

**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.)
TRACY KAYE TROXELL, P.T.)
LICENSE NO. 3981,)
Defendant.)

FILED

APR 10 2020

OKLAHOMA STATE BOARD OF
MEDICAL LICENSURE & SUPERVISION

Case No. 19-12-5847

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 **TRACY KAYE TROXELL, P.T.** (“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 physicians and surgeons in the State of Oklahoma. **59 O.S. §887.1, et seq.** and **Okl. Admin. Code 435:20-5-1 et seq.**
2. In Oklahoma, Defendant holds physical therapist license no. 3981.
3. The acts and omissions complained of herein were made while Defendant was acting as a physical therapist pursuant to the license conferred upon her by the State of Oklahoma.

II. ALLEGATIONS OF UNPROFESSIONAL CONDUCT

4. Defendant was a PRN employee for Encompass Health.
5. On November 18, 2019, Carla Morgan, RN/BD of Encompass Health received a report from Krystal Vernor LPN/PSC that a patient had a patient signed, documented visit from the Defendant on November 7, 2019; however, the patient had been admitted to

Ascension Jane Phillips Hospital in Bartlesville on November 6, 2019, and wasn't discharged until November 9, 2019.

6. On November 19, 2019, Carla Morgan received a call from the defendant to inform her that she had made a mistake and accidentally charted a visit that had not been completed. The defendant was asked how the patient's signature was on the visit, and she stated she did not know. Upon further questioning, the defendant admitted signing for the patient.

III. VIOLATIONS

7. Based on the foregoing, Defendant is guilty of unprofessional conduct as follows:
 - a. been grossly negligent in the practice of physical therapy pursuant to **Title 59 O.S. §887.13(7); OAC 435:20-5-8(11);**
 - b. been guilty of conduct unbecoming a person licensed as a physical therapist pursuant to **Title 59 O.S. §887.13(9);**
 - c. been guilty of any act in conflict with the ethics of the profession of physical therapy pursuant to **Title 59 O.S. §887.13(10);**
 - d. dishonorable or immoral conduct that is likely to deceive, defraud, or harm the public pursuant to **OAC 435:20-5-8(4);**
 - e. improper management of medical records, inaccurate recording, falsifying or altering or failing to complete documentation of patient records pursuant to **OAC 435:20-5-8(15).**

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 **OAC 435:20-5-8(a)** upon **TRACY KAYE TROXELL, P.T.**, including an assessment of costs and attorneys' fees incurred in this action as provided by law.

Respectfully submitted,



Marc S. Pate, OBA No. 10567
Assistant Attorney General
313 NE 21st Street
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(405)521-3921

VERIFICATION

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

1. I have read the above Complaint regarding **TRACY KAYE TROXELL, P.T.**;
and,
2. The factual statements contained therein are true and correct to the best of my knowledge and belief.



Melissa Davis, Investigator

**OKLAHOMA STATE BOARD OF MEDICAL
LICENSURE AND SUPERVISION**

Executed this 6 day of April, 2020, in Oklahoma County, State of Oklahoma.