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.

Executive Director of the Board

Executive Director of the Board**

In the Matter of LAUREN CAMPBELL-PERRY Registered Nurse License Number 672752

§ BEFORE THE TEXAS §

BOARD OF NURSING

NUNC PRO TUNC ORDER OF THE BOARD

An Agreed Order was entered for LAUREN CAMPBELL-PERRY on September 4, 2019. The Agreed Order, however, included an error in Finding of Fact Number 6. Upon notice and hearing, administrative agencies, like the Courts, have the power to enter nunc pro tunc orders where it can be seen by reference to a record that what was intended to be entered, but was omitted by inadvertence or mistake, can be corrected upon satisfactory proof of its rendition provided that no intervening rights will be prejudiced. *Railroad Comm'n v. McClain*, 356 S.W.2d 330, 334 (Tex. App.--Austin 1962, no writ) (citing *Frankfort Ky. Nat. Gas Co. v. City of Frankfort*, 276 Ky. 199, 123 S.W.2d 270, 272).

The Executive Director, as agent of the Texas Board of Nursing, after review and due consideration of the record and the facts therein submits and enters the corrected Agreed Order of the Board. Respondent received due process regarding her license; therefore, her rights have not been prejudiced.

NOW, THEREFORE, IT IS ORDERED that the corrected Agreed Order of the Board is hereby approved and entered on the dates set forth below.

Order effective September 4, 2019.

Entered this 31st day of October, 2019.

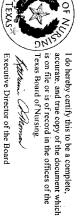
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BY:

KATHERINE A. THOMAS, MN, RN, FAAN EXECUTIVE DIRECTOR ON BEHALF OF SAID BOARD

BEFORE THE TEXAS BOARD OF NURSING

In the Matter of \$
Registered Nurse License Number 672752 \$
issued to LAUREN CAMPBELL-PERRY \$



AGREED ORDER

On this day the Texas Board of Nursing, hereinafter referred to as the Board, cc the matter of LAUREN CAMPBELL-PERRY, Registered Nurse License Number 672752, hereinafter referred to as Respondent.

Information received by the Board produced evidence that Respondent may be subject to discipline pursuant to Section 301.452(b)(10), Texas Occupations Code.

Respondent waived notice and hearing and agreed to the entry of this Agreed Order approved by Katherine A. Thomas, MN, RN, FAAN, Executive Director, on July 22, 2019.

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 notice and hearing, and agreed to the entry of this Agreed Order.
- 3. Respondent's license to practice as a professional nurse in the State of Texas is in current status.
- 4. Respondent received a Baccalaureate Degree in Nursing from University of Detroit Mercy, Detroit, Michigan, on May 1, 2000. Respondent was licensed to practice professional nursing in the State of Texas on September 19, 2000.
- 5. Respondent's nursing employment history is unknown.
- 6. On or about July 12, 2018, Respondent's license to practice professional nursing in the State of Michigan was placed on PROBATION for a minimum of one (1) year, not to exceed three (3) years by the State of Michigan, Department of Licensing and Regulatory

Affairs, Bureau of Professional Licensing, Board of Nursing. On or about January 9, 2019, Respondent's suspension was lifted. A copy of the Consent Order dated July 12, 2018, is attached and incorporated, by reference, as part of this Order.

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(s) of 22 TEX. ADMIN. CODE §217.12(1)(A)&(6)(A).
- 4. The evidence received is sufficient cause pursuant to Section 301.452(b)(10), Texas Occupations Code, to take disciplinary action against Registered Nurse License Number 672752, heretofore issued to LAUREN CAMPBELL-PERRY.
- 5. Pursuant to Section 301.463(d), Texas Occupations Code, this Agreed Order is a settlement agreement under Rule 408, Texas Rules of Evidence, in civil or criminal litigation.

TERMS OF ORDER

I. SANCTION AND APPLICABILITY

IT IS THEREFORE AGREED and ORDERED that RESPONDENT SHALL receive the sanction of REMEDIAL EDUCATION in accordance with the terms of this Order.

- A. This Order SHALL apply to any and all future licenses issued to RESPONDENT to practice nursing in the State of Texas.
- B. This Order SHALL be applicable to RESPONDENT'S nurse licensure compact privileges, if any, to practice nursing in the State of Texas.
- C. As a result of this Order, RESPONDENT'S license(s) will be designated "single state" and RESPONDENT may not work outside the State of Texas in another nurse licensure compact party state.

II. COMPLIANCE WITH LAW

While under the terms of this Order, RESPONDENT agrees to comply in all respects with the Nursing Practice Act, Texas Occupations Code, §§301.001 et seq., the Rules and Regulations Relating to Nursing Education, Licensure and Practice, 22 TEX. ADMIN. CODE §§211.1 et seq., and this Agreed Order.

III. UNDERSTANDING BOARD ORDERS

Within thirty (30) days of entry of this Order, RESPONDENT must successfully complete the Board's online course, "Understanding Board Orders", which can be accessed on the Board's website from the "Discipline & Complaints" drop-down menu or directly at: http://www.bon.texas.gov/UnderstandingBoardOrders/index.asp. Upon successful completion, RESPONDENT must submit the course verification at the conclusion of the course, which automatically transmits the verification to the Board.

IV. REMEDIAL EDUCATION COURSE(S)

In addition to any continuing education requirements the Board may require for licensure renewal, RESPONDENT SHALL successfully complete the following remedial education course(s) within one (1) year of the effective date of this Order, unless otherwise specifically indicated:

A Board-approved course in Texas nursing jurisprudence and ethics that 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. Home study and video programs will not be approved.

B. <u>The course "Sharpening Critical Thinking Skills,"</u> a 3.6 contact hour online program provided by the National Council of State Boards of Nursing (NCSBN) Learning Extension.

In order to receive credit for completion of this/these course(s), RESPONDENT SHALL CAUSE the instructor to submit a Verification of Course Completion form or SHALL submit the continuing education certificate, as applicable, to the attention of Monitoring at the Board's office. RESPONDENT SHALL first obtain Board approval of any course prior to enrollment if the course is not being offered by a pre-approved provider. Information about Board-approved courses and Verification of Course Completion forms are available from the Board at www.bon.texas.gov/compliance.

V. RESTORATION OF UNENCUMBERED LICENSE(S)

Upon full compliance with the terms of this Agreed Order, all encumbrances will be removed from RESPONDENT'S license(s) and/or privilege(s) to practice nursing in the State of Texas and, subject to meeting all existing eligibility requirements in Texas Occupations Code Chapter 304, Article III, RESPONDENT may be eligible for nurse licensure compact privileges, if any.

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CONTINUED ON NEXT PAGE.

RESPONDENT'S CERTIFICATION

representation by counsel. I have reviewed this Order. I neither admit nor deny the violation(s) alleged herein. By my signature on this Order, I agree to the entry of this 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 this Order becomes effective upon acceptance by the Executive Director on behalf of the Texas Board of Nursing and 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 possible revocation of my license(s) and/or privileges to practice nursing in the State of Texas, as a consequence of my noncompliance.

Signed this day of	AUGUST, 20/9.
Mound	10-12004
	ERRY, RESPONDENT

Notary Public in and for the State of Michigan

Sworn to and subscribed before me this 2 day of August, 20

SEAL

Shubham Saxena Notary Public, State of Michigan County of Wayne

My Commission Expites Maych 20,2024

tengy in the County of Waye

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 _29th_ day of _August_, 20_19_, by LAUREN CAMPBELL-PERRY, Registered Nurse License Number 672752, and said Agreed Order is final.

Effective this _4th_ day of _September_, 20_19_.

Katherine A. Thomas, MN, RN, FAAN

Kethim a. Momas

Executive Director on behalf

of said Board



GRETCHEN WHITMER GOVERNOR

STATE OF MICHIGAN DEPARTMENT OF LICENSING AND REGULATORY AFFAIRS LANSING

ORLENE HAWKS DIRECTOR

Certification of Documents in Response to FOIA Request

Requester: Terry Washington

I, Stephani Fleming, FOIA Coordinator, Michigan Department of Licensing and Regulatory Affairs, acknowledge that a FOIA requesting certified records, dated 06/27/2019, was received by the Department on 06/28/2019. Enclosed are true copies of the only records within the Department's possession related to "CERTIFIED copies of ANY and ALL disciplinary actions taken on license number 47-04-226166 belong to Lauren Yvette Campbell-Perry, a/k/a, La Keyetta Evett Campbell. Please forward to the attention of Terry Washington, Investigator, Texas Board of Nursing, 333 Guadalupe Street, Suite 3-460, Austin, Texas 7870.", which consists of 35 pages. The Department conducted a thorough search of its electronic databases and other records, and I certify that, to the best of my knowledge, information, and belief, it has no additional records responsive to the request.

Dated: July 22, 2019

Stephani Fleming FOIA Coordinator

Department of Licensing and Regulatory Affairs State of Michigan



STATE OF MICHIGAN
DEPARTMENT OF LICENSING AND REGULATORY AFFAIRS
BUREAU OF PROFESSIONAL LICENSING
BOARD OF NURSING
DISCIPLINARY SUBCOMMITTEE

In the Matter of

LAUREN YVETTE CAMPBELL-PERRY, R.N. aka LA KEYETTA EVETT CAMPBELL, R.N. License No. 47-04-226166,

Respondent.

File No. 47-17-144792

CONSENT ORDER

On January 22, 2018, the Department of Licensing and Regulatory Affairs executed an Administrative Complaint charging Respondent with violating the Public Health Code, MCL 333.1101 et seq.

Respondent has admitted that the facts alleged in the Complaint are true and constitute violation(s) of MCL 333.16221(a) and (b)(i). The Michigan Board of Nursing Disciplinary Subcommittee (DSC) has reviewed this Consent Order and Stipulation and agrees that the public interest is best served by resolution of the outstanding Complaint.

Therefore, IT IS FOUND that the facts alleged in the Complaint are true and constitute violation(s) of MCL 333.16221(a) and (b)(i).

Accordingly, IT IS ORDERED that for the cited violation(s) of the Public Health Code, Respondent is placed on PROBATION for a minimum of one year, and not to exceed three years, commencing on the effective date of this Order. The probationary

Page 1 of 8

period shall only be reduced while Respondent is employed as a nurse. The terms of probation shall be as follows:

1. <u>EVALUATION</u>: Within 30 days of the effective date of this Order, Respondent shall contact the Health Professional Recovery Program (HPRP), telephone number 1-800-453-3784, to make arrangements to undergo an evaluation as directed by HPRP. The evaluation shall be conducted at Respondent's expense, and Respondent shall ensure that a copy of the evaluation results is provided to HPRP.

Respondent shall comply with all requests by HPRP. If Respondent fails to comply with any request, HPRP shall immediately notify the Department in writing.

If HPRP determines that Respondent does not require treatment monitoring, HPRP shall immediately notify the Department in writing of this determination and Respondent shall not be required to enter into a monitoring agreement.

If HPRP determines that Respondent needs treatment monitoring, Respondent shall promptly enter into a non-confidential regulatory monitoring agreement with HPRP.

If Respondent fails to enter into and comply with a monitoring agreement, HPRP shall immediately notify the Department in writing.

All information and documentation acquired by HPRP in developing and implementing the monitoring agreement, including but not limited to urinalyses, reports of mental and physical evaluations, therapist reports, or chemical dependency/substance abuse treatment facility records or reports, shall be made available to the Department upon request to establish Respondent's compliance or non-compliance with the terms of this Order.

If the duration of a monitoring agreement required pursuant to this Order exceeds the period of probation, Respondent shall continue to comply with the monitoring agreement.

Upon Respondent's successful completion of the monitoring agreement, HPRP shall promptly notify the Department in writing.

2. CONTINUING EDUCATION: Within six months of the effective date of this Order, Respondent shall successfully complete and submit satisfactory evidence of completing a minimum of three hours of continuing education accepted by the Board in each of the following areas: a) disciplinary actions; b) documentation; c) medication errors; and d) sharpening critical thinking skills. This continuing education shall not apply in computing Respondent's current continuing education requirements for license renewal.

Respondent shall seek and obtain pre-approval of the continuing education from the Chairperson of the Board or the Chairperson's designee or may successfully complete pre-approved continuing education in the above-specified areas offered by the National Council of State Boards of Nursing, available at www.learningext.com.

Respondent shall mail requests for pre-approval and proof of the successful completion of the continuing education to the address at set for the below.

3. <u>EMPLOYER REPORTS</u>: If Respondent is employed in the licensed profession, Respondent shall immediately provide copies of this Order and the Complaint to Respondent's employer and supervisor. Respondent's employer or supervisor shall be knowledgeable of Respondent's history and shall file reports with the Department advising of Respondent's work performance, as provided below.

If Respondent fails to comply with minimal standards of acceptable and prevailing practice or appears unable to practice with reasonable skill and safety, Respondent's employer or supervisor shall immediately notify the Department.

 EMPLOYMENT CHANGE: Respondent shall provide written notice to the Department upon entering into or leaving any employment in the licensed profession within 15 days of such action.

Respondent shall provide copies of this Order and the Complaint to each successor employer in the licensed profession. Respondent's employer or supervisor shall continue to file reports with the Department advising of Respondent's work performance, as set forth above.

- 5. REPORT OF NON-EMPLOYMENT: If at any time during the period of probation Respondent is not employed in the licensed profession, Respondent shall file a report of non-employment with the Department within 15 days after becoming unemployed. Respondent shall continue to file a report of non-employment on a quarterly basis until Respondent returns to employment in the licensed profession.
- 6. RESIDENCY AND PRACTICE OUTSIDE MICHIGAN: Periods of residency and practice outside Michigan shall not reduce the probationary period of this Order. Respondent shall report any change of residency or practice outside Michigan no more than 15 days after the change occurs. Compliance with this provision does not satisfy the requirements of MCL 333.16192(1) and 333.16221(g), regarding Respondent's duty to report name or mailing address changes to the Department.
- 7. REPORTING PROCEDURE: Unless immediate notification is required, as indicated above, all reports shall be filed on a quarterly basis. The first report shall be filed at the end of the third month of probation and subsequent reports every three months after that.

Respondent authorizes the Department or its authorized representative to periodically contact the reporting individuals or agencies to inquire of Respondent's progress.

Respondent shall direct all communications, required by the terms of this Order to: Department of Licensing and Regulatory Affairs, Enforcement Division, Compliance Section, P.O. Box 30670, Lansing, MI 48909.

The timely filing of all information relating to this Order shall be Respondent's responsibility, and failure to file the required information within the time limitations provided shall be deemed a violation of this Order.

- 8. COMPLIANCE WITH THE PUBLIC HEALTH CODE:
 Respondent shall comply with all applicable provisions
 of the Public Health Code and rules promulgated
 thereunder.
- COSTS: Respondent shall be solely responsible for payment of all costs incurred in complying with the terms of this Order.

IT IS FURTHER ORDERED that Respondent shall be automatically discharged from probation at the end of the probationary period, PROVIDED Respondent has paid the fine as set forth below, has complied with the terms of this Order and has not violated the Public Health Code.

IT IS FURTHER ORDERED that for the cited violation(s) of the Public Health Code, Respondent is FINED \$250.00, to be paid to the State of Michigan within 60 days of the effective date of this Order. Respondent shall direct payment to the Department of Licensing and Regulatory Affairs, Enforcement Division, Compliance Section, P.O. Box 30189, Lansing, MI 48909. The fine shall be paid by check or money order, made payable to the State of Michigan, and shall clearly display File Number 47-17-144792.

IT IS FURTHER ORDERED that if Respondent is unable to obtain one year of employment demonstrating compliance with the minimal standards of acceptable and prevailing practice, or the ability to practice with reasonable skill and safety during the maximum three year period of probation, Respondent may demonstrate safety to practice by submitting to a skills assessment by a skills assessment program pre-approved by the

Board Chairperson or the Chairperson's designee. Respondent shall not be eligible to submit to the skills assessment sooner than 90 days prior to the expiration of the maximum three year period of probation, provided Respondent has successfully complied with all other terms of the Order.

discharged from probation upon written verification from the pre-approved skills assessment program that Respondent is safe to practice. Failure to meet the employment requirement or successfully complete a skills assessment evaluation within the maximum three year period of probation shall be deemed a violation of probation and constitute grounds for further disciplinary action. If Respondent fails to meet the employment requirement or successfully complete a skills assessment evaluation within the maximum three year period of probation or fails to comply with the terms and conditions of this Order, Respondent's license shall be suspended for a minimum of one day until successful completion of the skills evaluation or compliance with the terms and conditions of this Order. If Respondent's license remains suspended for more than six months, reinstatement of Respondent's license shall not be automatic, and Respondent will have to petition for reinstatement of her license. If Respondent petitions for reinstatement of her license, the petition shall be in accordance with MCL 333.16245 and 333.16247.

Page 6 of 8

IT IS FURTHER ORDERED that this Order shall be effective 30 days from the date signed by the Board, as set forth below.

MICHIGAN BOARD OF NURSING

By: Chairperson, Disciplinary Subcommittee

Dated: 30/4/12 2018

STIPULATION

- 1. The facts alleged in the Complaint are true and constitute violation(s) of MCL 333.16221(a) and (b)(i).
- 2. Respondent understands and intends that by signing this Stipulation Respondent is waiving the right, pursuant to the Public Health Code, the rules promulgated thereunder, and the Administrative Procedures Act, MCL 24.201 *et seq.*, to require the Department to prove the charges set forth in the Complaint by presentation of evidence and legal authority, and Respondent is waiving the right to appear with an attorney and such witnesses as Respondent may desire to present a defense to the charges.
- 3. This matter is a public record required to be published and made available to the public pursuant to the Michigan Freedom of Information Act, MCL 15.231 et seq., and this action will be reported to the National Practitioner Data Bank and any other entity as required by state or federal law, in accordance with 42 USC 1396r-2.

- 4. Mary VanderKolk, M.S.N., M.B.A., R.N., a member of the Board who supports this proposal, and the Department's representative are free to discuss this matter with the DSC and recommend acceptance of the resolution set forth in this Order.
- 5. This Order is approved as to form and substance by Respondent and the Department and may be entered as the final order of the DSC in this matter.
- 6. This proposal is conditioned upon acceptance by the DSC. Respondent and the Department expressly reserve the right to further proceedings without prejudice should this Order be rejected.

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AGREED TO BY: Chyllyfofflyan	AGREED TO BY: AMAGE COLUMN
Cheryl Wykoff Pezon, Acting Director Bureau of Professional Licensing	Lauren Yvelle Campbell-Perry, R.M. aka La Keyetta Evett Campbell, R.N. Respondent
Dated: June 15, 2018	Dated;

CC

STATE OF MICHIGAN DEPARTMENT OF LICENSING AND REGULATORY AFFAIRS BUREAU OF PROFESSIONAL LICENSING BOARD OF NURSING DISCIPLINARY SUBCOMMITTEE

In the Matter of

LAUREN YVETTE CAMPBELL-PERRY, R.N. aka LA KEYETTA EVETT CAMPBELL, R.N. License No. 47-04-226166,

Respondent.

File No. 47-17-144792

ADMINISTRATIVE COMPLAINT

The Michigan Department of Licensing and Regulatory Affairs, by Cheryl Wykoff Pezon, Acting Director, Bureau of Professional Licensing, complains against Respondent as follows:

- 1. The Michigan Board of Nursing is an administrative agency established by the Public Health Code, MCL 333.1101 *et seq.* Pursuant to MCL 333.16226, the Board's Disciplinary Subcommittee is empowered to discipline persons for violations of the Public Health Code.
- 2. Respondent is currently licensed to practice as a registered nurse in the state of Michigan.
- 3. At all times relevant, Respondent was employed by Henry Ford Health System (facility), in Detroit, Michigan, as a registered nurse.

4. For historical information:

- a. On June 5, 2013, in case number 47-11-119662, a Consent Order was entered against Respondent based on Respondent failing to respond in a timely manner to a patient's potentially lethal cardiac arrhythmia and failing to administer medication to the patient as ordered by a physician. Respondent was reprimanded, ordered to pay a fine, and required to complete continuing education.
- 5. Hydromorphone, morphine, and Norco¹ are schedule 2 controlled substances. Lorazepam is a schedule 4 controlled substance.
- 6. On or about November 28, 2016, facility management performed an audit of Respondent's November 2016 Pyxis and Medication Administration Record (MAR) documentation, and the following information was discovered:

Patient C.B. (initials used to protect patient privacy)

- a. On November 5, 2016, patient C.B. had an order for hydromorphone IV, PRN.² At 8:00 a.m., Respondent documented that patient C.B. had no pain. However, at 9:37a.m., Respondent documented the administration of hydromorphone 1 mg to patient C.B. without documenting a pre- or post-pain assessment.
- b. On November 5, 2016, at 12:00 p.m., Respondent documented that patient C.B. had no pain. However, at 1:33 p.m., Respondent administered patient C.B. hydromorphone 1mg without documenting a pre- or postpain assessment.
- c. On November 5, 2016, at 4:29 p.m., Respondent removed hydromorphone 1 mg from Pyxis and failed to document administering or wasting the medication.

¹ Norco is a combination of acetaminophen and hydrocodone.

² PRN stands for "pro re nata" or "as needed."

Patient O.H.

a. On November 5, 2016, patient O.H. had an order for hydromorphone. At approximately 11:47 a.m., Respondent removed one hydromorphone 2 mg tablet and documented administering 1mg of hydromorphone to patient O.H. However, at 2:29 p.m., Respondent documented wasting 2 mg of hydromorphone.

Patient Y.G.

a. On November 5, 2016, patient Y.G. had an order for morphine. At 8:08 a.m., Respondent documented administration of morphine 2mg to patient Y.G. with no pre- or post-pain assessment.

Patient J.G.

b. On November 6, 2016, patient J.G. had an order for morphine. At 2:58 p.m., Respondent documented the administration of morphine 2mg to patient J.G. with no preor post-pain assessment.

Patient J.B.

c. On November 10, 2016, patient J.B. had an order for Norco, PRN. At 8:06 a.m., Respondent documented no pain for patient J.B. At 8:37 a.m., Respondent documented administering one Norco tablet to patient J.B. without documenting a pre- or post-pain assessment.

Patient R.B.

a. On November 11, 2016, patient R.B. had an order for Norco. At 8:48 a.m., Respondent administered a Norco tablet to patient R.B. without documenting a pre- or post-pain assessment. At 5:30 p.m., Respondent administered a Norco tablet to patient R.B. without documenting a pre- or post-pain assessment.

Patient L.S.

a. On November 14, 2016, patient L.S. had an order for Lorazepam. At 11:04 a.m., Respondent removed Lorazepam 2mg but documented administering 0.5mg and wasting 1.75mg.

Patient S.J.

- a. On November 14, 2016, patient S.J. had an order for a hydromorphone 1mg IV. At 7:49 a.m., Respondent removed hydromorphone 1mg but failed to document its administration or waste.
- b. On November 15, 2016, at 4:12 p.m., Respondent administered hydromorphone to patient S.J. without documenting a pre- or post-pain assessment. At 4:18 p.m., Respondent removed two (2) Oxycodone 5mg tabs but failed to document their administration or waste. At 6:17 p.m., Respondent administered hydromorphone to patient S.J. without documenting a pre- or post-pain assessment.
- Respondent was suspended from the facility from December 2,
 through December 12, 2016, pending further investigation.
- 8. Respondent refused to meet with facility management per the investigation and on December 11, 2016, Respondent resigned in lieu of termination.
- 9. Facility management notified the Department of Respondent's resignation in lieu of termination, pursuant to MCL 333.20175(5).

COUNT I

Respondent's conduct, as set forth above, evidences a violation of general duty, consisting of negligence or failure to exercise due care, including negligent

delegation to or supervision of employees or other individuals, whether or not injury results, or any conduct, practice, or condition that impairs, or may impair, the ability to safely and skillfully engage in the practice of the health profession, in violation of MCL 333.16221(a).

COUNT II

Respondent's conduct, as set forth above, evidences departure from, or failure to conform to, minimal standards of acceptable and prevailing practice for the health profession, whether or not actual injury to an individual occurs, in violation of MCL 333.16221(b)(i).

RESPONDENT IS NOTIFIED that, pursuant to MCL 333.16231(8), Respondent has 30 days from the date of receipt of this Complaint to answer this Complaint in writing and to show compliance with all lawful requirements for licensure. Respondent shall submit the response to the Bureau of Professional Licensing, Department of Licensing and Regulatory Affairs, P.O. Box 30670, Lansing, MI 48909.

Administrative Complaint File No. 47-17-144792

Respondent's failure to submit an answer within 30 days is an admission of the allegations in this Complaint. If Respondent fails to answer, the Department shall transmit this Complaint directly to the Board's Disciplinary Subcommittee to impose a sanction, pursuant to MCL 333.16231(9).

Dated: January 22, 2018

Cheryl Wykoff Pezon, Acting Director Bureau of Professional Licensing

MFW

STATE OF MICHIGAN DEPARTMENT OF LICENSING AND REGULATORY AFFAIRS BUREAU OF PROFESSIONAL LICENSING BOARD OF NURSING DISCIPLINARY SUBCOMMITTEE

In the Matter of

LAUREN YVETTE CAMPBELL-PERRY, R.N. aka LA KEYETTA EVETT CAMPBELL License No. 47-04-226166,

Respondent.

File No. 47-18-000502

ADMINISTRATIVE COMPLAINT

The Michigan Department of Licensing and Regulatory Affairs, by Cheryl Wykoff Pezon, Director, Bureau of Professional Licensing, complains against Respondent as follows:

- 1. The Michigan Board of Nursing is an administrative agency established by the Public Health Code, MCL 333.1101 *et seq*. Pursuant to MCL 333.16226, the Board's Disciplinary Subcommittee is empowered to discipline persons for violations of the Public Health Code.
- Respondent is currently licensed to practice as a registered nurse in the state of Michigan.
 - 3. For historical purposes, the following occurred:

On September 27, 2011, the Department executed a Formal Complaint against Respondent based on allegations that Respondent failed to respond in a timely manner to a patient's potentially lethal cardiac arrhythmia and failed to administer medication to the patient as ordered by a physician. On June 5,

2013, in resolution of the matter, a Consent Order and Stipulation was executed in which Respondent was reprimanded, ordered to pay a fine, and required to complete continuing education.

4. On January 22, 2018, the Department executed an Administrative Complaint (Complaint) against Respondent alleging documentation errors. On July 12, 2018, in resolution of the matter, the Board's Disciplinary Subcommittee executed a Consent Order and Stipulation (Order) which, in part, placed Respondent on probation and ordered Respondent to immediately provide her employer with copies of the Order and Complaint. A copy of the Order, marked Exhibit A, is attached and incorporated.

Contrary to the terms of the Order, Respondent failed to provide copies of the Order and Complaint to her employer.

COUNT I

Respondent's conduct, as set forth above, constitutes a violation of a final order executed by the Board's Disciplinary Subcommittee, contrary to Mich Admin Code, R 338.1632, in violation of MCL 333.16221(h).

RESPONDENT IS NOTIFIED that, pursuant to MCL 333.16231(8), Respondent has 30 days from the date of receipt of this Complaint to answer this Complaint in writing and to show compliance with all lawful requirements for licensure. Respondent shall submit the response to the Bureau of Professional Licensing, Department of Licensing and Regulatory Affairs, P.O. Box 30670, Lansing, MI 48909.

Respondent's failure to submit an answer within 30 days is an admission of the allegations in this Complaint. If Respondent fails to answer, the Department shall transmit this Complaint directly to the Board's Disciplinary Subcommittee to impose a sanction, pursuant to MCL 333.16231(9).

Dated:

November 1, 2018

Cheryl Wykoff Pezon, Director Bureau of Professional Licensing

Attachment

KDG

STATE OF MICHIGAN DEPARTMENT OF LICENSING AND REGULATORY AFFAIRS BUREAU OF HEALTH CARE SERVICES BOARD OF NURSING DISCIPLINARY SUBCOMMITTEE

In the Matter of

LA KEYETTA EVETT CAMPBELL, R.N. License No. 47-04-226166

Complaint No. 47-11-119662

CONSENT ORDER AND STIPULATION

CONSENT ORDER

An administrative complaint was filed with the Disciplinary Subcommittee of the Board of Nursing on September 27, 2011, charging La Keyetta Evett Campbell, R.N. (Respondent) with having violated section 16221(a) of the Public Health Code, 1978 PA 368, as amended, MCL 383.1101 et seq.

The parties have stipulated that the Disciplinary Subcommittee may enter this consent order. The Disciplinary Subcommittee has reviewed the stipulation contained in this document and agrees that the public interest is best served by resolution of the outstanding complaint. Therefore, the Disciplinary Subcommittee finds that the allegations of fact contained in the complaint are true and that Respondent has violated section 16221(a) of the Public Health Code.

Accordingly, for these violations, IT IS ORDERED:

Respondent is REPRIMANDED.

Respondent is FINED \$600.00 to be paid by check, money order or cashier's check made payable to the State of Michigan (with complaint number 47-11-119682 clearly indicated on the check or money order) within sixty days from the effective date of this order. The timely payment of the fine shall be Respondent's responsibility. Respondent shall mail the fine to: Sanction Monitoring, Bureau of Health Care Services, Department of Licensing and Regulatory Affairs, P.O. Box 80185, Lensing, Michigan 48909.

Respondent shall direct any communications to the Department that are required by the terms of this order to: Sanction Monitoring Unit, Bureau of Health Care Services, Department of Licensing and Regulatory Affairs, P.O. Box 30670, Lansing, Michigan 48909.

Respondent shall be responsible for the timely compliance with the terms of this consent order, including the timely filing of any documentation. Failure to comply within the time limitations provided will constitute a violation of this order.

If Respondent violates any term or condition set forth in this order,

Respondent will be in violation of 1996 AACS, R 388.1632, and section 16221(h) of
the Public Health Code.

This order shall be effective on the date signed by the Chairperson of the Disciplinary Subcommittee or the Disciplinary Subcommittee's authorized representative, as set forth below.

Signed on 4/5/13

MICHIGAN BOARD OF NURSING

By May & Couado Chairperson, Disciplinary Subcommittee

STIPULATION

The parties stipulate as follows:

- 1. Respondent does not contest the allegations of fact and law in the complaint. Respondent understands that, by pleading no contest, she does not admit the truth of the allegations but agrees that the Disciplinary Subcommittee may treat the allegations as true for resolution of the complaint and may enter an order treating the allegations as true.
- 2. Respondent understands and intends that, by signing this stipulation, she is waiving the right under the Public Health Code, rules promulgated under the Public Health Code, and the Administrative Procedures Act of 1969, 1969 PA 306, as amended, MCL 24.201 st seq, to require the Department to prove the charges set forth in the complaint by presentation of evidence and legal authority, and to present a defense to the charges before the Disciplinary Subcommittee or its authorized representative. Should the Disciplinary Subcommittee reject the proposed consent order, the parties reserve the right to proceed to hearing.
- 3. The Disciplinary Subcommittee may enter the above Consent Order, supported by Board conferee Joshua M. Meringa, RN-BC, BSN. Mr. Meringa or an attorney from the Licensing and Regulation Division may discuss this matter with the Disciplinary Subcommittee in order to recommend acceptance of this resolution.

- 4. Mr. Meringa and the parties considered the following factors in reaching this agreement:
 - A. Following this incident, Respondent completed pre-approved continuing education in the following subject areas: professional responsibility and legal liability; recognizing lethal rhythms; documentation; and medication administration and safety (see attached). These courses were reviewed by conferee Meringa, who deemed them sufficient and approved them.
 - B. During a compliance conference between the parties on February 25, 2018, Respondent maintained that she intended to administer the K-dur tablet to the patient, but she claimed that the Hospital's pharmacy failed to fill the order. Additionally, Respondent did not attempt to obtain the medication from the PYXIS machine because she understood that the PYXIS system would not let her remove medication without an order, and she could not override the machine.
 - C. Respondent maintains that she was sufficiently monitoring the patient's heart rhythms and had communicated with the physician's assistant earlier in her shift about this issue. Additionally, Respondent believes there are documents missing from the patient's chart and these documents would substantiate her claims.
 - D. Conferee Josh Meringa, RN-BC, BSN, spoke with Respondent at length during the compliance conference and concluded that this violation appeared to be a one-time incident and not indicative of her overall nursing skills. Thus, Mr. Meringa concluded that it was unnecessary for the Board to monitor Respondent's nursing practice.

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By signing this stipulation, the parties confirm that they have read, understand and agree with the terms of the consent order.

AGREED TO BY:

Andrew J. Hudson (P76092)

Assistant Attorney General Attorney for Complainant

Dated: 4/29/15

AGREED TO BY:

La Keyetta Evett Campbell, R.N.

Respondent

Dated: 4/00/13

Andrew J. Paluda (P42890) Attorney for Respondent

Dated: 4/2/0/13

LE72012-0028822-A/Campbell, La Keyetta Bvett, R.N., 119662/COS

GANNETT Education

6400 Arthugion Boulevard, Suba 1000 Pulli Church, VA 22042

On this date of Tuesday, April 16, 2013

Lakeyeta Campbell 19353 Lexington Redford, MI 48240

License #: Registered Nurse MI 4704226166

5.20 contact hows for the study of:

Document It Right: A Nurse's Guide to Charting (60076)

Passing Score

Genoett Education is secredited as a provider of continuing suraing adscation by the American Nurses Credentialing Canter's Commission on Accordington

Gentact Education is also accordited by the State of Florida Board of Nazing (provider so. FBN 50-1489) and the California Board of Registered Nursing (provider to. CEP 13213).

This program has been pro-approved by The Commission for Case Manager Cartification to provide continuing education credit to CCM board cartified case managers. Sponsor code: 00061357. The course is approved for 4 CE context board for 2008 (approved # 6135765713), 2009 (approved # 00061357-A203), 01/15/10-12/31/10 (approved # 00061357-A216), 2011 (approved # 790003727), and 2013 (activity code: W0000972; approved number: 2013/349). To claim these CEs, leg into your CE Center account at www.comeerification.org. Contificates must be existed for one year past the perticipant's CCM beard certified case manager's reserval date.

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Robert Q. Hess, k., RN, PhD, FAAN

Executive Vice President, Global Programming, Gennett Education

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GANNETT

Education

6460 Artitogica Bostovard, Suite 1000 Palle Chards, VA 220/2

On this date of Tuesday, April 16, 2013

Lakoyetta Campbell 1933 Lechegon Redford, MI 48240

Liconso #: Ragistarod Nazas MI 4704726166

7.30 contact hours for the study of:

Everyday Ethics for Nurses

Passing Score

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Oursont Education is also accordibed by the State of Floride Board of Nursing (provider no. FBN 59-1489) and the California Board of Registered Nursing (provider no. CEP 13213).

This program has been pre-approved by The Commission for Case Manager Contification to provide continuing education credit to OCM board certified case managers. Sponsor code: 00061357. The cosme is approved for 6 CB clack hours for 2006 (approved # 6135763195), 2007 (approved # 6135763195), 2009 (approved # 00061357-A214), 01/15/10-12/31/10 (approved # 00061357-A345), 2011 (approved # 00061357 W0000936; approval number: 20133257). To claim these CBs, log lois year CE Canter soos board cardified case manager 's runawal date st at www.comcerdification.org. Cartificates mest be retained for one year past the participant's CCIM

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Robert G. Hess, Jr., 204, PhD, FAAN

Boccoulive Vice President, Global Programming, Gassett Education

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GANNETT Education

6400 Arlington Bordcrand, Batta 1000 Palis Chereb, VA 22042

On this date of Tuesday, April 16, 2013

Laktyetin Campbell 19353 Ledagion Redford, MI 48240

License #: Registered Name MI 4704226166

5.80 contact hours for the study of:

Rhythm Recognition
Getting to the Heart of the Matter (60090)

Passing Score

Output Education is accordined to a provider of continuing straing education by the American Nutses Credentialing Caster's Commission on Accorditation.

Common Education in also socredised by the State of Florida Board of Nexiting (provider no. FBN 50-1489) and the Children's Board of Registered Nursing (provider no. CEP 13213).

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Cobert G. Hens, Jr., ROI, PRO, F

Robert G. Hess, &, RN, PhD, FAAN
Exceptive Vice President, Global Programming, Gennett Education

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GANNETT Education

6400 Artington Booterard, Suthe 1000 Patts Charect, VA 22042

On this date of Therday, April 16, 2013

Lakeyetta Campbell 19353 Ladington Radford, MI 48340

License #: Ragistered Neuro MI 4704226166

1.00 contact hours for the study of

Promoting a Culture of Safety to Prevent Medical Errors (CEA98)

Pressing Sooms

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Cerractt Edwardon is also sourcethed by the Stete of Florida Board of Neuslag (provider so. FBN 50-1489) and the California Board of Registered Neuslag (provider no. CEP 13213).

Robert G. Hess, Jr., RN., PhD., PAAN

Exocutive Vice President, Global Programming, Gennest Education

GANNETT T

6400 Avillagico Boolevard, Sulle (000 Felle Church, VA 22042

On this date of Tuesday, April 16, 2013

Leksystta Campbell 19353 Lexington Redford, MI 41240

Licarate #: Ragistaned Nature MI 4704226166

2.00 contact hours for the study of:

(82 [88) Preventing Medication Errors

Passing Score

Gennett Edwardon is accredited as a provider of continuing sursing education by the American Nursea Cradentaling Center's Commission on Accreditation

Chemical Education is also secardified by the State of Florida Board of Naziring (provider no. FBN 50-1489) and the California Board of Registered Naziring (provider no. CEP 13213).

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Robert G. Heet, Jr., RN, PhD, FAAN

Executive Vice President, Global Programming, Gaznott Education

Tonce have this original confidence for you

NCSBN Learning Extension

Course Completion
Certificate

This certifies that

La Keyetta Campbell

has completed

Professional Accountability and Legal Liability v4.0

Course Session Date: 19 Apr 2013 - 19 Apr 2013

Contact Hours: 5.40

This course is approved by Narional Council of State Boards of Nursing (NCSBN)

E Provider Number: ABNP 1046, expiration date October 2014.

Printed 4/19/2013 4:18:25 PM

STATE OF MICHIGAN
DEPARTMENT OF LICENSING AND REGULATORY AFFAIRS
BUREAU OF HEALTH PROFESSIONS
BOARD OF NURSING
DISCIPLINARY SUBCOMMITTEE

In the Matter of

LA KEYETTA EVETT CAMPBELL, R.N. License Number: 47-04-226166

ADMINISTRATIVE COMPLAINT

File Number: 47-11-119662

NOW COMES the Michigan Department of Licensing and Regulatory Affairs, hereafter Complainant, by Rae Ramedell, Acting Director, Bureau of Health Professions, and files this complaint against La Keyetta Evett Campbell, R.N., hereafter Respondent, alleging upon information and belief as follows:

- 1. The Michigan Board of Nursing, hereafter Board, is an administrative agency established by the Public Health Code, 1978 PA 368, as amended; MCL 333.1101 et seq. Pursuant to section 16226 of the Public Health Code, supra, the Board's Disciplinary Subcommittee is empowered to discipline licensees for violations of the Public Health Code.
- 2. Respondent is currently licensed to practice as a registered nurse in the state of Michigan.
- 3. At all relevant times, Respondent was employed as a registered nurse at Triumph Hospital, hereafter facility, in Detroit, Michigan.

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- 4. K-dur (potassium chloride) is a prescription medication.
- 5. On February 17, 2011, Respondent was assigned to care for patient W.K. (initials used to protect patient privacy). The following occurred with regard to Respondent's care of patient W.K.:

At 2:00 p.m., the facility's house supervisor nurse noticed patient W.K.'s alarm sounding as the supervisor was walking through the unit. Upon investigation, it was discovered that patient W.K. had been having potentially lethal cardiac arrhythmia since approximately 12:30 p.m. Respondent falled to respond in a timely manner to patient W.K. and falled to notify the physician of the patient's condition.

Once the physician was notified of patient W.K.'s condition by the supervising nurse, an order for K-dur 20 mg by mouth "NOW" was issued along with a blood draw. The supervising nurse informed Respondent of the patient's condition and of the "NOW" order for potassium.

At 4:30 p.m., the supervising nurse was notified that the physician's order had not yet been carried out. Respondent falled to administer patient W.K.'s medication as ordered and failed to perform the blood draw.

6. On February 18, 2011, the facility suspended Respondent's employment pending the results of its investigation into this matter. Subsequently, on February 22, 2011, the facility terminated Respondent's employment and, pursuant to section 20175(5) of the Public Health Code, supra, notified Complainant of Respondent's termination.

CONTINUED ON NEXT PAGE

COUNTI

Respondent's conduct, as set forth above, evidences violations of general duty, consisting of negligence or failure to exercise due care, including negligent delegation to or supervision of employees or other individuals, whether or not injury results, in violation of section 16221(a) of the Public Health Code, <u>supra</u>.

WHEREFORE, Complainant requests that the within complaint be served upon Respondent and that Respondent be offered an opportunity to show compliance with all lawful requirements for retention of the license. If compliance is not shown, Complainant further requests that formal proceedings be commenced pursuant to the Public Health Code, rules promulgated thereunder, and the Administrative Procedures Act of 1969, 1969 PA 306, as amended; MCL 24.201 et seq.

RESPONDENT IS HEREBY NOTIFIED that, pursuant to section 16231(7) of the Public Health Code, <u>supra</u>, Respondent has 30 days from the date of receipt of this complaint to submit a written response to the allegations contained herein. The written response shall be submitted to Complainant Rae Ramsdell, Acting Director, Bureau of Health Professions, Department of Licensing and Regulatory Affairs, P.O. Box 30670, Lansing, MI 48909.

RESPONDENT IS FURTHER NOTIFIED that, pursuant to section 16231(8) of the Public Health Code, <u>supra</u>, Respondent's failure to submit a written response within 30 days, as noted above, shall be treated as an admission of the allegations contained

herein and shall result in transmittal of this complaint directly to the Board's Disciplinary Subcommittee for imposition of an appropriate sanction.

DATED: 9/37/2011

Rae Ramsdell, Acting Director Bureau of Health Professions

This is the tast and final page of an <u>Administrative Complaint</u> in the matter of La Keyetta Evett Campbell, R.N., File Number 47-11-11962, before the Disciplinary Subcommittee of the Michigan Board of Nursing, consisting of four pages, this page included.

ВP

BEFORE THE TEXAS BOARD OF NURSING

In the Matter of
Registered Nurse License Number 672752
issued to LAUREN CAMPBELL-PERRY

AGREED ORDER

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.

Matterial Contents

Executive Director of the Board

On this day the Texas Board of Nursing, hereinafter referred to as the Board, cc the matter of LAUREN CAMPBELL-PERRY, Registered Nurse License Number 672752, hereinafter referred to as Respondent.

Information received by the Board produced evidence that Respondent may be subject to discipline pursuant to Section 301.452(b)(10), Texas Occupations Code.

Respondent waived notice and hearing and agreed to the entry of this Agreed Order approved by Katherine A. Thomas, MN, RN, FAAN, Executive Director, on July 22, 2019.

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 notice and hearing, and agreed to the entry of this Agreed Order.
- 3. Respondent's license to practice as a professional nurse in the State of Texas is in current status.
- 4. Respondent received a Baccalaureate Degree in Nursing from University of Detroit Mercy, Detroit, Michigan, on May 1, 2000. Respondent was licensed to practice professional nursing in the State of Texas on September 19, 2000.
- 5. Respondent's nursing employment history is unknown.
- 6. On or about July 12, 2018, Respondent's license to practice professional nursing in the State of Missouri was placed on PROBATION for a minimum of one (1) year, not to exceed three (3) years by the State of Michigan, Department of Licensing and Regulatory

Affairs, Bureau of Professional Licensing, Board of Nursing. On or about January 9, 2019, Respondent's suspension was lifted. A copy of the Consent Order dated July 12, 2018, is attached and incorporated, by reference, as part of this Order.

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(s) of 22 TEX. ADMIN. CODE §217.12(1)(A)&(6)(A).
- 4. The evidence received is sufficient cause pursuant to Section 301.452(b)(10), Texas Occupations Code, to take disciplinary action against Registered Nurse License Number 672752, heretofore issued to LAUREN CAMPBELL-PERRY.
- 5. Pursuant to Section 301.463(d), Texas Occupations Code, this Agreed Order is a settlement agreement under Rule 408, Texas Rules of Evidence, in civil or criminal litigation.

TERMS OF ORDER

I. SANCTION AND APPLICABILITY

IT IS THEREFORE AGREED and ORDERED that RESPONDENT SHALL receive the sanction of **REMEDIAL EDUCATION** in accordance with the terms of this Order.

- A. This Order SHALL apply to any and all future licenses issued to RESPONDENT to practice nursing in the State of Texas.
- B. This Order SHALL be applicable to RESPONDENT'S nurse licensure compact privileges, if any, to practice nursing in the State of Texas.
- C. As a result of this Order, RESPONDENT'S license(s) will be designated "single state" and RESPONDENT may not work outside the State of Texas in another nurse licensure compact party state.

II. COMPLIANCE WITH LAW

While under the terms of this Order, RESPONDENT agrees to comply in all respects with the Nursing Practice Act, Texas Occupations Code, §§301.001 et seq., the Rules and Regulations Relating to Nursing Education, Licensure and Practice, 22 TEX. ADMIN. CODE §§211.1 et seq., and this Agreed Order.

III. UNDERSTANDING BOARD ORDERS

Within thirty (30) days of entry of this Order, RESPONDENT must successfully complete the Board's online course, "Understanding Board Orders", which can be accessed on the Board's website from the "Discipline & Complaints" drop-down menu or directly at: http://www.bon.texas.gov/UnderstandingBoardOrders/index.asp. Upon successful completion, RESPONDENT must submit the course verification at the conclusion of the course, which automatically transmits the verification to the Board.

IV. REMEDIAL EDUCATION COURSE(S)

In addition to any continuing education requirements the Board may require for licensure renewal, RESPONDENT SHALL successfully complete the following remedial education course(s) within one (1) year of the effective date of this Order, unless otherwise specifically indicated:

A. <u>A Board-approved course in Texas nursing jurisprudence and ethics</u> that 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. Home study and video programs will not be approved.

B. The course "Sharpening Critical Thinking Skills," a 3.6 contact hour online program provided by the National Council of State Boards of Nursing (NCSBN) Learning Extension.

In order to receive credit for completion of this/these course(s), RESPONDENT SHALL CAUSE the instructor to submit a Verification of Course Completion form or SHALL submit the continuing education certificate, as applicable, to the attention of Monitoring at the Board's office. RESPONDENT SHALL first obtain Board approval of any course prior to enrollment if the course is <u>not</u> being offered by a pre-approved provider. Information about Board-approved courses and Verification of Course Completion forms are available from the Board at www.bon.texas.gov/compliance.

V. RESTORATION OF UNENCUMBERED LICENSE(S)

Upon full compliance with the terms of this Agreed Order, all encumbrances will be removed from RESPONDENT'S license(s) and/or privilege(s) to practice nursing in the State of Texas and, subject to meeting all existing eligibility requirements in Texas Occupations Code Chapter 304, Article III, RESPONDENT may be eligible for nurse licensure compact privileges, if any.

BALANCE OF THIS PAGE INTENTIONALLY LEFT BLANK.

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RESPONDENT'S CERTIFICATION

representation by counsel. I have reviewed this Order. I neither admit nor deny the violation(s) alleged herein. By my signature on this Order, I agree to the entry of this 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 this Order becomes effective upon acceptance by the Executive Director on behalf of the Texas Board of Nursing and 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 possible revocation of my license(s) and/or privileges to practice nursing in the State of Texas, as a consequence of my noncompliance.

Signed this Aday of August 2019.
WINNIGO C-19004
LAUREN CAMPBELL-PERRY, RESPONDENT

Notary Public in and for the State of ___

Sworn to and subscribed before me this 27 day of August, 2019

SEAL

Shubham Saxena Notary Public, State of Michigan County of Wayne

My Commission Explices Mayon 20,2024

Acting in the County of Wark

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 _29th_ day of _August_, 20_19_, by LAUREN CAMPBELL-PERRY, Registered Nurse License Number 672752, and said Agreed Order is final.

Effective this _4th_ day of _September_, 20_19_.

Katherine A. Thomas, MN, RN, FAAN

Kathim a. Moman

Executive Director on behalf

of said Board



GRETCHEN WHITMER GOVERNOR

STATE OF MICHIGAN DEPARTMENT OF LICENSING AND REGULATORY AFFAIRS LANSING

ORLENE HAWKS

Certification of Documents in Response to FOIA Request

Requester: Terry Washington

I, Stephani Fleming, FOIA Coordinator, Michigan Department of Licensing and Regulatory Affairs, acknowledge that a FOIA requesting certified records, dated 06/27/2019, was received by the Department on 06/28/2019. Enclosed are true copies of the only records within the Department's possession related to "CERTIFIED copies of ANY and ALL disciplinary actions taken on license number 47-04-226166 belong to Lauren Yvette Campbell-Perry, a/k/a, La Keyetta Evett Campbell. Please forward to the attention of Terry Washington, Investigator, Texas Board of Nursing, 333 Guadalupe Street, Suite 3-460, Austin, Texas 7870.", which consists of 35 pages. The Department conducted a thorough search of its electronic databases and other records, and I certify that, to the best of my knowledge, information, and belief, it has no additional records responsive to the request.

Dated: July 22, 2019

Stephani Fleming FOIA Coordinator

Department of Licensing and Regulatory Affairs State of Michigan



STATE OF MICHIGAN
DEPARTMENT OF LICENSING AND REGULATORY AFFAIRS
BUREAU OF PROFESSIONAL LICENSING
BOARD OF NURSING
DISCIPLINARY SUBCOMMITTEE

In the Matter of

LAUREN YVETTE CAMPBELL-PERRY, R.N. aka LA KEYETTA EVETT CAMPBELL, R.N. License No. 47-04-226166,

Respondent.

File No. 47-17-144792

CONSENT ORDER

On January 22, 2018, the Department of Licensing and Regulatory Affairs executed an Administrative Complaint charging Respondent with violating the Public Health Code, MCL 333.1101 et seq.

Respondent has admitted that the facts alleged in the Complaint are true and constitute violation(s) of MCL 333.16221(a) and (b)(i). The Michigan Board of Nursing Disciplinary Subcommittee (DSC) has reviewed this Consent Order and Stipulation and agrees that the public interest is best served by resolution of the outstanding Complaint.

Therefore, IT IS FOUND that the facts alleged in the Complaint are true and constitute violation(s) of MCL 333.16221(a) and (b)(i).

Accordingly, IT IS ORDERED that for the cited violation(s) of the Public Health Code, Respondent is placed on PROBATION for a minimum of one year, and not to exceed three years, commencing on the effective date of this Order. The probationary

Page 1 of 8

period shall only be reduced while Respondent is employed as a nurse. The terms of probation shall be as follows:

1. <u>EVALUATION</u>: Within 30 days of the effective date of this Order, Respondent shall contact the Health Professional Recovery Program (HPRP), telephone number 1-800-453-3784, to make arrangements to undergo an evaluation as directed by HPRP. The evaluation shall be conducted at Respondent's expense, and Respondent shall ensure that a copy of the evaluation results is provided to HPRP.

Respondent shall comply with all requests by HPRP. If Respondent fails to comply with any request, HPRP shall immediately notify the Department in writing.

If HPRP determines that Respondent does not require treatment monitoring, HPRP shall immediately notify the Department in writing of this determination and Respondent shall not be required to enter into a monitoring agreement.

If HPRP determines that Respondent needs treatment monitoring, Respondent shall promptly enter into a non-confidential regulatory monitoring agreement with HPRP.

If Respondent fails to enter into and comply with a monitoring agreement, HPRP shall immediately notify the Department in writing.

All information and documentation acquired by HPRP in developing and implementing the monitoring agreement, including but not limited to urinalyses, reports of mental and physical evaluations, therapist reports, or chemical dependency/substance abuse treatment facility records or reports, shall be made available to the Department upon request to establish Respondent's compliance or non-compliance with the terms of this Order.

If the duration of a monitoring agreement required pursuant to this Order exceeds the period of probation, Respondent shall continue to comply with the monitoring agreement. Upon Respondent's successful completion of the monitoring agreement, HPRP shall promptly notify the Department in writing.

2. CONTINUING EDUCATION: Within six months of the effective date of this Order, Respondent shall successfully complete and submit satisfactory evidence of completing a minimum of three hours of continuing education accepted by the Board in each of the following areas: a) disciplinary actions; b) documentation; c) medication errors; and d) sharpening critical thinking skills. This continuing education shall not apply in computing Respondent's current continuing education requirements for license renewal.

Respondent shall seek and obtain pre-approval of the continuing education from the Chairperson of the Board or the Chairperson's designee or may successfully complete pre-approved continuing education in the above-specified areas offered by the National Council of State Boards of Nursing, available at www.learningext.com.

Respondent shall mail requests for pre-approval and proof of the successful completion of the continuing education to the address at set for the below.

3. <u>EMPLOYER REPORTS</u>: If Respondent is employed in the licensed profession, Respondent shall immediately provide copies of this Order and the Complaint to Respondent's employer and supervisor. Respondent's employer or supervisor shall be knowledgeable of Respondent's history and shall file reports with the Department advising of Respondent's work performance, as provided below.

If Respondent fails to comply with minimal standards of acceptable and prevailing practice or appears unable to practice with reasonable skill and safety, Respondent's employer or supervisor shall immediately notify the Department.

4. <u>EMPLOYMENT CHANGE</u>: Respondent shall provide written notice to the Department upon entering into or

leaving any employment in the licensed profession within 15 days of such action.

Respondent shall provide copies of this Order and the Complaint to each successor employer in the licensed profession. Respondent's employer or supervisor shall continue to file reports with the Department advising of Respondent's work performance, as set forth above.

- 5. REPORT OF NON-EMPLOYMENT: If at any time during the period of probation Respondent is not employed in the licensed profession, Respondent shall file a report of non-employment with the Department within 15 days after becoming unemployed. Respondent shall continue to file a report of non-employment on a quarterly basis until Respondent returns to employment in the licensed profession.
- 6. RESIDENCY AND PRACTICE OUTSIDE MICHIGAN: Periods of residency and practice outside Michigan shall not reduce the probationary period of this Order. Respondent shall report any change of residency or practice outside Michigan no more than 15 days after the change occurs. Compliance with this provision does not satisfy the requirements of MCL 333.16192(1) and 333.16221(g), regarding Respondent's duty to report name or mailing address changes to the Department.
- 7. REPORTING PROCEDURE: Unless immediate notification is required, as indicated above, all reports shall be filed on a quarterly basis. The first report shall be filed at the end of the third month of probation and subsequent reports every three months after that.

Respondent authorizes the Department or its authorized representative to periodically contact the reporting individuals or agencies to inquire of Respondent's progress.

Respondent shall direct all communications, required by the terms of this Order to: Department of Licensing and Regulatory Affairs, Enforcement Division, Compliance Section, P.O. Box 30670, Lansing, MI 48909.

The timely filing of all information relating to this Order shall be Respondent's responsibility, and failure to file the required information within the time limitations provided shall be deemed a violation of this Order.

8. COMPLIANCE WITH THE PUBLIC HEALTH CODE:
Respondent shall comply with all applicable provisions
of the Public Health Code and rules promulgated
thereunder.

 COSTS: Respondent shall be solely responsible for payment of all costs incurred in complying with the terms of this Order.

IT IS FURTHER ORDERED that Respondent shall be automatically discharged from probation at the end of the probationary period, PROVIDED Respondent has paid the fine as set forth below, has complied with the terms of this Order and has not violated the Public Health Code.

IT IS FURTHER ORDERED that for the cited violation(s) of the Public Health Code, Respondent is FINED \$250.00, to be paid to the State of Michigan within 60 days of the effective date of this Order. Respondent shall direct payment to the Department of Licensing and Regulatory Affairs, Enforcement Division, Compliance Section, P.O. Box 30189, Lansing, MI 48909. The fine shall be paid by check or money order, made payable to the State of Michigan, and shall clearly display File Number 47-17-144792.

IT IS FURTHER ORDERED that if Respondent is unable to obtain one year of employment demonstrating compliance with the minimal standards of acceptable and prevailing practice, or the ability to practice with reasonable skill and safety during the maximum three year period of probation, Respondent may demonstrate safety to practice by submitting to a skills assessment by a skills assessment program pre-approved by the

Board Chairperson or the Chairperson's designee. Respondent shall not be eligible to submit to the skills assessment sooner than 90 days prior to the expiration of the maximum three year period of probation, provided Respondent has successfully complied with all other terms of the Order.

discharged from probation upon written verification from the pre-approved skills assessment program that Respondent is safe to practice. Failure to meet the employment requirement or successfully complete a skills assessment evaluation within the maximum three year period of probation shall be deemed a violation of probation and constitute grounds for further disciplinary action. If Respondent fails to meet the employment requirement or successfully complete a skills assessment evaluation within the maximum three year period of probation or fails to comply with the terms and conditions of this Order, Respondent's license shall be suspended for a minimum of one day until successful completion of the skills evaluation or compliance with the terms and conditions of this Order. If Respondent's license remains suspended for more than six months, reinstatement of Respondent's license shall not be automatic, and Respondent will have to petition for reinstatement of her license. If Respondent petitions for reinstatement of her license, the petition shall be in accordance with MCL 333.16245 and 333.16247.

Consent Order and Stipulation File No. 47-17-144792

IT IS FURTHER ORDERED that this Order shall be effective 30 days from the date signed by the Board, as set forth below.

MICHIGAN BOARD OF NURSING

By: Chairperson Disciplinary Subcommittee

Dated: July 12, 2018

STIPULATION

- 1. The facts alleged in the Complaint are true and constitute violation(s) of MCL 333.16221(a) and (b)(i).
- 2. Respondent understands and intends that by signing this Stipulation Respondent is waiving the right, pursuant to the Public Health Code, the rules promulgated thereunder, and the Administrative Procedures Act, MCL 24.201 *et seq.*, to require the Department to prove the charges set forth in the Complaint by presentation of evidence and legal authority, and Respondent is waiving the right to appear with an attorney and such witnesses as Respondent may desire to present a defense to the charges.
- 3. This matter is a public record required to be published and made available to the public pursuant to the Michigan Freedom of Information Act, MCL 15.231 et seq., and this action will be reported to the National Practitioner Data Bank and any other entity as required by state or federal law, in accordance with 42 USC 1396r-2.

- 4. Mary VanderKolk, M.S.N., M.B.A., R.N., a member of the Board who supports this proposal, and the Department's representative are free to discuss this matter with the DSC and recommend acceptance of the resolution set forth in this Order.
- 5. This Order is approved as to form and substance by Respondent and the Department and may be entered as the final order of the DSC in this matter.
- 6. This proposal is conditioned upon acceptance by the DSC. Respondent and the Department expressly reserve the right to further proceedings without prejudice should this Order be rejected.

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AGREED TO BY: Chyllyfoff Gran	AGREED TO BY: A MUSE CONTROL A MUSE CONTROL
Cheryl Wykoff Pezon, Acting Director Bureau of Professional Licensing	aka La Keyetta Evett Campbell-Perry, R.N. Respondent
Dated: June 15, 2018	Dated;

CC

STATE OF MICHIGAN DEPARTMENT OF LICENSING AND REGULATORY AFFAIRS BUREAU OF PROFESSIONAL LICENSING BOARD OF NURSING DISCIPLINARY SUBCOMMITTEE

In the Matter of

LAUREN YVETTE CAMPBELL-PERRY, R.N. aka LA KEYETTA EVETT CAMPBELL, R.N. License No. 47-04-226166,

Respondent.

File No. 47-17-144792

ADMINISTRATIVE COMPLAINT

The Michigan Department of Licensing and Regulatory Affairs, by Cheryl Wykoff Pezon, Acting Director, Bureau of Professional Licensing, complains against Respondent as follows:

- 1. The Michigan Board of Nursing is an administrative agency established by the Public Health Code, MCL 333.1101 *et seq.* Pursuant to MCL 333.16226, the Board's Disciplinary Subcommittee is empowered to discipline persons for violations of the Public Health Code.
- 2. Respondent is currently licensed to practice as a registered nurse in the state of Michigan.
- 3. At all times relevant, Respondent was employed by Henry Ford Health System (facility), in Detroit, Michigan, as a registered nurse.

4. For historical information:

- a. On June 5, 2013, in case number 47-11-119662, a Consent Order was entered against Respondent based on Respondent failing to respond in a timely manner to a patient's potentially lethal cardiac arrhythmia and failing to administer medication to the patient as ordered by a physician. Respondent was reprimanded, ordered to pay a fine, and required to complete continuing education.
- 5. Hydromorphone, morphine, and Norco¹ are schedule 2 controlled substances. Lorazepam is a schedule 4 controlled substance.
- 6. On or about November 28, 2016, facility management performed an audit of Respondent's November 2016 Pyxis and Medication Administration Record (MAR) documentation, and the following information was discovered:

Patient C.B. (initials used to protect patient privacy)

- a. On November 5, 2016, patient C.B. had an order for hydromorphone IV, PRN.² At 8:00 a.m., Respondent documented that patient C.B. had no pain. However, at 9:37a.m., Respondent documented the administration of hydromorphone 1 mg to patient C.B. without documenting a pre- or post-pain assessment.
- b. On November 5, 2016, at 12:00 p.m., Respondent documented that patient C.B. had no pain. However, at 1:33 p.m., Respondent administered patient C.B. hydromorphone 1mg without documenting a pre- or post-pain assessment.
- c. On November 5, 2016, at 4:29 p.m., Respondent removed hydromorphone 1 mg from Pyxis and failed to document administering or wasting the medication.

¹ Norco is a combination of acetaminophen and hydrocodone.

² PRN stands for "pro re nata" or "as needed."

Patient O.H.

a. On November 5, 2016, patient O.H. had an order for hydromorphone. At approximately 11:47 a.m., Respondent removed one hydromorphone 2 mg tablet and documented administering 1mg of hydromorphone to patient O.H. However, at 2:29 p.m., Respondent documented wasting 2 mg of hydromorphone.

Patient Y.G.

a. On November 5, 2016, patient Y.G. had an order for morphine. At 8:08 a.m., Respondent documented administration of morphine 2mg to patient Y.G. with no pre- or post-pain assessment.

Patient J.G.

b. On November 6, 2016, patient J.G. had an order for morphine. At 2:58 p.m., Respondent documented the administration of morphine 2mg to patient J.G. with no preor post-pain assessment.

Patient J.B.

c. On November 10, 2016, patient J.B. had an order for Norco, PRN. At 8:06 a.m., Respondent documented no pain for patient J.B. At 8:37 a.m., Respondent documented administering one Norco tablet to patient J.B. without documenting a pre- or post-pain assessment.

Patient R.B.

a. On November 11, 2016, patient R.B. had an order for Norco. At 8:48 a.m., Respondent administered a Norco tablet to patient R.B. without documenting a pre- or postpain assessment. At 5:30 p.m., Respondent administered a Norco tablet to patient R.B. without documenting a preor post-pain assessment.

Patient L.S.

a. On November 14, 2016, patient L.S. had an order for Lorazepam. At 11:04 a.m., Respondent removed Lorazepam 2mg but documented administering 0.5mg and wasting 1.75mg.

Patient S.J.

- a. On November 14, 2016, patient S.J. had an order for a hydromorphone 1mg IV. At 7:49 a.m., Respondent removed hydromorphone 1mg but failed to document its administration or waste.
- b. On November 15, 2016, at 4:12 p.m., Respondent administered hydromorphone to patient S.J. without documenting a pre- or post-pain assessment. At 4:18 p.m., Respondent removed two (2) Oxycodone 5mg tabs but failed to document their administration or waste. At 6:17 p.m., Respondent administered hydromorphone to patient S.J. without documenting a pre- or post-pain assessment.
- Respondent was suspended from the facility from December 2,
 2016, through December 12, 2016, pending further investigation.
- 8. Respondent refused to meet with facility management per the investigation and on December 11, 2016, Respondent resigned in lieu of termination.
- 9. Facility management notified the Department of Respondent's resignation in lieu of termination, pursuant to MCL 333.20175(5).

COUNT I

Respondent's conduct, as set forth above, evidences a violation of general duty, consisting of negligence or failure to exercise due care, including negligent

delegation to or supervision of employees or other individuals, whether or not injury results, or any conduct, practice, or condition that impairs, or may impair, the ability to safely and skillfully engage in the practice of the health profession, in violation of MCL 333.16221(a).

COUNT II

Respondent's conduct, as set forth above, evidences departure from, or failure to conform to, minimal standards of acceptable and prevailing practice for the health profession, whether or not actual injury to an individual occurs, in violation of MCL 333.16221(b)(i).

RESPONDENT IS NOTIFIED that, pursuant to MCL 333.16231(8), Respondent has 30 days from the date of receipt of this Complaint to answer this Complaint in writing and to show compliance with all lawful requirements for licensure. Respondent shall submit the response to the Bureau of Professional Licensing, Department of Licensing and Regulatory Affairs, P.O. Box 30670, Lansing, MI 48909.

Administrative Complaint File No. 47-17-144792

Respondent's failure to submit an answer within 30 days is an admission of the allegations in this Complaint. If Respondent fails to answer, the Department shall transmit this Complaint directly to the Board's Disciplinary Subcommittee to impose a sanction, pursuant to MCL 333.16231(9).

Dated: January 22, 2018

Cheryl Wykoff Pezon, Acting Director Bureau of Professional Licensing

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STATE OF MICHIGAN DEPARTMENT OF LICENSING AND REGULATORY AFFAIRS BUREAU OF PROFESSIONAL LICENSING BOARD OF NURSING DISCIPLINARY SUBCOMMITTEE

In the Matter of

LAUREN YVETTE CAMPBELL-PERRY, R.N. aka LA KEYETTA EVETT CAMPBELL License No. 47-04-226166,

Respondent.

File No. 47-18-000502

ADMINISTRATIVE COMPLAINT

The Michigan Department of Licensing and Regulatory Affairs, by Cheryl Wykoff Pezon, Director, Bureau of Professional Licensing, complains against Respondent as follows:

- 1. The Michigan Board of Nursing is an administrative agency established by the Public Health Code, MCL 333.1101 *et seq.* Pursuant to MCL 333.16226, the Board's Disciplinary Subcommittee is empowered to discipline persons for violations of the Public Health Code.
- 2. Respondent is currently licensed to practice as a registered nurse in the state of Michigan.
 - 3. For historical purposes, the following occurred:

On September 27, 2011, the Department executed a Formal Complaint against Respondent based on allegations that Respondent failed to respond in a timely manner to a patient's potentially lethal cardiac arrhythmia and failed to administer medication to the patient as ordered by a physician. On June 5,

2013, in resolution of the matter, a Consent Order and Stipulation was executed in which Respondent was reprimanded, ordered to pay a fine, and required to complete continuing education.

4. On January 22, 2018, the Department executed an Administrative Complaint (Complaint) against Respondent alleging documentation errors. On July 12, 2018, in resolution of the matter, the Board's Disciplinary Subcommittee executed a Consent Order and Stipulation (Order) which, in part, placed Respondent on probation and ordered Respondent to immediately provide her employer with copies of the Order and Complaint. A copy of the Order, marked Exhibit A, is attached and incorporated.

5. Contrary to the terms of the Order, Respondent failed to provide copies of the Order and Complaint to her employer.

<u>COUNT I</u>

Respondent's conduct, as set forth above, constitutes a violation of a final order executed by the Board's Disciplinary Subcommittee, contrary to Mich Admin Code, R 338.1632, in violation of MCL 333.16221(h).

RESPONDENT IS NOTIFIED that, pursuant to MCL 333.16231(8), Respondent has 30 days from the date of receipt of this Complaint to answer this Complaint in writing and to show compliance with all lawful requirements for licensure. Respondent shall submit the response to the Bureau of Professional Licensing, Department of Licensing and Regulatory Affairs, P.O. Box 30670, Lansing, MI 48909.

Respondent's failure to submit an answer within 30 days is an admission of the allegations in this Complaint. If Respondent fails to answer, the Department shall transmit this Complaint directly to the Board's Disciplinary Subcommittee to impose a sanction, pursuant to MCL 333.16231(9).

Dated:

November 1, 2018

Cheryl Wykoff Pezon, Director Bureau of Professional Licensing

Attachment

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STATE OF MICHIGAN DEPARTMENT OF LICENSING AND REGULATORY AFFAIRS BUREAU OF HEALTH CARE SERVICES BOARD OF NURSING DISCIPLINARY SUBCOMMITTEE

In the Matter of

LA KEYETTA EVETT CAMPBELL, R.N.

Complaint No. 47-11-119662

License No. 47-04-226166

CONSENT ORDER AND STIPULATION

CONSENT ORDER

An administrative complaint was filed with the Disciplinary Subcommittee of the Board of Nursing on September 27, 2011, charging La Keyetta Evett Campbell, R.N. (Respondent) with having violated section 16221(a) of the Public Health Code, 1978 PA 368, as amended, MCL 383.1101 et seq.

The parties have stipulated that the Disciplinary Subcommittee may enter this consent order. The Disciplinary Subcommittee has reviewed the stipulation contained in this document and agrees that the public interest is best served by resolution of the outstanding complaint. Therefore, the Disciplinary Subcommittee finds that the allegations of fact contained in the complaint are true and that Respondent has violated section 16221(a) of the Public Health Code.

Accordingly, for these violations, IT IS ORDERED:

Respondent is REPRIMANDED.

Respondent is FINED \$500.00 to be paid by check, money order or cashier's check made payable to the State of Michigan (with complaint number 47-11-119682 clearly indicated on the check or money order) within sixty days from the effective date of this order. The timely payment of the fine shall be Respondent's responsibility. Respondent shall mail the fine to: Sanction Monitoring, Bureau of Health Care Services, Department of Licensing and Regulatory Affairs, P.O. Box 80185, Lensing, Michigan 48909.

Respondent shall direct any communications to the Department that are required by the terms of this order to: Sanction Monitoring Unit, Bureau of Health Care Services, Department of Licensing and Regulatory Affairs, P.O. Box 30670, Lansing, Michigan 48909.

Respondent shall be responsible for the timely compliance with the terms of this consent order, including the timely filing of any documentation. Failure to comply within the time limitations provided will constitute a violation of this order.

If Respondent violates any term or condition set forth in this order,
Respondent will be in violation of 1996 AACS, R 388.1632, and section 16221(h) of
the Public Health Code.

This order shall be effective on the date signed by the Chairperson of the Disciplinary Subcommittee or the Disciplinary Subcommittee's authorized representative, as set forth below.

Signed on 4/5/13

MICHIGAN BOARD OF NURSING

By Nay Couado Chairperson, Disciplinary Subcommittee

STIPULATION

The parties stipulate as follows:

- 1. Respondent does not contest the allegations of fact and law in the complaint. Respondent understands that, by pleading no contest, she does not admit the truth of the allegations but agrees that the Disciplinary Subcommittee may treat the allegations as true for resolution of the complaint and may enter an order treating the allegations as true.
- 2. Respondent understands and intends that, by signing this stipulation, she is waiving the right under the Public Health Code, rules promulgated under the Public Health Code, and the Administrative Procedures Act of 1969, 1969 PA 306, as amended, MCL 24.201 st seq, to require the Department to prove the charges set forth in the complaint by presentation of evidence and legal authority, and to present a defense to the charges before the Disciplinary Subcommittee or its authorized representative. Should the Disciplinary Subcommittee reject the proposed consent order, the parties reserve the right to proceed to hearing.
- 3. The Disciplinary Subcommittee may enter the above Consent Order, supported by Board conferee Joshua M. Meringa, RN-BC, BSN. Mr. Meringa or an attorney from the Licensing and Regulation Division may discuss this matter with the Disciplinary Subcommittee in order to recommend acceptance of this resolution.

- 4. Mr. Meringa and the parties considered the following factors in reaching this agreement:
 - A. Following this incident, Respondent completed pre-approved continuing education in the following subject areas: professional responsibility and legal liability; recognizing lethal rhythms; documentation; and medication administration and safety (see attached). These courses were reviewed by conferee Meringa, who deemed them sufficient and approved them.
 - B. During a compliance conference between the parties on February 25, 2018, Respondent maintained that she intended to administer the K-dur tablet to the patient, but she claimed that the Hospital's pharmacy failed to fill the order. Additionally, Respondent did not attempt to obtain the medication from the PYXIS machine because she understood that the PYXIS system would not let her remove medication without an order, and she could not override the machine.
 - C. Respondent maintains that she was sufficiently monitoring the patient's heart rhythms and had communicated with the physician's assistant earlier in her shift about this issue.

 Additionally, Respondent believes there are documents missing from the patient's chart and these documents would substantiate her claims.
 - D. Conferee Josh Meringa, RN-BC, BSN, spoke with Respondent at length during the compliance conference and concluded that this violation appeared to be a one-time incident and not indicative of her overall nursing skills. Thus, Mr. Meringa concluded that it was unnecessary for the Board to monitor Respondent's nursing practice.

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By signing this stipulation, the parties confirm that they have read, understand and agree with the terms of the consent order.

AGREED TO BY:

AGREED TO BY:

Andrew J. Hudson (P76092) Assistant Attorney General

Attorney for Complainant

Dated: 4/29/15

La Keyetta Evett Campbell, R.N.

Respondent

Dated: __

Andrew J. Paluda (P42890)
Attorney for Respondent

Attorney for Respondent Dated: 1/2/0/13

LF/2012-0028222-A/Compbell, La Keyetta Evett, R.N., 119662/CO8

GANNETT Education

6400 Arthagon Boxleverd, Sahe 1000 Pulls Church, VA 22042

On this date of Tresday, April 16, 2013

Lateryetta Campbell 19353 Lexhagon Redford, MI 48240

License #: Registered Nurse MI 4704226166

5.20 contact hours for the study of:

(60075) Document It Right: A Nurse's Guide to Charting

Panding Score

Gennett Education is socredited at a provider of continuing serving advention by the American Nurses Credentialing Center's Commission on Accreditation

Gennett Education is also accounted by the State of Florida Board of Nazzing (provider so. FBN 50-1489) and the California Board of Registered Nursing (provider no. CEP 13213).

This program has boom pro-approved by The Commission for Case Manager Cartification to provide continuing advantion aredit to CCM board cartified case managers. Sponsor code: 00061357. The course is approved for 4 CE content hours for 2008 (approved # 6135765713), 2009 (approved # 00061357-A203), 01/15/10-12/31/10 (approved # 00061357-A216), 2011 (approved # 790003727), and 2013 (activity code: W0000978; approved manager. 20133349). To claim these CEs, log into your CE Center account at www.comecrelification.org. Contibeates must be retained for one year past the participant 's CCM board cardified case manager's renewal date

Robert O. Heas, Jr., RN, PhD, FAAN
Executive Vice President, Global Programming, Connect Education

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GANNETT

Education

6490 ArRogons Bostoward, Suite 1000 Palls Chards, VA 22042

On this date of Tuesday, April 16, 2013

Lalwyetta Campbell 19353 Ladington Rodford, MI 48240

Liconso #: Ragistared Naces MI 4704226166

7.30 contact hours for the study of:

(0000)

Everyday Ethics for Nurses

Passing Score

Connect Education is accredited as a provider of continuing number education by the American Number Conductating Contests Commission on Accreditation

Cament Education is also accordited by the State of Fioritis Board of Nursing (provider se. FBN S9-1489) and the California Board of Registered Nursing (provider no. CEP 13213).

This program has been pre-approved by The Commission for Case Manager Carillession to provide continuing education credit to CCM board certified case managers. Sponsor code: 00061357. The course is approved for 6 CB clack board for 2006 (approved 8 6135742195), 2007 (approved 8 613576395), 2009 (approved 8 00061357-A214), 01/15/10-12/31/10 (approved 8 00061357-A245), 2011 (approved 8 00061357-W000986; approval number: 20133357). To claim these CBs, log into your CE Canter account at www.comocrification.org. Cardificates must be retained for one year past the participant's CCM board cardification args.

boban G. Heen, Jr., EUK, Ph.D. F.

Robort G. Heas, Jr., RM, PhD, PAAN

Boccotive Vice President, Global Programming, General Education

Plane keep this religional confidence for your profusional executor, do not read to the board unless confidence in specifically requests

GANNETT Education

6400 Arlington Bowlerard, Butts 1000 Palis Cherch, VA 22042

On this date of Tuesday, April 16, 2013

Lakeyetta Campbell 1935) Lechagos Redford, MI 48240

License #: Registered Nurse MI 4704226166

5.80 contact hours for the study of:

Getting to the Heart of the Matter (60090) Rhythm Recognition

Passing Score

Connect Education is accordated as a provider of continuing serving education by the American Nuclea Credentishing Capter's Commission on Accorditation.

Garnett Education is also socration by the State of Florida Board of Numbra (provider no. FBN 58-1489) and the Catifornia Board of Registered Numbra (provider no. CEP 13213).

This program has been pro-approved by The Commission for Case Manager Cardiffication to provide confinning education exact to CCM board confined once managers. Sponsor code: 00061357, The course is approved for 4 CS about hours for 2009 (approval # 00061357-A213), 01/15/16-12/31/10 (approval # 00061357-A214), 2011 (approval # 00061357-A214), 2012 (approval # 00061357-A214), 2013 (approval # 00061357-A214), 2012 (approval # 00061357-A214), 2013 (approval # 00 one year past the participant's CCM board certified case manager's received date.

Robert G. Hess, Jr., RN, PhD, FAAN
Executive Vice President, Global Programming, General Education

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GANNETT T

6400 Arlington Bordovard, State 2000 Pulls Church, VA 22042

On this date of Tuesday, April 16, 2013

Lakeyetts Campbull 19353 Lexhipton Radford, MI 48340

License F. Registered Nerse MI 4704226166

1.00 contact hours for the study of

Promoting a Culture of Safety to Prevent Madical Errors (CE498)

Pressing Score

Onnost Education is secretized as a provider of containing nursing education by the American Nurses Credentialing Center's Commission on Accreditation

Caractt Education is also accredited by the Sam of Florida Board of Necsing (provider so. FBN 30-1489) and the California Board of Registered Nersing (provider no. CEP 13213).

Robert G. Hon, Jr., RN, PhD, PAAN
Executive Vice President, Chobal Programs

GANNETT Education

6400 Arthugton Booleward, Sche (000 Falls Church, VA 22002

On this date of Tuesday, April 16, 2013

Lekoyette Campbell 19353 Leedington Redford, MI 45340

License #: Ragistared Name MI 4704226166

2.00 contact bours for the study of:

(82 (82 (82) Preventing Medication Errors

Passing Score

Cennett Beluestion is accredited as a provider of contituing nursing education by the American Nurses Cradentaling Caster's Commission on Accreditation.

Charact Education is also secredized by the State of Florida Board of Nacing (provider no. FBN 59-1489) and the California Board of Registered Nazzing (provider no. CEP 13213).

This program has been pro-approved by The Codentisation for Case Manager Cartification to provide constaining adsocution could to CCM board cartified case managers. Sponsor code: 00061357. The come is approved for 2 CEUs for 2011 (approved 8 00061357-A288), 2012 (approved 8 750003735), and 2013 (activity code: W5000999; approved number: 20133370). To claim these CES, log into your CE Caster account at www.comecrification.org. Cartificates smeat be retained for one year past the participant's CCM board certified case manager's renewal date.

Robert G. Hass, Jr., RN, FhD, FAAN Executive Vice Pealders, Global Programming, Gaenett Edwardon

NCSBN Learning Extension

Course Completion
Certificate

This certifies that

La Keyetta Campbell

has completed

Professional Accountability and Legal Liability v4.0

Course Session Date: 19 Apr 2013 - 19 Apr 2013

Contact Hours: 5.40

This course is approved by Neriouel Council of State Boards of Mursting (MCSBN)
WCSBN is accredited as a provider of confishing mursing education by the Alabama Board of Mursting

CE Provider Number: ABNP1046, expiration date October 2014.

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STATE OF MICHIGAN
DEPARTMENT OF LICENSING AND REGULATORY AFFAIRS
BUREAU OF HEALTH PROFESSIONS
BOARD OF NURSING
DISCIPLINARY SUBCOMMITTEE

In the Matter of

LA KEYETTA EVETT CAMPBELL, R.N. License Number: 47-04-226166

File Number: 47-11-119662

ADMINISTRATIVE COMPLAINT

NOW COMES the Michigan Department of Licensing and Regulatory Affairs, hereafter Complainant, by Rae Ramsdell, Acting Director, Bureau of Health Professions, and files this complaint against La Keyetta Evett Campbell, R.N., hereafter Respondent, alleging upon Information and belief as follows:

- 1. The Michigan Board of Nursing, hereafter Board, is an administrative agency established by the Public Health Code, 1978 PA 368, as amended; MCL 333.1101 et seg. Pursuant to section 16226 of the Public Health Code, supra, the Board's Disciplinary Subcommittee is empowered to discipline licensees for violations of the Public Health Code.
- 2. Respondent is currently licensed to practice as a registered nurse in the state of Michigan.
- At all relevant times, Respondent was employed as a registered nurse at Triumph Hospital, hereafter facility, in Detroit, Michigan.

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- 4. K-dur (potassium chloride) is a prescription medication.
- 5. On February 17, 2011, Respondent was assigned to care for patient W.K. (Initials used to protect patient privacy). The following occurred with regard to Respondent's care of patient W.K.:

At 2:00 p.m., the facility's house supervisor nurse noticed patient W.K.'s alarm sounding as the supervisor was walking through the unit. Upon investigation, it was discovered that patient W.K. had been having potentially lethal cardiac arrhythmia since approximately 12:30 p.m. Respondent failed to respond in a timely manner to patient W.K. and failed to notify the physician of the patient's condition.

Once the physician was notified of patient W.K.'s condition by the supervising nurse, an order for K-dur 20 mg by mouth "NOW" was issued along with a blood draw. The supervising nurse informed Respondent of the patient's condition and of the "NOW" order for potassium.

At 4:30 p.m., the supervising nurse was notified that the physician's order had not yet been carried out. Respondent falled to administer patient W.K.'s medication as ordered and falled to perform the blood draw.

6. On February 18, 2011, the facility suspended Respondent's employment pending the results of its investigation into this matter. Subsequently, on February 22, 2011, the facility terminated Respondent's employment and, pursuant to section 20175(5) of the Public Health Code, supra, notified Complainant of Respondent's termination.

CONTINUED ON NEXT PAGE

COUNTI

Respondent's conduct, as set forth above, evidences violations of general duty, consisting of negligence or failure to exercise due care, including negligent delegation to or supervision of employees or other individuals, whether or not injury results, in violation of section 18221(a) of the Public Health Code, <u>supra</u>.

WHEREFORE, Complainant requests that the within complaint be served upon Respondent and that Respondent be offered an opportunity to show compliance with all lawful requirements for retention of the license. If compliance is not shown, Complainant further requests that formal proceedings be commenced pursuant to the Public Health Code, rules promulgated thereunder, and the Administrative Procedures Act of 1969, 1969 PA 306, as amended; MCL 24.201 et seq.

RESPONDENT IS HEREBY NOTIFIED that, pursuant to section 16231(7) of the Public Health Code, <u>supra</u>, Respondent has 30 days from the date of receipt of this complaint to submit a written response to the allegations contained herein. The written response shall be submitted to Complainant Rae Ramsdell, Acting Director, Bureau of Health Professions, Department of Licensing and Regulatory Affairs, P.O. Box 30670, Lansing, MI 48909.

RESPONDENT IS FURTHER NOTIFIED that, pursuant to section 16231(8) of the Public Health Code, <u>supra</u>, Respondent's failure to submit a written response within 30 days, as noted above, shall be treated as an admission of the allegations contained

herein and shall result in transmittal of this complaint directly to the Board's Disciplinary Subcommittee for imposition of an appropriate sanction.

DATED: 9/37/2011

Ree Ramsdell, Acting Director Bureau of Health Professions

This is the tast and final page of an <u>Administrative Complaint</u> in the matter of Le Keyetta Evett Campbell, R.N., File Number 47-11-11982, before the Disciplinary Subcommittee of the Michigan Board of Nursing, consisting of four pages, this page included.

BP