

**BEFORE THE VIRGINIA BOARD OF NURSING**

**IN RE:            PAULA RENEE JOHNSON, L.P.N. REINSTATEMENT APPLICANT**  
**a.k.a PAULA RENEE MOSES**  
**License Number:    0002-085634**  
**Suspension Date:   April 7, 2015**  
**Case Number:        175581**

---

**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.**

<b>TYPE OF PROCEEDING:</b>	This is an informal conference before a Special Conference Committee ("Committee") of the Board.
<b>DATE AND TIME:</b>	<b>February 13, 2017</b> 1:00 P.M.
<b>PLACE:</b>	Virginia Department of Health Professions Perimeter Center - 9960 Mayland Drive 2 <sup>nd</sup> 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 may 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 restricted license subject to terms and conditions.
  - Deny your application;

- Refer the matter to the Board for a formal administrative 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: February 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 **February 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 **February 6, 2017**.

---

**STATEMENT OF ALLEGATIONS**

---

The Board alleges that grounds exist to refuse to reinstate the license of Paula Renee Johnson, L.P.N. to practice practical nursing in that:

1. Ms. Johnson violated Virginia Code § 54.1-3007(6) in that she is unsafe to practice due to mental illness and substance abuse, in that between or about April 13, 2015 through August 1, 2016, Ms. Johnson received outpatient treatment at Walnut Avenue Associates, Roanoke, Virginia, where she was diagnosed with bipolar disorder and anxiety.

2. Ms. Johnson violated Virginia Code § 54.1-3007(1) and 18 VAC 90-20-300(A)(1)(b) of the Regulations in that on the application for reinstatement of her Virginia nursing license, dated October 21, 2015:

a. She falsely answered “no” to the question “do you have a mental, physical or chemical dependency condition which could interfere with your current ability to practice nursing,” when, in fact, she has been diagnosed with bipolar disorder and anxiety, a history of major depression and has admitted that she has a substance abuse problem.

b. When asked to list all employers since her license was suspended, Ms. Johnson indicated that she had been unemployed; however, she had been working part-time at a restaurant, since January 2016.

3. Ms. Johnson violated Virginia Code § 54.1-3007(2) and (5) and 18 VAC 90-20-300(A)(2)(e) of the Regulations in that, on her July 17, 2014 application for employment with Salem Terrace at Harrowgate, Salem, Virginia, as evidenced by the following:

a. She stated that she left Pheasant Ridge due to “working conditions” when, in fact, her employment was involuntarily terminated.

b. She failed to disclose her employment with Lewis Gale Physicians, Roanoke, Virginia, which was terminated for job abandonment due to excessive absenteeism and tardiness.

c. She stated that she left Salem Health and Rehabilitation Center due to "too much overtime" when, in fact, her employment was terminated for receiving two written warnings in a 12-month period.

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



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



Date