



OFFICE OF THE ATTORNEY GENERAL
STATE OF OKLAHOMA

ATTORNEY GENERAL OPINION
2025-34A

Jenny Barnhouse, Executive Director
Oklahoma Board of Nursing
2915 N. Classen Blvd., Ste. 524
Oklahoma City, Oklahoma 73106

June 16, 2025

Re: Lucas, Case No. 10.2025020197.25

Dear Executive Director Barnhouse:

This office has received your request for a written Attorney General Opinion regarding action that the Oklahoma Board of Nursing intends to take in the above-referenced case.

The Oklahoma Nursing Practice Act authorizes the Board to impose discipline, including a denial of licensure, when a nurse has “had disciplinary actions taken against the individual’s registered or practical nursing license, advanced unlicensed assistive certification, or any professional or occupational license, registration or certification in this or any state, territory or country[.]” 59 O.S.2021, § 567.8(B)(10).

On or about January 30, 2025, Lucas submitted to the Oklahoma Board of Nursing (OBN) a complete licensed practical nursing (LPN) Licensure by Examination with multistate license request Application (Application) to practice multistate licensed practical nursing LPN. Lucas had previously been licensed as an (Undeclared) Certified Nursing Assistant (CNA), Certificate No. UCNA1000039423 by the Arizona Board of Nursing (Arizona BON) which expired on March 23, 2017, when her registry CNA was granted. Lucas’s CNA Certificate was issued prior to July 1, 2016, and was thus equivalent to the Licensed Nursing Assistant License (LNA). On July 27, 2015, a complaint was filed by Lucas’s employer at the time alleging that she had not been checking patients’ blood sugars and, instead, was just making up numbers. Additionally, on July 21, 2015, the same employer reported Lucas, while working as a CNA, allegedly fabricated results of an unknown patient’s blood sugar level. The Arizona BON attempted to get Lucas to respond to the allegations and disciplinary proceeding but the correspondence was returned undeliverable. Lucas had failed to keep her mailing address updated as required. The Arizona BON ultimately revoked Lucas’s CNA certificate (LNA equivalent).

After the OBN considered Lucas’s application, and the revocation of Lucas’s Arizona license, it proposes to deny Lucas’s Application pursuant to clear evidence that Luca’s conduct violates the Oklahoma Nursing Practices Act, 59 O.S.2021, § 567.8 (B)(10).

It is, therefore, the official opinion of the Attorney General that the Oklahoma Board of Nursing has adequate support for the conclusion that this action advances the State's policy to protect public health, safety, and welfare by ensuring nurses meet minimum standards of professional conduct.

A handwritten signature in black ink, appearing to read "Cheryl Dixon". The signature is fluid and cursive, with the first name "Cheryl" written in a larger, more prominent script than the last name "Dixon".

CHERYL DIXON

Deputy General Counsel