

Respondent's vocational nursing employment history continued:

05/06-05/06	Charge Nurse	Treemont Nursing and Rehabilitation Dallas, Texas
06/06-07/06	Charge Nurse	Rockwall Nursing Center Rockwall, Texas
08/06-08/06	Staff Nurse	Amberwood Care Center Celina, Texas
09/06-12/06	Unknown	
01/07-01/07	Charge Nurse	Windsor Place Lancaster, Texas
02/07-02/08	Not employed in Nursing	
03/08-04/08	Staff Nurse	Irving Nursing & Rehab Center Irving, Texas
05/08-10/08	Staff Nurse	Mesquite Tree Nursing Center Mesquite, Texas
11/08	Unknown	
12/08-05/08	Staff Nurse	Hillcrest Nursing and Rehabilitation Wylie, Texas
06/08 - Present	Unknown	

5. On or about May 18, 2006, Respondent was issued an Agreed Order by the Board of Nurse Examiners for the State of Texas which required her to participate in and successfully complete the Texas Peer Assistance Program for Nurses (TPAPN). A copy of the Findings of Fact, Conclusions of Law, and Agreed Order dated May 18, 2006 is attached and incorporated herein by reference as part of this Order.
6. On or about June 10, 2008, Respondent's license to practice vocational nursing in the State of Texas was Suspended with the suspension STAYED and placed on PROBATION for a period of three (3) years through an Agreed Order by the Texas Board of Nursing. A copy of the Findings of Fact, Conclusions of Law, and Agreed Order dated June 10, 2008 is attached and incorporated herein by reference as part of this Order.

7. On or about February 2009, while employed as a Licensed Vocational Nurse with Hillcrest Nursing Home, Wylie, Texas, Respondent signed out Lortab from the "Individual Patient's Narcotic Record" for Residents I.P. and C.M. but failed to document, or accurately document the administration of the medications in the patient's Medical Administration Records (MAR) and/or nurse's notes, as follows:

Date	Resident ID	Physician's Orders	Individual Patient's Narcotic Record	Medication Sheet
02/05/09	I.P.	Lortab 10/500 1 Tablet TID at 0800/1400/2000	2000-1 tab	2000-1 tab
			2000-1 tab	Not Documented
02/06/09	C.M.	Lortab 7.5/325 1 Tablet TID at 0800/1400/2000 AND 1-2 tabs Q4-6hrs PRN	0800-2 tabs	0800-1 tab
			0930-2 tabs	Not Documented
			1300-2 tabs	1300-1 tab
02/08/09	C.M.	Lortab 7.5/325 1 Tablet TID at 0800/1400/2000 AND 1-2 tabs Q4-6hrs PRN	1100-2 tabs	Not Documented
02/08/09	I.P.	Lortab 10/500 1 Tablet TID at 0800/1400/2000	1100-2 tabs	Not Documented
02/09/09	C.M.	Lortab 7.5/325 1 Tablet TID at 0800/1400/2000 AND 1-2 tabs Q4-6hrs PRN	0700-1 tab	Not Documented
			0800-1 tab	0800-1 tab
			1200-2 tabs	1400-1 tab
			2000-2 tabs	2000-1 tab
02/09/09	I.P.	ORDER CHANGED Lortab 10/500 1 Tablet TID at 0800 /1400/2000 AND 1 tab Q12hrs PRN	0700-2 tabs	0800-1 tab
			1300-2 tabs	1400-1 tab
			1900-2 tabs	2000-1 tab
02/10/09	C.M.	Lortab 7.5/325 1 Tablet TID at 0800/1400/2000 AND 1-2 tabs Q4-6hrs PRN	0700-2 tabs	0800-1 tab
			1300-2 tabs	1400-1 tab
			2100-2 tabs	2000-1 tab
02/10/09	I.P.	Lortab 10/500 1 Tablet TID at 0800 /1400/2000 AND 1 tab Q12hrs PRN	0700-2 tabs	0800-1 tab
			1300-2 tabs	1400-1 tab

			2000-2 tabs 1 Tab- Time Not Documented	2000-1 tab Not Documented
02/11/09	I.P.	Lortab 10/500 1 Tablet TID at 0800 /1400/2000 AND 1 tab Q12hrs PRN	0700-2 tabs 1300-2 tabs 2000-2 tabs	0800-1 tab 1400-1 tab 0600-1400 shift-1 tab PRN (actual time not documented) 2000-1 tab 1400-2200 shift-1 tab PRN (actual time not documented)
02/13/09	C.M.	Lortab 7.5/325 1 Tablet TID at 0800/1400/2000 AND 1-2 tabs Q4-6hrs PRN	0800-2 tabs 1300-2 tabs	0800-1 tab Not Documented
02/13/09	I.P.	Lortab 10/500 1 Tablet TID at 0800 /1400/2000 AND 1 tab Q12hrs PRN	0800-2 tabs 1300-2 tabs	0800-1 tab 0600-1400 shift-1 tab PRN (actual time not documented) 1400-2200 shift-1 tab PRN (actual time not documented)
02/16/09	I.P.	Lortab 10/500 1 Tablet TID at 0800 /1400/2000 AND 1 tab Q12hrs PRN	None signed out during this time period 1800-2 tabs 2200-2 tabs	0600-1400 shift-1 tab PRN (actual time not documented) 2000-1 tab 1400-2200 shift-1 tab PRN (actual time not documented)
02/17/09	I.P.	Lortab 10/500 1 Tablet TID at 0800 /1400/2000 AND 1 tab Q12hrs PRN	None signed out	2000-1 tab
02/18/09	I.P.	Lortab 10/500 1 Tablet TID at 0800 /1400/2000 AND 1 tab Q12hrs PRN	0800-2 tabs 1300-2 tabs	0800-1 tab 1400-1 tab
02/19/09	I.P.	Lortab 10/500	1300-1 tab	Not Documented

		1 Tablet TID at 0800 /1400/2000 AND 1 tab Q12hrs PRN	1300-2 tabs	Not Documented
02/20/09	I.P.	Lortab 10/500 1 Tablet TID at 0800 /1400/2000 AND 1 tab Q12hrs PRN	0800-2 tabs 1300-2 tabs	0800-1 tab Not Documented
02/23/09	I.P.	Lortab 10/500 1 Tablet TID at 0800 /1400/2000 AND 1 tab Q12hrs PRN	0800-2 tabs	0800-1 tab

Respondent's conduct was likely to injure the patients in that subsequent care givers would rely on her documentation to further medicate the patient which could result in an overdose.

8. On or about February 2009, while employed as a Licensed Vocational Nurse with Hillcrest Nursing Home, Wylie, Texas, Respondent signed out Lortab from the "Individual Patient's Narcotic Record" for Residents I.P. and C.M. but failed to follow the facility's policy and procedures for the wastage of any of the unused portions of the medications, as follows:

Date	Resident ID	Physician's Orders	Individual Patient's Narcotic Record	Medication Sheet	Wastage
02/05/09	I.P.	Lortab 10/500 1 Tablet TID at 0800/1400/2000	2000-1 tab 2000-1 tab	2000-1 tab Not Documented	None
02/06/09	C.M.	Lortab 7.5/325 1 Tablet TID at 0800/1400/2000 AND 1- 2 tabs Q4-6hrs PRN	0800-2 tabs 0930-2 tabs 1300-2 tabs	0800-1 tab Not Documented 1300-1 tab	None
02/08/09	C.M.	Lortab 7.5/325 1 Tablet TID at 0800/1400/2000 AND 1- 2 tabs Q4-6hrs PRN	1100-2 tabs	Not Documented	None
02/08/09	I.P.	Lortab 10/500 1 Tablet TID at 0800/1400/2000	1100-2 tabs	Not Documented	None
02/09/09	C.M.	Lortab 7.5/325 1 Tablet TID at 0800/1400/2000 AND 1- 2 tabs Q4-6hrs PRN	0700-1 tab 0800-1 tab 1200-2 tabs 2000-2 tabs	0800-1 tab 1400-1 tab 2000-1 tab	None

02/09/09	I.P.	ORDER CHANGED Lortab 10/500 1 Tablet TID at 0800 /1400/2000 AND 1 tab Q12hrs PRN	0700-2 tabs 1300-2 tabs 1900-2 tabs	0800-1 tab 1400-1 tab 2000-1 tab	None
02/10/09	C.M.	Lortab 7.5/325 1 Tablet TID at 0800/1400/2000 AND 1- 2 tabs Q4-6hrs PRN	0700-2 tabs 1300-2 tabs 2100-2 tabs	0800-1 tab 1400-1 tab 2000-1 tab	None
02/10/09	I.P.	Lortab 10/500 1 Tablet TID at 0800 /1400/2000 AND 1 tab Q12hrs PRN	0700-2 tabs 1300-2 tabs 2000-2 tabs 1 Tab- Time Not Documented	0800-1 tab 1400-1 tab 2000-1 tab Not Documented	None
02/11/09	I.P.	Lortab 10/500 1 Tablet TID at 0800 /1400/2000 AND 1 tab Q12hrs PRN	0700-2 tabs 1300-2 tabs 2000-2 tabs	0800-1 tab 1400-1 tab 0600-1400 shift-1 tab PRN 2000-1 tab 1400-2200 shift- 1 tab PRN	None
02/13/09	C.M.	Lortab 7.5/325 1 Tablet TID at 0800/1400/2000 AND 1- 2 tabs Q4-6hrs PRN	0800-2 tabs 1300-2 tabs	0800-1 tab Not Documented	None
02/13/09	I.P.	Lortab 10/500 1 Tablet TID at 0800 /1400/2000 AND 1 tab Q12hrs PRN	0800-2 tabs 1300-2 tabs	0800-1 tab 0600-1400 shift-1 tab PRN 1400-2200 shift- 1 tab PRN	None
02/16/09	I.P.	Lortab 10/500 1 Tablet TID at 0800 /1400/2000 AND 1 tab Q12hrs PRN	1800-2 tabs 2200-2 tabs	0600-1400 shift-1 tab PRN 2000-1 tab 1400-2200 shift- 1 tab PRN	None

02/18/09	I.P.	Lortab 10/500 1 Tablet TID at 0800 /1400/2000 AND 1 tab Q12hrs PRN	0800-2 tabs 1300-2 tabs	0800-1 tab 1400-1 tab	None
02/19/09	I.P.	Lortab 10/500 1 Tablet TID at 0800 /1400/2000 AND 1 tab Q12hrs PRN	1300-1 tab 1300-2 tabs	Not Documented Not Documented	None
02/20/09	I.P.	Lortab 10/500 1 Tablet TID at 0800 /1400/2000 AND 1 tab Q12hrs PRN	0800-2 tabs 1300-2 tabs	0800-1 tab Not Documented	None
02/23/09	I.P.	Lortab 10/500 1 Tablet TID at 0800 /1400/2000 AND 1 tab Q12hrs PRN	0800-2 tabs	0800-1 tab	None

Respondent's conduct was likely to deceive the hospital pharmacy and place them in violation of Chapter 481 of the Texas Health and Safety Code (Controlled Substances Act).

9. On or about February 2009, while employed as a Licensed Vocational Nurse with Hillcrest Nursing Home, Wylie, Texas, Respondent misappropriated Lortab from the facility and patients thereof, or failed to take precautions to prevent such misappropriation. Respondent's conduct was likely to defraud the facility and patients of the cost of the medications.
10. On or about December 28, 2008, through May 12, 2009, Respondent became non-compliant with the terms of the Agreed Order issued to her by the Texas Board of Nursing on June 10, 2008. Non-compliance is the result of Respondent's failure to comply with Stipulation Number Five (5) of the Order which reads:
 - (5) RESPONDENT SHALL CAUSE each present employer in nursing to submit the Notification of Employment form, which is provided to the Respondent by the Board, to the Board's office within ten (10) days of receipt of this Order. RESPONDENT SHALL CAUSE each future employer to submit the Notification of Employment form, which is provided to the Respondent by the Board, to the Board's office within five (5) days of employment as a nurse.

Respondent became employed as a Licensed Vocational Nurse with Hillcrest Nursing and Rehabilitation, Wylie, Texas, on December 23, 2008; therefore, a Notification of Employment form was due to the Board by December 28, 2008, five (5) days after the date of hire.

11. On or about June 1, 2009, in a telephone conversation with a member of Board staff, Respondent admitted to faxing a fraudulent, unauthorized prescription for hydrocodone for Patient B.C. on May 28, 2009, while employed as a Licensed Vocational Nurse with Hillcrest Nursing and Rehabilitation, Wylie, Texas. Respondent denies taking possession of the medication when it was delivered. Furthermore, documentation from the facility shows that Respondent documented on May 27, 2009, a fraudulent physician telephone order for hydrocodone prior to faxing the fraudulent prescription. Respondent's conduct was likely to deceive the pharmacy and possession of hydrocodone through the use of a fraudulent, unauthorized prescription is prohibited by Chapter 481 of the Texas Health and Safety Code (Controlled Substances Act).
12. On June 2, 2009, Respondent submitted a notarized statement to the Board voluntarily surrendering the right to practice vocational nursing in Texas. A copy of the notarized statement is attached and incorporated, by reference, as part of this Order.

CONCLUSIONS OF LAW

1. Pursuant to Texas Occupations Code, Sections 301.451-301.555, the Board has jurisdiction over this matter.
2. Notice was served in accordance with law.
3. The evidence received is sufficient to prove violations of Section 301.452(b)(1),(10)&(13), Texas Occupations Code, and 22 TEX. ADMIN. CODE §217.11(1)(A)(B)&(D), and 22 TEX. ADMIN. CODE §217.12(1)(A)(B),(4),(6)(A),(10)(B)(C)(E)&(11)(B).
4. Under Section 301.453(c), Texas Occupations Code, the Board has the authority to accept the voluntary surrender of a license.
5. Under Section 301.453(d), Texas Occupations Code, the Board may impose conditions for reinstatement of licensure.
6. Any subsequent reinstatement of this license will be controlled by Section 301.452 (b), Texas Occupations Code, and 22 TAC §§213.26-.29, and any amendments thereof in effect at the time of the reinstatement.

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ORDER

NOW, THEREFORE, IT IS ORDERED that the voluntary surrender of Vocational Nurse License Number 198335, heretofore issued to VERONICA LAJOY JACKSON, to practice vocational nursing in the State of Texas, is accepted by the Executive Director on behalf of the Texas Board of Nursing. In connection with this acceptance, the Board imposes the following conditions:

1. RESPONDENT SHALL immediately deliver the wallet-size license, heretofore issued to VERONICA LAJOY JACKSON, to the office of the Texas Board of Nursing.
2. RESPONDENT SHALL NOT practice vocational nursing, use the title of "vocational nurse" or the abbreviation "LVN" or wear any insignia identifying herself as a vocational nurse or use any designation which, directly or indirectly, would lead any person to believe that RESPONDENT is a registered nurse during the period in which the license is surrendered.
3. RESPONDENT SHALL NOT petition for reinstatement of licensure until: one (1) year has elapsed from the date of this Order.
4. Upon petitioning for reinstatement, RESPONDENT SHALL satisfy all then existing requirements for relicensure.

IT IS FURTHER AGREED and ORDERED that this Order SHALL be applicable to Respondent's multistate licensure privilege, if any, to practice vocational nursing in compact states.

Effective this 5th day of June, 2009.



TEXAS BOARD OF NURSING

By:


Katherine A. Thomas, MN, RN
Executive Director on behalf
of said Board

Veronica Lajoy Jackson
5320 Cedar Springs Road #121E
Dallas, TX 75235
Texas LVN License #198335

Voluntary Surrender Statement

Dear Texas Board of Nursing:

At this time, I no longer desire to be licensed as a vocational nurse. Accordingly, I voluntarily surrender my license to practice in Texas. I waive representation by counsel and consent to the entry of an Order which outlines requirements for reinstatement of my license. I understand that I will be required to comply with the Board's Rules and Regulations in effect at the time I submit any petition for reinstatement.

Signature Veronica Lajoy Jackson
Date June 1, 2009
Texas Nursing License Number 198335

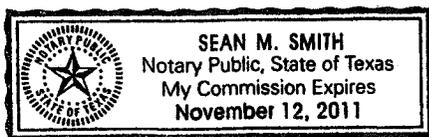
The State of Texas

Before me, the undersigned authority, on this date personally appeared Veronica Lajoy Jackson who, being duly sworn by me, stated that she executed the above for the purpose therein contained and that she understood same.

Sworn to before me the 1st day of June, 2009.

SEAL

Sean M. Smith
Notary Public in and for the State of Texas



fraudulent, unauthorized telephonically communicated prescription is prohibited by Chapter 481 of the Texas Health and Safety Code (Controlled Substances Act).

7. On or about October 24, 2005, while employed with Doctors Healthcare Center, Dallas, Texas, Respondent misappropriated Norco belonging to the facility and patient thereof in that she admitted to the misappropriation. Respondent's conduct was likely to defraud the facility and patients of the cost of the medication.
8. On or about October 24, 2005, while employed with Doctors Healthcare Center, Dallas, Texas, Respondent engaged in the intemperate use of Norco in that she admitted to the intemperate use. Possession of Norco is prohibited by Chapter 481 of the Texas Health & Safety Code (Controlled Substances Act). The use of Norco by a nurse, while subject to call or duty, could impair the nurse's ability to recognize subtle signs, symptoms or changes in the patient's condition, and could impair the nurse's ability to make rational, accurate, and appropriate assessments, judgments, and decisions regarding patient care, thereby placing the patient in potential danger.
9. On or about December 22, 2005, Respondent was arrested by the Dallas County, Texas, Sheriff's Office for the offense of "Possession of a Controlled Substance PG 3 <28g," a Class A Misdemeanor. Respondent's arrest was the result of her conduct described in Finding of Fact Number Six (6). This case is currently pending.
10. The Respondent's conduct described in the preceding Findings of Fact was reportable under the provisions of Sections 301.401-301.419, Texas Occupations Code.
11. The Board finds that there exists serious risks to public health and safety due to intemperate use of controlled substances or chemical dependency.
12. Respondent's compliance with the terms of a Board approved peer assistance program should be sufficient to protect patients and the public.

CONCLUSIONS OF LAW

1. Pursuant to Texas Occupations Code, Sections 301.451-301.455, the Board has jurisdiction over this matter.
2. Notice was served in accordance with law.
3. The evidence received is sufficient to prove violation of Section 301.452(b)(9)&(10), Texas Occupations Code, and 22 TEX. ADMIN. CODE §217.12(6)(G),(8),(10)(A)&(E)&(13).

4. The evidence received is sufficient cause pursuant to Section 301.452(b), Texas Occupations Code, to take disciplinary action against Vocational Nurse License Number 198335, heretofore issued to VERONICA LAJOY WARREN, including revocation of Respondent's license to practice vocational nursing in the State of Texas.
5. The Board may, in its discretion, order a nurse to participate in a peer assistance program approved by the Board if the nurse would otherwise have been eligible for referral to peer assistance pursuant to Section 301.410, Texas Occupations Code.

ORDER

IT IS THEREFORE AGREED and ORDERED that RESPONDENT, in lieu of the sanction of Revocation under Section 301.453, Texas Occupations Code, SHALL comply with the following conditions for such a time as is required for RESPONDENT to successfully complete the Texas Peer Assistance Program for Nurses (TPAPN):

(1) RESPONDENT SHALL, within forty-five (45) days following the date of entry of this final Order, apply to and be accepted into the TPAPN, which SHALL include payment of a non-refundable participation fee in the amount of three hundred fifty dollars (\$350) payable to TPAPN.

(2) Upon acceptance into the TPAPN, RESPONDENT SHALL waive confidentiality and provide a copy of the executed TPAPN contract to the Board of Nurse Examiners.

(3) RESPONDENT SHALL comply with all requirements of the TPAPN contract during its term.

(4) RESPONDENT SHALL CAUSE the TPAPN to notify the Board of Nurse Examiners of any violation of the TPAPN contract.

IT IS FURTHER AGREED and ORDERED, RESPONDENT SHALL comply in all respects with the Nursing Practice Act, Revised Civil Statutes of Texas as amended, Texas

Occupations Code, Section §§301.001 *et seq.*, the Rules and Regulations Relating to Nurse Education, Licensure and Practice, 22 TEX. ADMIN. CODE §211.01 *et seq.* and this Order.

IT IS FURTHER AGREED and ORDERED that this Order SHALL be applicable to Respondent's multistate licensure privileges, if any, to practice vocational nursing in the State of Texas.

IT IS FURTHER AGREED and ORDERED that while Respondent's license is encumbered by this Order, Respondent may not work outside the State of Texas pursuant to a multistate licensure privilege without the written permission of the State of Texas and the Board of Nursing in the party state where Respondent wishes to work.

IT IS FURTHER AGREED, SHOULD RESPONDENT fail to comply with this Order or the terms of the participation agreement with the TPAPN, such noncompliance will result in further disciplinary action including revocation of Respondent's license and multistate licensure privileges, if any, to practice vocational nursing in the State of Texas.

IT IS FURTHER AGREED, SHOULD RESPONDENT be convicted of or receive a deferred order for the offense(s) as outlined in Finding of Fact Number Nine (9), said judicial action will result in further disciplinary action including Revocation of Respondent's license to practice vocational nursing in the State of Texas.

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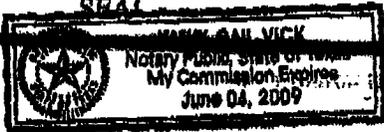
RESPONDENT'S CERTIFICATION

I understand that I have the right to legal counsel prior to signing this Agreed Order. I waive representation by counsel. I have reviewed this Order. I neither admit nor deny the violations alleged herein. I do acknowledge possessing a diagnosis that deems me eligible to participate in the Texas Peer Assistance Program for Nurses. By my signature on this Order, I agree to the Findings of Fact, Conclusions of Law, and Conditions One (1) through Four (4) of this Order to obtain disposition of the allegations through peer assistance and to avoid further disciplinary action in this matter. I waive judicial review of this Order. I understand that this Order becomes effective upon acceptance by the Executive Director on behalf of the Board of Nurse Examiners, and a copy will be mailed to me. I understand that if I fail to comply with all terms and conditions of this Order, I will be subject to investigation and disciplinary sanction, including revocation of my license to practice vocational nursing in the State of Texas, as a consequence of my noncompliance.

Signed this 10th day of May, 2006.

Veronica L. Warren
 VERONICA LAJOY WARREN, Respondent

Sworn to and subscribed before me this 10th day of May, 2006.



Mary Ann Vick
 Notary Public in and for the State of Texas

WHEREFORE PREMISES CONSIDERED, the Executive Director, on behalf of the Board of Nurse Examiners for the State of Texas, does hereby accept and enter the Agreed Order that was signed on the 10th day of May, 2006, by VERONICA LAJOY WARREN, Vocational Nurse License Number 198335, and said Order is final.

Entered and effective this 18th day of May, 2006.



Katherine A. Thomas, MN, RN
Executive Director on behalf
of said Board

BEFORE THE TEXAS BOARD OF NURSING

In the Matter of Vocational Nurse §
License Number 198335 § AGREED
issued to VERONICA LAJOY (WARREN) JACKSON § ORDER

On this day the Texas Board of Nursing, hereinafter referred to as the Board, considered the matter of VERONICA LAJOY (WARREN) JACKSON, Vocational Nurse License Number 198335, hereinafter referred to as Respondent.

Information received by the Board produced evidence that Respondent may have violated Section 301.452(b)(1),(3),(10)&(13), Texas Occupations Code Respondent waived informal conference, notice and hearing, and agreed to the entry of this Order offered on April 22, 2008, by Katherine A. Thomas, MN, RN, Executive Director, subject to ratification by the Board.

FINDINGS OF FACT

1. Prior to the institution of Agency proceedings, notice of the matters specified below in these Findings of Fact was served on Respondent and Respondent was given an opportunity to show compliance with all requirements of the law for retention of the license.
2. Respondent waived informal conference, notice and hearing, and agreed to the entry of this Order.
3. Respondent is currently licensed to practice vocational nursing in the State of Texas.
4. Respondent received a Certificate in Vocational Nursing from Concord Career Institute, Arlington, Texas, on April 13, 2005. Respondent was licensed to practice vocational nursing in the State of Texas on April 28, 2005.
5. Respondent's employment history includes:

04/05 - 09/05	Staff Nurse, As Needed	The Park In Plano Plano, Texas
10/05 - 04/06	Charge Nurse, As Needed	South Haven Dallas, Texas

Respondent's employment history continued:

05/06 - 05/06	Charge Nurse	Treemont Nursing and Rehabilitation Dallas, Texas
06/06 - 07/06	Charge Nurse	Rockwall Nursing Center Rockwall, Texas
08/06 - 08/06	Staff Nurse	Amberwood Care Center Celina, Texas
09/06 - 12/06	Unknown	
01/07 - 01/07	Charge Nurse	Windsor Place Lancaster, Texas
02/07 - 2/08		Not employed in Nursing
03/08-Present	Staff Nurse	Irving Nursing & Rehabilitation Center Irving, Texas

6. On or about May 18, 2006, Respondent was required to successfully complete the Texas Peer Assistance Program for Nurses (TPAPN) through an Agreed Order by the Board. A copy of the Findings of Fact, Conclusions of Law, and Order, dated May 18, 2006, is attached and incorporated by reference as a part of this Order.
7. At the time of the initial incident, Respondent was employed with Treemont Nursing and Rehabilitation, Dallas, Texas, and had been in this position for less than one (1) month.
8. On or about May 14, 2006, while employed as Charge Nurse with Treemont Nursing Home and Rehabilitation, Dallas, Texas, Respondent ordered a pureed diet tray for Client N.G., when the physician's order was for NPO. Respondent states that she ordered the diet based on her belief that family members wanted to determine whether the client could tolerate a pureed diet.
9. On or about August 2006, through September 2006, Respondent became non-compliant with the terms of the Agreed Order issued to her by the Board of Nurse Examiners for the State of Texas on May 18, 2006. Non-compliance is the result of Respondent's failure to comply with Stipulation Number Three (3) of the Order which reads, in pertinent part:

(3) RESPONDENT SHALL comply with all requirements of the TPAPN contract during its term.

On or about August 2006 through September 2006, Respondent failed to comply with the drug testing and recovery reporting requirements of TPAPN.

A copy of the May 18, 2006 Agreed Order, Findings of Fact and Conclusions of Law is attached and incorporated by reference as part of this pleading.

10. On or about February 7, 2007, Respondent plead "Nolo Contendere" to "UNLAWFULLY OBTAINING FROM A LEGALLY REGISTERED PHARMACIST, A CONTROLLED SUBSTANCE, TO WIT: DIHYDROCODEINONE (SIC), BY THE USE OF A FALSE & FORGED PRESCRIPTION"(A Third Degree Felony offense committed on October 24, 2005) in the 282nd Judicial District Court, Dallas County, Texas, Case No. F-0573931-S. As a result of the plea, the findings were deferred and Respondent was placed on Community Supervision Probation for a period of five (5) years, was fined two thousand dollars (\$2,000.00) and was ordered to pay court costs in the amount of two hundred seven dollars (\$207.00).
11. The Board finds that there exists serious risks to public health and safety as a result of impaired nursing care due to intemperate use of controlled substances or chemical dependency.
12. Formal Charges were filed on December 10, 2007.
13. Formal Charges were mailed to Respondent on December 13, 2007.
14. Respondent states her date of sobriety is October 24, 2005.
15. Respondent states she has a sponsor and attends 4-6 Narcotics Anonymous (NA) meetings per week.
16. Respondent states she is eligible for early termination of her February 7, 2007, order of probation.

CONCLUSIONS OF LAW

1. Pursuant to Texas Occupations Code, Sections 301.451-301.555, the Board has jurisdiction over this matter.
2. Notice was served in accordance with law.
3. The evidence received is sufficient to prove violation of Section 301.452(b)(1),(3),(10)&(13), Texas Occupations Code, and 22 TEX. ADMIN. CODE §217.11(1)(B)&(C) and 22 TEX. ADMIN. CODE §217.12(1)(B),(4),(8),(9),(10)(E),(11)(B) &(13).
4. The evidence received is sufficient cause pursuant to Section 301.452(b), Texas Occupations Code, to take disciplinary action against Vocational License Number 198335, heretofore issued to VERONICA LAJOY (WARREN) JACKSON, including

revocation of Respondent's license to practice vocational nursing in the State of Texas.

ORDER

IT IS THEREFORE AGREED and ORDERED, subject to ratification by the Texas Board of Nursing, that Vocational Nurse License Number 198335, previously issued to VERONICA LAJOY (WARREN) JACKSON, to practice vocational nursing in Texas is hereby SUSPENDED for a period of three (3) years with the suspension STAYED and Respondent is hereby placed on PROBATION for three (3) years with the following agreed terms of probation:

IT IS FURTHER AGREED and ORDERED that this Order SHALL be applicable to Respondent's multistate privilege, if any, to practice vocational nursing in the State of Texas.

IT IS FURTHER AGREED and ORDERED that while Respondent's license is encumbered by this order the Respondent may not work outside the State of Texas pursuant to a multistate licensure privilege without the written permission of the Texas Board of Nursing and the Board of Nursing in the party state where Respondent wishes to work.

(1) RESPONDENT SHALL comply in all respects with the Nursing Practice Act, Revised Civil Statutes of Texas as amended, Texas Occupations Code, §§301.001 *et seq.*, the Rules and Regulations Relating to Nurse Education, Licensure and Practice, 22 TEX. ADMIN. CODE §211.01 *et seq.* and this Order.

(2) If applicable, RESPONDENT SHALL deliver the wallet-sized license issued to VERONICA LAJOY WARREN WILLIAMS, to the office of the Texas Board of Nursing within ten (10) days of the date of this Order for appropriate notation.

(3) RESPONDENT SHALL, within one (1) year of the suspension being stayed, successfully complete a course in Texas nursing jurisprudence and ethics. RESPONDENT

SHALL obtain Board approval of the course prior to enrollment only if the course is not being offered by a pre-approved provider. Home study courses and video programs will not be approved. In order for the course to be approved, the target audience shall include nurses. It shall be a minimum of six (6) contact hours in length. The course's content shall include the Nursing Practice Act, standards of practice, documentation of care, principles of nursing ethics, confidentiality, professional boundaries, and the Board's Disciplinary Sanction Policies regarding: Sexual Misconduct; Fraud, Theft and Deception; Nurses with Substance Abuse, Misuse, Substance Dependency, or other Substance Use Disorder; and Lying and Falsification. Courses focusing on malpractice issues will not be accepted. RESPONDENT SHALL CAUSE the sponsoring institution to submit a Verification of Course Completion form, provided by the Board, to the Office of the Board to verify RESPONDENT's successful completion of the course. This course shall be taken in addition to any other courses stipulated in this Order, if any, and in addition to any continuing education requirements the Board has for relicensure. *Board-approved courses may be found at the following Board website address:*

<http://www.bon.state.tx.us/disciplinary.action>

IT IS FURTHER AGREED, SHOULD RESPONDENT PRACTICE AS A NURSE IN THE STATE OF TEXAS, RESPONDENT WILL PROVIDE DIRECT PATIENT CARE AND PRACTICE IN A HOSPITAL, NURSING HOME, OR OTHER CLINICAL SETTING AND RESPONDENT MUST WORK IN SUCH SETTING A MINIMUM OF SIXTY-FOUR (64) HOURS PER MONTH UNDER THE FOLLOWING PROBATION CONDITIONS FOR THREE (3) YEAR(S) OF EMPLOYMENT. THE LENGTH OF THE PROBATIONARY PERIOD WILL BE EXTENDED UNTIL SUCH THIRTY-SIX (36) MONTHS HAVE ELAPSED. PERIODS OF UNEMPLOYMENT OR

OF EMPLOYMENT THAT DO NOT REQUIRE THE USE OF A VOCATIONAL NURSE (LVN) LICENSE WILL NOT APPLY TO THIS PROBATIONARY PERIOD:

(4) RESPONDENT SHALL notify each present employer in nursing of this Order of the Board and the probation conditions on RESPONDENT's license. RESPONDENT SHALL present a complete copy of this Order and all Proposals for Decision issued by the Administrative Law Judge, if any, to each present employer within five (5) days of receipt of this Order. RESPONDENT SHALL notify all future employers in nursing of this Order of the Board and the probation conditions on RESPONDENT's license. RESPONDENT SHALL present a complete copy of this Order and all Proposals for Decision issued by the Administrative Law Judge, if any, to each future employer prior to accepting an offer of employment.

(5) RESPONDENT SHALL CAUSE each present employer in nursing to submit the Notification of Employment form, which is provided to the Respondent by the Board, to the Board's office within ten (10) days of receipt of this Order. RESPONDENT SHALL CAUSE each future employer to submit the Notification of Employment form, which is provided to the Respondent by the Board, to the Board's office within five (5) days of employment as a nurse.

(6) For the first year of employment as a Vocational Nurse under this Order, RESPONDENT SHALL be directly supervised by a Registered Nurse or a Licensed Vocational Nurse. Direct supervision requires another professional or vocational nurse to be working on the same unit as RESPONDENT and immediately available to provide assistance and intervention. RESPONDENT SHALL work only on regularly assigned, identified and predetermined unit(s). The RESPONDENT SHALL NOT be employed by a nurse registry, temporary nurse employment agency, hospice, or home health agency. RESPONDENT SHALL NOT be self-employed or contract for services. Multiple employers are prohibited.

(7) For the remainder of the probation period, RESPONDENT SHALL be supervised by a Registered Nurse or a Licensed Vocational Nurse who is on the premises. The supervising nurse is not required to be on the same unit or ward as RESPONDENT, but should be on the facility grounds and readily available to provide assistance and intervention if necessary. The supervising nurse shall have a minimum of two (2) years experience in the same or similar practice setting to which the Respondent is currently working. RESPONDENT SHALL work only regularly assigned, identified and predetermined unit(s). RESPONDENT SHALL NOT be employed by a nurse registry, temporary nurse employment agency, hospice, or home health agency. RESPONDENT SHALL NOT be self-employed or contract for services. Multiple employers are prohibited.

(8) RESPONDENT SHALL CAUSE each employer to submit, on forms provided to the Respondent by the Board, periodic reports as to RESPONDENT's capability to practice nursing. These reports shall be completed by the Registered Nurse or Licensed Vocational Nurse who supervises the RESPONDENT. These reports shall be submitted by the supervising nurse to the office of the Board at the end of each three (3) months for three (3) year(s) of employment as a nurse.

(9) RESPONDENT SHALL abstain from the consumption of alcohol, Nubain, Stadol, Dalgan, Ultram, or other synthetic opiates, and/or the use of controlled substances, except as prescribed by a licensed practitioner for a legitimate purpose. If prescribed, RESPONDENT SHALL CAUSE the licensed practitioner to submit a written report identifying the medication, dosage and the date the medication was prescribed. The report shall be submitted directly to the office of the Board by the prescribing practitioner, within ten (10) days of the date of the prescription. **In the event that prescriptions for controlled substances are required for**

periods of two (2) weeks or longer, the Board may require and RESPONDENT SHALL submit to an evaluation by a Board approved physician specializing in Pain Management or Psychiatry. The performing evaluator will submit a written report to the Board's office, including results of the evaluation, clinical indications for the prescriptions, and recommendations for on-going treatment within thirty (30) days from the Board's request.

(10) RESPONDENT SHALL submit to random periodic screens for controlled substances, tramadol hydrochloride (Ultram), and alcohol. For the first three (3) month period, random screens shall be performed at least once per week. For the next three (3) month period, random screens shall be performed at least twice per month. For the next six (6) month period, random screens shall be performed at least once per month. For the remainder of the probation period, random screens shall be performed at least once every three (3) months.

Specimens shall be screened for at least the following substances:

Amphetamines	Meperidine
Barbiturates	Methadone
Benzodiazepines	Methaqualone
Cannabinoids	Opiates
Cocaine	Phencyclidine
Ethanol	Propoxyphene
tramadol hydrochloride (Ultram)	

A Board representative may appear at the RESPONDENT's place of employment at any time during the probation period and require RESPONDENT to produce a specimen for screening.

All screens shall be properly monitored and produced in accordance with the Board's policy on Random Drug Testing. A complete chain of custody shall be maintained for each specimen obtained and analyzed. RESPONDENT SHALL be responsible for the costs of all random drug screening during the probation period.

Any positive result for which the nurse does not have a valid prescription will be

regarded as non-compliance with the terms of this Order and may subject the nurse to further disciplinary action by this Board. Failure to report for a drug screen may be considered the same as a positive result and may result in further disciplinary action by this Board.

(11) RESPONDENT SHALL CAUSE her probation officer to submit written reports on forms provided to the Respondent by the Board. The reports shall indicate the RESPONDENT's compliance with the court ordered probation. The reports shall be furnished each and every three (3) month period until RESPONDENT is released from probation.

(12) IT IS FURTHER AGREED, SHOULD RESPONDENT be convicted of the offense(s) as outlined in Finding of Fact Number TEN (10) or probation be amended/modified, said judicial action will result in further disciplinary action including Revocation of Respondent's license to practice vocational nursing in the State of Texas.

IT IS FURTHER AGREED and ORDERED that if during the period of probation, an additional allegation, accusation, or petition is reported or filed against the Respondent's license, the probationary period shall not expire and shall automatically be extended until the allegation, accusation, or petition has been acted upon by the Board.

IT IS FURTHER AGREED. that upon full compliance with the terms of this Order, RESPONDENT SHALL be issued an unencumbered license and multistate licensure privileges, if any, to practice vocational nursing in the State of Texas.

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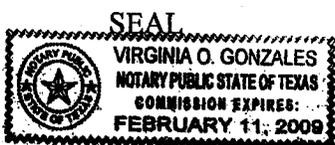
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RESPONDENT'S CERTIFICATION

I understand that I have the right to legal counsel prior to signing this Agreed Order. I have reviewed this Order. I neither admit nor deny the violations alleged herein. By my signature on this Order, I agree to the Findings of Fact, Conclusions of Law, Order, and any conditions of said Order, to avoid further disciplinary action in this matter. I waive judicial review of this Order. I understand that this Order is subject to ratification by the Board. When this Order is ratified, the terms of this Order become effective, and a copy will be mailed to me. I understand that if I fail to comply with all terms and conditions of this Order, I will be subject to investigation and disciplinary sanction, including revocation of my license to practice vocational nursing in the State of Texas, as a consequence of my noncompliance.

Signed this 23 day of April, 2008
Veronica Warren Jackson
VERONICA LAJOY (WARREN) JACKSON, Respondent

Sworn to and subscribed before me this 23rd day of April, 2008.



Virginia O. Gonzales
Notary Public in and for the State of Texas

Approved as to form and substance.

Jeff B. McDonald
JEFF B. MCDONALD, Attorney for Respondent

Signed this 4/23/08

WHEREFORE, PREMISES CONSIDERED, the Texas Board of Nursing does hereby ratify and adopt the Agreed Order that was signed on the 23rd day of April, 2008, by VERONICA LAJOY WARREN JACKSON, Vocational Nurse License Number 198335, and said Order is final.

Effective this 10th day of June, 2008.



Katherine A. Thomas, MN, RN
Executive Director on behalf
of said Board