

BEFORE THE VIRGINIA BOARD OF NURSING

IN RE: RAQUEL LEE BRADY, L.P.N.
REINSTATEMENT APPLICANT
License Number: 0002-076867
Suspension Date: May 27, 2010
Case Number: 177482

**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 application for reinstatement of your license to practice practical nursing in the Commonwealth of Virginia following its suspension by the Board.

TYPE OF PROCEEDING:	This is an informal conference before a Special Conference Committee ("Committee") of the Board.
DATE AND TIME:	April 12, 2017 1:00 P.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. The burden rests on you, as the applicant, to demonstrate that you are prepared to resume the safe and competent practice of practical nursing.
3. In considering your application, the Committee will consider evidence that grounds exist to deny your application for reinstatement of your license to practice practical nursing, as more fully set out in the enclosed Statement of Allegations.
4. At the conclusion of the proceeding, the Committee is authorized to take any of the following actions:
 - Approve your application and issue an unrestricted license to practice practical nursing.
 - Approve your application and issue a reprimand, a monetary penalty, and/or a restricted license subject to terms and conditions.

- Deny your application;
- Refer the matter to the Board for a formal administrative hearing.

ABSENCE OF APPLICANT AND APPLICANT’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.

APPLICANT’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: **April 6, 2017**. Submit 6 copies of all documents you want the Board to consider to Brenda Krohn, 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 **April 6, 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 **April 6, 2017**.

STATEMENT OF ALLEGATIONS

The Board alleges that grounds exist to refuse to reinstate the license of Raquel Lee Brady, L.P.N. to practice practical nursing in that:


1. Ms. Brady violated Virginia Code § 54.1-3007(4), as evidenced by the following:
 - a. On or about December 12, 2014, she was convicted of felony possession of cocaine in the Circuit Court of Newport News, Virginia.
 - b. On or about January 10, 2014, she was convicted of felony possession of cocaine in the Circuit Court of Hampton, Virginia.
 - c. On or about July 12, 2012, she was convicted of misdemeanor shoplifting, a crime of moral turpitude, in the General District Court of Hampton, Virginia.
2. Ms. Brady violated Virginia Code § 54.1-3007(6), in that she is unsafe to practice practical nursing due to substance abuse and mental illness, as evidenced by the following:
 - a. By her own admission, she has a history of drug use including cocaine, crack cocaine, benzodiazepines, and intravenous heroin use.
 - b. Beginning on or about February 24, 2016, Ms. Brady has participated in the Hampton Drug Treatment Court Program where she is currently in phase two of a four phase program. In an interview with an investigator with the Department of Health Professions conducted on February 27, 2017, Ms. Brady's therapist stated that Ms. Brady has "good intentions" but has not done as well in the program as she should have and that her outcome is not always up to par.
 - c. Ms. Brady has received court-ordered substance abuse treatment at the Hampton-Newport News Community Services Board beginning on or about February 10, 2015.

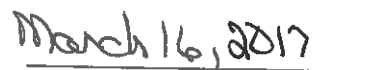
d. From on or about July 13, 2015 through July 27, 2015, Ms. Brady received heroin detox residential treatment at Rubicon, Inc., Richmond, Virginia, where she was diagnosed with depression and opioid dependence.

e. From on or about August 11, 2014 through December 1, 2014, Ms. Brady received inpatient substance abuse treatment at Guest House, Alexandria, Virginia. Ms. Brady was terminated from the program twice: once for relapse and again for policy violations.

f. From on or about November 24, 2008 through December 18, 2008, and May 21, 2010 through May 26, 2010, Ms. Brady received substance abuse treatment at William J. Farley Center at Williamsburg Place, Williamsburg, Virginia, where she was diagnosed with opiate dependence and withdrawal, benzodiazepine dependence and withdrawal, and cocaine dependence.

Pursuant to Virginia Code § 54.1-2400.2(K), the Board considered whether to disclose or not disclose Ms. Brady's health records or health services.


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


Date