

MAR 14 1988

STIPULATION

KANSAS STATE BOARD OF  
HEALING ARTS

THIS AGREEMENT made and entered into this 10<sup>th</sup> day of April, 1988, by and between the Kansas State Board of Healing Arts, hereinafter referred to as "Board" and Karl S. Saffo, M.D., hereinafter referred to as "Licensee".

WITNESSES:

WHEREAS, Licensee is currently licensed to practice medicine and surgery in the State of Kansas and bears license #15405; and

WHEREAS, information has been provided to the Disciplinary Counsel for the Board of Healing Arts alleging over-utilization of services by Licensee, specifically in regards to physical therapy performed in Licensee's office; and

WHEREAS, such conduct by Licensee could result in revocation, suspension, or limitation of Licensee's license pursuant to K.S.A. (1987 Supp.) 65-2836 through K.S.A. (1987 Supp.) 65-2844 and amendments thereto; and

WHEREAS, following a thorough investigation into the alleged misconduct, the matter was presented to a Medicine and Surgery Review Committee; and

WHEREAS, two medical consultations were obtained in this matter; and

WHEREAS, Licensee appeared in the Board office for an informal interview with Richard A. Uhlig, D.O., Interim Executive Director of the Board of Healing Arts; and

WHEREAS, Richard A. Uhlig, D.O., Interim Executive Director of the Board of Healing Arts recommended to the Disciplinary Counsel that the matter be referred for a hearing; and

WHEREAS, in lieu of the prosecution of formal charges at a hearing, the parties mutually desire to enter into a Stipulation.

NOW, THEREFORE, in consideration of the forbearance of a formal hearing and other covenants and promises contained herein, the parties hereto agree as follows:

1. That, the Licensee hereby agrees to cease and desist from any and all physical therapy procedures for outpatients in his office.
2. That, such physical therapy treatment includes, but is not necessarily limited to, whirlpool treatments, hotpacks, ultrasound, P.T. evaluation, and parafin baths.
3. That, as long as Licensee remains in strict compliance with all of the terms and conditions of this Stipulation, no formal adjudicative proceedings will be initiated against Licensee based upon the aforementioned items. Any violation of the terms and conditions of this Stipulation by the Licensee shall be prima facie evidence that a violation of the Healing Arts Act has occurred for which the Board may suspend, revoke, or otherwise limit the license of Licensee.
4. That, it is further understood and agreed that the provisions of this Stipulation are to be strictly construed and adhered to. This Stipulation constitutes the entire agreement between the parties and there are no other agreements or understandings not set forth herein. This Stipulation may be modified or amended only by written instrument, signed by the parties hereto.
5. That, this Stipulation shall remain in full force until modified, amended, or rescinded by the parties hereto; provided however, should Licensee strictly adhere to the terms and provisions contained herein Licensee may, upon the expiration of two years from the date hereof,

request an appearance before the Board to discuss modification, amendment, or rescision of this Stipulation and the Board will give such request due consideration.

IN WITNESS WHEREOF, the parties hereto have executed this Stipulation on the date indicated below their signature, it being specifically understood that the effective date of this Stipulation will be the date it has been signed by both parties hereto.

KANSAS STATE BOARD OF HEALING ARTS

Richard A. Uhlig  
RICHARD A. UHLIG, D.O., Interim Executive Director  
"Board"

April 16, 1988  
Date

Karl S. Saffo  
KARL S. SAFFO, M.D.  
"Licensee"

3-10-1988  
Date

BEFORE THE KANSAS STATE BOARD OF HEALING ARTS

In the Matter of  
KARL S. SAFFO, M.D.  
Kansas License #15405

ENFORCEMENT ORDER

NOW, on this 16th day of April, 1988, this matter comes before the Board as a result of a Stipulation having been entered into between the Board and the above-named licensee.

The Kansas State Board of Healing Arts is represented by its Disciplinary Counsel, Joseph M. Furjanic. There are no other appearances.

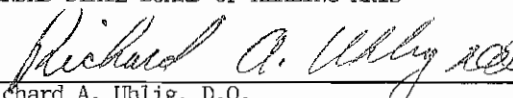
After examining the files, hearing the statements of counsel and being otherwise duly advised in the premises, the Board finds as follows:

1. That, Licensee hereby agrees to cease and desist from any and all physical therapy procedures for outpatients in his office.
2. That, as long as Licensee remains in strict compliance with all terms and conditions of this Stipulation, no formal adjudicative proceedings will be initiated against Licensee.
3. That, the provisions of the Stipulation are to be strictly construed and adhered to and there are no other agreements or understandings not set forth herein.
4. That, the Stipulation shall remain in full force until modified, amended, or rescinded by the parties hereto, provided however, should Licensee strictly adhere to the terms and provisions contained herein, Licensee may, upon the expiration of two (2) years from the date herein request an appearance before the Board to discuss modification, amendment, or rescission of the Stipulation and the Board shall give such request due consideration.

IT IS THEREFORE BY THE BOARD ORDERED, ADJUDGED AND DECREED:

- A. That, the findings hereinabove made be and the same are made the order of the Board.
- B. That, Karl S. Saffo, M.D. shall comply with and abide by all of the terms and conditions set forth in the Stipulation and attached hereto.
- C. That, any violation of the Stipulation by Karl S. Saffo, M.D. during the time the Stipulation remains in effect shall constitute prima facie evidence of a violation of the Healing Arts Act and disciplinary proceedings may be initiated against said individual for the revocation, suspension, or limitation of his license to practice medicine and surgery in the State of Kansas.

KANSAS STATE BOARD OF HEALING ARTS

  
Richard A. Uhlig, D.O.  
Interim Executive Director

Prepared and approved by:  
JOSEPH M. FURJANIC, Disciplinary Counsel  
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