

BEFORE THE VIRGINIA BOARD OF NURSING

IN RE: PARIS KEVONA SIRE-PUGH, C.N.A.
Certificate Number: 1401-120075
Issue Date: July 14, 2007
Expiration Date: July 31, 2016
Case Number: 163971, 163930

**NOTICE OF FORMAL ADMINISTRATIVE HEARING
AND STATEMENT OF ALLEGATIONS**

You are hereby notified that a Formal Hearing has been scheduled before the Board of Nursing (“Board”) regarding your certificate to practice as a nurse aide in the Commonwealth of Virginia.

TYPE OF PROCEEDING:	This is a formal administrative hearing before a panel of the Board of Nursing.
DATE AND TIME:	May 16, 2016 9:30 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 formal hearing is being held pursuant to Virginia Code §§ 2.2-4020, 2.2-4024(F), and 54.1-2400(11). This proceeding will be convened as a public meeting pursuant to Virginia Code § 2.2-3700.

2. At the conclusion of the proceeding, the Board 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;
 - Suspend your certificate;
 - Revoke your certificate.

DEFAULT:

If you fail to appear at the formal hearing, the Board 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 Board 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 Board and will be considered by the Board 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 formal hearing.**

FILING DEADLINES:

1. Deadline for filing exhibits: **May 9, 2016**. Submit 15 copies of all documents you want the Board to consider to Darlene Graham, Board of Nursing, 9960 Mayland Drive, Suite 300, Henrico, Virginia 23233. Exhibits may not be sent by facsimile or e-mail. Please note that any documentation or evidence that you previously submitted for an informal conference must be resubmitted for consideration by the Board at the formal hearing.
2. Deadline for filing motions, including motions for continuance or objections to exhibits, in writing, to Darlene Graham at the above address: **May 9, 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

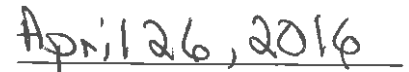
The Board of Nursing alleges that:

1. At all times relevant hereto, Paris Kevona Sire-Pugh, C.N.A. was certified to practice as a nurse aide in the Commonwealth of Virginia.
2. Paris Kevona Sire-Pugh, C.N.A. violated Virginia Code § 54.1-3007(6) and Term No. 2(b) of the Order of the Board entered September 5, 2014 (“Board’s Order”), which required her to refrain from using alcohol or any mood-altering chemical, in that on or about May 11 and June 10, 2015, she was hospitalized for substance abuse and mental health treatment.
3. Ms. Sire-Pugh violated Term No. 2(b) of the Board’s Order, which required her to submit a written report from the prescribing practitioner for any C-II – C-V controlled medications, in that a prescription monitoring report obtained on July 21, 2015, revealed that between September 22, 2014 and November 1, 2014, Ms. Sire-Pugh received one prescription for oxycodone (C-II) and two prescriptions for zolpidem tartrate (C-IV) and failed to provide prescription reports. She also failed to provide a prescription report for Fioricet (butalbital/acetaminophen/caffeine, C-III), which she revealed to the Board’s Compliance Case Manager on September 17, 2014.
4. Ms. Sire-Pugh violated Term No. 2(c) of the Board’s Order, which required her to undergo two supervised, unannounced random drug screens per quarter, in that she failed to do so.
5. Ms. Sire-Pugh violated Term Nos. 2(d) and (f) of the Board’s Order, which required her to attend Alcoholics Anonymous or Narcotics Anonymous and submit written evidence of attendance, in that she failed to do so.

6. Ms. Sire-Pugh violated Term No. 2(i) of the Board's Order, which required her to provide all current and future treating practitioners with a complete copy of the Board's Order, in that she failed to do so.

7. Ms. Sire-Pugh violated Term No. 2(j) of the Board's Order, which required her to submit quarterly self-reports, in that she failed to do so.


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


Date