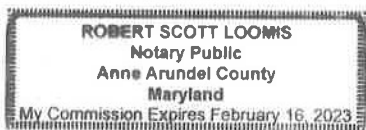
CITY: CANTON

COUNTY: PRINCE GEORGES

I HEREBY CERTIFY that on this 10TH day of JUNE 2022, before me, Notary Public of the State and City/County aforesaid, **Saffie Daffia** personally appeared and made oath in due form of law that signing the foregoing Permanent Voluntary Surrender was the voluntary act and deed of **Saffie Daffia**.

AS WITNESSETH my hand and notarial seal.

SEAL



[Signature]
Notary Public

My Commission Expires: 02/16/2023

DAFFIA, Saffie (LP54555)
Permanent Voluntary Surrender

ACCEPTANCE

ON BEHALF OF THE MARYLAND BOARD OF NURSING, on this 21st day of June, 2022, I accept **Saffie Daffia's** public Permanent Voluntary Surrender of her license to practice as a licensed practical nurse in the State of Maryland, license number LP54555.

6/21/2022
Date

G
Pr
M
Gary N. Hicks, MS, RN, CEN, CNE
The Board President's Signature
Appears on the Original Document