

BEFORE THE
BOARD OF NATUROPATHIC MEDICINE
STATE OF OREGON

In the Matter of the License of
STEFANI K. HAYES, N.D.,

Licensee.

Case No. N15-09-216, N16-03-06

CONSENT ORDER

The Board of Naturopathic Medicine (Board) is the state agency responsible for licensing, regulating and disciplining naturopathic physicians in the State of Oregon. Stefani K. Hayes, N.D., (Licensee) is a licensed naturopathic physician in Oregon, and is subject to the jurisdiction of the Board.

The Board issued a Notice of Proposed Disciplinary Action to Licensee on or about October 19, 2016. Licensee was provided the opportunity to request a hearing on the Notice. In lieu thereof, the parties wish to resolve this matter informally, without any hearing, appeal or judicial review, by entering this Settlement Agreement and Consent Order, pursuant to ORS 183.417(3) on the terms set forth below.

SETTLEMENT AGREEMENT

1. The Board and Licensee stipulate to the following:
2. Licensee agrees the Board may enter the Consent Order set forth below.
3. Licensee enters into this Settlement Agreement and Consent Order voluntarily and without any force or duress. Licensee states that the Board and Board staff have not made promises or representations not stated herein to induce her to sign this document and agree to issuance of the Order.
4. Licensee acknowledges that she has had the opportunity to seek the advice of legal counsel. Licensee further acknowledges that she understands and agrees to the terms of this Order.
5. Licensee understands that she has the right to a contested case hearing under the Administrative Procedures Act (ORS Chapter 183), and fully and finally waives any and all right to a hearing and any rights to appeal or otherwise challenge this Settlement Agreement and Consent Order.

6. The parties acknowledge that this Settlement Agreement and Consent Order is a public document.
7. This Settlement Agreement and Consent Order shall take effect on the date it is signed by the Board.

IT IS SO STIPULATED.

Signature on file
Stefan K. Hayes, N.D. Date 4/18/17

CONSENT ORDER

The Board issues the following final order:

1. Licensee shall be assessed civil penalties in the total amount of twenty five thousand dollars (\$25,000).
 - a. The Board suspends payment of \$12,500 of these civil penalties, provided Licensee abides by the terms of this Settlement Agreement and Consent Order, ORS Chapter 685 and the administrative rules adopted by the Board in OAR Chapter 850. If Licensee fails to comply with this Settlement Agreement and Consent Order, the Board may assess all or a portion of the suspended penalties.
 - b. The non-suspended portion of the civil penalty, in the amount of \$12,500, is payable by licensee to the Board in monthly installments over the four year period of the probation.
 - c. If Licensee complies with the terms of this Settlement Agreement and Consent Order, then the suspended civil penalty in the amount of \$12,500 shall be waived.
2. Licensee agrees to a four year period of probation commencing the date this Consent Order is signed by the Board. Successful termination of the probation period will be conditioned upon Licensee's compliance with the statutes, rules, and orders of the Board throughout those four years.

3. Not less than 180 days from the date the Board approves this Consent Order, Licensee must complete 20 hours of in-person, Board-approved continuing education or training and report to the Board following this continuing education regarding what Licensee learned. In anticipation of this agreement, Licensee has already completed both the Board-approved continuing education and training and the report to the board. This portion of the Consent Order is therefore complete.
4. Licensee shall comply with the statutes, rules and orders of the Board.
5. Licensee's failure to comply with any term of this order, ORS chapter 685 or OAR chapter 850 shall be grounds for additional discipline by the Board.

DATED this 18 day of April 2017.

BOARD OF NATUROPATHIC MEDICINE
State of Oregon

Signature on file

Mary Beth Baptista, Executive Director