

**VIRGINIA:**

**BEFORE THE BOARD OF NURSING**

**IN RE: CHARLES A. CURTIS-THOMAS, R.N. REINSTATEMENT APPLICANT**

**NOTICE OF HEARING**

Pursuant to §§ 2.2-4020, 2.2-4024(F), and 54.1-2400(11) of the Code of Virginia (1950), as amended ("Code"), Charles A. Curtis-Thomas, R.N. Reinstatement Applicant, who prior to its suspension by the Department of Health Professions on May 18, 2007, held License No. 0001-125735 to practice professional nursing in Virginia, is hereby given notice that a formal administrative hearing will be held in the presence of a panel of the Board of Nursing. The hearing will be held on January 25, 2010, at 10:00 a.m., at the offices of the Department of Health Professions, Board of Nursing, Perimeter Center, 9960 Mayland Drive, Suite 201, Richmond, Virginia 23233, at which time Mr. Curtis-Thomas will be afforded the opportunity to be heard in person or by counsel.

At the hearing, Mr. Curtis-Thomas has the following rights, among others: the right to representation by counsel; the right to have witnesses subpoenaed and to present witnesses on his behalf; the right to present documentary evidence; and the right to cross-examine adverse witnesses. If Mr. Curtis-Thomas desires any witnesses to appear on his behalf, he must notify the Director of Administrative Proceedings, Department of Health Professions, 9960 Mayland Drive, Suite 300, Richmond, Virginia 23233, in accordance with the Instructions for Requesting Subpoenas.

The purpose of the hearing is to receive and act upon the application of Charles A. Curtis-Thomas for reinstatement of his license to practice professional nursing in Virginia, which was mandatorily suspended by Order of the Department of Health Professions on May 18, 2007, and to inquire into evidence that Mr. Curtis-Thomas may have violated certain laws and regulations governing professional nursing practice in Virginia, as more fully set forth in the Statement of Particulars below.

Pursuant to § 54.1-2409 of the Code, reinstatement of Mr. Curtis-Thomas' license requires the affirmative vote of three-fourths of the members of the Board in attendance at the hearing.

### **STATEMENT OF PARTICULARS**

The Board alleges that:

1. Charles A. Curtis-Thomas may have violated § 54.1-3007(7) of the Code in that, on March 9, 2004, the Board of Nursing for the State of New Jersey entered a Final Order of Discipline revoking Mr. Curtis-Thomas' license to practice nursing in New Jersey due to discrepancies in the administration and documentation of narcotics while on assignment at St. Joseph's Hospital and Medical Center through his employer O.S.C. Staffing, and due to substandard nursing care provided while on assignment at Chilton Memorial Hospital through his employer Star Med Staffing. This revocation formed the basis for the mandatory suspension of Mr. Curtis-Thomas' license to practice professional nursing in Virginia.

2. Mr. Curtis-Thomas may have violated § 54.1-3007(2) and (5) of the Code and 18 VAC 90-20-300(A)(2)(e) of the Regulations Governing the Practice of Nursing in that on the application for employment with HCR Manor Care (Fair Oaks), Fairfax, Virginia, dated October 13, 2006, Mr. Curtis-Thomas answered "no" to the question "have you ever been sanctioned by a health care licensing agency in this state or any other United States or foreign jurisdiction?" when, in fact, his license had been suspended by the New Jersey Board of Nursing.

3. Mr. Curtis-Thomas may have violated § 54.1-3007(5) and (6) of the Code in that on or about April 18, 2007, he submitted a pre-employment drug screen with Recruitment Specialists, Inc., which was positive for cocaine.

FOR THE BOARD

*Jodi P. Lane*  
for Jay P. Douglas R.N., M.S.M., C.S.A.C.  
Executive Director for the  
Board of Nursing

ENTERED: January 7, 2010