



I do hereby certify this to be a complete, accurate, and true copy of the document which is on file or is of record in the offices of the Texas Board of Nursing.
Katherine A. Thomas
Executive Director of the Board

BEFORE THE TEXAS BOARD OF NURSING

In the Matter of Registered Nurse
License Number 776664
issued to TONI RENE PARHAM

§ AGREED
§
§ ORDER

On this day the Texas Board of Nursing, hereinafter referred to as the Board, considered the matter of TONI RENE PARHAM, Registered Nurse License Number 776664, hereinafter referred to as Respondent.

Information received by the Board produced evidence that Respondent may have violated Section 301.452(b)(8), Texas Occupations Code. Respondent waived representation by counsel, informal proceedings, notice and hearing, and agreed to the entry of this Order offered on March 7, 2012, by Katherine A. Thomas, MN, RN, FAAN, Executive Director.

FINDINGS OF FACT

1. Prior to the institution of Agency proceedings, notice of the matters specified below in these Findings of Fact was served on Respondent and Respondent was given an opportunity to show compliance with all requirements of the law for retention of the license(s).
2. Respondent waived representation by counsel, informal proceedings, notice and hearing, and agreed to the entry of this Order.
3. Respondent is currently licensed to practice professional nursing in the State of Texas.
4. Respondent received an Associate Degree in Nursing from Clark County Community College, Las Vegas, Nevada, on December 12, 2002. Respondent was licensed to practice professional nursing in the State of Texas on October 19, 2009.
5. Respondent's professional nursing employment history is unknown.

6. On or about September 30, 2010, Respondent's license to practice professional nursing in the State of Nevada was PUBLICLY REPRIMANDED, with conditions, by the Nevada State Board of Nursing. A copy of the Nevada State Board of Nursing Findings of Fact, Conclusions of Law, and Order dated September 30, 2010, is attached and incorporated, by reference, as part of this order.
7. On or about November 22, 2010, Respondent's license to practice professional nursing in the State of Nevada was SUSPENDED by the Nevada State Board of Nursing due to non-compliance with the Agreed Order issued to her by the Nevada State Board of Nursing on September 30, 2010. A copy of the letter issued by the Nevada State Board of Nursing, dated November 22, 2010, is attached and incorporated, by reference, as part of this order.
8. In response to Findings of Fact Numbers Seven (7) and Eight (8), Respondent states:

"I renewed my license on December 4, 2009. At that time I renewed to work 6 shifts until I moved to El Paso, Texas.

I was notified by the Nevada State Board of my audit for CEUs. I did attempt to provide them as I had done them but in my move to Texas I had lost my documentation. I also tried to retrieve them from management but then learned management had changed. I regretfully was unable to provide them with my CEUs, therefore had to have the process of suspension carried out."
9. Formal Charges were filed on February 16, 2012. Formal Charges were mailed to Respondent on February 17, 2012.

CONCLUSIONS OF LAW

1. Pursuant to Texas Occupations Code, Sections 301.451-301.555 , the Board has jurisdiction over this matter.
2. Notice was served in accordance with law.
3. The evidence received is sufficient to prove violation of Section 301.452(b)(8), Texas Occupations Code.
4. The evidence received is sufficient cause pursuant to Section 301.452(b), Texas Occupations Code, to take disciplinary action against Registered Nurse License Number 776664, heretofore issued to TONI RENE PARHAM, including revocation of Respondent's license(s) to practice nursing in the State of Texas.

ORDER

IT IS THEREFORE AGREED and ORDERED that RESPONDENT SHALL receive the sanction of REMEDIAL EDUCATION AND A FINE, and RESPONDENT SHALL comply in all respects with the Nursing Practice Act, Texas Occupations Code §§301.001 *et seq.*, the Rules and Regulations Relating to Nurse Education, Licensure and Practice, 22 TEX. ADMIN. CODE §211.1 *et seq.* and this Order.

IT IS FURTHER AGREED and ORDERED that, while under the terms of this Order, this Order SHALL apply to any and all future licenses issued to Respondent to practice nursing in the State of Texas.

IT IS FURTHER AGREED and ORDERED that this Order SHALL be applicable to Respondent's nurse licensure compact privileges, if any, to practice nursing in the State of Texas.

IT IS FURTHER AGREED and ORDERED that while Respondent's license(s) is/are encumbered by this Order, Respondent may not work outside the State of Texas pursuant to a nurse licensure compact privilege without the written permission of the State of Texas and the Board of Nursing in the party state where Respondent wishes to work.

IT IS FURTHER AGREED that:

(1) RESPONDENT SHALL, within one (1) year of entry of this Order, successfully complete a course in Texas nursing jurisprudence and ethics. RESPONDENT SHALL obtain Board approval of the course prior to enrollment only if the course is not being offered by a pre-approved provider. Home study courses and video programs will not be approved. In order for the course to be approved, the target audience shall include nurses. It shall be a minimum of six (6) hours in length. The course's content shall include the Nursing Practice Act, standards of practice,

documentation of care, principles of nursing ethics, confidentiality, professional boundaries, and the Board's Disciplinary Sanction Policies regarding: Sexual Misconduct; Fraud, Theft and Deception; Nurses with Substance Abuse, Misuse, Substance Dependency, or other Substance Use Disorder; and Lying and Falsification. Courses focusing on malpractice issues will not be accepted. RESPONDENT SHALL CAUSE the sponsoring institution to submit a Verification of Course Completion form, provided by the Board, to the Office of the Board to verify RESPONDENT'S successful completion of the course. This course shall be taken in addition to any other courses stipulated in this Order, if any, and in addition to any continuing education requirements the Board has for relicensure. *Board-approved courses may be found at the following Board website address:* <http://www.bon.texas.gov/disciplinaryaction/stipscourses.html>.

(2) RESPONDENT SHALL pay a monetary fine in the amount of two hundred fifty dollars (\$250). RESPONDENT SHALL pay this fine within forty-five (45) days of entry of this Order. Payment is to be made directly to the Texas Board of Nursing in the form of cashier's check or U.S. money order. Partial payments will not be accepted.

IT IS FURTHER AGREED, that upon full compliance with the terms of this Order, all encumbrances will be removed from RESPONDENT'S license(s) to practice nursing in the State of Texas and RESPONDENT shall be eligible for nurse licensure compact privileges, if any.

BALANCE OF THIS PAGE INTENTIONALLY LEFT BLANK.

CONTINUED ON NEXT PAGE.

RESPONDENT'S CERTIFICATION

I understand that I have the right to legal counsel prior to signing this Agreed Order. I waive representation by counsel. I have reviewed this Order. I neither admit nor deny the violations alleged herein. By my signature on this Order, I agree to the Findings of Fact, Conclusions of Law, Order, and any conditions of said Order, to avoid further disciplinary action in this matter. I waive judicial review of this Order. I understand that when this Order becomes final and the terms of this Order become effective, a copy will be mailed to me. I understand that if I fail to comply with all terms and conditions of this Order, I will be subject to investigation and disciplinary sanction, including revocation of my license(s) to practice nursing in the State of Texas, as a consequence of my noncompliance.

Signed this 09 day of April, 2012.

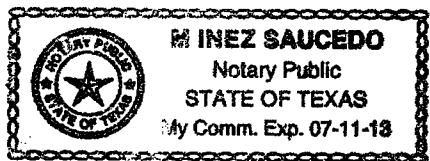
Toni Rene Parham

TONI RENE PARHAM, Respondent

Sworn to and subscribed before me this

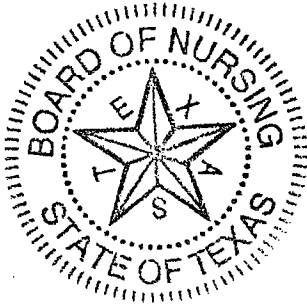
9th day of April, 2012

SEAL




Dr. Inez Saucedo
Notary Public in and for the State of Texas

WHEREFORE, PREMISES CONSIDERED, the Executive Director, on behalf of the Texas Board of Nursing, does hereby ratify and adopt the Agreed Order that was signed on the 9th day of April, 20 12, by TONI RENE PARHAM, Registered Nurse License Number 776664, and said Order is final.



Effective this 12th day of April, 20 12.


Katherine A. Thomas, MN, RN, FAAN
Executive Director on behalf
of said Board

ORIGINAL

BEFORE THE NEVADA STATE BOARD OF NURSING

IN THE MATTER OF
TONI PARHAM
LICENSED PROFESSIONAL NURSE
NEVADA LICENSE NO. RN46907
RESPONDENT

COMPLAINT AND NOTICE
OF HEARING

CASE NO. 0228-10CE

The Nevada State Board of Nursing (Board), by and through counsel, Frederick R. Olmstead, hereby notifies Respondent Toni Parham of an administrative hearing, which is to be held pursuant to Chapters 233B and 632 of the Nevada Revised Statutes and Chapter 632 of the Nevada Administrative Code. The purpose of the hearing is to consider the allegations stated below and to determine if the Respondent should be subject to an administrative penalty as set forth in NRS 632.320 and/or NRS 632.325 and/or NAC 632.926-.927, if the stated allegations are proven at the hearing by the evidence presented.

Respondent Toni Parham is currently and was at the time of the allegations stated below, licensed as a Licensed Professional Nurse in the State of Nevada, and is, therefore, subject to the jurisdiction of the Board and the provisions of NRS Chapter 632 and NAC Chapter 632.

IT IS HEREBY ALLEGED AND CHARGED AS FOLLOWS:

I.

On or about December 1, 2009, Respondent submitted an application for renewal of her Nevada Professional Nursing License. On that renewal application, Respondent attested that she had completed thirty hours of Board approved, nursing related, continuing education during the two-year renewal period. At least four hours of the continuing education must have been on bioterrorism, which is a one time requirement mandated in Nevada.

On or about January 7, 2010, Respondent was randomly selected for a continuing education and bioterrorism audit. On that same day, Respondent was mailed a letter requesting

1 that she provide to the Board documentation in support of her attestation that she had completed
2 the required continuing education.

3 As of this date, Respondent has failed to provide to the Board any documentation in
4 support of her attestation that she had completed the required continuing education.

5 II.

6 The foregoing conduct constitutes grounds for disciplinary action pursuant to NRS
7 632.320(1)(g) unprofessional conduct, because Respondent violated NAC 632.890(26) when
8 Respondent failed to abide by any state or federal statute or regulation relating to the practice of
9 nursing.

10 Based on the foregoing:

11 PLEASE TAKE NOTICE, that a disciplinary hearing has been set to consider this
12 Administrative Complaint against the above-named Respondent in accordance with Chapters
13 233B and 632 of the Nevada Revised Statutes and Chapter 632 of the Nevada Administrative
14 Code.
15

16 THE HEARING WILL TAKE PLACE on Thursday, September 16, 2010,
17 commencing at 1:00 p.m., or as soon thereafter as the Board is able to hear the matter, at the
18 Tuscany Suites, 255 E. Flamingo Road, Las Vegas, NV 89169. This case and other matters are
19 scheduled to be heard by the Board.
20

21 PURSUANT TO NRS 632.350, Respondent may request, in writing, that the Board
22 furnish copies of communications, reports, and affidavits in its possession, regarding the above-
23 referenced matter.

24 As the Respondent, you are specifically informed that you have the right to appear and be
25 heard in your defense, either personally or through counsel of your choice. You have the right to
26 respond and to present relevant evidence and argument on all issues involved. You have the
27 right to call and examine witnesses, introduce exhibits, and cross-examine opposing witnesses on
28 any matter relevant to the issues involved.

1 You have the right to request that the Board issue subpoenas to compel witnesses to
2 testify and/or evidence to be offered on your behalf. In making this request, you may be required
3 to demonstrate the relevancy of the witness' testimony and/or evidence.

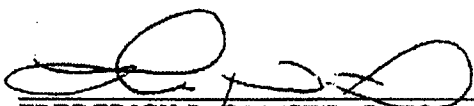
4 The purpose of the hearing is to determine if the Respondent has violated NRS
5 632.320(1)(g) and/or NAC 632.890(26), and if the allegations contained herein are substantially
6 proven by the evidence presented to further determine what administrative penalty is to be
7 assessed against the Respondent, if any, pursuant to NRS 632.320 and/or NRS 632.325 and/or
8 NAC 632.926-.927.

9 Should the Respondent fail to appear at the hearing, a decision may still be reached by
10 the Board. As the Respondent, you are further advised that you may be charged with cost
11 associated with the hearing pursuant to NRS 622.400.

12 Pursuant to NRS 233B.121(5), informal disposition of this case may be made by
13 stipulation, agreed settlement, consent order, or default. Any attempt to negotiate this case
14 should be made through Frederick R. Olmstead, General Counsel, Nevada State Board of
15 Nursing.

16 Pursuant to NRS 241.033(2)(b), the Nevada State Board of Nursing may, without further
17 notice, take administrative action against your license and/or certificate to practice within the
18 State of Nevada if the Board determines that such administrative action is warranted after
19 considering your character, alleged misconduct, professional competence, or physical or mental
20 health.

21 DATED this 16th day of August 2010.

22
23 By: 
24 FREDERICK R. OLMSTEAD, ESQ.
25 General Counsel
26 Nevada State Board of Nursing
27 5011 Meadowood Mall Way, Suite 300
28 Reno, Nevada 89502-6547
(775) 687-7728

ORIGINAL

BEFORE THE NEVADA STATE BOARD OF NURSING

IN THE MATTER OF
TONI PARHAM
LICENSED PROFESSIONAL NURSE
NEVADA LICENSE NO. RN46907
RESPONDENT

FINDINGS OF FACT,
CONCLUSIONS OF LAW,
AND ORDER.

CASE NO. 0228-10CE

On Thursday, September 16, 2010, a hearing was held in the above matter before the Nevada State Board of Nursing at the Tuscany Suites, 255 E. Flamingo Road, Las Vegas, NV 89169, in compliance with the provisions of Chapters 233B and 632 of the Nevada Revised Statutes (NRS) and Chapter 632 of the Nevada Administrative Code (NAC).

Respondent Toni Parham did not appear at the hearing. The Nevada State Board of Nursing staff appeared through counsel, Frederick R. Olmstead.

Based upon NAC 632.923, the Board proceeded to consider the case without the participation of Respondent. Based upon NAC 632.923, the Board considered the charges specified in the Complaint to be true. Accordingly, the Board made the following Findings of Fact, Conclusions of Law, and Order:

FINDINGS OF FACT

I.

At least twenty-one (21) working days prior to the date of the hearing, Respondent had been noticed of the hearing by certified mail and by first class mail, which notice was mailed to Respondent's last known residential address.

II.

The Board had jurisdiction over the matter, and the Board could proceed to make a determination in the matter.

1 III.

2 On December 1, 2009, Respondent submitted an application for renewal of her Nevada
3 Professional Nursing License. On that renewal application, Respondent attested that she had
4 completed thirty hours of Board approved, nursing related, continuing education during the two-
5 year renewal period. At least four hours of the continuing education must have been on
6 bioterrorism, which is a one time requirement mandated in Nevada.

7 On January 7, 2010, Respondent was randomly selected for a continuing education and
8 bioterrorism audit. On that same day, Respondent was mailed a letter requesting that she
9 provide to the Board documentation in support of her attestation that she had completed the
10 required continuing education.

11 As of the day of the hearing, Respondent has failed to provide to the Board any
12 documentation in support of her attestation that she had completed the required continuing
13 education.

14 CONCLUSIONS OF LAW

15 1. Pursuant to NRS 632.320 and/or NAC 632.325 and/or NAC 632.923-927, the
16 Board may take disciplinary action against the Respondent based upon proof of a violation of
17 chapter 632 of the Nevada Revised Statutes and/or the Nevada Administrative Code.

18 2. Based on the charges specified in the Complaint being considered as true, due to
19 Respondent's failure to appear at the hearing after proper notice was given, Respondent was found
20 guilty of violating NRS 632.320(1)(g) unprofessional conduct, because Respondent violated
21 NAC 632.890(26) when Respondent failed to abide by any state or federal statute or regulation
22 relating to the practice of nursing.

23 ORDER

24 Based on the foregoing Findings of Fact and Conclusions of Law and good cause
25 appearing therefore,
26

27 IT IS HEREBY ORDERED that pursuant to NRS 632.320 and/or NAC 632.926 (1)(h),
28 Respondent's Nevada Professional Nurse's License No. RN46907 is Publicly Reprimanded.

1 IT IS FURTHER ORDERED that Respondent is Fined in the amount of Two Hundred
2 Dollars (\$200.00).

3 IT IS FURTHER ORDERED that Respondent shall take and complete the Nevada Nurse
4 Practice Act course and a Board approved thirty-unit course on Legal Ethics. Respondent shall
5 provide evidence of successful completion of the courses to the Board within thirty (30) days of
6 the date of this Order. If Respondent fails to provide the original thirty hours of continuing
7 education that she had attested that she had completed, and fails to provide documentation of
8 successful completion of the Legal Ethics course and the Nevada Nurse Practice Act course and
9 fails to submit the full amount of the fine imposed within thirty 30 days of the date of this Order,
10 then Respondent's Nevada Professional Nurse's License No. RN46907 is automatically
11 suspended.

12 IT IS FURTHER ORDERED that pursuant to NRS 622.400, Respondent shall pay the
13 fees and costs incurred by the Board during the prosecution of this matter. The fees and costs are
14 due within one hundred and twenty days from the date of this Order. Respondent shall be
15 notified of the amount of fees and costs within thirty days of the date of this Order.

16 IT IS FURTHER ORDERED that the public reprimand and fine shall become part of
17 Respondent's permanent record, be published on the Board's list of disciplinary actions, and be
18 reported to the appropriate data banks.

19 Pursuant to NRS 632.400(2), the ruling of the Board contained in these Findings of Fact,
20 Conclusions of Law, and Order shall take effect upon service to the Respondent or when the
21 Board receives a return from the United States Postal Service indicating the Respondent refused
22 service or could not be located.

23 If no return is received by the Board, the order shall become effective 30 days from the
24 date of the order.

25 DATED this 30 day of September 2010.

26 NEVADA STATE BOARD OF NURSING

27 By:

28 Doreen K Begley
DOREEN BEGLEY, MS, RN
Board President

Nevada State Board of
NURSING

November 22, 2010

Toni Parham
PO Box 962713
El Paso, TX 79996

Dear Ms. Parham:

Your nursing license in Nevada has been suspended effective today, November 22, 2010, due to you failing to complete courses and pay an administrative fine as ordered by the Board.

If you have any questions or concerns please do not hesitate to call me at 888 590 6726, extension 77730.

Sincerely,
NEVADA STATE BOARD OF NURSING



Linda Aure, RN
Investigator