

BEFORE THE ALABAMA STATE BOARD OF SOCIAL WORK EXAMINERS

IN THE MATTER OF THE COMPLAINT)

AGAINST CAROLINE VICKERS) Case No.: 12-0007B-14

Respondent)

COMPLAINT

Upon consideration of the allegations set forth in this Complaint, the Complainant herein, the Investigative Committee of the Alabama State Board of Social Worker Examiners, (the "Board"), submits there is sufficient merit in such allegations to warrant the filing of this formal Complaint and alleges as follows:

I.

Respondent, CAROLINE VICKERS, heretofore had been duly issued a license to practice as a social worker by the Board and, at all times relevant to this Complaint, was licensed to practice as a social worker in Alabama under a license.

II.

Since the issuance of such license, Respondent, CAROLINE VICKERS, has committed acts in violation of the Code of Ethics and/or the Administrative Code provisions governing the practice of social work in the State of Alabama, to wit:

1. While licensed by the Board to practice social work as a Licensed Bachelor Social Worker, CAROLINE VICKERS reported to work at St. Vincent's Health System under the influence.

2. On September 11, 2012 CAROLINE VICKERS resigned her position with St. Vincent's Health System while charges were pending including reporting for work under the influence of alcohol.

COUNT

1. The allegations contained in this Complaint violate the Alabama State Board of Social Worker Examiner's Administrative Code § 850- X-9-.01-(b)-4, which states that the social worker whose personal problems, psychosocial distress, substance abuse, or mental health difficulties interfere with professional judgment and performance should immediately seek consultation and take appropriate remedial action by seeking professional help, making adjustments in workload, terminating practice, or taking any steps necessary to protect clients and others.

WHEREFORE, these PREMISES CONSIDERED, the Complainant, the Investigative Committee of the Board, submits that Probable Cause exists to file this formal Complaint.

Done this ____ day of _____, 2012.

ALABAMA STATE BOARD OF
SOCIAL WORK EXAMINERS

BY-

REBECCA GOODSON
EXECUTIVE DIRECTOR

Rebecca Goodson
Executive Director
AL BD of Social Work Examiners
334/242-5860 or 1-888-879-3672
www.socialwork.alabama.gov

Address of Attorney for the Board:

Ellen Leonard
Assistant Attorney General
11 South Union Street
Montgomery, AL 36130
(334) 242-7371
(334) 242-2433 (Fax)

BEFORE THE ALABAMA STATE BOARD OF SOCIAL WORK EXAMINERS

IN THE MATTER OF THE COMPLAINT)
AGAINST)
CAROLINE VICKERS,)
Respondent)
_____)

CASE NO.: 12-0007B-14

AGREEMENT TO INFORMAL SETTLEMENT OF VIOLATIONS

WHEREAS, the Disciplinary Investigative Committee (Committee) of the Alabama State Board of Social Work Examiners (Board) has investigated a complaint of a violation of the Respondent CAROLINE VICKERS and has determined that probable cause exists to warrant filing formal charges against the Respondent CAROLINE VICKERS for having violated rules of the Board, and

WHEREAS, Respondent CAROLINE VICKERS has been notified of the Complaint and alleged violations, the Committee's determination of probable cause, and the right to have a formal hearing before the Board on the alleged violations, and

WHEREAS, Respondent having been notified of the alleged violations and the Committee's determination of probable cause, the right to a formal hearing before the Board on the alleged violations, waives her right to a formal hearing and requests an informal disposition of the alleged violations presently pending before the Alabama State Board of Social Work Examiners, and

WHEREAS, the Respondent has agreed to an informal disposition of the alleged violations, and in consideration of the Committee's promise to informally dispose of the violations, the Respondent agrees to the following:

- (1) A reprimand for unprofessional conduct. Complete two years of attendance to Alcoholics Anonymous or similar program. Your sponsor or other appropriate representative shall submit quarterly letters to the board verifying your attendance. Failure to comply with these terms will result in automatic suspension of your license.
- (2) By agreeing to have the violations informally discharged by the Committee, Respondent does not admit to the truth of the allegations contained in the Administrative Complaint; however, the Respondent waives her right to a formal hearing before the full Board.
- (3) This agreement applies only to the present allegations, and has no bearing on any future complaints or allegations.
- (4) Nothing in this Agreement is intended to circumvent the law, statutes, or Administrative Code of the Alabama State Board of Social Work Examiners.
- (5) The Board is required to report all disciplinary measures imposed, formally or informally, and that the Board has no authority to waive this requirement.

- (6) The disciplinary infractions will be reported by the Board as unprofessional conduct in violation of the *Administrative Code § 850- X-9-.01-(b)-4*
- (7) In the event that the Investigative Committee has probable cause to determine that Respondent has violated any term of this Agreement, the Agreement is rescinded, and this cause will be set for an Administrative Hearing before the full Board.
- (8) This Agreement is and shall be deemed as a public record. In consideration of the Respondent's acceptance of the above-listed disciplinary measures and acknowledgment of a violation of the Committee, on behalf of the Board, agrees that the Board agrees not to actively pursue the prosecution of the Administrative Violations.
- (9) This Agreement must be approved by the Alabama State Board of Social Work Examiners Board. The Respondent agrees to waive any objections, if a hearing is required later, to the Board receiving enough information about this case to approve this settlement.

IT IS STIPULATED AND AGREED by the Respondent and the Committee that the above-stated terms represent the complete agreement, and that this Agreement is binding once it has been signed by both parties, and that if any term is illegal or unconstitutional, the agreement becomes void.

SIGNED, this _____ day of _____ 2013

CAROLINE VICKERS
Respondent

Rebecca Goodson
Executive Director