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**Commonwealth of Kentucky
Shelby Circuit Court**

Susan Cox, Mother and Natural Guardian of)
Amber Nicole Snider)
)
Plaintiff,)
) Civil Action No. 02-CI-00549
vs.)
)
Anita R. Kotheimer, MD,)
)
Defendant.)

Affidavit of Laura J. Lampton, RN, BSN, CNLCP, CRRN

COMES NOW, Laura J. Lampton, being first duly sworn upon her oath states the following:

Defense has filed a motion to exclude my testimony. This motion centers around my qualifications as a Life Care Planner.

Defense questions my expertise as a Life Care Planner, stating that my education and experience are inadequate. This is wrong. Perhaps Defense is confused by the forensic terminology of "Life Care Plan" in that this term is not in the vernacular of traditional nursing education and practice. Not only have my education and experience provided a necessary foundation for life care planning, but I have received professional certification as a Certified Nurse Life Care Planner as well. These will be discussed in more detail below.

A Life Care Plan is a document that identifies long-term care needs for a person with a catastrophic injury or disability and determines the best method for meeting those needs. I determine some of these needs myself and gather others from treating medical professionals. My professional certifications, education, and work experience all qualify me in this role.

In 2002, I obtained qualification as a Certified Nurse Life Care Planner through the American Association of Nurse Life Care Planners. In order to qualify for this, I not only needed to demonstrate proficiency in the field through 500 hours of life care planning, but needed to pass a test to prove my knowledge of the field. Since obtaining that certification, I have maintained and updated my skills through a series of continuing education courses. These are listed on my Curriculum Vitae (see Attachment A). In the 5 years that I have provided Life Care Plans for forensic purposes, I have completed over 200 plans and testified in 21 cases in 9 states.

My education consists of Associate and Bachelor of Science degrees in nursing through Bellarmine University in Louisville, Kentucky. A basic part of this, as with all nursing education, was a repeated emphasis on needs assessment, which consists of four basic parts:

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1. Assess ongoing medical care needs
2. Develop a plan of care to meet those needs
3. Provide the planned intervention
4. Evaluate the effectiveness of the plan

Nursing education and employment as a nurse do not use the forensic term of "Life Care Plan." However, my education above and experience below clearly mirror the same steps, discipline, and requirements as a Life Care Plan.

Building on the foundation that was provided through my education, my work experience further developed and utilized my skills in needs assessment. This included the more basic work as a Staff Registered Nurse, but was particularly notable in my work as a Nurse Manager with Southern Indiana Rehab Hospital and with Frazier Rehab Center. One of the key functions of these positions was to assess the levels of ongoing need of the patients currently being served, to determine the level of care required to meet those needs, and to make sure that there was adequate staff, in terms of numbers as well as skill level (e.g., Registered Nurses versus Nurse Assistants) to meet the need.

In addition to the level of needs assessment described above, all of my work as a Registered Nurse involved the use of medical supplies (e.g., drugs, equipment) and the recognition and coordination of service needs (e.g., diagnostic testing).

My planning skills as a Nurse Manager and practical experience as a Registered Nurse are clearly relevant to my work as a Life Care Planner. While my previous work experience may not have involved developing life care plans in a forensic setting, it clearly involved the same set of planning skills.

Based on the combination of my professional certification, education, and experience, therefore, I am clearly qualified to fulfill the role of Life Care Planner in this case.

FURTHER, THE AFFIANT SAYETH NAUGHT.

Laura J. Lampton, RN, BSN, CNLCP, CRRN
Certified Nurse Life Care Planner

Subscribed and sworn to before me, a notary public, in this ____ of January 2006.

Notary Public

My Commission Expires _____