

5. On June 12, 2017 at 7:29 a.m., Defendant was having difficulty maintaining her balance while attempting to put her ID card into the computer at her workplace. Corporal Hicks with the VA Medical Center Police Department smelled the odor of alcohol emitting from Defendant's person. She also had slurred speech and stated she had consumed "a ton of alcohol" prior to coming to work. Defendant's breath sample on the intoxilyzer indicated a .074% BAC. Defendant was again arrested and charged with Public Intoxication in Oklahoma County case no. CM-2017-2414.
6. On August 15, 2017, Defendant's supervisor reported that Defendant came to work on this date and appeared to be intoxicated, but did not observe an odor of alcohol. Defendant told her supervisor she was taking medications for anxiety and sleep and it was affecting her.
7. On August 16, 2017, Board Investigator Robbin Roberts interviewed Defendant who confirmed the allegations and admitted she had a problem with alcohol. She denied being drunk at work the day before, but admitted she had two drinks the night before and believes it interacted with the medications she was given from a treatment center. At 3:10 p.m. that afternoon, Defendant submitted a urinalysis, which was positive for Ethanol at .331%.
8. Investigator Roberts received written confirmation from Healing Springs Ranch that Defendant was a client there from June 20, 2017 to August 3, 2017, and was treated for substance abuse disorders, anxiety and depression. They recommended that she continue her treatment in an intensive outpatient program for eight weeks.
9. The Department of Veterans Affairs advised the Board on August 22, 2017 that the Defendant "has been involved in egregious performance" by reporting to work "showing signs of impairment, seemingly under the influence of alcohol." They seized her keys and badge and removed her access to patient records.
10. On August 29, 2017, Defendant voluntarily entered into a two year contract with the Allied Professional Peer Assistance Program ("APPA").
11. Defendant was discharged from APPA on October 11, 2017, following a positive Ethyl glucuronide ("EtG") test indicating 16900 ng/mL, dated October 5, 2017. Okla. Admin. Code § 435:12-1-8.
12. On October 11, 2017, an Immediate Summary Suspension of Occupational Therapist License ("ISS") was filed by the Board's Executive Director. 59 O.S. 2011, § 518.1(J).

III. VIOLATIONS

13. Based on the foregoing, the Defendant is guilty of unprofessional conduct as follows:
 - a. Violation of any provision(s) of the Occupational Therapy Practice Act or the rules and regulations of the board or of an action, stipulation, agreement or order of the Board. Okla. Admin. Code § 435:30-1-10(28).

- b. Dishonorable or immoral conduct likely to deceive, defraud, or harm the public. Okla. Admin. Code § 435:30-1-10(2).
- c. Habitual intemperance or the habitual use of habit-forming drugs. Okla. Admin. Code § 435:30-1-10(9).
- d. Habitual intemperance or addicted use of any drug, chemical or substance that could result in behavior that interferes with the practice of occupational therapy and the responsibilities of the licensee. Okla. Admin. Code § 435:30-1-10(10).
- e. Participation in fraud, abuse and/or violation of state or federal laws. Okla. Admin. Code § 435:30-1-10(5).

IV. 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.

Respectfully submitted,



Rachel Rogers, OBA No. 31206

Assistant Attorney General

OKLAHOMA STATE BOARD OF MEDICAL

LICENSURE AND SUPERVISION

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Oklahoma City, Oklahoma 73105

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VERIFICATION

I, Robbin Roberts, 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, Staci Sparks, O.T.; and
2. The factual statements contained therein are true and correct to the best of my knowledge and belief.



Robbin Roberts, Investigator
OKLAHOMA STATE BOARD OF MEDICAL
LICENSURE AND SUPERVISION

Date: 12-5-17

Oklahoma,

County, State of Execution