

**Louisiana Licensed Professional
Counselors Board of Examiners**

IN THE MATTER OF

COMPLAINT NUMBER 10/11-27

HOLLY RICHARDSON, CI

REGISTRATION NO: CI3817

CONSENT AGREEMENT AND ORDER

WHEREAS, Holly Richardson is a Counselor Intern (CI) subject to the jurisdiction and rules and regulations of the Louisiana Mental Health Counselor Licensing Act (La. R.S. 37:1101, et seq.), the Code of Conduct for Licensed Professional Counselors (LAC 46:LX §2101, et seq.), and the rules regarding disciplinary proceedings (LAC 46:LX § 1301-1325); and:

WHEREAS, pursuant to a complaint and administrative investigation, the CI, Holly Richardson, has indicated her desire to resolve this matter through a Consent Agreement and Order as provided for in LAC 46:LX § 1311, LAC 46:LX § 3907, and La. R.S. 49:955(D) of the Louisiana Administrative Procedure Act; and

WHEREAS, the CI, Holly Richardson, has admitted the following:

1. Ms. Richardson is and at all times pertinent to the facts and matters alleged herein a Counselor Intern registered with the LPC Board to engage in the practice of mental health counseling in the State of Louisiana, as evidenced by registration number CI3817.
2. At all times pertinent to the facts of this case, Ms. Richardson was actively engaged in the practice of professional counseling at Allen's Consultation and

Training, Inc. in Baton Rouge, Louisiana and Fidelity First Health Care Service in Baton Rouge, Louisiana.

3. Ms. Richardson provided inaccurate timesheets for false services rendered with the knowledge that this documentation would be used to submit false and fraudulent claims with Medicaid.
4. Ms. Richardson admits that her actions were in violation of La. R.S. 33:1110(A)(3),(9) and LAC 46:LX § 2103(A)(1)(E)(1), LAC 46:LX § 2107(A)(1)(a)(A)(2)(e), LAC 46:LX § 2103(A)(1)(E)(1)(A)(6)(d), LAC 46:LX § 2113(A)(8)(a) and LAC 46:LX § 2117(A).

WHEREAS, Ms. Richardson has indicated her desire to resolve this matter through a Consent Agreement and Order;

WHEREAS, the undersigned Assistant Attorney General has conducted an interview with Ms. Richardson who has indicated her desire to resolve this matter through a Consent Agreement and Order;

WHEREAS, the Respondent, Ms. Richardson, agrees not to repeat the misconduct mentioned in this Consent Agreement and Order, and acknowledges that any further misconduct mentioned in this Consent Agreement and Order will be considered a violation of the terms of this Consent Agreement and Order and cause for further disciplinary action.

IT IS HEREBY ORDERED that in consideration of the foregoing and pursuant to the authority vested in the LPC Board by La. R.S. 49:955(D), the LPC Board orders and Ms. Richardson accepts the following administrative action which is a final decision pursuant to La. R.S. 49:958:

1. Ms. Richardson's CI registration will be suspended for a period of one (1) year from the date that all parties sign this Consent Agreement and Order.
2. Ms. Richardson will be actively supervised by a Board-Approved LPC Supervisor with monthly reports submitted to the LPC Board from the supervisor for a period of two (2) years should she desire to resume practice as a CI after her one (1) year suspension.
3. In courses approved by the LPC Board in advance, Ms. Richardson shall complete a total of nine (9) CEHs, six (6) hours on the subject of ethics, three (3) hours on the subject of documentation and billing practices, within two (2) years from the date all parties sign this Consent Agreement and Order.
4. Ms. Richardson shall pay investigative and legal costs associated with Complaint 10/11-27 in the amount of \$660.00¹ within two (2) years from the date that all parties sign this Consent Agreement and Order. The payments shall be made on a quarterly basis with the first payment due within thirty (30) days from the date that all parties sign this Consent Agreement and Order. There shall be no pre-payment penalty.
5. Ms. Richardson shall pay a fine as authorized by La. R.S. 37:1106(D) for the above referenced violations in the amount of five hundred dollars (\$500.00) within two (2) years from the date that all parties sign this Consent Agreement and Order.² The payments shall be made on a quarterly basis with the first payment due within

¹ The legal costs in this Consent Agreement and Order could increase depending upon the additional time required to resolve this matter. A more accurate assessment of costs will be provided at such time the licensee is prepared to accept this Consent Agreement and Order.

² Installment payments by certified check, money order, or credit card are allowable.

thirty (30) days from the date that all parties sign this Consent Agreement and Order. There shall be no pre-payment penalty.

6. Ms. Richardson specifically acknowledges that failure to comply with the terms of the Consent Agreement and Order may result in further disciplinary action taken by the LPC Board. The admissions contained herein, will be considered proven and the only issue will be failure to follow the terms of the Consent Agreement and Order.
7. By agreeing to the terms of this Consent Agreement and Order, Ms. Richardson waives all rights to appeal this adjudication.

THIS CONSENT AGREEMENT AND ORDER shall take effect immediately upon adoption by the LPC Board and are a matter of public record. The terms of this Consent Agreement and Order may be published and reported in, including but not limited to, the LPC Board Newsletter, the National Board for Certified Counselors, and the National Practitioner Data Bank (NPDB).

THE ADMISSIONS AND FINDINGS CONTAINED HEREIN are intended solely for the purpose of resolving the case at hand or in connection with other matters before the LPC Board involving Respondent.

ORDER

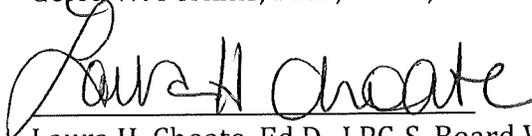
The Louisiana Licensed Professional Counselors Board of Examiners, having examined the Consent Agreement and Order, Case No. CI 10/11-27, adopt the Consent Agreement and Order in this matter on November 21st, 2014.

DATED this 21st day of November, 2014, at Baton Rouge, Louisiana.

LOUISIANA LICENSED PROFESSIONAL COUNSELORS BOARD
OF EXAMINERS



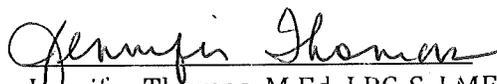
Gerra W. Perkins, Ph.D, LPC-S, Board Chair



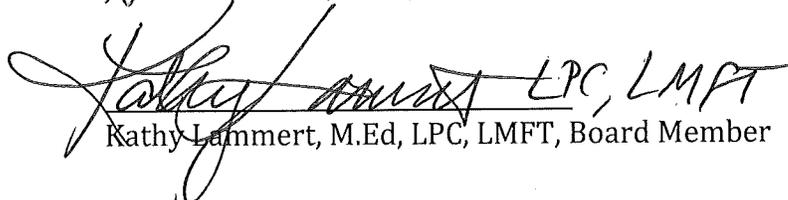
Laura H. Choate, Ed.D., LPC-S, Board Vice Chair



Penny Millhollon, MA, LPC, LMFT, Board Secretary



Jennifer Thomas, M.Ed, LPC-S, LMFT-S, Board Member

 LPC, LMFT

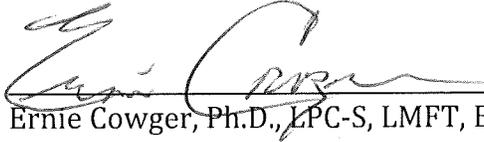
Kathy Lammert, M.Ed, LPC, LMFT, Board Member



Kathryn Steele, Ph.D., LPC-S, LMFT-S, MFTAC, Board Member

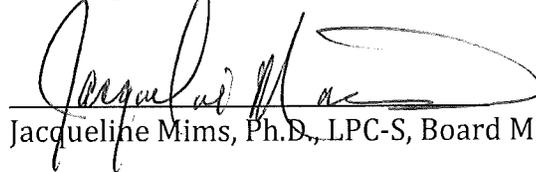


David Legendre, Ph.D., LPC, LMFT, MFTAC, Board Member



Ernie Cowger, Ph.D., LPC-S, LMFT, Board Member

Earl Augustine, Member-at-Large, Board Member



Jacqueline Mims, Ph.D., LPC-S, Board Member

I, Jessica Thornhill, Assistant Attorney General serving as Prosecutor, do hereby acknowledge negotiation and preparation of this Consent Agreement and Order in order to resolve, with prejudice, all matters for which Holly Richardson, CI, could be charged under CI 10/11-27; and further certify that this Consent Agreement and Order is consistent with the evidence, adequately addresses the complaint and represents a true and correct statement of that which could be proven at a hearing of this matter.


Assistant Attorney General

10/10/14
Date

I, Holly S. Richardson, CI, make these acknowledgments and waivers in support of a final disposition of the pending investigation of CI 10/11-27 by Consent Agreement and Order ("Order") pursuant to La. R.S. 49:955(D), in lieu of the institution and prosecution of formal administrative proceedings, and accordingly consent to the entirety of the Order set forth hereinbefore and further waive any right to which I may be entitled under the Louisiana Administrative Procedure Act or any other law to contest, in any court, my agreement to this Order. By my subscription hereto, I also hereby authorize the Assistant Attorney General to present this Order to the LPC Board for its consideration and to disclose to and discuss with the LPC Board the nature and results of the investigation of this matter. I herein waive any objection to such disclosure based on due process of law under either the State or Federal Constitution or under State statutory law, including La. R.S. 49:960. I expressly acknowledge that the

disclosure of such information to the LPC Board shall be without prejudice to the Assistant Attorney General's authority to file a formal Administrative Complaint, or the LPC Board's capacity to adjudicate such Administrative Complaint, should the LPC Board decline to approve this Consent Agreement and Order. I further acknowledge my awareness that should the LPC Board approve this Consent Agreement and Order that the Order will become a matter of public record.

Holly Richardson CI
Holly Richardson, CI

10/23/14
Date

I, Holly Richardson, CI, have read the Consent Agreement and Order, understand it, and agree to be bound by its terms and conditions.

DATED: 10/23/14

Holly Richardson
CI NAME

SUBSCRIBED AND SWORN TO before me this 23 day of Oct., 2014, at Baton Rouge, Louisiana.

**DOCUMENT NOT PREPARED
BY NOTARY PUBLIC**

Catherine Harrison

Notary Public

Print Name:

My commission expires:

STATE OF LOUISIANA
NOTARY PUBLIC
COMMISSIONED FOR LIFE

**Notary liable for
Notarization ONLY**