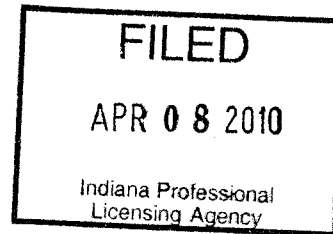


BEFORE THE INDIANA STATE
BOARD OF NURSING
CAUSE NUMBER: 2010 NB 086

IN THE MATTER OF THE LICENSE OF)
)
KELIIN J. PARSONS, R.N.)
)
LICENSE NO: 28159768A)



PETITION FOR SUMMARY SUSPENSION

The State of Indiana (Petitioner), by Counsel, Deputy Attorney General Darren R. Covington, moves the Indiana State Board Of Nursing (Board) to summarily suspend the nursing license of Keliin J. Parsons, R.N. (Respondent) for ninety (90) days and in support of its petition states the following:

1. This Board has jurisdiction to suspend Respondent's license in accordance with the provisions of Ind. Code § 4-21.5-4 et seq. and Ind. Code § 25-1-9-10.
2. Respondent's address on file with the Indiana Professional Licensing Agency is 1322 Keensburg Court, Indianapolis, Indiana 46228 and she is a Registered Nurse in the State of Indiana having been issued license number 28159768A in 2004.
3. On or around February 20, 2008, Respondent initiated intake with the Indiana State Nurses Assistance Program (ISNAP) after being referred by St. Vincent's Employee Assistance Program (EAP) for diversion of morphine and Dialudid. Respondent was diagnosed with opioid abuse, rule out dependence, by St. Vincent Stress Center.
4. On or around April 1, 2008, Respondent signed a two-year Recovery Monitoring Agreement (RMA) with ISNAP.
5. On or around April 14, 2008, Respondent submitted to a urine drug screen which tested positive for ethanol and tramadol.

6. On or around April 25, 2008, Respondent submitted to a urine drug screen which tested positive for hydrocodone. Respondent provided copies of prescriptions for hydrocodone and oxycodone.

7. On or around May 2, 2008, Respondent submitted to a urine drug screen which tested positive for oxycodone. Respondent previously provided a copy of a prescription for oxycodone.

8. On or around May 12, 2008, Respondent submitted to a urine drug screen which tested positive for hydrocodone and oxycodone. Respondent previously provided copies of prescriptions for hydrocodone and oxycodone.

9. On or around May 22, 2008, Respondent's addictionist at The Kolbe Center assessed Respondent for the first time and diagnosed her with opiate and benzodiazepine dependence and alcohol abuse. Respondent's RMA was extended one year as a result.

10. On or around May 28, 2008, Respondent submitted to a urine drug screen which tested positive for oxycodone. Respondent previously provided a copy of a prescription for oxycodone.

11. On or around June 13, 2008, Respondent submitted to a urine drug screen which tested positive for hydrocodone. Respondent previously provided a copy of a prescription for hydrocodone.

12. On or around October 30, 2008, ISNAP's quarterly compliance report indicated that Respondent was in partial compliance.

13. On or around January 14, 2009, Respondent submitted to a urine drug screen which tested positive for propoxyphene and nor-propoxyphene.

14. On or around January 30, 2009, ISNAP's quarterly compliance report indicated that Respondent was in partial compliance.

15. On or around February 19, 2009, Respondent submitted to a urine drug screen which tested positive for oxycodone, propoxyphene and nor-propoxyphene. Respondent provided copies of prescriptions for these drugs.

16. On or around February 27, 2009, Respondent submitted to a urine drug screen which tested positive for tramadol. Respondent provided a copy of a prescription for tramadol.

17. On or around March 12, 2009, Respondent submitted to a urine drug screen which tested positive for tramadol. Respondent previously provided a copy of a prescription for tramadol.

18. On or around March 17, 2009, Respondent's RMA was extended for three months due to her positive urine drug screen on January 14, 2009.

19. On or around April 3, 2009, Respondent submitted to a urine drug screen which tested positive for tramadol. Respondent previously provided a copy of a prescription for tramadol.

20. On or around April 30, 2009, ISNAP's quarterly compliance report indicated that Respondent was in significant non-compliance.

21. On or around May 15, 2009, Respondent submitted to a urine drug screen which tested positive for tramadol, oxycodone and ethanol.

22. On or around June 1, 2009, Respondent's RMA was extended three months due to her significant non-compliance.

23. On or around June 22, 2009, Respondent submitted to a urine drug screen which tested positive for ethanol and tramadol. Respondent previously provided a copy of a prescription for tramadol.

24. On or around July 16, 2009, ISNAP's quarterly compliance report indicated that Respondent was in significant non-compliance.

25. On or around July 18, 2009, Respondent submitted to a urine drug screen which tested positive for oxycodone. Respondent provided a copy of a prescription for oxycodone.

26. On or around August 12, 2009, Respondent submitted to a urine drug screen which tested positive for oxycodone and ethanol. Respondent previously provided a copy of a prescription for oxycodone.

27. On or around September 9, 2009, Respondent's RMA was extended three months due to her significant non-compliance.

28. On or around November 9, 2009, ISNAP's quarterly compliance report indicated that Respondent was in partial compliance.

29. On or around February 8, 2010, ISNAP's quarterly compliance report indicated that Respondent was in partial compliance.

30. On or around March 30, 2010, Respondent was charged in Marion County, Indiana Superior Court with three counts of Forgery, a Class C Felony, three counts of Obtaining a Controlled Substance by Fraud or Deceit, a Class D Felony, and three counts of Possession of a Controlled Substance, a Class D Felony, in Cause Number 49G20-1003-FC-024313. These charges stemmed from Respondent's act of forging prescriptions for Dialudid and oxycodone in March 2010.

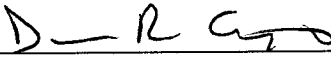
31. On or around April 7, 2010, Respondent's RMA was terminated after Respondent reported to ISNAP that she was arrested for forging prescriptions.

32. Due to the above facts, Respondent represents a clear and immediate danger to the public health and safety if allowed to continue to practice as a Registered Nurse in Indiana.

WHEREFORE, the State of Indiana requests that this Board set a hearing on this Petition for Summary Suspension and suspend Respondent's license for a period of ninety (90) days and for all other proper relief.

Respectfully submitted,

Gregory F. Zoeller
Attorney General of Indiana

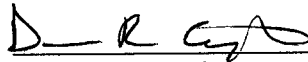
By: 

Darren R. Covington
Deputy Attorney General
Attorney Number: 28511-16

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing "Petition for Summary Suspension" has been sent to the Respondent at the address listed below, by United Parcel Service Ground, on this 8th day of April, 2010:

Keliin J. Parsons
1322 Keensburg Court
Indianapolis, IN 46228



Darren R. Covington
Deputy Attorney General
Attorney Number: 28511-16

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