

**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.)
)
GREGORY SHAUN PERRIN, OA,)
LICENSE NO. OA 218,)
)
Defendant.)

FILED

SEP 13 2024

OKLAHOMA STATE BOARD OF
MEDICAL LICENSURE & SUPERVISION

Case No. 24-06-6359

VERIFIED COMPLAINT

The State of Oklahoma, *ex rel.* Oklahoma State Board of Medical Licensure and Supervision (“Board”), for its Verified Complaint against Gregory Shaun Perrin, OA (“Licensee”; “Defendant”), alleges and states as follows:

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 Occupational Therapy Assistants in the State of Oklahoma. 59 O.S. § 888.1, *et seq.* and Okla. Admin. Code 430:30-1-1 *et seq.*
2. In Oklahoma, Licensee holds Oklahoma License No. OA 218.

II. ALLEGATIONS OF UNPROFESSIONAL CONDUCT

3. Licensee was initially issued his Occupational Therapy Assistant license, No. 218, by the Board on November 20, 1993.
4. The Board received an initial complaint regarding Licensee from the Human Resources Director of an affiliate of Licensee’s former employer indicating that Licensee’s employment had been terminated following an investigation which ultimately substantiated allegations that Licensee had falsified patient records and submitted fraudulent documentation regarding the amount of time spent with patients.
5. Based on this information a Board investigator subpoenaed Licensee’s occupational therapy notes for three (3) patients specified in the initial complaint. Review of the same confirmed that the number of minutes recorded differed from the number of minutes

Licensee had spent with each particular patient on each particular date and time. The Board investigator additionally conducted an interview with Licensee wherein Licensee admitted that he did not document "minute-to-minute" and that he was never trained or advised to do so, despite evidence to the contrary.

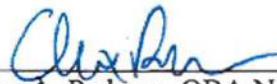
III. VIOLATIONS

6. Based on the foregoing, Defendant is guilty of violating the following relevant provisions of law:
- a. Engaging in unprofessional conduct as defined by the rules established by the Board, or violating the Code of Ethics adopted and published by the Board, in violation of 59 O.S. § 888.9(A)(2) of the Occupational Therapy Practice Act, to wit:
 - i. Fraudulent billing practices and/or violation of Medicare and Medicaid laws or abusive billing practices, in violation of Okla. Admin. Code § 435:30-1-10(6).
 - ii. Improper management of medical records, inaccurate recording, falsifying or altering of patient records, in violation of Okla. Admin. Code § 435:30-1-10(7).
 - iii. Negligence while in practice of occupational therapy or violating the "Standards of Ethics and Professional Conduct" adopted by the Board, in violation of Okla. Admin. Code § 435:30-1-10(19).

IV. CONCLUSION

Given the foregoing, the undersigned respectfully 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 Defendant's professional license, including an assessment of costs and attorney's fees incurred in this action as provided by law.

Respectfully submitted,



Alex A. Pedraza, OBA No. 33584
Assistant Attorney General
OKLAHOMA STATE BOARD OF MEDICAL
LICENSURE AND SUPERVISION
101 N.E. 51st Street
Oklahoma City, Oklahoma 73105
405.522.5264

VERIFICATION

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

1. I have read the above Complaint regarding Gregory Shaun Perrin, OA.; and
2. The factual statements contained therein are true and correct to the best of my knowledge and belief.

Melissa Davis, RN
Melissa Davis, RN, Investigator
OKLAHOMA STATE BOARD OF MEDICAL
LICENSURE AND SUPERVISION

Date: *9-12-24*

OK, Oklahoma
County, State of Execution