

**BEFORE THE INDIANA STATE
BOARD OF NURSING
CAUSE NUMBER 2022 NB 0098**

**IN THE MATTER OF THE LICENSE OF)
)
TRAVIS TUCKER, R.N.)
)
LICENSE NUMBER: 28262249A (Active))**



ADMINISTRATIVE COMPLAINT

The State of Indiana (“Petitioner”), by counsel, Deputy Attorney General Sha’na Terry, on behalf of the Office of the Indiana Attorney General, and pursuant to Ind. Code § 25-1-7-7, the Administrative Orders and Procedures Act, Ind. Code Art. 4-21.5, and Ind. Code ch. 25-1-9, files its Administrative Complaint against the Indiana nursing license of Travis Tucker, R.N. (“Respondent”), and in support alleges and states the following:

FACTS

1. Respondent is a “practitioner” as defined by Ind. Code § 25-1-9-2.
2. Respondent is a Registered Nurse (“R.N.”) in the State of Indiana having been issued license number 28262249A on September 22, 2020.
3. Respondent’s address on file with the Indiana Professional Licensing Agency (“IPLA”) is 3213 Heritage Heights Way, Jeffersonville, Indiana 47130.
4. On or about December 6, 2020, Respondent began employment with Lead Health Staff.
5. On or about January 4, 2021, Respondent began a thirteen-week contract with Medical Solutions and received a six-week extension to continue working with them.
6. On or about May 1, 2021, Respondent’s contract with Medical Solutions was terminated due to failing to report a patient fall, and he received a “Do Not Use” status in which

he is unable to return to work for Medical Solutions until this matter is investigated by the nursing board.

7. On or between May 4-May 6, 2021, Lead Health Staff discussed the importance of accurate documentation with Respondent, recommended continuing education units, and because of his positive attitude and acknowledgment of the need of improvement in proper documentation Lead Health Staff continued his work through their company while giving him “2 points” regarding the incident.

8. On October 20, 2021, Respondent submitted an online renewal application to the Indiana Professional Licensing Agency (“IPLA”), and on question # 5 which states “Since you last renewed, have you ever been terminated, reprimanded, disciplined, or demoted in the scope of your practice as a Nurse or as another health care professional,” he selected the answer “No.”

COUNTS

COUNT I

Unprofessional Conduct

9. Respondent’s conduct constitutes a violation of Ind. Code § 25-1-9-4(a)(3) in that Respondent knowingly violated a state rule regulating nursing, as evidenced by Respondent failing to document the circumstances regarding the patient fall, which is a violation of 848 IAC 2-3-3(6). Specifically, 848 IAC 2-3-3(6) states that falsifying, omitting, or destroying documentation of nursing actions on the official patient record is unprofessional conduct.

COUNT II

Renewal Fraud

10. Respondent’s actions constitute a violation of Ind. Code § 25-1-9-4(a)(1)(A) in that Respondent engaged in or knowingly cooperated in fraud or material deception in order to obtain a license to practice as evidenced by Respondent’s failure to reveal his employment contract

termination with Medical Solutions and/or reprimand at Lead Health Staff related to his documentation errors.

ACCORDINGLY, Petitioner respectfully requests this Board enter an order finding that:

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

Respectfully submitted,

Office of the Indiana Attorney General

By: *Shana Terry*
Sha'na Terry
Deputy Attorney General
Attorney No. 34048-64

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CERTIFICATE OF SERVICE

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

Travis Tucker
3213 Heritage Heights Way
Jeffersonville, Indiana 47130

By: *Shana Terry*
Sha'na Terry
Deputy Attorney General

OFFICE OF THE INDIANA ATTORNEY GENERAL

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