



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.
Patricia A. Plummer
Executive Director of the Board

BEFORE THE TEXAS BOARD OF NURSING

In the Matter of
KEVIN WILLIAMS,
Vocational Nurse License Number 217353

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ORDER OF THE BOARD

On this day the Texas Board of Nursing, hereinafter referred to as the Board, considered the matter of KEVIN WILLIAMS, Vocational Nurse License Number 217353, hereinafter referred to as Respondent.

This action was taken in accordance with Section 301.453(c), Texas Occupations Code.

Respondent waived notice and hearing and agreed to the entry of this Order.

The Board makes the following Findings of Fact and Conclusions of Law.

FINDINGS OF FACT

1. Respondent's license to practice as a vocational nurse in the State of Texas is in delinquent status.
2. Respondent waived notice and hearing, and agreed to the entry of this Order.
3. Respondent received a Certificate in Vocational Nursing from Coastal Bend College, Beeville, Texas, on August 8, 2008. Respondent was licensed to practice vocational nursing in the State of Texas on August 28, 2008.
4. Respondent's nursing employment history includes:

08/2008 – 04/2010	LVN	South Texas Regional Medical Center Jourdanton, Texas
05/2010	Unknown	

Respondent's nursing employment history continued:

06/2010 – 05/2011	LVN	Poteet Manor Nursing and Rehabilitation Center Poteet, Texas
06/2011	Unknown	
07/2011 – 06/2012	LVN	Retama Manor Nursing Center Pleasanton, Texas
07/2012 – 08/2012	Unknown	
09/2012 – 09/2015	LVN	Poteet Manor Nursing and Rehabilitation Center Poteet, Texas
10/2015	Unknown	
11/2015 – 04/2017	LVN	The Heights Rehabilitation and Long Term Care Pleasanton, Texas
05/2017 - Present	Unknown	

5. Formal Charges were filed on October 4, 2019. A copy of the Formal Charges, dated October 4, 2019, is attached and incorporated herein by reference as part of this Order.
6. On October 28, 2019, the Board received a statement from Respondent voluntarily surrendering the right to practice nursing in Texas. A copy of Respondent's statement, dated October 22, 2019, is attached and incorporated herein 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 §217.11 (1)(A),(1)(B),(1)(C)&(1)(D) and 22 TEX. ADMIN. CODE §217.12 (1)(A),(1)(B),(1)(C),(4),(6)(G),(8),(10)(C)(10)(E)&(11)(B)
4. The evidence received is sufficient cause pursuant to Section 301.452(b) (10)&(13), Texas Occupations Code, to take disciplinary action against Vocational Nurse License Number

217353, heretofore issued to KEVIN WILLIAMS, including revocation of Respondent's license(s) to practice nursing in the State of Texas.

5. Under Section 301.453(c), Texas Occupations Code, the Board has the authority to accept the voluntary surrender of a license.
6. Under Section 301.453(d), Texas Occupations Code, as amended, the Board may impose conditions for reinstatement of licensure.
7. Any subsequent reinstatement of this license will be controlled by Section 301.453(d), Texas Occupations Code, and 22 TEX. ADMIN. CODE §213.26-.29, and any amendments thereof in effect at the time of the reinstatement.

TERMS OF ORDER

NOW, THEREFORE, IT IS ORDERED that the VOLUNTARY SURRENDER of Vocational Nurse License Number 217353 is accepted by the Texas Board of Nursing. In connection with this acceptance, the Board imposes the following conditions:

1. RESPONDENT SHALL NOT practice vocational nursing, use the title "vocational nurse" or the abbreviation "LVN" or wear any insignia identifying himself as a vocational nurse or use any designation which, directly or indirectly, would lead any person to believe that RESPONDENT is a vocational nurse during the period in which the license is surrendered.
2. RESPONDENT SHALL NOT petition for reinstatement of licensure until:
 - A. At least one (1) year has elapsed from the date of this Order; and
 - B. RESPONDENT has objective, verifiable proof of twelve (12) consecutive months of sobriety immediately preceding the petition.
3. Upon petitioning for reinstatement, RESPONDENT SHALL satisfy all then existing requirements for relicensure.

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

Effective this 28th day of October, 2019

A handwritten signature in cursive script, appearing to read "Katherine A. Thomas".

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

10/22/2019

To: Whom it concerns

I, Kevin E. Williams, am voluntarily surrendering my license to practice nursing. My formal response to certified mail with date of 10/07/2019 and received on 10/11/2019 is as follows; Guilty to Charge 1 and Not Guilty to Charge 2 & 3. Please refer to document stated above for details of charges. I have no further comments at this time.

K. Williams (signature) 10/22/2019
Kevin Williams (Print) Date

In the Matter of
Permanent Vocational Nurse
License Number 217353
Issued to KEVIN WILLIAMS,
Respondent

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BEFORE THE TEXAS
BOARD OF NURSING

FORMAL CHARGES

This is a disciplinary proceeding under Section 301.452(b), Texas Occupations Code. Respondent, KEVIN WILLIAMS, is a Vocational Nurse holding license number 217353 which is in delinquent status at the time of this pleading.

Written notice of the facts and conduct alleged to warrant adverse licensure action was sent to Respondent at Respondent's address of record and Respondent was given opportunity to show compliance with all requirements of the law for retention of the license prior to commencement of this proceeding.

CHARGE I.

On or about April 17, 2017, through April 23, 2017, while employed as a Licensed Vocational Nurse with The Heights Rehabilitation and Long Term Care, Pleasanton, Texas, Respondent withdrew Hydrocodone from the medication dispensing system for patients but failed to document and/or completely and accurately document the administration of the medications in the patients' Medication Administration Records and/or nurses' notes, as follows:

Date	Time	Patient	Medication Signed out (Qty)	MAR	Nurse's Notes
4/17/17	0133	M.C.	Hydrocodone 10/325 mg (1)	None	Pain level 7
4/17/17	0455	C.G.	Hydrocodone 10/325 mg (1)	None	Pain level 6
4/17/17	0501	M.C.	Hydrocodone 10/325 mg (1)	None	Pain level 7
4/18/17	0150	M.C.	Hydrocodone 10/325 mg (1)	None	Pain level 5
4/18/17	0427	C.G.	Hydrocodone 10/325 mg (1)	None	Pain level 7
4/18/17	0530	M.C.	Hydrocodone 10/325 mg (1)	None	Pain level 5
4/18/17	2240	L.A.	Hydrocodone 5/325 mg (1)	None	Pain level 0
4/18/17	2347	J.H.	Hydrocodone 10/325 mg (1)	None	None
4/19/17	0130	I.K.	Hydrocodone 5/325 mg (1)	None	Pain level 0

4/19/17	0345	J.H.	Hydrocodone 10/325 mg (1)	None	None
4/19/17	0415	C.G.	Hydrocodone 10/325 mg (1)	None	Pain level 7
4/19/17	0433	L.A.	Hydrocodone 5/325 mg (1)	None	Pain level 0
4/19/17	0451	M.C.	Hydrocodone 10/325 mg (1)	None	Pain level 6
4/19/17	2340	J.H.	Hydrocodone 10/325 mg (1)	None	None
4/20/17	0353	J.H.	Hydrocodone 10/325 mg (1)	None	None
4/20/17	0500	M.C.	Hydrocodone 10/325 mg (1)	None	Pain level 0
4/20/17	2214	C.G.	Hydrocodone 10/325 mg (1)	None	Pain level 7
4/20/17	2312	L.A.	Hydrocodone 5/325 mg (1)	None	Pain level 6
4/21/17	0011	M.C.	Hydrocodone 10/325 mg (1)	None	Pain level 5
4/21/17	0137	I.K.	Hydrocodone 5/325 mg (1)	None	Pain level 0
4/21/17	0402	M.C.	Hydrocodone 10/325 mg (1)	None	Pain level 5
4/21/17	0408	L.A.	Hydrocodone 5/325 mg (1)	None	Pain level 6
4/21/17	0438	C.G.	Hydrocodone 10/325 mg (1)	None	Pain level 7
4/21/17	2217	C.G.	Hydrocodone 10/325 mg (1)	None	Pain level 7
4/21/17	2240	M.M.	Hydrocodone 7.5/325 mg (1)	None	Pain level 0
4/21/17	2347	J.H.	Hydrocodone 10/325 mg (1)	None	None
4/21/17	2353	L.A.	Hydrocodone 5/325 mg (1)	None	Pain level 6
4/22/17	0005	M.C.	Hydrocodone 10/325 mg (1)	None	Pain level 0
4/22/17	0348	M.C.	Hydrocodone 10/325 mg (1)	None	Pain level 0
4/22/17	0422	C.G.	Hydrocodone 10/325 mg (1)	None	Pain level 7
4/22/17	0444	M.M.	Hydrocodone 7.5/325 mg (1)	None	Pain level 6

4/22/17	2230	M.C.	Hydrocodone 10/325 mg (1)	None	Pain level 0
4/23/17	0049	L.A.	Hydrocodone 5/325 mg (1)	None	None
4/23/17	0230	J.H.	Hydrocodone 10/325 mg (1)	None	None
4/23/17	0420	C.G.	Hydrocodone 10/325 mg (1)	None	None
4/23/17	0438	M.C.	Hydrocodone 10/325 mg (1)	None	None
4/23/17	0500	M.M.	Hydrocodone 7.5/325 mg (1)	None	None
4/23/17	0511	L.A.	Hydrocodone 5/325 mg (1)	None	None
04/23/17	0517	J.H.	Hydrocodone 10/325 mg (1)	None	None

Respondent's conduct was likely to injure the patients, in that subsequent care givers would rely on his documentation to further medicate the patients which could result in an overdose. Additionally, Respondent's conduct placed the hospital in violation of Chapter 481 (Controlled Substances Act) of the Texas Health and Safety Code.

The above action constitutes grounds for disciplinary action in accordance with Section 301.452(b)(10)&(13), Texas Occupations Code, and is a violation of 22 TEX. ADMIN. CODE §217.11(1)(A),(1)(B),(1)(C)&(1)(D) and 22 TEX. ADMIN. CODE §217.12(1)(A),(1)(B),(1)(C),(4)&(11)(B).

CHARGE II.

On or about April 17, 2017, through April 23, 2017, while employed as a Licensed Vocational Nurse with The Heights Rehabilitation and Long Term Care, Pleasanton, Texas, Respondent withdrew Hydrocodone from the medication dispensing system for patients but failed to follow the facility's policy and procedures for wastage of the unused portions of the medications, as follows:

Date	Time	Patient	Medication Signed out (Qty)	Waste	Physician's Order	MAR	Nurse's Notes
4/17/17	0133	M.C.	Hydrocodone 10/325 mg (1)	None	Hydrocodone 10/325 mg 1 tablet by mouth every 4 hours PRN	None	Pain level 7
4/17/17	0455	C.G.	Hydrocodone 10/325 mg (1)	None	Hydrocodone 10/325 mg 1 tablet orally every 6 hours	None	Pain level 6
4/17/17	0501	M.C.	Hydrocodone 10/325 mg (1)	None	Hydrocodone 10/325 mg 1 tablet by mouth every 4 hours PRN	None	Pain level 7

4/18/17	0150	M.C.	Hydrocodone 10/325 mg (1)	None	Hydrocodone 10/325 mg 1 tablet by mouth every 4 hours PRN	None	Pain level 5
4/18/17	0427	C.G.	Hydrocodone 10/325 mg (1)	None	Hydrocodone 10/325 mg 1 tablet orally every 6 hours	None	Pain level 7
4/18/17	0530	M.C.	Hydrocodone 10/325 mg (1)	None	Hydrocodone 10/325 mg 1 tablet by mouth every 4 hours PRN	None	Pain level 5
4/18/17	2240	L.A.	Hydrocodone 5/325 mg (1)	None	Hydrocodone 5/325mg 1 tablet by mouth every 4 hours PRN	None	Pain level 0
4/18/17	2347	J.H.	Hydrocodone 10/325 mg (1)	None	Hydrocodone 10/325mg 1 Tab TID PRN	None	None
4/19/17	0130	I.K.	Hydrocodone 5/325 mg (1)	None	Hydrocodone 5/325mg 1 tablet by mouth every 6 hours PRN	None	Pain level 0
4/19/17	0345	J.H.	Hydrocodone 10/325 mg (1)	None	Hydrocodone 10/325mg 1 Tab TID PRN	None	None
4/19/17	0415	C.G.	Hydrocodone 10/325 mg (1)	None	Hydrocodone 10/325 mg 1 tablet orally every 6 hours	None	Pain level 7
4/19/17	0433	L.A.	Hydrocodone 5/325 mg (1)	None	Hydrocodone 5/325mg 1 tablet by mouth every 4 hours PRN	None	Pain level 0
4/19/17	0451	M.C.	Hydrocodone 10/325 mg (1)	None	Hydrocodone 10/325 mg 1 tablet by mouth every 4 hours PRN	None	Pain level 6
4/19/17	2340	J.H.	Hydrocodone 10/325 mg (1)	None	Hydrocodone 10/325mg 1 Tab TID PRN	None	None
4/20/17	0353	J.H.	Hydrocodone 10/325 mg (1)	None	Hydrocodone 10/325mg 1 Tab TID PRN	None	None
4/20/17	0500	M.C.	Hydrocodone 10/325 mg (1)	None	Hydrocodone 10/325 mg 1 tablet by mouth every 4 hours PRN	None	Pain level 0
4/20/17	2214	C.G.	Hydrocodone 10/325 mg (1)	None	Hydrocodone 10/325 mg 1 tablet orally every 6 hours	None	Pain level 7
4/20/17	2312	L.A.	Hydrocodone 5/325 mg (1)	None	Hydrocodone 5/325mg 1 tablet by mouth every 4 hours PRN	None	Pain level 6
4/21/17	0011	M.C.	Hydrocodone 10/325 mg (1)	None	Hydrocodone 10/325 mg 1 tablet by mouth every 4 hours PRN	None	Pain level 5
4/21/17	0137	I.K.	Hydrocodone 5/325 mg (1)	None	Hydrocodone 5/325mg 1 tablet by mouth every 6 hours PRN	None	Pain level 0
4/21/17	0402	M.C.	Hydrocodone 10/325 mg (1)	None	Hydrocodone 10/325 mg 1 tablet by mouth every 4 hours PRN	None	Pain level 5

4/21/17	0408	L.A.	Hydrocodone 5/325 mg (1)	None	Hydrocodone 5/325mg 1 tablet by mouth every 4 hours PRN	None	Pain level 6
4/21/17	0438	C.G.	Hydrocodone 10/325 mg (1)	None	Hydrocodone 10/325 mg 1 tablet orally every 6 hours	None	Pain level 7
4/21/17	2217	C.G.	Hydrocodone 10/325 mg (1)	None	Hydrocodone 10/325 mg 1 tablet orally every 6 hours	None	Pain level 7
4/21/17	2240	M.M.	Hydrocodone 7.5/325 mg (1)	None	Hydrocodone 7.5/325 mg 1 tablet by mouth every 6 hours PRN	None	Pain level 0
4/21/17	2347	J.H.	Hydrocodone 10/325 mg (1)	None	Hydrocodone 10/325mg 1 Tab TID PRN	None	None
4/21/17	2353	L.A.	Hydrocodone 5/325 mg (1)	None	Hydrocodone 5/325mg 1 tablet by mouth every 4 hours PRN	None	Pain level 6
4/22/17	0005	M.C.	Hydrocodone 10/325 mg (1)	None	Hydrocodone 10/325 mg 1 tablet by mouth every 4 hours PRN	None	Pain level 0
4/22/17	0348	M.C.	Hydrocodone 10/325 mg (1)	None	Hydrocodone 10/325 mg 1 tablet by mouth every 4 hours PRN	None	Pain level 0
4/22/17	0422	C.G.	Hydrocodone 10/325 mg (1)	None	Hydrocodone 10/325 mg 1 tablet orally every 6 hours	None	Pain level 7
4/22/17	0444	M.M.	Hydrocodone 7.5/325 mg (1)	None	Hydrocodone 7.5/325 mg 1 tablet by mouth every 6 hours PRN	None	Pain level 6
4/22/17	2230	M.C.	Hydrocodone 10/325 mg (1)	None	Hydrocodone 10/325 mg 1 tablet by mouth every 4 hours PRN	None	Pain level 0
4/23/17	0049	L.A.	Hydrocodone 5/325 mg (1)	None	Hydrocodone 5/325mg 1 tablet by mouth every 4 hours PRN	None	None
4/23/17	0230	J.H.	Hydrocodone 10/325 mg (1)	None	Hydrocodone 10/325mg 1 Tab TID PRN	None	None
4/23/17	0420	C.G.	Hydrocodone 10/325 mg (1)	None	Hydrocodone 10/325 mg 1 tablet orally every 6 hours	None	None
4/23/17	0438	M.C.	Hydrocodone 10/325 mg (1)	None	Hydrocodone 10/325 mg 1 tablet by mouth every 4 hours PRN	None	None
4/23/17	0500	M.M.	Hydrocodone 7.5/325 mg (1)	None	Hydrocodone 7.5/325 mg 1 tablet by mouth every 6 hours PRN	None	None
4/23/17	0511	L.A.	Hydrocodone 5/325 mg (1)	None	Hydrocodone 5/325mg 1 tablet by mouth every 4 hours PRN	None	None
04/23/17	0517	J.H.	Hydrocodone 10/325 mg (1)	None	Hydrocodone 10/325mg 1 Tab TID PRN	None	None

Respondent's conduct left medications unaccounted for, was likely to deceive the hospital pharmacy, and placed the pharmacy in violation of Chapter 481 (Controlled Substances Act) of the Texas Health and Safety Code.

The above action constitutes grounds for disciplinary action in accordance with Section 301.452(b)(10)&(13), Texas Occupations Code, and is a violation of 22 TEX. ADMIN. CODE §217.11(1)(A)&(1)(B) and 22 TEX. ADMIN. CODE §217.12(1)(A),(1)(B),(4)(10)(C)&(11)(B).

CHARGE III.

On or about April 17, 2017, through April 23, 2017, while employed as a Licensed Vocational Nurse with The Heights Rehabilitation and Long Term Care, Pleasanton, Texas, Respondent misappropriated Hydrocodone, belonging to the facility and patients thereof, or failed to take precautions to prevent such misappropriation, as follows:

Date	Time	Patient	Medication Signed out (Qty)	Waste	Physician's Order	MAR	Nurse's Notes
4/17/17	0133	M.C.	Hydrocodone 10/325 mg (1)	None	Hydrocodone 10/325 mg 1 tablet by mouth every 4 hours PRN	None	Pain level 7
4/17/17	0455	C.G.	Hydrocodone 10/325 mg (1)	None	Hydrocodone 10/325 mg 1 tablet orally every 6 hours	None	Pain level 6
4/17/17	0501	M.C.	Hydrocodone 10/325 mg (1)	None	Hydrocodone 10/325 mg 1 tablet by mouth every 4 hours PRN	None	Pain level 7
4/18/17	0150	M.C.	Hydrocodone 10/325 mg (1)	None	Hydrocodone 10/325 mg 1 tablet by mouth every 4 hours PRN	None	Pain level 5
4/18/17	0427	C.G.	Hydrocodone 10/325 mg (1)	None	Hydrocodone 10/325 mg 1 tablet orally every 6 hours	None	Pain level 7
4/18/17	0530	M.C.	Hydrocodone 10/325 mg (1)	None	Hydrocodone 10/325 mg 1 tablet by mouth every 4 hours PRN	None	Pain level 5
4/18/17	2240	L.A.	Hydrocodone 5/325 mg (1)	None	Hydrocodone 5/325mg 1 tablet by mouth every 4 hours PRN	None	Pain level 0
4/18/17	2347	J.H.	Hydrocodone 10/325 mg (1)	None	Hydrocodone 10/325mg 1 Tab TID PRN	None	None
4/19/17	0130	I.K.	Hydrocodone 5/325 mg (1)	None	Hydrocodone 5/325mg 1 tablet by mouth every 6 hours PRN	None	Pain level 0
4/19/17	0345	J.H.	Hydrocodone 10/325 mg (1)	None	Hydrocodone 10/325mg 1 Tab TID PRN	None	None
4/19/17	0415	C.G.	Hydrocodone 10/325 mg (1)	None	Hydrocodone 10/325 mg 1 tablet orally every 6 hours	None	Pain level 7

4/19/17	0433	L.A.	Hydrocodone 5/325 mg (1)	None	Hydrocodone 5/325mg 1 tablet by mouth every 4 hours PRN	None	Pain level 0
4/19/17	0451	M.C.	Hydrocodone 10/325 mg (1)	None	Hydrocodone 10/325 mg 1 tablet by mouth every 4 hours PRN	None	Pain level 6
4/19/17	2340	J.H.	Hydrocodone 10/325 mg (1)	None	Hydrocodone 10/325mg 1 Tab TID PRN	None	None
4/20/17	0353	J.H.	Hydrocodone 10/325 mg (1)	None	Hydrocodone 10/325mg 1 Tab TID PRN	None	None
4/20/17	0500	M.C.	Hydrocodone 10/325 mg (1)	None	Hydrocodone 10/325 mg 1 tablet by mouth every 4 hours PRN	None	Pain level 0
4/20/17	2214	C.G.	Hydrocodone 10/325 mg (1)	None	Hydrocodone 10/325 mg 1 tablet orally every 6 hours	None	Pain level 7
4/20/17	2312	L.A.	Hydrocodone 5/325 mg (1)	None	Hydrocodone 5/325mg 1 tablet by mouth every 4 hours PRN	None	Pain level 6
4/21/17	0011	M.C.	Hydrocodone 10/325 mg (1)	None	Hydrocodone 10/325 mg 1 tablet by mouth every 4 hours PRN	None	Pain level 5
4/21/17	0137	L.K.	Hydrocodone 5/325 mg (1)	None	Hydrocodone 5/325mg 1 tablet by mouth every 6 hours PRN	None	Pain level 0
4/21/17	0402	M.C.	Hydrocodone 10/325 mg (1)	None	Hydrocodone 10/325 mg 1 tablet by mouth every 4 hours PRN	None	Pain level 5
4/21/17	0408	L.A.	Hydrocodone 5/325 mg (1)	None	Hydrocodone 5/325mg 1 tablet by mouth every 4 hours PRN	None	Pain level 6
4/21/17	0438	C.G.	Hydrocodone 10/325 mg (1)	None	Hydrocodone 10/325 mg 1 tablet orally every 6 hours	None	Pain level 7
4/21/17	2217	C.G.	Hydrocodone 10/325 mg (1)	None	Hydrocodone 10/325 mg 1 tablet orally every 6 hours	None	Pain level 7
4/21/17	2240	M.M.	Hydrocodone 7.5/325 mg (1)	None	Hydrocodone 7.5/325 mg 1 tablet by mouth every 6 hours PRN	None	Pain level 0
4/21/17	2347	J.H.	Hydrocodone 10/325 mg (1)	None	Hydrocodone 10/325mg 1 Tab TID PRN	None	None
4/21/17	2353	L.A.	Hydrocodone 5/325 mg (1)	None	Hydrocodone 5/325mg 1 tablet by mouth every 4 hours PRN	None	Pain level 6
4/22/17	0005	M.C.	Hydrocodone 10/325 mg (1)	None	Hydrocodone 10/325 mg 1 tablet by mouth every 4 hours PRN	None	Pain level 0
4/22/17	0348	M.C.	Hydrocodone 10/325 mg (1)	None	Hydrocodone 10/325 mg 1 tablet by mouth every 4 hours PRN	None	Pain level 0

4/22/17	0422	C.G.	Hydrocodone 10/325 mg (1)	None	Hydrocodone 10/325 mg 1 tablet orally every 6 hours	None	Pain level 7
4/22/17	0444	M.M.	Hydrocodone 7.5/325 mg (1)	None	Hydrocodone 7.5/325 mg 1 tablet by mouth every 6 hours PRN	None	Pain level 6
4/22/17	2230	M.C.	Hydrocodone 10/325 mg (1)	None	Hydrocodone 10/325 mg 1 tablet by mouth every 4 hours PRN	None	Pain level 0
4/23/17	0049	L.A.	Hydrocodone 5/325 mg (1)	None	Hydrocodone 5/325mg 1 tablet by mouth every 4 hours PRN	None	None
4/23/17	0230	J.H.	Hydrocodone 10/325 mg (1)	None	Hydrocodone 10/325mg 1 Tab TID PRN	None	None
4/23/17	0420	C.G.	Hydrocodone 10/325 mg (1)	None	Hydrocodone 10/325 mg 1 tablet orally every 6 hours	None	None
4/23/17	0438	M.C.	Hydrocodone 10/325 mg (1)	None	Hydrocodone 10/325 mg 1 tablet by mouth every 4 hours PRN	None	None
4/23/17	0500	M.M.	Hydrocodone 7.5/325 mg (1)	None	Hydrocodone 7.5/325 mg 1 tablet by mouth every 6 hours PRN	None	None
4/23/17	0511	L.A.	Hydrocodone 5/325 mg (1)	None	Hydrocodone 5/325mg 1 tablet by mouth every 4 hours PRN	None	None
04/23/17	0517	J.H.	Hydrocodone 10/325 mg (1)	None	Hydrocodone 10/325mg 1 Tab TID PRN	None	None

Respondent's conduct was likely to defraud the facility and patients of the cost of the medications.

The above action constitutes grounds for disciplinary action in accordance with Section 301.452(b)(10), Texas Occupations Code, and is a violation of 22 TEX. ADMIN. CODE §217.12(1)(A),(1)(B),(4),(6)(G),(8),(10)(E)&(11)(B).

NOTICE IS GIVEN that staff will present evidence in support of the recommended disposition of up to, and including, revocation of Respondent's license(s) and/or privilege(s) to practice nursing in the State of Texas pursuant to the Nursing Practice Act, Chapter 301, Texas Occupations Code and the Board's rules, 22 TEX. ADMIN. CODE §§ 213.27 - 213.33.

NOTICE IS GIVEN that all statutes and rules cited in these Charges are incorporated as part of this pleading and can be found at the Board's website, www.bon.texas.gov.

NOTICE IS GIVEN that, based on the Formal Charges, the Board will rely on adopted policies related to Substance Use Disorders and Other Alcohol and Drug Related Conduct, on adopted policies related to Behavior Involving Lying and Falsification, and on adopted policies related to

Behavior Involving Fraud, Theft, and Deception, which can be found under the "Discipline & Complaints; Board Policies & Guidelines" section of the Board's website, www.bon.texas.gov.

NOTICE IS GIVEN that, based on the Formal Charges, the Board will rely on the Disciplinary Matrix, located at 22 TEX. ADMIN. CODE §213.33(b), which can be found under the "Discipline & Complaints; Board Policies & Guidelines" section of the Board's website, www.bon.texas.gov.

Filed this 4th day of October, 2019.

TEXAS BOARD OF NURSING



James W. Johnston, General Counsel
Board Certified - Administrative Law
Texas Board of Legal Specialization
State Bar No. 10838300

Jena Abel, Deputy General Counsel
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