

BEFORE THE VIRGINIA BOARD OF NURSING

IN RE: TIFFANY MONIQUE BAGBY KEY, R.M.A.
Registration Number: 0031-009549
Issue Date: July 13, 2016
Expiration Date: April 30, 2018
Case Number: 176643, 176644

**NOTICE OF INFORMAL CONFERENCE
AND STATEMENT OF ALLEGATIONS**

You are hereby notified that an Informal Conference has been scheduled before the Board of Nursing ("Board") regarding your registration to practice as a medication aide in the Commonwealth of Virginia.

TYPE OF PROCEEDING:	This is an informal conference before a Special Conference Committee ("Committee") of the Board.
DATE AND TIME:	June 20, 2017 9:00 A.M.
PLACE:	Virginia Department of Health Professions Perimeter Center - 9960 Mayland Drive 2 nd Floor - Virginia Conference Center Henrico, Virginia 23233

LEGAL AUTHORITY AND JURISDICTION:

1. This informal conference is being held pursuant to Virginia Code §§ 2.2-4019 and 54.1-2400(10). This proceeding will be convened as a public meeting pursuant to Virginia Code § 2.2-3700.

2. At the conclusion of the proceeding, the Committee is authorized to take any of the following actions:

- Exonerate you;
- Reprimand you;
- Require you to pay a monetary penalty;
- Place you on probation and/or under terms and conditions;
- Refer the matter to the Board of Nursing for a formal administrative hearing; or
- Offer you a consent order for suspension or revocation of your registration in lieu of a formal hearing.

ABSENCE OF RESPONDENT AND RESPONDENT'S COUNSEL:

If you fail to appear at the informal conference, the Committee may proceed to hear this matter in your absence and may take any of the actions outlined above.

RESPONDENT'S LEGAL RIGHTS:

You have the right to the information on which the Committee will rely in making its decision, to be represented by counsel at this proceeding, to subpoena witnesses and/or documents, and to present relevant evidence on your behalf.

INFORMAL CONFERENCE MATERIALS:

Enclosed is a copy of the documents that will be distributed to the members of the Committee and will be considered by the Committee when discussing any allegations with you and when deliberating on your case. **These documents are enclosed only with the notice sent by certified mail, which you may be required to claim at the post office. Please bring these documents with you to the informal conference.**

FILING DEADLINES:

Deadline for filing materials: **June 13, 2017**. Submit 5 copies of all documents you want the Board to consider to Sylvia Tamayo-Suijk, Board of Nursing, 9960 Mayland Drive, Suite 300, Henrico, Virginia 23233. Exhibits may not be sent by facsimile or e-mail.

REQUEST FOR A CONTINUANCE

Absent exigent circumstances, such as personal or family illness, a request for a continuance after **June 13, 2017**, will not be considered. If you obtain counsel, you should do so as soon as possible, as a motion for a continuance due to the unavailability of counsel will not be considered unless received by **June 13, 2017**.

STATEMENT OF ALLEGATIONS

The Board alleges that:

1. At all times relevant hereto, Tiffany Monique Bagby Key, R.M.A., was registered to practice as a medication aide in the Commonwealth of Virginia.
2. Tiffany Monique Bagby Key, R.M.A., violated Virginia Code § 54.1-3007(2), (5) and (8) and 18 VAC 90-60-120(2)(d) of the Regulations Governing the Registration of Medication Aides (“Regulations”) in that by her own admission, during the course of her employment with Morningside of Charlottesville, Charlottesville, Virginia, she performed the narcotic counts alone and documented the count sheet as if she counted the narcotics with the on-coming or off-going nurse.
3. Ms. Key violated § 54.1-3007(2), (5) and (8) and 18 VAC 90-60-120(2)(e) of the Regulations in that on her application for employment with Morningside of Charlottesville, dated January 26, 2016, she documented that her reason for leaving Care Advantage, Charlottesville, Virginia, was because of “hours,” when, in fact, her employment was terminated in or about February 2015, for excessive call outs and multiple client complaints.



Brenda Krohn, R.N., M.S.
Deputy Executive Director
Virginia Board of Nursing

May 26, 2017
Date