

**IN AND BEFORE THE OKLAHOMA STATE BOARD
OF MEDICAL LICENSURE AND SUPERVISION
STATE OF OKLAHOMA**

**STATE OF OKLAHOMA, *ex rel.*,
THE OKLAHOMA STATE BOARD
OF MEDICAL LICENSURE AND
SUPERVISION,**)
)
)
)
)
Plaintiff,)
)
vs.)
)
**DARLENE MARIE SNYDER, O.A.,
LICENSE NO. OA 1015,**)
)
Defendant.)

FILED

JUL 07 2021

OKLAHOMA STATE BOARD OF
MEDICAL LICENSURE & SUPERVISION
Case No. 21-01-5965

VERIFIED COMPLAINT

The State of Oklahoma, *ex rel.*, the Oklahoma State Board of Medical Licensure and Supervision (“Board”), alleges and states as follows for its Complaint against DARLENE MARIE SNYDER, O.A. (“Defendant”):

I. JURISDICTION

1. The Board is a duly authorized agency of the State of Oklahoma empowered to license and oversee the activities of Occupational Therapy Assistants in the State of Oklahoma pursuant 59 O.S. §888.14, *et seq.* and Okla. Admin. Code 435:30-1-10.
2. Defendant, holds Oklahoma Occupational Therapy Assistant license number OA 1015. The acts and omissions complained of herein were made while Defendant was acting as an occupational therapy assistant pursuant to the occupational therapy assistant license conferred upon her by the State of Oklahoma, and such acts and omissions occurred within the physical territory of the State of Oklahoma.

II. ALLEGATIONS OF UNPROFESSIONAL CONDUCT

3. Defendant was employed by Northwest Physical Therapy and Sports Rehabilitation as an occupational therapy assistant. She was assigned to work at Share Convalescent Home in Alva Oklahoma in December 2020. The administrator at Share Convalescent Home, responding to a complaint that Defendant wasn’t spending much time with patients, reviewed video footage in comparison to times Defendant documented. The documented time did not match the actual time spent with patients.

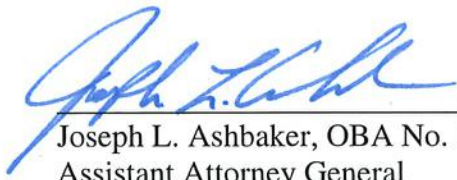
4. The documentation discrepancies are as follows:
 - December 30, 2020
 - Room 207: 16 Actual minutes, 38 minutes documented
 - Room 208: 13 actual minutes, 101 minutes documented
 - December 31, 2020
 - Room 207: 0 actual minutes, 38 documented minutes
 - Room 208: 24 actual minutes, 91 documented minutes
5. Board Investigator Melissa Davis, R.N., interviewed Defendant on April 12, 2021. Defendant admitted that her submitted time was not accurate but stated that it was accidental, not on purpose. She stated that she had many significant stressors and included her patient documentation time in addition to her patient care time which is not normally done. This, however, does not make sense given the actual times versus the documented times. It does not, for example, explain the zero minutes spent in room 207 on December 31 compared to the 38 minutes documented.

III. VIOLATIONS

6. Based on the foregoing, the Defendant is guilty of unprofessional conduct as follows:
 - a. Dishonorable or immoral conduct that is likely to deceive, defraud, or harm the public, in violation of Okla. Admin. Code 435: 30-1-10(a)(2).
 - b. Fraudulent billing practices and/or violation of Medicare and Medicaid laws, in violation of OAC 435:30-1-10(a)(6).
 - c. Violation of any provision(s) of the Occupational Therapy Practice Act or the rules and regulations of the board in violation of Okla. Admin. Code 435: 30-1-10(a)(28) and 59 O.S. §888.9(4) and (5).

CONCLUSION

Given the foregoing, the undersigned requests the Board conduct a hearing, and, upon proof of the allegations contained herein, impose such disciplinary action as authorized by law, up to and including suspension or revocation and any other appropriate action with respect to the Defendant's professional license, including an assessment of costs and attorney's fees incurred in this action as provided by law.



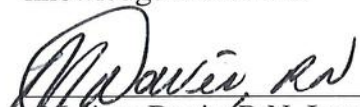
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VERIFICATION

I, Melissa Davis, R.N., under penalty of perjury, under the laws of the State of Oklahoma, state as follows:

1. I have read the above Complaint regarding the Defendant, DARLENE MARIE SNYDER, O.A.; and

2. The factual statements contained therein are true and correct to the best of my knowledge and belief.



Melissa Davis, R.N, Investigator
OKLAHOMA STATE BOARD OF MEDICAL
LICENSURE AND SUPERVISION

Date: 7/6/21
