IN THE MATTER OF * BEFORE THE MARYLAND

JACQUETA WILLIAMS * BOARD OF NURSING

License No.: LP51709 * OAG Case No.: 23-BP-069

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ORDER FOR SUMMARY SUSPENSION OF LICENSED PRACTICAL NURSE LICENSE PURSUANT TO SECTION 10-226(c)(2) OF THE ADMINISTRATIVE PROCEDURE ACT

The Maryland Board of Nursing (the "Board") hereby orders the **SUMMARY SUSPENSION** of the license of **JACQUETA WILLIAMS**, (the "Respondent"), License Number LP51709, to practice in the State of Maryland. The Board takes this action pursuant to the authority of Maryland Code Ann., State Government Article ("SG") § 10-226 (c) (2) (2021 Repl. Vol.), which provides:

- (2) A unit may order summarily the suspension of a license if the unit:
 - (i) finds that the public, health, safety, or welfare imperatively requires emergency action; and
 - (ii) promptly gives the licensee:
 - 1. Written notice of the suspension, the finding and the reasons that support the finding; and
 - 2. An opportunity to be heard.

The Board has reason, as set forth below, to find that the public health, safety, or welfare imperatively requires emergency action ("SG") § 10-226(c) (2).

INVESTIGATIVE FINDINGS AND REASONS IN SUPPORT OF SUMMARY SUSPENSION

Based on investigatory information obtained by, received by, and made known to and available to the Board, the Board has reason to believe that the following facts are true:¹

- 1. On August 13, 2014, the Respondent was issued a license to practice as a licensed practical nurse ("LPN") in the State of Maryland, license number LP51709. The Respondent's license is currently active and is scheduled to expire on January 28, 2024. The Compact² status of the Respondent's LPN license is Multistate. According to the Maryland Board's MyLicenseOffice ("MYLO") database, the Respondent's current address is in the State of Maryland.³
- 2. On September 25, 2001, the Respondent was issued a certificate to practice as a certified nursing assistant ("CNA") in the State of Maryland, certificate number A000432674. The Respondent's certificate expired on January 28, 2018 and its status is Non-renewed.
- 3. On January 11, 2002, the Respondent was certified as a geriatric nursing assistant ("GNA") in the State of Maryland, certificate number A000432674. The Respondent's certificate expired on January 28, 2018 and its status is Non-renewed.

¹ The allegations set forth in this document are intended to provide the Respondent with reasonable notice of the Board's action. They are not intended as, and do not necessarily represent a complete description of the evidence, either documentary or testimonial, to be offered against the Respondent in connection with this action

² The Nurse Licensure Compact (NLC) is an agreement between Boards of Nursing of party states that allows nurses to have a Multistate nursing license with the ability to practice nursing in both their home state and other party states. In accordance with the Nurse Licensure Compact, Md. Code. Ann., Health Occ. §8-7A-01.3(h) and §8-7A-01.3(m) respectively, "Home state" means the party state that is the nurse's primary state of residence and, "Party state" means any state that has adopted this Compact.

³ The information cited in Paragraph 1 in this document regarding the Respondent's current address, active/renewal status, and the Compact status of the Maryland nursing license was obtained on April 10, 2023 from the Maryland Board's website and the Maryland Board's MYLO database and was obtained on July 6, 2023 from the NURSYS database.

INITIAL APPLICATION FOR LPN BY EXAM

- 4. On or about January 8, 2013, the Respondent submitted a <u>Maryland Board of Nursing</u>

 <u>Licensure by Exam Application</u> ("LPN Application").
- 5. On the LPN Application, the Respondent indicated that she graduated from an LPN School located in Woodbridge, Virginia (the "LPN School") on October 5, 2012.
- 6. The LPN Application was submitted by the Respondent who affirmed the following:

I hereby make an application for examination and registration in Maryland according to the Nurse Practice Act and the regulations of the Maryland Board of Nursing.

I affirm that the contents of this document are true and correct to the best of my knowledge and belief.

7. Based on the information provided in the online LPN Application, the Maryland Board issued the Respondent an LPN license on August 13, 2014.

LPN SCHOOL

- 8. In July 2010, the Virginia Board of Nursing approved a <u>Consent Order</u>, ordering that the LPN School be placed on Conditional Provisional Approval for not less than one (1) year, subject to terms and condition. The <u>Consent Order</u> was signed by LPN School's Program Director ("Director").⁴
- 9. On May 15, 2012, the Virginia Board of Nursing approved a <u>Consent Order</u> signed by the Director. The May 15, 2012 <u>Consent Order</u> orders that:
 - a. [LPN School's] approval to operate a practical nursing education program in Virginia is WITHDRAWN. [LPN School] shall cease operations no later that June 30, 2013, when all students shall have either graduated or transferred to an approved program.

⁴ Program Director completed and returned the email-based Certification on the Respondent's LPN Application, as Director of Nursing Program.

b. [LPN School] shall not admit any new or transfer students.

NCLEX EXAMINATION

10.	According to	the	Maryland	Board's	MyLicenseOffice	("MYLO")	database,	the
	Respondent [
					,	, and took t	he NCLEX	PN
	examination or	ı July	22, 2014 ar	nd passed.				

THE RESPONDENT'S LPN SCHOOL OFFICIAL TRANSCRIPT

- 11. On or about April 10, 2023, the Board issued a Subpoena Duces Tecum ("Subpoena") to the Respondent commanding her to produce and provide to the Board, among other things, copies of transcripts from all schools attended for any LPN program and proof of clinical attendance and rotations documentation from all schools attended for any LPN program.
- 12. The only transcript provided to the Board was an <u>Official Transcript</u>, included with the Respondent's application for licensure, which listed the school as the LPN School. It is signed by the Director⁵ and dated January 8, 2013, and provides the following information:

FIRST QUARTER From: 04/04/2011 To: 06	5/10/2011	THIRD QUARTER From: 09/19/2011	<u>To</u> : 01/06/2012
Course Description	Contact Hours	Course Description	<u>Contact</u> Hours
Basic Computer	30	Med/Surg I	120
Medical Terminology	60	Med/Surg II	120
Anatomy and Physiology	180	Med/Surg Clinical	200
		Med/Surg Lab	40
Total Contact Hours Required	270	Geriatrics Theory	30

⁵ On or about July 8, 2021, in the U.S. District Court of Maryland, Director was indicted on charges of Conspiracy to Commit Health Care Fraud, Conspiracy to Commit False Statements Relating to Health Care Matters, and False Statements Relating to Health Care Matters. According to the Criminal Complaint, Director conspired with two other individuals and submitted false statements relating to health care matters by working together to sell fraudulent transcripts and diplomas that indicate that various individuals completed necessary courses and clinical hours to obtain

nursing degrees and coached these individuals to pass the nursing board exam.

		Geriatrics Clinical	40	
		Total Contact Hours Requir	red 550	
SECOND QUARTER		FOURTH QUARTER		
From: 06/13/2011 To	<u>o</u> : 09/16/2011	<u>From</u> : 01/09/2012 <u>To</u> :	10/5/2012	
Course Description	Contact	Course Description	Contact	
	<u>Hours</u>		<u>Hours</u>	
Diet and Nutrition	60	Pediatric Nursing	90	
Pharmacology	120	Pediatric Nursing Clinical	40	
Nursing Fundamentals	210	Maternity Nursing	90	
Nursing Fundamentals Lal	60	Maternity Clinical 40		
Nursing Fundamentals Cli	nical 40	Mental Health Nursing 30		
_		Mental Health Clinical	40	
Total Contact Hours Requi	ired 490	Professional Development & 60		
		NCLEX Review		
		Total Contact Hours Requir	red 390	

Summary of Clinical Agencies/Facilities and dates for each experience

Clinical Courses	Clinical Agency	Clinical Start Date	Clinical End Date	Total Hours
Nsg. Fundamentals	Facility 1	09/12/11	09/16/11	40
Medical – Surgical Nsg.	Facility 1 and Facility 2	11//07/11	12/09/11	200
Geriatrics Nsg.	Facility 3	01/03/12	01/07/12	40
Maternity Nsg.	Facility 4	04/16/12	04/20/12	40
Pediatrics Nsg.	Facility 4	04/23/12	04/27/12	40
Mental Health Nsg.	Facility 5	05/07/12	05/11/12	40

THE BOARD'S INVESTIGATION

- 13. On August 4, 2021, the Board Investigator communicated with General Counsel for Facilities 2 and 3⁶ and inquired about contracts with LPN School allowing nursing students to complete their Med-Surg clinical. On August 5, 2021, General Counsel for Facilities 2 and 3 responded to the Board Investigator via email and stated "I searched our contacts database and do not find any contacts with LPN School. Additionally, as a skilled nursing facility, I do not believe we would have hosted clinicals for surgical nursing."⁷
- 14. On August 6, 2021, the Board Investigator contacted the Executive Director of Facility 4 to inquire about services offered at Facility 4. The Executive Director of Facility 4 stated that Facility 4 does not offer OB/GYN or pediatric care. The program is for troubled teens in the Washington, D.C. area and provides transitional housing, parenting classes and food programs for teen parents; there are no nurses on staff and Facility 4 does not provide any medical services. They previously hosted nursing students only from LPN School, but the school provided the preceptors.
- 15. The Board Enforcement Division Coordinator contacted the Assistant Executive Director of Facility 5 to inquire about clinical affiliations with LPN School between 2010 and 2013. The Assistant Executive Director of Facility 5 stated that during her time at Facility 5, she had "not known [Facility 5] to have any affiliations with schools for clinical." On August 6, 2021, the Assistant Executive Director of Facility 5 communicated with the Board

⁶ Facilities 2 and 3 are owned and operated by Entity 1.

⁷ On or about February 6, 2020, the Board's investigator spoke with the Administrator of Facility 2 who could only recall hosting students from LPN School one (1) time. On or about February 6, 2020, the Board's investigator also spoke with Administrator of Facility 3. Facility 3's Administrator could not recall ever hosting students from LPN School.

Enforcement Office and stated that she followed up with [Facility 5's] Executive Director and confirmed that they have never had any contracts with schools for students to do clinical. 8

- 16. In correspondence dated September 8, 2021, the Administrator of Facility 1 wrote "...after searching our records, we were unable to locate any school agreement for clinical rotations with [LPN School]."9
- 17. On or about May 3, 2023, the Board Investigator conducted an interview of the Respondent under oath. The Respondent stated the following during the interview:
 - a. The Respondent attended the LPN School in Woodbridge, Virginia. She graduated in 2012. She found out about the school from a friend who was also going to school at LPN School.
 - b. While attending the LPN school, the Respondent was working at Facility 6 as a GNA on weekends. Facility 6 paid the full tuition for attendance at LPN School and paid the school directly. The Respondent was unaware of the cost of the tuition to attend LPN School. The Respondent is still employed at Facility 6 as a licensed practical nurse.
 - c. The Respondent didn't recall the exact sites she went to for clinical experiences. The Respondent stated that she went to Arlington. She stated that the class was split into two groups. She was not sure if she went to Facility 2 or Facility 1. The Respondent later stated that she went to Facility 2. She could not recall where she went for pediatric and maternity clinical experiences.
 - d. When shown the transcript from LPN School, the Respondent stated that the identifying information at the top of the transcript belonged to her. She confirmed that she took the classes listed on the transcript at the LPN School. The Respondent identified the signature on the transcript as Director's signature but questioned whether he signed it in 2013.

⁸ In August 2011, in a Virginia Board of Nursing Compliance Report relating to LPN School, the [Facility 5's] executive director reported, to the best of his recollection, that LPN School students were at [Facility 5] in October and November 2010 only, and not in 2011 as reflected in the fraudulent LPN School transcripts.

⁹ The Board's investigator reviewed records from the Virginia Board of Nursing which showed that LPN School had an affiliation with a facility in Arlington, Virginia, dated and signed in October 2010. On or about February 14, 2020, General Counsel for Facility 1 confirmed that Facility 1 could not locate any records or contracts relating to LPN School.

- e. The Respondent could not recall going to the clinical locations listed on the transcript. She only confirmed that she went to Facility 2.
- f. Respondent stated that she has never seen the transcript prior to her interview with the Board. She stated that she believed you had to ask for it and that she had not requested a copy of the transcript.
- g. When provided with the Maryland Board of Nursing application for RN/LPN license, the Respondent confirmed that her signature and the date are on the application. The Respondent stated she turned in the application herself. The Respondent stated that she completed the application, but she was unsure whose handwriting is at the top of page two of the application. The Respondent confirmed that she completed the LPN program on October 5, 2012.
- h. The Respondent stated that she recalled going to the Board to turn in the application. She stated that because it was so long ago, she could not remember all the details of the process of applying for the LPN license. She could not recall if she completed the application at the LPN School or if she completed it and took it back to the Director of the LPN School to complete the school section of the application.
- i. The Respondent indicated that she attended an online high school in South Carolina. She stated that she completed high school in February 2011.¹⁰

DISCUSSION

18. The Respondent submitted a Maryland LPN application with fraudulent information about her LPN School, including a fraudulent transcript from the school, resulting in the Board issuing an LPN license to the Respondent in August 2014. The Respondent did not meet the Board's statutory and regulatory requirements, didactic and clinical training, for LPN licensure by exam and had practiced on a fraudulent LPN license. The Respondent's continued practice poses a serious risk and danger to the public health, safety, and welfare.

¹⁰ In response to the Board's request, the Respondent provided a copy of document which reads "Woodfield High School, Upon recommendation of the Faculty, and by virtue of its vested authority, the Woodfield School Board confers upon Jacquetta Williams the respectable High School Diploma, presented on the 12th day of February, two thousand and eleven."

CONCLUSION OF LAW

Based on the foregoing investigative findings and reasons, the Board finds that the public health, safety, or welfare requires emergency in this case pursuant to Md. Code Ann., State Govt. §10-226(c)(2) (2021 Repl. Vol.).

ORDER

It is hereby,

ORDERED that pursuant to the authority vested in the Board of Nursing by Maryland Code Ann., State Govt. §10-226(c)(2) (2021 Repl. Vol.) the license of JACQUETA WILLIAMS to practice as a licensed practical nurse in the State of Maryland is hereby SUMMARILY SUSPENDED; and it is further

ORDERED that there will be a Show Cause Hearing on **Tuesday**, **July 25**, **2023** at **12:00 p.m.** before the Board at the Maryland Nursing Board offices, 4140 Patterson Avenue, Baltimore, Maryland 21215; and it is further

ORDERED that if, the suspension of the Respondent's license is continued following a Show Cause Hearing, the Respondent has the right to a full evidentiary hearing before the Board and a hearing will be scheduled before the Board if the Respondent submits a written request for an evidentiary hearing to the Board no later than thirty (30) days from the date of the Board's written decision issued after the Show Cause Hearing; and it is further

ORDERED that if the Respondent does not submit a timely written request to the Board for an evidentiary hearing within 30 days from the date of the Board's written decision issued after the Show Cause Hearing, the Respondent shall have waived all rights now and in the future to any

hearing on the merits of the summary suspension of the Respondent's license and the factual allegations contained in this Order for Summary Suspension, and it is further

ORDERED that this Order for Summary Suspension shall remain in effect and the summary suspension of the Respondent's license shall continue until further order of the Board; and it is further

ORDERED that this "Order for Summary Suspension of Licensed Practical Nurse License" is a **PUBLIC RECORD** pursuant to Md. Code Ann., General Provisions §4-101 *et. seq.* & §4-333 (2019).

<u>July 12, 2023</u> Date Rhonda Scott, JD, BSN, CRNI, SD-CLTC The Interim Executive Director's Signature Appears on the Original Document

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