

BEFORE THE VIRGINIA BOARD OF NURSING

IN RE: KARLA YVONNE PERRY, L.P.N., R.N. APPLICANT
License Number: 0002-085721
Case Numbers: 174599/171619

0001-270235

**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 licensure by examination to practice professional nursing and regarding your license to practice practical nursing in the Commonwealth of Virginia.

TYPE OF PROCEEDING:	This is an informal conference before a Special Conference Committee of the Board of Nursing.
DATE AND TIME:	October 11, 2016 2:00 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 meet the requirements of Virginia Code § 54.1-3017 and 18 VAC 90-20-190 of the Regulations Governing the Practice of Nursing.
3. In considering your application, the Committee will consider evidence that grounds may exist to refuse to issue you a license to practice professional 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 with regard to your application for licensure to practice professional nursing:
 - Approve your application for licensure to practice professional nursing and issue an unrestricted license;
 - Approve your application and issue a restricted license subject to terms and conditions;

- Deny your application; or
 - Refer the matter to the Board for a formal administrative hearing.
5. At the conclusion of the proceeding, the Committee is authorized to take any of the following actions against your license to practice practical nursing:
- 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;
 - Offer you a consent order for suspension or revocation of your license 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.

COMMONWEALTH'S EXHIBIT:

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 exhibits: October 4, 2016. Submit five copies of all documents you want the Board to consider to LaTasha Austin, 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: October 4, 2016. 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.

STATEMENT OF ALLEGATIONS

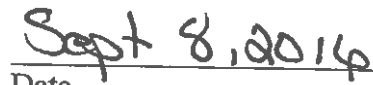
The Board of Nursing alleges that grounds exist to refuse to issue a license to Karla Yvonne Perry, L.P.N. to practice professional nursing in that:

1. Ms. Perry violated Virginia Code §§ 54.1-3007(3) and 54.1-3008(A)(4) and 18 VAC 90-20-190(F) of the Regulations Governing the Practice of Nursing (“Regulations”) in that in or about June 2016, during the course of her employment with Five Star Home Health, Ms. Perry wore a badge indicating that she was an “R.N.,” although she is not licensed as a professional nurse.

2. Ms. Perry violated Virginia Code § 54.1-3007(2), (3), (5) and (8) and 18 VAC 90-20-300(2)(e) and (f) in that during the course of her employment with Live Long and Healthy, LLC, Boyds, Maryland, from on or about May 12, 2015 to September 25, 2015, Ms. Perry falsely documented visiting patients and providing home health care; however, she failed to actually do so.


Brenda Krohn, R.N., M.S.

Deputy Executive Director
Virginia Board of Nursing


Date