



OFFICE OF THE ATTORNEY GENERAL  
STATE OF OKLAHOMA

ATTORNEY GENERAL OPINION  
2025-56A

Jenny Barnhouse, Executive Director  
Oklahoma Board of Nursing  
P.O. Box 52926  
Oklahoma City, Oklahoma 73152

November 3, 2025

Re: Trogdon, Case No. 3.2023020177.26

Dear Executive Director Barnhouse:

This office has received your request for a written Attorney General Opinion regarding action that the Oklahoma Board of Nursing (“Board”) intends to take in the above-referenced case. Respondent holds a single-state registered nurse (RN) license and has an advanced practice registered nurse-certified nurse practitioner (APRN-CNP), certified in family/individual across the lifespan, with prescriptive authority recognition (Family APRN-CNP).

The Oklahoma Nursing Practice Act (“Act”) authorizes the Board to impose discipline when a nurse “[i]s guilty of unprofessional conduct[,]”<sup>1</sup> “[f]ails to adequately care for patients or to conform to the minimum standards of acceptable nursing” in a way that “unnecessarily exposes a patient or other person to risk of harm[,]” “[i]s guilty of any act that jeopardizes a patient’s life, health or safety[,]”<sup>2</sup> or “[v]iolate[s] a . . . state or federal narcotics or controlled dangerous substance law including, but not limited to prescribing, dispensing or administering opioid drugs in excess of the maximum limits authorized[.]” 59 O.S.2021, §§ 567.8(B)(3), (7-9). The Act also requires that “[c]hanges to the supervision agreement shall be filed with the Board within thirty (30) days of the change and shall be effective on filing.” 59 O.S. § 567.4a(1).

On June 5, 2025, a Board Nurse Investigator filed a Complaint against the Respondent’s licenses for the following violations. Between October 8, 2021, through August 29, 2022, Respondent, while working as a Family APRN-CNP, with prescriptive authority recognition and contracted to work for Mental Health Clinic #1, practiced outside of her scope of practice as a Family APRN-CNP by providing psychiatric care and psychotropic medication management for at least five (5) Patients. On or about August 29, 2022, the Respondent was terminated from Mental Health Clinic #1 for “Failure to Complete Job Duties” and is not eligible for rehire.

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<sup>1</sup> Unprofessional conduct includes “conduct detrimental to the public interest.” OAC 485:10-11-1(b)(3)(H).

<sup>2</sup> Conduct that jeopardizes a patient’s life, health, and safety includes “[f]ail[ing] to utilize appropriate judgment in administering safe nursing practice” and “patient care[.]” OAC 485:10-11-1(b)(4)(D).

On March 1, 2023, through May 21, 2024, Respondent, while contracted to work as an APRN-CNP, with prescriptive authority recognition, at Mental Health Clinic #2, practiced outside her scope of practice as a Family APRN-CNP by providing psychiatric care and psychotropic medication management for at least four (4) Patients. On April 15, 2024, Respondent, during a telephonic investigative conference with Board staff, admitted to Board staff to working in Mental Health without being certified in Mental Health, which is outside of the Respondent's scope of practice. Furthermore, on October 8, 2024, Respondent submitted to the Board a Request for Change in Physician(s) Supervising APRN Prescriptive Authority for CNP, CNM, CNS Application (Application) for a supervising physician deletion that had already occurred on January 1, 2024, which is greater than 30 days prior to the Application being received in the Board office.

After a hearing on October 2, 2025, the Board found that Respondent practiced outside her scope of practice and failed to provide adequate nursing care or to conform to the minimum standards of acceptable APRN-CNP and unnecessarily exposed patients to risk of harm; lacked sufficient knowledge or reasonable skill; is guilty of unprofessional conduct; is guilty of an act that jeopardized patients' life, health or safety; violated a rule promulgated by the Board, or a state or federal narcotics or controlled dangerous substance law including prescribing opioid drugs in excess of limits authorized by Oklahoma law. Respondent failed to file with the Board a supervising physician deletion for over seven (7) months in violation of prescriptive authority rules.

Respondent's R.N., APRN-CNP licenses are therefore suspended for three (3) months and Respondent must take education courses in Nursing Jurisprudence and Roles and Responsibilities of the APRN within sixty (60) days prior to submission of any reinstatement application. Prior to submission of any reinstatement application, Respondent must pay an administrative penalty of \$5,400.00. Upon reinstatement of her license, Respondent shall be placed on probation for employment as a licensed nurse for 1,440 cumulative worked hours to be completed in two (2) years in a hospital and/or health care agency under the supervision of not more than two (2) registered nurses who agree to comply with the Guidelines for Supervised Practice.

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.



CHERYL DIXON  
*Deputy General Counsel*