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OCT 25 2016

**BEFORE THE BOARD OF HEALING ARTS
OF THE STATE OF KANSAS**

KS State Board of Healing Arts

In the Matter of)	
)	Docket No. ¹⁷ 16 HA-00011
Gurpreet S. Randhawa, M.D.)	
Kansas License No. 04-28472)	

CONSENT ORDER

COMES NOW, the Kansas State Board of Healing Arts, (“Board”), by and through Joseph S. Behzadi, Associate Litigation Counsel (“Petitioner”), and Gurpreet S. Randhawa (“Licensee”), *pro se*, and move the Board for approval of a Consent Order affecting Licensee’s license to practice medicine and surgery in the State of Kansas. The Parties stipulate and agree to the following:

1. Licensee’s last known mailing address to the Board is: 1411 W. 15th Street #202, Liberal, Kansas 67901.
2. Licensee is or has been entitled to engage in the practice of medicine and surgery in the State of Kansas, having been issued License No. 04-28472 on or about October 16, 1999. Licensee most recently renewed his license on or about June 9, 2015. Licensee’s license is currently active.
3. The Board is the sole and exclusive administrative agency in the State of Kansas authorized to regulate the practice of the healing arts, specifically the practice of medicine and surgery. K.S.A. 65-2801 *et seq.* and K.S.A. 65-2871.
4. This Consent Order and the filing of such document are in accordance with applicable law and the Board has jurisdiction to enter into the Consent Order as provided

Consent Order
Gurpreet S. Randhawa, M.D.

by K.S.A. 77-505 and 65-2838. Upon approval, these stipulations shall constitute the findings of the Board, and this Consent Order shall constitute the Board's Final Order.

5. The Kansas Healing Arts Act is constitutional on its face and as applied in the case. Licensee agrees that, in considering this matter, the Board is not acting beyond its jurisdiction as provided by law.

6. Licensee voluntarily and knowingly waives his right to a hearing. Licensee voluntarily and knowingly waives his right to present a defense by oral testimony and documentary evidence, to submit rebuttal evidence, and to conduct cross-examination of witnesses. Licensee voluntarily and knowingly agrees to waive all possible substantive and procedural motions and defenses that could be raised if an administrative hearing were held.

7. The terms and conditions of the Consent Order are entered into between the undersigned parties and are submitted for the purpose of allowing these terms and conditions to become an Order of the Board. This Consent Order shall not be binding on the Board until an authorized signature is affixed at the end of this document. Licensee specifically acknowledges that counsel for the Board is not authorized to sign this Consent Order on behalf of the Board.

8. The Board has received information and investigated the same, and has reason to believe that there may be grounds pursuant to K.S.A. 65-2836 to take action with respect to Licensee's license under the Kansas Healing Arts Act, K.S.A. 65-2801, *et seq.*

9. The facts supporting the allegations in this Consent Order are as follows:

a. [REDACTED]

b. [REDACTED]

c. Board staff requested several patient records during its investigation.

d. On or about August 17, 2015, the Board received records pertaining to Patient 1 from the dates of February 27, 2013, through January 28, 2014.

- i. On or about February 27, 2013, Patient 1, a thirteen (13) year old female, presented to Licensee for a follow-up five (5) days after a visit to the ER where she had complained of chest pain and had an abnormal D-dimer lab value.
- ii. No patient education is documented related to the significance of the finding or the risk of a pulmonary embolism.
- iii. The patient record appears to have been signed with a stamp and not dated.
- iv. On or about April 24, 2013, Patient 1 presented with complaints of bilateral ear pain and sore throat.
- v. Patient 1's past medical history states, "Significant for allergies"; however, at her previous appointment, it listed only left knee injury.
- vi. There is no other information contained in her past medical history.
- vii. The record was electronically signed by an ARNP on May 23, 2013.
- viii. On or about October 21, 2013, Patient was seen by the APRN with complaints of vomiting, diarrhea, and abdominal cramping.

- ix. At this appointment, Patient 1's past medical history stated, "Noncontributory."
 - x. The APRN documented putting Patient 1 on Phenergan 25 mg tablets #40 one by mouth every eight (8) hours as needed, Bentyl 20 mg #40 one by mouth every eight (8) hours as needed and "acidophilus tablets #20 one by p.o. b.i.d. x10 days."
 - xi. The record was electronically signed by the APRN on November 15, 2013.
 - xii. On or about January 28, 2014, Patient 1 presented with cough, sore throat, hoarseness, body aches, and headache.
 - xiii. Vitals were taken and documented within normal limits; however, no blood pressure or heart rate was documented.
 - xiv. Patient 1 was positive for cervical lymphadenopathy and flu A, rhonchi and wheezing were noted, and Licensee prescribed Azithromycin.
 - xv. Azithromycin is not indicated for a viral infection and not otherwise justified in the absence of a con-current bacterial infection.
 - xvi. More complete documentation demonstrating medical reasoning in cases where antibiotics are prescribed indicated tests were not performed.
 - xvii. The patient record was signed electronically by the APRN on March 19, 2014.
- e. On or about August 17, 2015, the Board received records pertaining to Patient 2 from the dates of March 6, 2013, through September 10, 2013.

- i. On or about March 6, 2013, Patient 2, first presented for a newborn screening.
 - ii. No pregnancy or labor and delivery history were documented.
 - iii. Family history was documented; however, no detail of family history was documented.
 - iv. Patient 2 was not seen until eleven (11) days after discharge.
 - v. On or about July 3, 2013, Patient 2 presented to Licensee for her four (4) month well exam.
 - vi. At that appointment, Patient 2 was administered the following vaccines: Hib, PEDIARIX, PCV13, and Rota.
 - vii. No consent form for the aforementioned vaccines is found in the record.
 - viii. On or about September 10, 2013, Patient 2 presented to Licensee for her six (6) month exam.
 - ix. Licensee electronically signed the record on September 27, 2013, approximately seventeen (17) days later.
- f. On or about August 17, 2015, the Board received records pertaining to Patient 3 from the dates of December 5, 2012, through September 3, 2013.
- i. On or about December 5, 2012, Patient 3, a newborn, presented for his two (2) week check.
 - ii. No family history, pregnancy, or labor and delivery history were documented.
 - iii. Patient 3 was not seen until thirty-three (33) days after discharge.

- iv. Patient 3 was seen only a total of three (3) times by six (6) months of age.
- v. The medical record does not discuss why immunizations were late.
- vi. The plan/treatment section of the record is word-for-word the same information as in other patient records.
- vii. On or about August 26, 2013, Licensee saw Patient 3.
- viii. Licensee documented Patient 3 had cough, wheezing, and runny nose.
- ix. No other information regarding an exam was given outside of Patient 3 vitals being taken.
- x. Licensee administered Micronephrine 0.2ML in the office.
- xi. The record appears to have been stamped with Licensee's signature, but there is no corresponding date.
- xii. On September 3, 2013, Patient 3 presented to Licensee after being admitted to the hospital the week prior with croup, bronchiolitis, and respiratory distress.
- xiii. No information regarding Patient 3's hospital stay is found in the record.
- g. On or about August 17, 2015, the Board received records pertaining to Patient 4 from the dates of February 4, 2013, through June 11, 2013.
 - i. On or about February 4, 2013, Patient 4, a seven (7) year old female, presented to Licensee's office and saw the APRN.
 - ii. Patient 4 presented with chief complaints of allergies, congestion, and diarrhea.

- iii. Patient 4 was prescribed Albuterol, Qvar 40mcg, Bactrim, and Triamcinolone.
 - iv. The Bactrim was prescribed inappropriately for diarrhea.
 - v. Licensee responded that he agreed, but that he had perhaps forgot to document otitis media.
 - vi. On or about February 19, 2013, Licensee saw Patient 4 for a follow-up appointment.
 - vii. Licensee documented that Patient 4 was there for a follow-up for her asthma, even though Patient 4 previously presented with reactive airway. Licensee did not document his thought process in confirming reactive airway disease developed into asthma.
 - viii. Licensee did not electronically sign the record until April 11, 2013.
 - ix. On or about June 11, 2013, Patient 4 presented to Licensee for a school physical.
 - x. Licensee failed to document Patient 4's asthma.
 - xi. In the School Health Examination for Liberal Unified School District No. 480, Licensee's stamped signature appears on the form with the date of June 11, 2013.
 - xii. Licensee stamped the document "No" to the question, "Is this student subject to any condition which might cause a possible classroom emergency such as seizures, fainting, diabetes, asthma, allergies, etc."
- h. On or about August 17, 2015, the Board received records pertaining to Patient 5 from the dates of February 19, 2013, through October 16, 2013.

- i. On or about February 19, 2013, Patient 5, a seventeen (17) month old male, presented to Licensee's office for his fifteen (15) month check.
- ii. Licensee documented past medical history of transposition of great vessels at three (3) weeks and open heart surgery.
- iii. During that appointment, Licensee failed to document family history entirely.
- iv. Licensee's plan/treatment section is word-for-word the same information as in other patient records.
- v. Licensee failed to provide detail of a treatment plan unique to Patient 5.
- vi. On or about April 10, 2013, Patient 5 presented with a chief complaint of progressively worsening cough, RSV, and bronchiolitis.
- vii. The review of systems documented an ENT evaluation and did not assess the heart.
- viii. No pulse oximetry was performed.
- ix. The physical assessment did not document any GI, musculoskeletal, or skin assessments.
- x. On or about May 2, 2013, Patient 5 presented for nasal congestion and cough for the last two (2) to three (3) days.
- xi. No review of systems is documented.
- xii. No oximetry was performed.
- xiii. It is unclear whether Budesonide and albuterol were prescribed, although, Licensee indicates treatments of Budesonide and albuterol in his plan.

- xiv. On or about May 13, 2013, Patient 5 presented for coughing coupled with wheezing and rales in the chest.
- xv. No pulse oximetry was performed.
- xvi. Licensee signed the patient record electronically ten (10) days following the patient visit.
- xvii. On or about June 13, 2013, Patient 5 presented with chief complaints of croupy cough, very phlegmy, audible wheezing, rales in the chest, and low-grade fever.
- xviii. No pulse oximetry was performed.
- xix. Licensee failed to document his impression regarding why Patient 5 has had the same symptoms since on or before April 10, 2013.
- xx. Licensee signed the patient record electronically on July 9, 2014.
- xxi. Licensee eventually administered Rocephin and solu-medrol, which was identified by PERC as being inappropriate.
- i. On or about August 17, 2015, the Board received records pertaining to Patient 6 from the dates of February 19, 2014, through April 7, 2014.
 - i. On or about February 19, 2014, Patient 6, a newborn male, presented to Licensee for a newborn check.
 - ii. Licensee failed to document family history with detail, but simply indicated, “unremarkable.”
 - iii. Licensee’s plan/treatment section is word-for-word the same information as in other patient records.
 - iv. On or about April 1, 2014, Patient 6 presented to Licensee.

- v. Patient 6 was going to have his immunizations administered at the health department.
- vi. Licensee did not electronically sign the record until July 9, 2014.
- vii. On or about April 7, 2014, documentation from Licensee shows that Patient 6 was administered four vaccines.
- viii. There is no consent form in the record for the vaccines.
- j. Licensee's Southwest Medical Center ("SMC") admitting privileges were suspended from May 2015, through on or about September 8, 2015, [REDACTED]

[REDACTED]

- i.
- ii.
- iii.
- iv.

[REDACTED]

Licensee's admitting privileges were reinstated on or about September 9, 2015.

10. Licensee acknowledges that if formal hearing proceedings were conducted and Licensee presented no exhibits, witnesses, or other evidence, the Board has sufficient evidence to prove that Licensee has violated the Kansas Healing Arts Act with respect to the above allegations. Licensee further waives his right to dispute or otherwise contest the allegations contained in the above paragraphs in any further proceeding before this Board.

11. Licensee's acts, if proven, constitute unprofessional conduct as set forth in K.S.A. 65-2836.

12. Licensee violated K.S.A. 65-2836(b), as further defined by K.S.A. 65-2837(b)(25) in that, Licensee failed to keep written medical records which accurately describe the services rendered to the patient, including patient histories, pertinent findings, examination results and test results.

13. Licensee violated K.S.A. 65-2836(k) in that, Licensee violated any lawful rule and regulation promulgated by the board or violated any lawful order or directive of the board previously entered by the board, specifically, Licensee violated K.A.R. 100-24-1, which requires each licensee to meet minimal requirements for each patient whom a professional service was performed.

14. Licensee violated K.S.A. 65-2836(s), in that sanctions or disciplinary actions have been taken against the licensee by a peer review committee, health care facility, a governmental agency or department or a professional association or society for acts or conduct similar to acts or conduct which would constitute grounds for disciplinary action under this section.

15. Licensee violated K.S.A. 65-2836(b), as further defined by K.S.A. 65-2837(b)(12) in that, Licensee's conduct is likely to deceive, defraud or harm the public.

16. Licensee violated K.S.A. 65-2836(b), as further defined by K.S.A. 65-2837(b)(23) in that Licensee's prescribing, dispensing, administering or distributing a prescription drug or substance, including a controlled substance, in an improper or inappropriate manner, or for other than a valid medical purpose, or not in the ordinary course of the licensee's professional practice.

17. Pursuant to K.S.A. 65-2836, the Board may revoke, suspend, limit, censure or place under probationary conditions Licensee's license, and pursuant to K.S.A. 65-2863a the Board has the authority to impose administrative fines for violations of the Kansas Healing Arts Act.

18. According to K.S.A.65-2838(b) and K.S.A. 77-505, the Board has authority to enter into this Consent Order without the necessity of proceeding to a formal hearing.

19. All pending investigation materials in KSBHA Investigation number 15-00677 and 16-00067 regarding Licensee, were fully reviewed and considered by the Board members who serve on the Board's Disciplinary Panel. Disciplinary Panel No. 31 authorized and directed Board counsel to seek settlement of this matter with the provisions contained in this Consent Order.

20. Licensee further understands and agrees that if the Board finds, after due written notice and an opportunity for a hearing, that Licensee has failed to comply with any of the terms of this Consent Order, the Board may immediately impose any sanction provided for by law, including but not limited to suspension or revocation of Licensee's license to practice medicine and surgery in the State of Kansas. Licensee hereby expressly understands and agrees that, at any such hearing, the sole issue shall be whether or not Licensee has failed to comply with any of the terms or conditions set forth in this Consent Order. The Board acknowledges that at any such hearing, Licensee retains the right to confront and examine all witnesses, present evidence, testify on his own behalf, contest the allegations, present oral argument, appeal to the courts, and all other rights set forth in the Kansas Administrative Procedures Act, K.S.A. 77-501 *et seq.*, and the Kansas Healing Arts Act, K.S.A. 65-2801 *et seq.*

21. Nothing in this Consent Order shall be construed to deny the Board jurisdiction to investigate alleged violations of the Kansas Healing Arts Act, or to investigate complaints received under the Risk Management Law, K.S.A. 65-4921 *et seq.*, that are known or unknown and are not covered under this Consent Order, or to initiate formal proceedings based upon known or unknown allegations of violations of the Kansas Healing Arts Act.

22. Licensee hereby releases the Board, its individual members (in their official and personal capacity), attorneys, employees and agents, hereinafter collectively referred to as "Releasees", from any and all claims, including but not limited to those alleged damages, actions, liabilities, both administrative and civil, including the Kansas Judicial Review Act, K.S.A. 77-601 *et seq.* arising out of the investigation and acts leading to the execution of this Consent Order. This release shall forever discharge the Releasees of any and all claims or demands of every kind and nature that Licensee has claimed to have had at the time of this release or might have had, either known or unknown, suspected or unsuspected, and Licensee shall not commence to prosecute, cause or permit to be prosecuted, any action or proceeding of any description against the Releasees.

23. Licensee further understands and agrees that upon signature by Licensee, this document shall be deemed a public record and shall be reported to any entities authorized to receive disclosure of the Consent Order.

24. This Consent Order, when signed by both parties, constitutes the entire agreement between the parties and may only be modified or amended by a subsequent document executed in the same manner by the parties.

25. Licensee agrees that all information maintained by the Board pertaining to the nature and result of any complaint and/or investigation may be fully disclosed to and

considered by the Board in conjunction with the presentation of any offer of settlement, even if Licensee is not present. Licensee further acknowledges that the Board may conduct further inquiry as it deems necessary before the complete or partial acceptance or rejection of any offer of settlement.

26. Licensee, by signature to this document, waives any objection to the participation of the Board members, including the Disciplinary Panel and General Counsel, in the consideration of this offer of settlement and agrees not to seek the disqualification or recusal of any Board member or General Counsel in any future proceedings on the basis that the Board member or General Counsel has received investigative information from any source which otherwise may not be admissible or admitted as evidence.

27. Licensee acknowledges that he has read this Consent Order and fully understands the contents.

28. Licensee acknowledges that this Consent Order has been entered into freely and voluntarily.

29. Licensee shall obey all federal, state and local laws and rules governing the practice of medicine and surgery in the State of Kansas that may be in place at the time of execution of the Consent Order or may become effective subsequent to the execution of this document.

30. Upon execution of this Consent Order by affixing a Board authorized signature below, the provisions of this Consent Order shall become an Order under K.S.A. 65-2838. This Consent Order shall constitute the Board's Order when filed with the office of the Executive Director for the Board and no further Order is required.

31. This Consent Order constitutes **public disciplinary action**.
32. The Board may consider all aspects of this Consent Order in any future matter regarding Licensee.
33. In lieu of conducting a formal proceeding, Licensee, by signature affixed to this Consent Order, hereby voluntarily agrees to the following disciplinary action on his license to engage in the practice of medicine and surgery:

EDUCATION

34. Licensee shall attend and successfully complete the Medical Record Keeping Seminar at Center for Personalized Education for Physicians (“CPEP”) at Licensee’s expense.
35. On or before August 30, 2016, Licensee shall notify the Compliance Coordinator in writing that Licensee has registered to attend the CPEP Seminar on one of the following dates: September 24, 2016, or December 2, 2016.
36. Licensee shall provide proof of successful completion of the Seminar within thirty (30) days of successfully completing the program.
37. All costs associated with the CPEP Medical Record Keeping Seminar shall be at Licensee’s own expense to include, but not be limited to, the cost of the program, any cost of travel to and from the program, and the cost of accommodations while attending the program.
38. All documentation required pursuant to this Consent Order shall be submitted to:

Kansas State Board of Healing Arts
Attn: Compliance Coordinator
800 SW Jackson, Lower Level-Suite A
Topeka, Kansas 66612

HIRE A SCRIBE

39. Within thirty (30) days of the approval of this Consent Order, Licensee shall hire a scribe.
40. The scribe is defined as an individual hired by Licensee who is a paraprofessional who specializes in charting physician-patient encounters in real time.
- a. The scribe is trained in health information management and the use of health information technology.
 - b. The scribe will work on-site with the Licensee.
41. Licensee shall provide proof of the successful hiring of a scribe immediately upon completion of the hiring process.
42. Proof of the successful completion of hiring a scribe shall be submitted to:
- Kansas State Board of Healing Arts
Attn: Compliance Coordinator
800 SW Jackson, Lower Level-Suite A
Topeka, Kansas 66612
43. Licensee retains ultimate responsibility over his patient records.

EVALUATION

44. Within ten (10) days of the approval of the Consent Order, Licensee shall contact CPEP, 7351 Lowry Boulevard, Suite 100, Denver, Colorado 80230, to schedule a Competence Assessment for the earliest dates available to both CPEP and Licensee within the next six (6) months. Both parties may provide relevant information to CPEP for consideration as part of this clinical skills assessment. In order to permit the Board to provide such relevant information, Licensee shall immediately notify the Compliance Coordinator in writing of the assessment dates once the assessment is scheduled.

45. All costs associated with such assessment by CPEP shall be at Licensee's own expense to include, but not be limited to, the cost of any accommodations while attending the assessment.

46. Licensee shall complete any necessary waiver/release so that the Board may receive a copy of the Assessment Report for review.

47. Licensee shall follow all recommendations of the CPEP Assessment, including monitoring if recommended by CPEP.

48. Proof of the completion of the assessment and copy of the CPEP Assessment Report shall be submitted by sending the same to:

Compliance Coordinator
Kansas State Board of Healing Arts
800 SW Jackson, Lower Level-Ste. A
Topeka, Kansas 66612

MONITORING

49. Within ten days (10) days of the Board's approval of this Consent Order, Licensee shall enter into and comply with all terms and conditions of a monitoring contract with Affiliated Monitors, Inc., ("AMI").

- a. Licensee shall sign a six (6) month contract with AMI for monitoring and provide a copy of the contract to the Board within fifteen (15) days of the approval of AMI's monitor. Monitoring shall be at Licensee's expense.
- b. The Monitor shall conduct his/her first review within thirty (30) calendar days of the approval of AMI's monitor.

- c. Licensee further agrees to immediately notify the Board of any revisions to the contract and to immediately provide a copy of such revised contract to the Board.
- d. The Board designates the Disciplinary Panel's Appointed Member to approve or disapprove of AMI's proposed monitor.
- e. Monitoring shall include:
 - i. Monthly site visits for the term of six (6) months;
 - ii. Specifically, a total of six (6) site visits will occur, every month, over the six (6) month term;
 - iii. Review of patient charts and billing with a minimum of fifteen (15) patient charts for each monitoring visit. The monitor(s) will randomly select charts based on patients seen by Licensee;
 - iv. Monitoring reports shall be due quarterly to the Board. The first monitoring report due following the Monitor's completion of three (3) monthly visits, and until these monitoring provisions have been terminated by the Board;
 - v. Licensee is responsible for ensuring AMI's timely submission of reports to the Board;
 - vi. Licensee shall take any and all corrective actions which are reasonably necessary to correct any and all deficiencies identified in any of the practice reviews conducted by the Monitor.

50. Licensee expressly agrees that he shall be responsible for all costs and expenses associated with the Practice Monitoring by AMI and that the Board shall bear no responsibility or liability for the costs of those services.

51. All reports required pursuant to this Consent Order shall be submitted to:

Kansas State Board of Healing Arts
Attn: Compliance Coordinator
800 SW Jackson, Lower Level, Ste. A
Topeka, Kansas 66612

TIMEFRAME

52. The AMI monitoring is not self-terminating. Once Licensee has successfully completed the aforementioned conditions and is following all CPEP recommendations, Licensee agrees to appear before the Board to request the AMI monitoring to be terminated.

53. Proof of the successful completion of the Medical Record Keeping Seminar, Competence Assessment, and all recommendations made by CPEP shall be submitted to:

Compliance Coordinator
Kansas State Board of Healing Arts
800 SW Jackson, Lower Level-Ste. A
Topeka, Kansas 66612

IT IS THEREFORE ORDERED that the Consent Order and agreement of the parties contained herein is adopted by the Board as findings of fact, conclusions of law, and as a Final Order of the Board.

IT IS SO ORDERED on this 25th day of October, 2016.

**FOR THE KANSAS STATE
BOARD OF HEALING ARTS:**

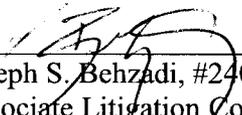
Kathleen Selzler Lippert by KQS
Kathleen Selzler Lippert
Executive Director

10/25/16
Date

Gurpreet S. Randhawa
Gurpreet S. Randhawa, M.D.
Licensee

7-14-16
Date

PREPARED AND APPROVED BY:


Joseph S. Behzadi, #24065
Associate Litigation Counsel
Kansas Board of Healing Arts
800 SW Jackson, Lower Level-Suite A
Topeka, Kansas 66612
785-296-8022

Consent Order
Gurpreet S. Randhawa, M.D.

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that I served a true and correct copy of the Consent Order by United States mail, postage prepaid, on this 29th day of October, 2016, to the following:

Gurpreet S. Randhawa, M.D.
Licensee
1411 W. 15th Street #202
Liberal, Kansas 67901

And the original was hand-filed with:

Kathleen Selzler Lippert
Executive Director
Kansas Board of Healing Arts
800 SW Jackson, Lower Level-Suite A
Topeka, Kansas 66612

And a copy was hand-delivered to:

Joseph S. Behzadi
Associate Litigation Counsel
Kansas Board of Healing Arts
800 SW Jackson, Lower Level-Suite A
Topeka, Kansas 66612

Compliance Coordinator
Kansas Board of Healing Arts
800 SW Jackson, Lower Level-Suite A
Topeka, Kansas 66612

Licensing Administrator
Kansas Board of Healing Arts
800 SW Jackson, Lower Level-Suite A
Topeka, Kansas 66612

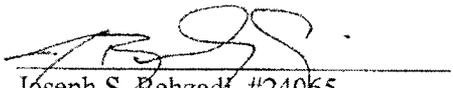
Cathy A. Brown
Executive Assistant, KSBHA

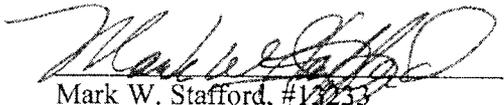
ADDENDUM TO CONSENT ORDER
DOCKET NO. 17-HA-00021
In The Matter of
GURPREET S. RANDHAWA, M.D.

As verbally agreed upon by the parties on the record during the October 14, 2016, Board Meeting, and as reflected by the Minutes of the Board Meeting, the Consent Order presented for consideration is modified as follows:

1. Page 18, paragraph 49.e.i., by striking the entire phrase and inserting, "During the six (6) month term, there will be one site visit by the monitor;"
2. Page 18, paragraph 49.e.ii., by striking the entire phrase and inserting, "Specifically, a total of six (6) reviews will occur, every month, over the six (6) month term;"
3. Page 18, paragraph 49.e.iii., by striking the entire phrase and inserting, "Review of patient charts and billing with a minimum of fifteen (15) patient charts for each review. The AMI monitor(s) will randomly select charts based on patients seen by Licensee and Licensee will submit those charts through electronic means;"

Addendum submitted by:


Joseph S. Behzadi, #24065
Associate Litigation Counsel
Kansas Board of Healing Arts
800 S.W. Jackson, Lower Level – Suite A
Topeka, KS 66612
785-296-8022


Mark W. Stafford, #13233
Simpson, Logback, Lynch, Norris, P.A.
106 S.W. 6th, Suite 210
Topeka, KS 66603
785-232-6200

Addendum Approved:

Kathleen Selzler Lippert *by KSL*
Kathleen Selzler Lippert
Executive Director
Kansas State Board of Healing Arts

10/25/16
Date