



OFFICE OF ATTORNEY GENERAL  
STATE OF OKLAHOMA

ATTORNEY GENERAL OPINION  
2016-297A

Richard Pierson, Executive Director  
Oklahoma Board of Licensed Alcohol  
and Drug Counselors  
101 NE 51st Street  
Oklahoma City, Oklahoma 73105

May 11, 2016

Dear Executive Director Pierson:

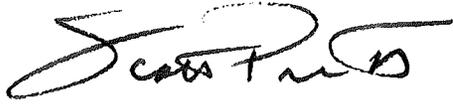
This office has received your request for a written Attorney General Opinion regarding agency actions that the Oklahoma Board of Licensed Alcohol and Drug Counselors intends to take pursuant to a consent agreement with respect to Board complaint 443-0615. The proposed action is require payment of a \$100 fine, submission of valid certificates of completion of continuing education programs, and completion of three hours of ethics education in addition to other continuing education requirements. Further, the action requires an audit of the licensee's continuing education for the period July 1, 2015, to June 30, 2016.

The licensee had submitted three certificates of completion for one-hour continuing education courses, but only one certificate was valid—the other two were edited versions of the first. The licensee had actually completed all three one-hour courses but presented two falsified certificates.

The Licensed Alcohol and Drug Counselors Act, 59 O.S.2011 & Supp.2015, §§ 1870–1885, authorizes the Board to discipline licensees if they have “[m]isrepresented any information required in obtaining a certificate or license,” 59 O.S.2011, § 1881(A)(8). Certificates evidencing the completion of continuing education are relevant to a licensee's duty to produce “evidence satisfactory to the Board that” an applicant for license renewal “has satisfied relevant professional or continuing education requirements.” *Id.* § 1878(C)(1); *see also* OAC 38:10-13-3 (providing for documentation evincing attendance).

Thus, producing false documents concerning continuing education constitutes misrepresentation of “information required in obtaining a certificate or license.” The Board may reasonably believe, in light of the circumstances of this case, that a modest fine, additional education, and corrective actions will prevent future violations.

It is, therefore, the official opinion of the Attorney General that the Oklahoma Board of Licensed Alcohol and Drug Counselors has adequate support for the conclusion that these actions advance the State of Oklahoma's policy requiring full, accurate, and honest information in license applications.

A handwritten signature in black ink, appearing to read "E. Scott Pruitt". The signature is stylized with a large, sweeping initial "E" and a long horizontal stroke extending to the right.

E. SCOTT PRUITT  
ATTORNEY GENERAL OF OKLAHOMA