

BEFORE THE VIRGINIA BOARD OF NURSING

IN RE: TIA MICHELLE BRIGGS, L.P.N. REINSTATEMENT APPLICANT
License Number: 0002-059109
Suspension Date: December 3, 2014
Case Number: 173226

**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:	February 6, 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 professional 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:

1. Deadline for filing materials: January 30, 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.
2. Deadline for filing motions, including requests for continuance or objections to exhibits, in writing, to Brenda Krohn at the above address: January 30, 2017. NOTE: Failure to object to the distribution prior to the proceeding will not affect your right to contest any information contained in these documents at the proceeding.

REQUEST FOR A CONTINUANCE

Absent exigent circumstances, such as personal or family illness, a request for a continuance after **January 30, 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 **January 30, 2017**.

STATEMENT OF ALLEGATIONS

The Board alleges that grounds exist to refuse to reinstate the license of Tia Michelle Briggs to practice practical nursing in that:

1. Ms. Briggs violated Virginia Code § 54.1-3007(6) in that she is unsafe to practice professional nursing due to substance abuse, as evidenced by the following:

a. On or about April 28, 2016, Ms. Briggs' primary care physician at Anwaral Islam Practice, Chesapeake, Virginia said that Ms. Briggs has a pattern of taking Xanax (alprazolam, C-IV) and pain medication, and that the last time she called and requested Xanax he refused to prescribe it.


b. On or about April 29, 2016, Ms. Briggs requested additional pain medication from Dr. Mohib Ghobrial I, M.D., F.A.C.S., whom she had seen for an injury to her arm. She indicated that her pain medications had been stolen from her hotel room. In June 2016, Ms. Briggs' insurance company, Anthem HealthKeepers Plus, Mason, Ohio, sent this doctor a letter advising the practice that Ms. Briggs may be obtaining too many pain medications.

c. On or about August 12, 2015, Ms. Briggs' emergency room doctor with Sentara Norfolk General Hospital, Norfolk, Virginia, indicated there was concern with regard to Ms. Briggs' use of narcotics. There was a concern about administering pain medications because Ms. Briggs had tampered with the sharps container during a prior admission. On August 12, 2015, Ms. Briggs' friend closed to door to Ms. Briggs' hospital room. When the technician re-entered the room, Ms. Briggs' friend was near the sharps container. The sharps container was then removed from the room. When Ms. Briggs observed that the sharps container was being removed she began shouting profanities at the staff.

d. On or about September 11, 2014, Ms. Briggs' emergency room doctor with Sentara Leigh Hospital, Norfolk, Virginia, indicated that her claims of pain may be attributed to drug seeking behavior.

2. Ms. Briggs violated Virginia Code § 54.1-3007(1) and 18 VAC 90-20-300(A)(1)(b) of the Regulations Governing the Practice of Nursing ("Regulations") in that she falsely represented facts on her Application for Reinstatement, dated February 26, 2016, in that she stated her reason for leaving her employment with Leigh Hall Assisted Living, Norfolk, Virginia was due to having surgery, when, in fact, her employment had been terminated because she had been observed on videotape sleeping in the memory care model room with her boyfriend.

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


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

January 11, 2017
Date