

BEFORE THE PHARMACY BOARD OF THE STATE OF IOWA

IN THE MATTER OF

**JEAN MOFFETT
1955 Henley Avenue
Independence, IA 50644**

RESPONDENT

CASE NO.: 2024-0076

**COMBINED STATEMENT OF
CHARGES, SETTLEMENT
AGREEMENT, AND FINAL ORDER**

COME NOW the Iowa Board of Pharmacy (“Board”) and Jean Moffett (“Respondent”) and enter into this Combined Statement of Charges, Settlement Agreement, and Final Order (“Order”) pursuant to Iowa Code sections 17A.10(2), 272C.3(4), and 272C.10 and 657 IAC 35.24.

A. BACKGROUND

1. **Iowa Registration.** Respondent was issued Iowa pharmacy technician registration 2762 most recently on February 7, 2024. Respondent’s Iowa pharmacy technician registration is active and will next expire on February 28, 2026.
2. **Practice Setting.** Respondent was an Iowa-registered pharmacy technician practicing in Independence, Iowa, during the time period relevant to these allegations.
3. **Jurisdiction.** The Board has jurisdiction in this matter pursuant to Iowa Code § 155A.
4. **Stipulated Facts.** On or about the date of February 16, 2024, Respondent processed a prescription of methotrexate for a minor patient with the incorrect strength and incorrect directions.

B. STATEMENT OF CHARGES

COUNT I

5. Respondent is charged under 657 Iowa Administrative Code 36.6(41) with dispensing an

incorrect prescription, which includes but is not limited to, the incorrect drug, the incorrect strength, the incorrect patient or prescriber, or the incorrect or incomplete directions.

C. SETTLEMENT AGREEMENT

6. Respondent acknowledges the Stipulated Facts in the Background section, if proven in a contested case hearing, would constitute grounds for the discipline agreed to in this Order.

7. In order to resolve this matter without proceeding to hearing, Respondent agrees to the following terms and conditions:

a. Completion of the continuing education program from RxCE entitled “The Pharmacy Technician Code of Ethics: Upholding a Higher standard of Practice.”

b. Any documentation required to be submitted to the Board pursuant to this Order shall be sent to the Iowa Board of Pharmacy, Attn: Amanda Woltz, 6200 Park Avenue, Suite 100, Des Moines IA 50321 or by email as appropriate to amanda.woltz@iowa.gov.

8. In accepting this Settlement Agreement, Respondent acknowledges the following:

a. This Combined Statement of Charges, Settlement Agreement, and Final Order is subject to the approval of the Board and will have no force or effect if it is not accepted by the Board.

b. Counsel for the State will present this Combined Statement of Charges, Settlement Agreement, and Final Order to the Board *ex parte*.

c. I have the right to be represented by counsel in this matter.

d. I understand I have an opportunity to be heard and to contest the allegations against me in a formal hearing before the Board and that by waiving the formal hearing, I waive my right to challenge the allegations against me and all attendant rights, including

the right to seek judicial review of the Board's actions.

e. I waive my ability to review the investigative file in this case.

f. I understand this Combined Statement of Charges, Settlement Agreement, and Final Order will be part of my permanent licensure file and may be considered by the Board in determining the nature and severity of any disciplinary action to be imposed in the event of any future violations.

g. I am voluntarily entering into this Combined Statement of Charges, Settlement Agreement, and Final Order.

h. Failure to comply with the provisions of this Combined Statement of Charges, Settlement Agreement, and Final Order shall be grounds for further disciplinary action pursuant to Iowa Code § 272C.3(2)(a).

i. Respondent understands and acknowledges the Board will report this Order to the National Association of Boards of Pharmacy (NABP) Clearinghouse. The report to the Clearinghouse will reflect the language included in this Order.

12. This Combined Statement of Charges, Settlement Agreement, and Final Order constitutes discipline against Respondent and is the final agency action in a contested case pursuant to Iowa Code section 17A.10.

13. This Combined Statement of Charges, Settlement Agreement, and Final Order shall not preclude the Board from taking additional action against Respondent should Respondent violate laws, rules, or standards of practice administered by the Board in the future.

14. This Combined Statement of Charges, Settlement Agreement, and Final Order becomes a public record available for inspection and copying upon execution in accordance with the

requirements of Iowa Code Chapters 17A, 22, and 272C.

15. The Board's approval of this Order shall constitute a **Final Order** of the Board.

D. FINAL ORDER

IT IS THEREFORE ORDERED:

Pursuant to this Settlement Agreement, Respondent is:

- 1) **Cited and Warned.** Respondent is **cited** for processing an incorrect prescription and **warned** that future violations of the rules governing pharmacy technicians will result in further action.
- 2) **Required to Complete the Continuing Education Program:** No later than July 21, 2024, the Respondent shall complete the continuing education program by RxCE. Information regarding this program can be located [here](#).
- 3) **Compliance with laws and rules.** Respondent shall abide by all state and federal laws and regulations governing the practice of pharmacy.

FOR THE RESPONDENT:

Voluntarily agreed to and accepted by Jean Moffett on this 9th day of September, 2024.


By: Jean Moffett, Respondent

State of IOWA)

County of BUCHANAN)

Signed and sworn to before me on this 9th day of September, 2024, by:



Kaylee Cox
Notary Public, State of IOWA
Printed Name: Kaylee Cox
My Commission Expires: 9/29/2026

FOR THE IOWA BOARD OF PHARMACY:

Voluntarily agreed to and accepted by the **IOWA BOARD OF PHARMACY** on this
____10th____ day of _____September_____, 2024.

Kathryn Stone

Chairperson
Iowa Board of Pharmacy