

### BOARD OF VOCATIONAL NURSE EXAMINERS 333 GUADALUPE STREET, SUITE 3-400 AUSTIN, TEXAS 78701 (512) 305-8100

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

Executive Director of the Board

July 7, 2003

TIFFANY REEVES 3117 FM 570 RANGER TX 76470

Certified Mail No. 7002 0860 0007 8847 2434

Dear Ms. Reeves:

Enclosed please find a sworn Complaint which has been filed against you alleging one or more statutory violations or grounds to take disciplinary action against you as a vocational nurse licensed under the Texas Occupations Code, Chapter 302.

Pursuant to the Board of Vocational Nurse Examiners' Rules, you are hereby offered the opportunity to schedule an Informal Conference, to be conducted at the Board's office, to discuss possible agreed resolution of this matter, in whole or in part. You may be represented by an attorney at the Informal Conference, or you may appear without an attorney. The date of the Informal Conference is August 14, 2003, September 4, 2003, and October 2, 2003.

You must file a "written answer to appear" within twenty (20) days from the date of this correspondence. You may file your answer via FAX (512) 305-8101, U.S. Mail and/or telephone Kirby W. Hattox, Supervising Investigator, at (512) 305-7664, **no later than** July 31, 2003, to schedule your Informal Conference. Docket times are assigned by the Board staff. Be advised that your conference will be scheduled on the first available date.

You must arrive at the Board office at least thirty (30) minutes prior to the scheduled time in order to meet with your case investigator. Please bring with you a valid form of picture identification (Drivers License, I.D. Card, etc.).

A copy of the Board's rules pertaining to Informal Conferences is enclosed. The proceedings relating to the Informal Conference are confidential and your statements made at the conference will not be offered as evidence to support the allegations in the Complaint. However, if an Agreed Order is proposed as a result of the Informal Conference, it will become a public record if accepted and ratified by the Board of Vocational Nurse Examiners.

Tiffany Reeves July 7, 2003 Page 2

Due to security concerns, purses, briefcases, backpacks, etc., will not be allowed into the conference chambers. (Attorneys are exempt from this requirement). Please make prior arrangements for the safekeeping of your personal belongings, as the Board will not be responsible for these items.

FIREARMS ARE NOT PERMITTED IN THE BOARD OF VOCATIONAL NURSE EXAMINERS OFFICES AND/OR HEARING CHAMBERS.

FAILURE TO ANSWER THIS NOTICE OF COMPLAINT WILL RESULT IN THE ALLEGATIONS AGAINST YOU THAT ARE SET OUT IN THE NOTICE OF COMPLAINT BEING DEEMED ADMITTED AS TRUE. IN ADDITION, YOUR OPPORTUNITY TO OBJECT TO THE PROPOSED SANCTIONS AND YOUR OPPORTUNITY FOR HEARING ON THE COMPLAINT SHALL BE DEEMED TO HAVE BEEN WAIVED.

Should you have questions regarding the Informal Conference procedure, please contact the Enforcement Division (512) 305-7664.

Sincerely/

Kirby W. Hattox, Supervisor Enforcement Division

KWH/ch

Enclosure: Complaint, Informal Conference Rules, Board Lo

(Certified and Regular Mail)



BOARD OF VOCATIONAL NURSE

**EXAMINERS** 

VS.

\* 177636

TIFFANY REEVES

NOTICE

Notice is hereby given in the above-referenced and styled cause of action that a hearing will be held before the Executive Director with the Board of Vocational Nurse Examiners (hereinafter "BVNE"), pursuant to the Texas Occupations Code, Chapter 302, on August 14, 2003 at the William P. Hobby Building, Tower 3, 4<sup>th</sup> Floor, Suite 400, Austin, Texas.

The purpose of said hearing will be to determine whether TIFFANY REEVES has violated the Texas Occupations Code, Chapter 302, by engaging in the alleged acts described in the Complaint filed and served on Respondent/Applicant, and which is incorporated herein for all purposes. In addition, should the Complaint contain an allegation regarding any felony or misdemeanor conviction you may have, the hearing shall also serve the purpose of determining whether or not the BVNE, can take disciplinary action against your license pursuant to the Texas Occupations Code, Chapter 53, § 53.021.

The hearing is being conducted under authority of the Texas Occupations Code and the Administrative Procedure Act, TEX. GOV'T CODE, ANN., Chapter 2001 (Vernon's Supp. 1998).

The Complaint is based on information received by the Board. You are hereby notified that such documentation, which may include certified business records submitted to the Board, is now on file and available for your inspection at the Board office during regular business hours prior to said hearing.

NOTICE

RE: TIFFANY REEVES, LVN #177636

JULY 7, 2003

PAGE 2

When applicable, the staff will propose that the Executive Director take official notice of the following: Federal and/or State Drug Laws, relating to medical practice, the Physician's Desk Reference, the Encyclopedia and Dictionary of Medicine and Nursing, and former Orders of the Board.

According to the provisions of the aforementioned authority, you have the right to be present at the hearing and to be represented by counsel. You may also present and introduce evidence by testimony, documentation, or any other offer of proof as prescribed by the Rules of Evidence of the courts of this State in refuting the aforesaid charges.

Pursuant to the Texas Occupations Code, Chapter 302, Section 302.403 and Section 302.451, relief such as revocation, suspension, suspension with probation, reprimand, warning, denial of licensure and/or imposition of administrative penalties (fines), may be recommended by the Board. Pursuant to Board Rule 239.19 the Board may assess penalties (fines), in the minimum amount of two hundred fifty dollars (\$250.00), not to exceed two thousand dollars (\$2,000.00).

PURSUANT TO BVNE RULE 239.44 (A) (7), YOUR FAILURE TO FILE A WRITTEN ANSWER TO APPEAR WILL RESULT IN THE ALLEGATIONS AGAINST YOU THAT ARE SET OUT IN THE NOTICE OF COMPLAINT BEING DEEMED ADMITTED AS TRUE. IN ADDITION YOUR OPPORTUNITY TO OBJECT TO THE PROPOSED SANCTIONS AND YOUR OPPORTUNITY FOR HEARING ON THE COMPLAINT SHALL BE DEEMED TO HAVE BEEN WAIVED. THE RELIEF SOUGHT IN THE NOTICE OF HEARING MAY BE GRANTED BY DEFAULT.

NOTICE

RE: TIFFANY REEVES, LVN #177636

JULY 7, 2003

PAGE 3

THE WRITTEN ANSWER OR OTHER RESPONSIVE PLEADING MUST BE FILED WITH THE BOARD OF VOCATIONAL NURSE EXAMINERS, 333 GUADALUPE, SUITE 3-400, AUSTIN, TEXAS 78701 VIA MAIL; OR FAXED TO (512) 305-8101; OR TELEPHONE THE SUPERVISOR OF THE ENFORCEMENT DIVISION (512) 305-7664; WITHIN TWENTY (20) DAYS (FROM THE DATE INDICATED ON THE ENCLOSED COVER LETTER).

Kirby W. Hattox, Supervisor

**Enforcement Division** 

**Board of Vocational Nurse Examiners** 

ENCLOSURE: BVNE ANSWER TO APPEAR

COMPLAINT/NOTICE INFORMAL CONFERENCE

RE: TIFFANY REEVES, LVN #177636

PAGE: 4

#### **CERTIFICATE OF SERVICE**

I hereby certify that on the 7th day of July, 2003, a true and correct copy of the foregoing complaint/notice was served by placement in the U.S. Mail, first class and certified return receipt, and addressed to the following person(s):

TIFFANY REEVES 3117 FM 570 RANGER, TX 76470

Kirby W. Hattox, Supervisor

**Enforcement Division** 

Agent for the Board of Vocational Nurse Examiners

\*

VS.

\*

TIFFANY REEVES

COUNTY OF TRAVIS

STATE OF TEXAS

#### COMPLAINT

BEFORE ME, the undersigned authority, a Notary Public in and for the State of Texas, on this day personally appeared Carolyn Hudson, who after being by me duly sworn, did depose and say:

As an Investigator for the Board of Vocational Nurse Examiners, I, Carolyn Hudson, do hereby present to the Executive Director of the Board of Vocational Nurse Examiners, the following complaint against TIFFANY REEVES, a practitioner of vocational nursing in Texas licensed by the Board of Vocational Nurse Examiners with license number 177636, hereinafter called Respondent.

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- a. On September 10, 2002, the Board of Vocational Nurse Examiners endorsed an Agreed Board Order. Respondent's license to practice Vocational Nursing in the State of Texas was reprimanded.
- b. Said Order stipulated, in part, that Respondent shall successfully complete nursing program courses(s) encompassing the following areas of study: Pharmacology (to include Clinical and Medication Administration), and Diabetes Management, and submit documentation of successful course completion to the Board office within six (6) months of the Order.
- c. Respondent has failed to successfully complete and submit documentation of successful completion of the required nursing courses on or before the due date of March 10, 2003.
- d. By said conduct Respondent has violated the terms of her Agreed Board Order.

COMPLAINT

RE: TIFFANY REEVES, LVN #177636

PAGE 2

II.

Respondent has violated the Texas Occupations Code, a rule or order issued under this

code, contrary to the Texas Occupations Code, Chapter 302, Section 302.402 (a) (1).

111.

The foregoing acts constitute grounds for the Board of Vocational Nurse

Examiners to take disciplinary action as provided under the Texas Occupations

Code Chapter 302, Licensed Vocational Nurse, Section 302.403 and Section

302.451, relief such as revocation, suspension, suspension with probation,

reprimand, warning, denial of licensure and/or imposition of administrative

penalties (fines), may be recommended by the Board. Pursuant to Board Rule

239.19 the Board may assess penalties (fines), in the minimum amount of two

hundred fifty dollars (\$250.00), not to exceed two thousand dollars (\$2,000.00).

WHEREFORE, PREMISES CONSIDERED, I, Carolyn Hudson, do hereby suggest and

request the Board of Vocational Nurse Examiners take disciplinary action against

TIFFANY REEVES, LVN # 177636, in accordance with the provisions of the laws of the

State of Texas.

Carry Hudson

COMPLAINT

RE: TIFFANY REEVES, LVN #177636

PAGE 3

SUBSCRIBED AND SWORN TO BEFORE ME by the said Carolyn Hudson, on this the

7th day of July 2003.

NOTARY PUBLIC IN AND FOR

THE STATE OF TEXAS

Vocational Nurse Examiners on the 7th day of July 2003.

Kirby W. Hattox, Supervisor

**Enforcement Division** 

Board of Vocational Nurse Examiners



## 333 GUADALUPE STREET, SUITE 3-400 AUSTIN, TEXAS 78701 512/305-8100

September 13, 2002

TIFFANY REEVES 908 WEST COMMERCE ST EASTLAND TX 76448

Dear Ms. Reeves:

The enclosed Agreed Board Order has been ratified by the Board of Vocational Nurse Examiners and is now in effect.

If you have any questions concerning this matter, please contact the Enforcement Division.

Sincerely,

Executive Director

TLH/ch

Enclosure: Agreed Order

STATE OF TEXAS

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TIFFANY SHEA REEVES

VS.

**COUNTY OF TRAVIS** 

#### AGREED BOARD ORDER

On this day came to be considered by the Board of Vocational Nurse Examiners the matter of vocational nurse license number 177636 held by TIFFANY SHEA REEVES, hereinafter called Respondent.

By letter, the Board of Vocational Nurse Examiners sent preliminary notice to Respondent of its intent to take disciplinary action with respect to said license held by Respondent, as a result of a complaint and subsequent investigation. Said investigation produced evidence indicating that Respondent has engaged in unprofessional or dishonorable conduct that, in the Board's opinion, is likely to deceive, defraud, or injure the public, in violation of Texas Occupations Code, Chapter 302, Section 302.402 (a) (10), in the following manner:

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- a. Respondent was employed as a Licensed Vocational Nurse with Tri Star Home Care in Cisco, Texas to include the period from about July 5, 2001 through about October 4, 2001.
- b. While so employed with said facility, from about September 15, 2001 through about October 4, 2001, Respondent was responsible for documentation and medication errors, to-wit:
  - 09-15-01 Respondent documented that Patient D.O.'s blood sugar was 208 but negligently administered only 24 units of Humulin N. Respondent failed to administer two extra units of regular insulin per sliding scale ordered by the physician;

AGREED BOARD ORDER

RE: TIFFANY SHEA REEVES, LVN #177636

PAGE 2

09-16-01	Respondent documented that Patient D.O.'s blood sugar was 225 but negligently administered only 24 units of Humulin N. Respondent failed to administer two extra units of regular insulin per sliding scale ordered by the physician;
09-30-01	Respondent failed to document Patient L.S.'s blood sugar on the Skilled Nursing Visit note;
10-03-01	Respondent documented that Patient D.O.'s blood sugar was 227 but negligently administered only 18 units of Humulin N. Respondent failed to administer two extra units of regular insulin per sliding scale ordered by the physician;
10-04-01	Respondent documented that Patient D.O.'s blood sugar was 242 but negligently administered only 24 units of Humulin N. Respondent failed to administer two extra units of insulin per sliding scale ordered by the physician.

By Respondent's signature on this Order, Respondent neither admits nor denies the truth of the matters previously set out in this Order with respect to the above-mentioned investigation. By Respondent's signature on this Order, Respondent acknowledges that they have read and understood this Order and have approved it for consideration by the Board.

By their notarized signature on this Order, Respondent does hereby waive the right to a formal Complaint, Notice of Hearing and a Public Hearing held before an Administrative Law Judge with the State Office of Administrative Hearings, and to judicial review of this disciplinary action. Notice of this disciplinary action will appear in the Board's newsletter sent to Texas employers.

AGREED BOARD ORDER

RE: TIFFANY SHEA REEVES, LVN #177636

PAGE 3

ORDER OF THE BOARD

NOW THEREFORE, IT IS ORDERED, subject to ratification by the Board of Vocational

Nurse Examiners that license number 177636, heretofore issued to TIFFANY SHEA

REEVES to practice vocational nursing in the State of Texas be, and the same is hereby

REPRIMANDED. It is further ordered that Respondent shall successfully complete

nursing program course(s) encompassing the following areas of study: Pharmacology

(to include Clinical and Medication Administration), and Diabetes Management, and

submit documentation of successful course completion to the Board office within six (6)

months of the date of the Board's ratification of this Order. Respondent shall be

responsible for locating said course(s) and obtaining prior written approval of Board staff

prior to committing to said course(s). Said course(s) shall be through correspondence

(through a recognized provider), in-house at a community college, university or nursing

program, and/or tutored by a state approved, licensed nursing program faculty member.

The expense of said course(s) shall be borne by Respondent. Failure to successfully

complete said course(s) within the time frame stipulated, shall be considered a violation

of your Board Order.

This Agreed Order shall not be effective or take effect and become enforceable in

accordance with its terms until ratified by a majority of the Board present and voting, at

its next regularly called session.

Dated this the 874 day of AUGUST, 2002.

AGREED BOARD ORDER RE: TIFFANY SHEA REEVES, LVN #177636 PAGE 4

Sig	July Show gnature of Respondent
Cu	908 W Commerce urrent Address
Cit	Ea Stland, TX: 76448 ty, State and Zip
Ar	254 1 629 - Frig 524 ea Code and Telephone Number
The State of Texas  County of	<del></del>
	on this day personally appeared TIFFANY SHEA stated that he or she executed the above for the or she understood same.
sworn to and subscribed	before me on this the $8$ day of 2002.
MY COMMISSION EXPIRES TH	MILLY A JUSTINA OTARY PUBLIC IN AND FOR HE STATE OF TEXAS V Commission Expires 10/7/04

AGREED BOARD ORDER RE: TIFFANY SHEA REEVES, LVN #177636 PAGE 5

Terrie L. Hairston, R.N., C.H.E.,

Agent for the Board of Vocational Nurse Examiners

SWORN TO AND SUBSCRIBED before me, the undersigned authority, on this the 3rd day of September \_\_\_\_\_\_, 2002.



NOTARY PUBLIC IN AND FOR

THE STATE OF TEXAS My Commission Expires

**BOARD ORDER** 

RE: TIFFANY SHEA REEVES, LVN #177636

PAGE: (

WHEREFORE, PREMISES CONSIDERED, the Board of Vocational Nurse

Examiners for the State of Texas does hereby ratify and adopt the Agreed Board Order, notarized on the 8<sup>th</sup> day of August, 2002 by Respondent, license number 177636 and that Said Order is Final.

Effective this 10<sup>th</sup> day of September, 2002

Terrie L. Hairston, RN, CHE

Executive Director
On Behalf of Said Board

**BOARD ORDER** 

RE: TIFFANY SHEA REEVES, LVN #177636

PAGE: 7

#### **CERTIFICATE OF SERVICE**

I hereby certify that on the 13<sup>th</sup> day of September, 2002, a true and correct copy of the foregoing **BOARD ORDER** was served by placement in the U.S. Mail, first class, and addressed to the following person(s):

TIFFANY SHEA REEVES 908 WEST COMMERCE ST EASTLAND, TX 76448

Terrie L. Hairston, RN, CHE

**Executive Director** 

Agent for the Board of Vocational Nurse Examiners



333 GUADALUPE STREET, SUITE 3-400 AUSTIN, TEXAS 78701 (512) 305-8100

September 26, 2003

TIFFANY REEVES 3117 FM 570 RANGER TX 76470

Dear Ms. Reeves:

You have successfully completed the terms of your Agreed Board Order dated September 10, 2002.

All pertinent information will remain in your permanent records. We urge you in the future to promote and uphold the ethical standards a Licensed Vocational Nurse should practice.

If you have any questions concerning this matter, please do not hesitate to contact our office.

Sincerely,

Carolyn Hudson Investigator

/ch