## STATE OF CONNECTICUT DEPARTMENT OF PUBLIC HEALTH HEALTHCARE QUALITY AND SAFETY BRANCH

In re: Antoinette M. Morris, L.P.N., R.N.

Petition No. 2022-1115

## STATEMENT OF CHARGES

Pursuant to the Connecticut General Statutes, §§19a-10 and 19a-14, the Department of Public Health (hereinafter "the Department") brings the following charges against Antoinette M. Morris, L.P.N., R.N.:

- 1. Antoinette M. Morris, L.P.N., R.N., of Trumbull, Connecticut (hereinafter "respondent") is, and has been since August 29, 2022, the holder of Connecticut registered nurse license number 197014.
- 2. On or about June 23, 2020 respondent sat for the National Council Licensure Examination Registered Nurse Examination (hereinafter "NCLEX") after seeking and receiving a determination of her eligibility to do so from the State of New York.
- 3. On or about August 13, 2020, the State of New York issued a registered nurse license to the respondent.
- 4. On or about May 4, 2022, respondent filed an application for registered nurse licensing with the Department seeking a license by endorsement based on her licensure as a registered nurse in the State of New York.
- 5. On or about August 29, 2022, the Department issued registered nurse license 197014 to respondent based on endorsement.
- 6. On or about September 2, 2022, the Department received information from the Department of Health and Human Services, Office of the Inspector General evidencing the fact that the respondent has not completed the required program hours and clinical training necessary to obtain either a practical nursing diploma and transcript or a nursing associate in science degree and transcript.
- 7. Respondent persists in claiming that she has completed the required program hours and/or clinical training required to complete and/or graduate from a prelicensure nursing program when she knows, or should know, that claim to be false.
- 8. Respondent's licensure as a registered nurse in the State of New York and in the State of Connecticut resulted from the provision of inaccurate information and documentation to the

licensing authorities in those states leading those authorities to conclude that respondent has completed the required program hours and/or clinical training required to complete and/or graduate from a prelicensure nursing program when, in fact, she has not.

- 9. The above cited facts evidence conduct of the respondent that fails to conform to the accepted standards of the nursing profession and they constitute grounds for disciplinary action pursuant to Conn. Gen. Stat. §§ 19a-17 and 20-99, including, but not necessarily limited to:
  - a. §19a-17(a),
  - b. §19a-17(c),
  - c. §20-99(b)(1), and
  - d. §20-99(b)(6).
- 10. For the foregoing reasons, the Department believes that respondent's continued practice as a registered nurse represents a clear and immediate danger to the public health and safety.

THEREFORE, the Department prays that:

The Connecticut Board of Examiners for Nursing, as authorized by the Connecticut General Statutes, §§ 20-99(b) and 19a-17, summarily suspend respondent's license to practice as a registered nurse until a full hearing on the merits can be held, and that it revoke, or order other disciplinary action against, the registered nurse license of Antoinette M. Morris, L.P.N., R.N. as it deems appropriate and consistent with law.

Dated at Hartford, Connecticut this \_\_\_\_\_ 1st \_\_\_\_ day of \_September \_\_\_ 2023.

Christian D. Andresen, MPH, Section Chief Practitioner Licensing and Investigations Section Healthcare Quality and Safety Branch

Churtian Olndusen