



SUPERINTENDENT OF PUBLIC INSTRUCTION

Chris Reykdal Old Capitol Building · PO BOX 47200 · Olympia, WA 98504-7200 · <http://www.k12.wa.us>

RE: Pamela Willoughby
OSPI Case Number: D15-11-094
Document: Agreed Order of Suspension

Regarding your request for information about the above-named educator; attached is a true and correct copy of the document on file with the State of Washington, Office of Superintendent of Public Instruction, Office of Professional Practices. These records are considered certified by the Office of Superintendent of Public Instruction.

Certain information may have been redacted pursuant to Washington state laws. While those laws require that most records be disclosed on request, they also state that certain information should not be disclosed.

The following information has been withheld: **None**

If you have any questions or need additional information regarding the information that was redacted, if any, please contact:

OSPI Public Records Office
P.O. Box 47200
Olympia, WA 98504-7200
Phone: (360) 725-6372
Email: PublicRecordsRequest@k12.wa.us

You may appeal the decision to withhold or redact any information by writing to the Superintendent of Public Instruction, OSPI P.O. Box 47200, Olympia, WA 98504-7200.



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IN THE MATTER OF THE EDUCATION)
CERTIFICATE OF)

Pamela Willoughby)
Certificate No. 188773F)
_____)

OPP No. D15-11-094

AGREED ORDER
OF SUSPENSION

INTRODUCTION

After receiving and investigating a complaint from Shoreline (Washington) School District regarding the above referenced educator, and based upon the facts available as of the date of this Agreed Order, the Superintendent of Public Instruction, through his undersigned designee, does hereby stipulate, by and between the Office of Superintendent of Public Instruction (OSPI), the Office of Professional Practices and Pamela Willoughby, that the Washington Education Certificate No. 188773F, of Pamela Willoughby, shall be suspended based on the Findings of Fact and Conclusions of Law set forth below:

I. FINDINGS OF FACT

1. On March 17, 1972, Pamela Willoughby, hereafter referred to as Ms. Willoughby, was issued Washington Education Certificate, No. 188773F. That certificate currently remains valid.
2. On or about June 2, 2015, Ms. Willoughby, after finding a device on the ground outside a drug store, brought the device to the Cascade K-8 Community School.
 - a. Ms. Willoughby states that she initially believed the device was a computer memory device, commonly known as a flash drive or thumb drive.
 - b. The device was a lancing device used to draw blood from a person in order to perform a blood sugar test.

3. At Cascade K-8 Community School, Ms. Willoughby allowed two 8th grade male students to handle the lancing device.
 - a. Both students activated the device.
 - b. Both students had physical contact from the lancing device needle.
 1. The device drew blood on one student.
4. Ms. Willoughby escorted the male students to the nurse's office and reported the incident.
5. On June 3, 2015, Ms. Willoughby was placed on administrative leave.
6. On October 2, 2015, Ms. Willoughby was issued a Letter of Reprimand for bringing the lancing device to school and allowing students to handle the device, causing injury to students.
7. On June 9, 2016, Ms. Willoughby participated in an interview with an OPP investigator.
 - a. On June 28, 2016, OPP received Ms. Willoughby's signed statement.

II. CONCLUSIONS OF LAW

1. Chapter 28A.410 RCW gives the Professional Educator Standards Board the authority to develop regulations determining eligibility for and certification of personnel employed in the common schools of the state of Washington. OSPI acts as the administrator of those statutes and regulations and has the authority to issue, reprimand, suspend, and revoke education certificates. RCW 28A.410.010. (RCW 28A.410.090) WAC 181-86 and WAC 181-87 further implement OPSI's authority.
2. OSPI has jurisdiction over Pamela Willoughby and the subject matter discussed herein.
3. Pamela Willoughby committed acts of unprofessional conduct pursuant to WAC 181-87-060.
4. There is clear and convincing evidence that Pamela Willoughby committed unprofessional conduct. WAC 181-86-170 (Burden and Standard of Proof).

5. Pursuant to WAC 181-86-080 eleven factors, at a minimum, are to be considered to determine the appropriate level and range of educator discipline:

1. The seriousness of the act(s) and the actual or potential harm to persons or property;
2. The person's criminal history including the seriousness and amount of activity;
3. The age and maturity level of participant(s) at the time of the activity;
4. The proximity or remoteness of time in which the acts occurred;
5. Any activity that demonstrates a disregard for health, safety or welfare;
6. Any activity that demonstrates a behavioral problem;
7. Any activity that demonstrates a lack of fitness;
8. Any information submitted regarding discipline imposed by any governmental or private entity as a result of acts or omissions;
9. Any information submitted that demonstrates aggravating or mitigating circumstances;
10. Any information submitted to support character and fitness; and
11. Any other relevant information submitted.

6. Based on the foregoing facts and considering them in light of the eleven factors enumerated in WAC 181-86-080, and in light of WAC 181-86-070 (Grounds for Issuance of an Order of Suspension), and WAC 181-87-060, Pamela Willoughby's education certificate should be suspended for unprofessional conduct.

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III. ORDER

THEREFORE, it is hereby ordered and agreed that the Washington Education Certificate, No. 188773F, of Pamela Willoughby be suspended for thirty (30) days, and that:

REINSTATEMENT of Pamela Willoughby's education certificate shall require submission of a new application, including Character and Fitness Supplement, provided by OPP and having Pamela Willoughby's fingerprints be checked by both the Federal Bureau of Investigation (FBI) and the Washington State Patrol (WSP). Reinstatement shall also be contingent upon Pamela Willoughby's fingerprint background check returning with no criminal convictions, occurring after the date of issuance of this Agreed Order of Suspension, that are listed in WAC 181-86-013, RCW 28A.410.090, or any felony convictions. The cost of conformance to all reinstatement requirements will be the responsibility of Pamela Willoughby.

DATED This 8th day of August, 2016.

RANDY I. DORN
Superintendent of Public Instruction
State of Washington

Stipulated to and approved
For entry:

Signed: Dierk Meierbachtol
Chief Legal Officer
Office of the Superintendent of Public Instruction

Signed: Pamela Willoughby, Respondent

Signed: Michael Gawley, Attorney for Respondent
WSBA #22110