

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

FILED

AUG 13 2024

OKLAHOMA STATE BOARD OF
MEDICAL LICENSURE & SUPERVISION

STATE OF OKLAHOMA)
EX REL. THE OKLAHOMA BOARD)
OF MEDICAL LICENSURE)
AND SUPERVISION,)

Plaintiff,)

v.)

Case No: 24-06-6356

JANA KAYE HAYNES, L.D.,)
LICENSE NO. LD 826)

Defendant.)

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 JANA KAYE HAYNES, L.D. (“Defendant”):

I. JURISDICTION

1. The Board is a duly authorized agency of the State of Oklahoma empowered to license and oversee the activities of Licensed Dietitians in the State of Oklahoma pursuant to 59 Okla. Stat. §§ 481 *et seq.* and 1721 *et seq.*
2. Defendant Jana Kaye Haynes, LD, holds Oklahoma License No. LD 826.
3. The acts and omissions complained of herein were made while Defendant was practicing as a Licensed Dietitian within the boundaries of the State of Oklahoma.

II. ALLEGATIONS OF UNPROFESSIONAL CONDUCT

4. On or about April 30, 2024, Defendant called Board licensing division asking for assistance accessing her account so she could renew her license. Defendant was advised that her license had been expired since October 31, 2018 so she would have to reapply. Defendant stated that she has maintained her national certification and thought she could keep working.
5. On or about July 16, 2024, Board investigator Robbin Roberts contacted Defendant and

inquired what prompted her to renew her license after almost 6 years. Defendant stated she found her national certification and wanted to put it with her state license. It was then that she realized her license was expired. She admitted to Investigator Roberts that she worked as a dietician for Spanish Cove since 2000 and they do bill Medicare and private insurance.

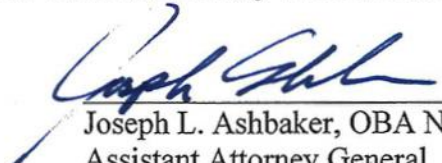
6. Board Secretary sent Defendant a letter of acknowledgment of receipt of her application which will be reviewed by committee on September 19, 2024. Until that time she is allowed to practice under a supervisor. Defendant submitted her Form 5 on May 1, 2024 naming Lisa Burroughs as her supervisor.

III. VIOLATIONS

7. Defendant is guilty of unprofessional conduct in that she:
 - A. Any violation of the provisions of the Licensed Dietitian Act in violation of 59 Okla. Stat. § 1738(A)(1);
 - i. A person may not use the title or represent or imply that he or she has the title of licensed dietitian or provisional licensed dietitian or use the letters LD or PLD and may not use any facsimile of those titles in any manner to indicate or imply that the person is a licensed dietitian or provisional licensed dietitian, unless that person holds an appropriate license. 59 O.S. § 1736(A)
 - B. Any violation of a rule adopted by the Advisory Committee on Dietetic Registration of the State Board of Medical Examiners in violation of 59 Okla. Stat. § 1738(A)(2);
 - i. OAC 435:35-1-4(c)(1)(A) A licensee shall not misrepresent any professional qualifications or credentials
 - ii. OAC 435:35-1-4(c)(3)(B) Integrity in personal and organizational behaviors and practices (Autonomy) Nutrition and dietetics practitioners shall:
 - (ii) Comply with all applicable laws and regulations, including obtaining/maintaining a state license or certification if engaged in practice governed by nutrition and dietetics statutes.

CONCLUSION

Plaintiff respectfully requests that 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 Licensed Dietician license, and an assessment of costs and attorney's fees incurred in this action as provided by law.




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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, JANA KAYE HAYNES, L.D.; 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: 8/12/24