

COMMONWEALTH OF MASSACHUSETTS

SUFFOLK COUNTY

BOARD OF REGISTRATION  
IN PHARMACY

In the Matter of )  
Lynsey Plummer )  
PH234995 )  
Expired: 12/31/2020 )

PHA-2021-0104

**CONSENT AGREEMENT FOR REPRIMAND**

The Massachusetts Board of Registration in Pharmacy ("Board") and Lynsey Plummer ("Licensee"), a pharmacist licensed by the Board, license number PH234995, do hereby stipulate and agree that the following information shall be entered into and become a permanent part of the Licensee's record maintained by the Board:

1. The Licensee acknowledges that the Board opened a Complaint against her Massachusetts pharmacist license related to the conduct set forth in Paragraph 2, identified as Docket Number PHA-2021-0104 ("Complaint").
2. The Licensee and the Board agree to resolve this Complaint without making any admissions or findings and without proceeding to a formal adjudicatory hearing. The Complaint alleges the following:
  - a. On or about July, 13, 2021, Licensee self-reported her failure to complete her continuing education requirements for 2019 and 2020, in violation of Board of Registration in Pharmacy (BORP) Policy 2020-10: Pharmacist Continuing Education (CE) Requirements.
  - b. On or about July 21, 2021, Licensee detailed in an email response to Board investigator Christina Mogni that she administered and/or oversaw the administration of immunizations in 2019 and 2020 while participating as an authorized pharmacist pursuant to a collaborative practice agreement during this time, in violation of BORP Policy 2020-10.
  - c. From August 2021 through September 2021, Licensee did not respond to investigator's Mogni's requests for additional information regarding Licensee's completed CE courses and her collaborative practice agreement for 2019 and 2020.

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- d. Licensee completed 0 hours of Continuing Education Units (CEUs) for 2019 and 0 hours of CEUs for 2020.
  - e. On or about January 6, 2022, the Board authorized Board counsel to temporarily resolve the matter with a Voluntary Agreement Not To Practice until such time that the Licensee could appear before the Board and speak on the Complaint.
  - f. On or about August 15, 2022, Board Counsel sent a letter to her address of record, informing the Licensee of the Board's vote and asking her to resume contact.
  - g. On or about October 20, 2022, Board Counsel sent a second copy of the aforementioned letter to the most recent address of the Licensee that could be ascertained.
  - h. Licensee provided no response by the time of the Board's meeting on March 2, 2023.
3. The Licensee acknowledges there are sufficient facts in the Complaint from which the Board could reasonably find grounds for discipline under M.G.L. c. 112, §§ 42A and 61 and under 247 CMR 10.03(a) & (q).
4. The Licensee agrees that the Board shall impose a REPRIMAND on her license based on the facts admitted in Paragraph 2, effective as of the date on which the Board signs this Agreement ("Effective Date").
5. The Licensee understands that she has a right to formal adjudicatory hearing concerning the Complaint and that during said adjudication she would possess the right to confront and cross-examine witnesses, to call witnesses, to present evidence, to testify on her own behalf, to contest the allegations, to present oral argument, to appeal to the courts, and all other rights as set forth in the Massachusetts Administrative Procedures Act, M.G.L. c. 30A, and the Standard Adjudicatory Rules of Practice and Procedure, 801 CMR 1.01 *et seq.* The Licensee further understands that by executing this Agreement she is knowingly and voluntarily waiving her right to a formal adjudication of the Complaint.
6. The Licensee acknowledges that she has been at all times free to seek and use legal counsel in connection with the Complaint and this Agreement.
7. The Licensee acknowledges that after the Effective Date, the Agreement constitutes a public record of disciplinary action by the Board subject to the Commonwealth of Massachusetts' Public Records Law, M.G.L. c. 4, § 7. The Board may forward a copy of this Agreement to other licensing boards, law

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enforcement entities, and other individuals or entities as required or permitted by law.

8. The Licensee certifies that she has read this Agreement. The Licensee understands and agrees that entering into this Agreement is a voluntary and final act and not subject to reconsideration, appeal or judicial review.

Joy Zinnella 10/17/23  
Witness (sign and date)

Lynsey Plummer 10-17-23  
Lynsey Plummer (sign and date)

11/6/23

David Sencabaugh

Effective Date of Reprimand Agreement

David Sencabaugh, R. Ph.  
Executive Director  
Board of Registration in Pharmacy

Fully Signed Agreement Sent to Registrant on 11/6/23 by  
Certified Mail No. 7022 3330 0001 0812 7722

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