BEFORE THE BOARD OF SOCIAL WORK
OF THE STATE OF IOWA

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| IN THE MATTER OF | ) | NO. 08-034 |
| | ) | |
| FARRAH BONDE, | ) | NOTICE OF HEARING |
| | ) | AND STATEMENT OF CHARGES |
| RESPONDENT. | ) | |

**COMES NOW** the Iowa Board of Social Work (Board) and files this Notice of Hearing and Statement of Charges pursuant to Iowa Code sections 17A.12(2), 17A.18(3), and 645 Iowa Administrative Code (IAC) 11.6. Respondent was issued Iowa license 06346 on May 10, 2004. Respondent's license to practice as an independent level social worker in Iowa is active and will next expire on December 31, 2012.

Respondent's address as reported to the Board is 1754 5th Street, Coralville, Iowa 52241.

**A. TIME, PLACE AND NATURE OF HEARING**

Hearing. A disciplinary contested case hearing shall be held on November 14, 2011, before the Board of Social Work. The hearing shall begin at 9 a.m. and shall be located in the Lucas State Office Building, Fifth Floor Board Room #526, Des Moines, Iowa.

Answer. Within twenty (20) days of the date you are served this Notice of Hearing and Statement of Charges you are required by 645 IAC 11.12 to file an Answer. The Answer should specifically admit, deny, or otherwise answer all allegations contained in sections C and D of this Notice of Hearing and Statement of Charges. Pleadings shall be filed with the Board at the following address: Iowa Board

of Social Work, Lucas State Office Building–5th Floor, 321 E. 12th St., Des Moines, Iowa, 50319.

Presiding Officer. The Board shall serve as presiding officer, but the Board may request an Administrative Law Judge make initial rulings on pre-hearing matters, and be present to assist and advise the board at hearing.

Hearing Procedures. The procedural rules governing the conduct of the hearing are found at 641 IAC chapter 11. At hearing, you may appear personally or be represented by legal counsel at your own expense. You will be allowed the opportunity to respond to the charges against you, to produce evidence on your behalf on issues of material fact, cross-examine witnesses present at the hearing, and examine and respond to any documents introduced at hearing. If you need to request an alternative time or date for hearing, you must comply with the requirements of 645 IAC 11.18. The hearing may be open to the public or closed to the public at your discretion.

Pre-hearing Conference. Any party may request a pre-hearing conference to discuss evidentiary issues related to the hearing. The Board's rules regarding pre-hearing conferences are contained at 645 IAC 11.17.

Prosecution. The Office of the Attorney General is responsible for representing the public interest (the State) in this proceeding. Copies of pleadings should be provided to counsel for the State at the following address: Sara Scott, Assistant Attorney General, Iowa Attorney General's Office, 2nd Floor, Hoover State Office Building, Des Moines, Iowa 50319.

Communications. You may not contact board members in any manner, including by phone, letter, or e-mail, about this Notice of Hearing and Statement of Charges. Board members may only receive information about the case when all parties have notice and an opportunity to participate, such as at the hearing or in pleadings you file with the Board office and serve upon all parties in the case.

## B. LEGAL AUTHORITY AND JURISDICTION

Jurisdiction. The Board has jurisdiction in this matter pursuant to Iowa Code Chapters 147, Chapter 154C, and 272C.

Legal Authority. If any of the allegations against you are founded, the Board has authority to take disciplinary action against you under Iowa Code Chapters 17A, 147, 154C, and 272C and 645 IAC Chapter 283.

Default. If you fail to appear at the hearing, the Board may enter a default decision or proceed with the hearing and render a decision in your absence, in accordance with Iowa Code Section 17A.12(3) and 645 IAC 11.21.

## C. SECTIONS OF STATUTES AND RULES INVOLVED

Count I

Pursuant to Iowa Administrative Code 645—282.2(7)(a) and (f), Respondent is charged with improper billing and failure to establish and maintain billing practices that accurately reflect the nature and extent of services provided.

Count II

Pursuant to Iowa Administrative Code 645—283.2(8), Respondent is charged with falsification of client records.

Count III

Pursuant to Iowa Administrative Code 645—283.2(3), Respondent is charged with knowingly making misleading, deceptive, untrue or fraudulent representations in the practice of social work.

Count IV

Pursuant to Iowa Administrative Code 645—283.2(12), Respondent is charged with violation of a regulation, rule, or law of this state which relates to the practice of social work, including, but not limited to, the rules of conduct found in 645—282.2.

## D. FACTUAL CIRCUMSTANCES

1. Respondent was employed at an agency in Iowa City from approximately 2005 to 2008.

2. From approximately June 2006 to February 2007, Respondent billed and/or instructed others to bill for services that were not rendered, utilizing billing codes that were not representative of actual therapy time spent.

3. From approximately June 2006 to February 2007, Respondent recorded and/or instructed others to record false times for individual therapy sessions.

## E. SETTLEMENT

This matter may be resolved by settlement agreement. The procedural rules governing the Board's settlement process are found at 645 IAC chapter 12. If you are interested in pursuing settlement of this matter, please contact Sara Scott, Assistant Attorney General, at 515/242-0104.

## F. PROBABLE CAUSE FINDING

On August 8, 2011, the Iowa Board of Social Work found probable cause to file this Notice of Hearing and Statement of Charges. Signed this 8th day of August, 2011.