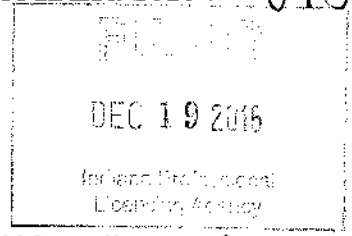


**BEFORE THE INDIANA STATE
BOARD OF NURSING
CAUSE NUMBER: 2016 NB 0453**

**IN THE MATTER OF THE LICENSE OF:)
SHANNON SIMMS, R.N.)
LICENSE NO: 28138943A)**



ADMINISTRATIVE COMPLAINT

This Administrative Complaint is brought against the Registered Nurse license of Shannon Simms, R.N. (“Respondent”), by the Office of the Attorney General, by counsel, Deputy Attorney General Jason J. Gross, on behalf of the State of Indiana (“Petitioner”) and pursuant to Ind. Code §25-1-7-7, Ind. Code §25-1-5-3, Ind. Code ch. 25-23-1, the Administrative Orders and Procedures Act, Ind. Code ch. 4-21.5-3 and Ind. Code ch. 25-1-9 and in support alleges and states:

FACTS

1. Respondent’s address on file with the Indiana State Board of Nursing (“Board”) is 2421 Maxwell Drive, West Lafayette, Indiana 47908. Respondent is a Registered Nurse (“R.N.”) in the State of Indiana having been issued license number 28138943A on September 25, 1997.
2. On June 18, 2009, Respondent called to enroll with ISNAP. She was referred by the Indiana State Board of Nursing. Respondent was diagnosed with alcohol, cocaine and opioid dependence in full sustained remission. ISNAP recommended a one year RMA. Respondent successfully completed her RMA on August 9, 2011.
3. On July 28, 2015, Respondent called to re-enroll with ISNAP. She was referred by Carol Carpentier, EAP, St. Vincent’s Hospital, for suspected diversion. Respondent tested positive on a for-cause urine drug screen (UDS) for Xanax and amphetamines for which she did

not have a valid prescription. She also tested positive for oxycodone, but had a valid prescription. Respondent was referred to Dr. El-Khahili for an assessment. Respondent was diagnosed with opiate dependence and benzodiazepine abuse by Carpentier.

4. On August 4, 2015, the ISNAP clinical team reviewed Respondent's assessment and recommended a three year RMA.

5. On September 4, 2015, a second assessment was received from Dr. El-Khahili. Respondent was diagnosed with an alcohol use disorder in full sustained remission, amphetamine-like substance use disorder, benzodiazepine use disorder and major depression.

6. On September 25, 2015, the RMA was mailed to Respondent due back on October 9, 2015. The RMA was returned on November 11, 2015.

7. On February 12, 2016, ISNAP ran an INSPECT on Respondent, which showed that Respondent had obtained a prescription for 84 tablets of methadone hydrochloride, 10 mg, without notifying ISNAP. ISNAP sent a message to Respondent giving her until February 29, 2016 to respond.

8. On March 1, 2016, Respondent's quarterly compliance report showed Respondent to be in significant non-compliance. Respondent had not done any UDSs during the 4th quarter. Respondent also stopped calling into the affinity system on January 22, 2016.

9. On March 3, 2016, the clinical team reviewed Respondent's non-compliance and recommended case closure.

10. On March 24, 2016, ISNAP formally closed Respondent's file.

VIOLATION

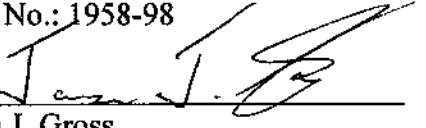
11. By her conduct in having her ISNAP file closed, Respondent has violated 848 IAC 7-1-7(2) a state rule regulating the nursing profession, subjecting Respondent to discipline by this Board in accordance with Ind. Code § 25-1-9-4(a)(3).

ACCORDINGLY, Petitioner demands this Board enter an order finding that:

1. the Respondent is subject to discipline according to I.C. 25-1-9;
2. Imposes an appropriate disciplinary sanction;
3. Directs the Respondent to immediately pay all cost incurred in the prosecution of this case; and
4. Provides any further relief a the Board deems just and proper..

Respectfully submitted,

Gregory F. Zoeller,
Attorney General of Indiana
Atty. No.: 1958-98

By: 
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CERTIFICATE OF SERVICE

I certify that a copy of the foregoing "Administrative Complaint" has been served upon the Respondent at the address listed below, by United States First Class Mail on this 19th day of December 2016.

Shannon Simms
2421 Maxwell Drive
West Lafayette, Indiana 47908

By:



Jason J. Gross

Deputy Attorney General

OFFICE OF THE INDIANA ATTORNEY GENERAL

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