

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

STATE OF OKLAHOMA, *ex rel.*,)
OKLAHOMA STATE BOARD OF)
MEDICAL LICENSURE)
AND SUPERVISION,)
)
)
Plaintiff,)
)
)
v.)
)
)
COLLEEN ANN SHEETS, RC)
LICENSE NO. RC 1417,)
)
)
Defendant.)

FILED

FEB 11 2021

OKLAHOMA STATE BOARD OF
MEDICAL LICENSURE & SUPERVISION

Case No. 20-11-5945

VERIFIED COMPLAINT

The State of Oklahoma, *ex rel.* Oklahoma State Board of Medical Licensure and Supervision ("Board"), alleges and states as follows for its Complaint against **COLLEEN ANN SHEETS, RC** ("Defendant"):

I. JURISDICTION

1. The Board has jurisdiction over the subject matter and is a duly authorized agency of the State of Oklahoma empowered to license and oversee the activities of Respiratory Care Practitioners in the State of Oklahoma. **59 O.S. §2040, et seq. and Okla. Admin. Code 435:45-5-3.**
2. In Oklahoma, Defendant holds Oklahoma license no. RC 1417.

II. ALLEGATIONS OF UNPROFESSIONAL CONDUCT

3. On August 20, 2020, Defendant self-reported to Board staff that she had documented having provided services to a patient; however, Defendant did not actually perform the documented service. In a follow-up letter, dated August 26, 2020, Defendant admitted that on July 27, 2020, Defendant charted an oxygen check on a patient whose oxygen she had not actually checked.
4. On August 4, 2020, approximately one week after the incident, Defendant was written up by her employer for said conduct. More specifically, the employer documented that "Colleen Sheets did not put a patient on oxygen, but charted and

charged the patient as if she did which is falsifying clinical documentation. This documentation could result in the commission of Medicare fraud. Fortunately, the erroneous charge was caught and did not get processed.” The document further describes “previous employee discussions/performance concerns” as “Numerous other verbal coaching sessions concerning documentation.”

III. VIOLATIONS

5. Based on the foregoing, **COLLEEN ANN SHEETS, RC**, is guilty of unprofessional conduct as follows:
 - a. Dishonest or unethical conduct, in violation of 59 O.S. §2040(5).
 - b. Engaging in fraudulent billing practices and/or violation of federal Medicare and Medicaid laws or state medical assistance laws, in violation of OAC 435:45-5-3(a)(12).
 - c. Inaccurate recording, falsifying or altering of patient records, in violation of OAC 435:45-5-3(a)(17).
 - d. Violation of any provision(s) of the medical practice act or the rules and regulations of the Board, in violation of OAC 435:45-5-3(a)(24).

IV. CONCLUSION

Given the foregoing, the undersigned respectfully request the Board to conduct a hearing, and upon proof of the allegation(s) contained herein, impose an appropriate punishment pursuant to the applicable law and rule on **COLLEEN ANN SHEETS, RC**, including an assessment of costs and attorneys' fees incurred in this action as provided by law.

Respectfully submitted,

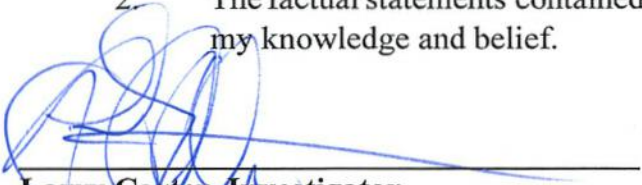


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VERIFICATION

I, Larry Carter, under penalty of perjury, under the laws of the State of Oklahoma, state as follows:

1. I have read the above Complaint regarding **COLLEEN ANN SHEETS, RC,** and,
2. The factual statements contained therein are true and correct to the best of my knowledge and belief.



Larry Carter, Investigator
OKLAHOMA STATE BOARD OF MEDICAL
LICENSURE AND SUPERVISION

Executed this 11th day of February, 2021, in Oklahoma County, State of Oklahoma.