

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.)
)
JOHN EDWARDS, O.A.,)
LICENSE NO. OA 1580,)
)
Defendant.)

FILED

JUN 21 2023

OKLAHOMA STATE BOARD OF
MEDICAL LICENSURE & SUPERVISION

Case No. 23-06-6231

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 JOHN EDWARDS, 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 1580. 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 him 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

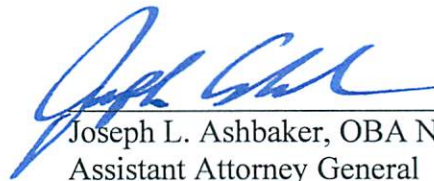
3. Defendant was required to attend and successfully complete twenty (20) hours of approved continuing education courses between November 1, 2020 and October 31, 2022. Defendant failed to complete his CME requirements. Further, phone calls and emails attempting to contact Defendant inquiring as to the status of his CME went unanswered. Defendant did answer “No” on his license renewal to the question “U. Have you obtained 20 hours of approved continuing education and have all the documentation to verify these hours?”

III. VIOLATIONS

4. Based on the foregoing, the Defendant is guilty of unprofessional conduct as follows:
- a. Continuing education for renewal of licensure has been established to require therapists' involvement in activities which keep their skills and knowledge of current practice up to date. A point is the equivalent of 1 contact hour. Twenty contact hours every 2 years will be required, in violation of OAC 435:30-1-5(b)(1).
 - b. 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).
 - c. All Occupational Therapy Personnel shall: Achieve and continually maintain high standards of competence. (Duties), in violation of OAC 435:30-1-10(C)(4).

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, Valeska Barr, 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, John Edwards, O.A.; and
2. The factual statements contained therein are true and correct to the best of my knowledge and belief.

Valeska Barr

Valeska Barr, Assistant Director of
Licensing
OKLAHOMA STATE BOARD OF MEDICAL
LICENSURE AND SUPERVISION

Date:

6/20/23