

DEPT. OF COMMERCE
AND CONSUMER AFFAIRS

eFiled 08/24/2020 12:08 pm

HEARINGS OFFICE

LIANNE M. AOKI 9621
Regulated Industries Complaints Office
Department of Commerce and Consumer Affairs
State of Hawaii
235 South Beretania Street, 9th Floor
Honolulu, Hawaii 96813
Telephone: (808) 586-2660

RECEIVED
PROF & VOCATIONAL
LICENSING DIVISION
2020 JUN 17 P 1:09
DEPT OF COMMERCE
& CONSUMER AFFAIRS
STATE OF HAWAII

Attorney for the Department of Commerce
and Consumer Affairs

HAWAII MEDICAL BOARD
DEPARTMENT OF COMMERCE AND CONSUMER AFFAIRS
STATE OF HAWAII

In the Matter of the License to Practice) MED 2020-77-L
Medicine of)
)
SREELATHA PULAKHANDAM, M.D.,) SETTLEMENT AGREEMENT PRIOR TO
) FILING OF PETITION FOR DISCIPLINARY
) ACTION AND BOARD'S FINAL ORDER;
Respondent.) EXHIBITS "1" THROUGH "4"
)

SETTLEMENT AGREEMENT PRIOR TO FILING OF PETITION
FOR DISCIPLINARY ACTION AND BOARD'S FINAL ORDER

A. UNCONTESTED FACTS:

1. Parties. Petitioner, the DEPARTMENT OF COMMERCE AND CONSUMER AFFAIRS' REGULATED INDUSTRIES COMPLAINTS OFFICE ("RICO" or "Petitioner"), through its undersigned attorney(s), and Respondent SREELATHA PULAKHANDAM, M.D. ("Respondent"), are parties to this Settlement Agreement and agree to its terms and conditions as the full and final resolution of RICO Case No. MED 2020-77-L.

2. Jurisdiction and Enforceability. The Hawaii Medical Board ("Board") has jurisdiction over this matter. This Settlement Agreement will be an enforceable order upon approval.

3. License Information. Respondent was licensed as a physician by the Board at all relevant times herein. A true and correct copy of license number and status information from a report by the DEPARTMENT OF COMMERCE AND CONSUMER AFFAIRS' PROFESSIONAL AND VOCATIONAL LICENSING DIVISION, current as of the date the parties executed this Settlement Agreement, is attached as Exhibit "1."

4. Investigation and Allegations. By law, RICO is empowered to investigate and prosecute persons who may have violated the State's professional and vocational licensing laws.

In this case, RICO received a request for investigation after the Board received information about disciplinary action taken by the Louisiana State Board of Medical Examiners ("Louisiana Board"), the State Medical Board of Ohio ("Ohio Board"), and the State of Florida Board of Medicine ("Florida Board"). RICO's investigation indicated disciplinary action was taken in Florida and that Respondent may have failed to report the Louisiana disciplinary action in Hawaii within thirty (30) days, in potential violation of Hawaii Revised Statutes ("HRS") § 453-8(a)(11) (disciplinary action by another state or federal agency) and § 453-8(a)(14) (failure to report disciplinary decision in writing). Respondent reported the Ohio disciplinary action in Hawaii in writing within thirty (30) days after the decision was issued. The Ohio and Florida disciplinary actions are in potential violation of Hawaii Revised Statutes ("HRS") § 453-8(a)(11) (disciplinary action by another state or federal agency).

5. Exhibits Attached. RICO obtained copies of disciplinary action decisions from the Louisiana Board, the Ohio Board, and the Florida Board.

- a. On October 16, 2017, the Consent Order became effective and was issued to Respondent by the Louisiana Board in Case No. 2016-I-585 (hereinafter "the Louisiana Order") (Exhibit "2"). The Louisiana Order was based on allegations of pre-signing prescriptions and falsifying medical records to indicate she examined patients on dates when she was out of the country. The Louisiana Order placed Respondent on a one-year term of probation, ordered a \$5,000 fine, practice-monitoring, quarterly reports, courses on professionalism, medical ethics, proper prescribing, and continuing medical education.
- b. On April 10, 2019, the Consent Agreement became effective and was issued to Respondent by the Ohio Board in Case No. 18-CRF-0063 (hereinafter "the Ohio Order") (Exhibit "3"). The Ohio Order reprimanded Respondent and ordered quarterly declarations and appearances, courses on professional ethics and medical recordkeeping.
- c. On April 30, 2019, the Final Order was filed and issued to Respondent by the Florida Board in DOH Case No. 2017-19955 (hereinafter "the Florida Order") (Exhibit "4"). The Florida Order approved the Settlement Agreement entered into by Respondent and the State of Florida Department of Health imposing a \$6,500 fine, a \$1,340.45 fee, and 5 hours of continuing medical education in risk management.

B. REPRESENTATIONS BY RESPONDENT:

1. Respondent represents the address information as indicated below is correct for purposes of this Settlement Agreement.

2. Respondent is fully aware Respondent has the right to be represented by counsel in this matter and voluntarily waives that right.

3. Respondent enters into this Settlement Agreement freely, knowingly, voluntarily, and under no coercion or duress.

4. Respondent is aware of the right to have a hearing to adjudicate the issues in the case. Pursuant to HRS § 91-9(d), Respondent freely, knowingly, and voluntarily waives the right to a hearing and agrees to dispose of this case in accordance with the terms and conditions of this Settlement Agreement.

5. Respondent being at all times relevant herein licensed as a physician by the Board acknowledges that Respondent is subject to penalties including but not limited to, revocation, suspension or limitation of the license and administrative fines, if the foregoing allegations are proven at hearing.

6. Respondent does not admit to violating any law or rule but acknowledges that RICO believes that it has sufficient cause to file a Petition for Disciplinary Action against Respondent's license.

7. Respondent enters into this Settlement Agreement as a compromise of the claims and to conserve on the expenses of proceeding with an administrative hearing on this matter.

8. Respondent agrees that this Settlement Agreement is intended to resolve the issues raised in RICO's investigation in RICO Case No. MED 2020-77-L.

9. Respondent understands that this Settlement Agreement may be subject to reporting requirements.

10. Respondent understands this Settlement Agreement is public record pursuant to Hawaii Revised Statutes Chapter 92F.

C. TERMS OF SETTLEMENT:

1. Administrative Fine. Respondent agrees to pay a fine in the amount of ONE THOUSAND AND NO/100 DOLLARS (\$1,000.00). Payment shall be made by **cashier's check or money order made payable to "DCCA - Compliance Resolution Fund"** and mailed to the Regulated Industries Complaints Office, Attn: Lianne M. Aoki, Esq., 235 S. Beretania Street, 9th Floor, Honolulu, Hawaii 96813. Payment of the fine shall be due at the time this Settlement Agreement is returned to RICO.

2. Assurance of Compliance and Proof of Completion. Respondent shall, within sixty (60) days from the approval of this Settlement Agreement, submit to the Board, in writing, assurance of compliance and proof of completion of the requirements set forth in the above-referenced Louisiana Order, Ohio Order, and Florida Order.

3. Failure to Comply. Respondent understands if Respondent fails to fully and timely comply with the terms of this Settlement Agreement as set forth in Section(s) C.1. of the

Settlement Agreement, Respondent's license shall be automatically revoked for a period of five (5) years upon RICO's filing of an affidavit with the Board attesting to such failure. In case of such revocation, Respondent shall turn in all indicia of licensure to the Executive Officer of the Board within ten (10) days after receipt of notice of the revocation. If Respondent's license is revoked, Respondent understands, at the completion of the revocation period, Respondent must apply to the Board for a new license pursuant to and subject to the requirements and conditions set forth in HRS §§ 92-17, 436B-21, and all other applicable laws and rules in effect at that time.

4. Possible Further Sanction. The Board, at its discretion, may pursue additional disciplinary action as provided by law to include further fines and other sanctions as the Board may deem appropriate if, after the execution of this Settlement Agreement, Respondent violates any provision of the statutes or rules governing the conduct of physicians in the State of Hawaii, or if Respondent fails to abide by the terms of this Settlement Agreement.

5. Approval of the Board. Respondent agrees that, except for the representations, agreements and covenants contained in Paragraphs C.6., C.7., C.8., and C.9. below, this Settlement Agreement shall not be binding on any of the parties unless and until it is approved by the Board.

6. No Objection if Board Fails to Approve. If the Board does not approve this Settlement Agreement, does not issue an order pursuant thereto, or does not approve a lesser remedy, but instead an administrative hearing is conducted against Respondent in the Board's usual and customary fashion pursuant to the Administrative Procedure Act, Respondent agrees that neither Respondent nor any attorney that Respondent may retain, will raise as an objection in any administrative proceeding or in any judicial action, to the Board's proceeding against Respondent on the basis that the Board has become disqualified to consider the case because of its review and consideration of this Settlement Agreement.

7. Any Ambiguities Shall be Construed to Protect the Consuming Public. It is agreed that any ambiguity in this Settlement Agreement is to be read in the manner that most completely protects the interests of the consuming public.

8. No Reliance on Representations by RICO. Other than the matters specifically stated in this Settlement Agreement, neither RICO nor anyone acting on its behalf has made any representation of fact, opinion or promise to Respondent to induce entry into this Settlement Agreement, and Respondent is not relying upon any statement, representation or opinion or promise made by RICO or any of its agents, employees, representatives or attorneys concerning the nature, extent or duration of exposure to legal liability arising from the subject matter of this Settlement Agreement or concerning any other matter.

9. Complete Agreement. This Settlement Agreement is a complete settlement of the rights, responsibilities and liabilities of the parties hereto with respect to the subject matter hereof; contains the entire agreement of the parties; and may only be modified, changed or amended by written instrument duly executed by all parties hereto.

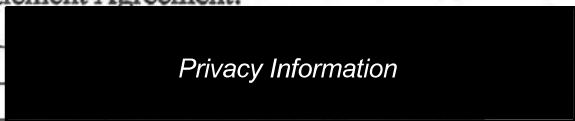
IN WITNESS WHEREOF, the parties have signed this Settlement Agreement on the date(s) set forth below.

DATED: Conington, LA, 6/12/20.
(City) (State) (Date)



SREELATHA PULAKHANDAM, M.D.
Respondent

Respondent's address for purposes of this Settlement Agreement:



Privacy Information

(Print or type address information clearly; indicate if address is residential or business/commercial.)

DATED: Honolulu, Hawaii, June 17, 2020.

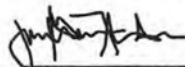


LIANNE M. AOKI
Attorney for the Department of Commerce
and Consumer Affairs

IN THE MATTER OF THE LICENSE TO PRACTICE MEDICINE OF SREELATHA PULAKHANDAM, M.D.; SETTLEMENT AGREEMENT PRIOR TO FILING OF PETITION FOR DISCIPLINARY ACTION AND BOARD'S FINAL ORDER; EXHIBITS "1" THROUGH "4"; RICO CASE NO. MED 2020-77-L

APPROVED AND SO ORDERED:
HAWAII MEDICAL BOARD
STATE OF HAWAII

August 13, 2020

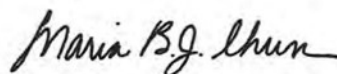


JONE GEIMER-FLANDERS, D.O.
Chairperson

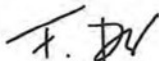
DATE



PETER HALFORD, M.D.
Vice Chairperson



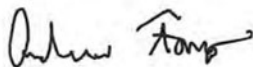
MARIA B.J. CHUN, Ph.D.



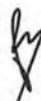
FRANKLIN V.H. DAO, M.D.



DARREN K. EGAMI, M.D.



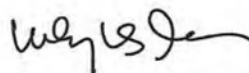
ANDREW R. FONG, M.D.



PETER D. HOLT, M.D.



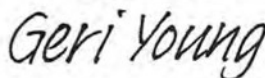
MICHAEL JAFFE, D.O.



WESLEY MUN



DANNY M. TAKANISHI, JR., M.D.



GERI YOUNG, M.D.

DEPARTMENT OF COMMERCE AND CONSUMER AFFAIRS
STATE OF HAWAII

In the Matter of the License to Practice) MED 2020-77-L
Medicine of)
)
SREELATHA PULAKHANDAM, M.D.,) DECLARATION OF
) SREELATHA PULAKHANDAM, M.D.
)
Respondent.)
)
)
)
_____)

DECLARATION OF SREELATHA PULAKHANDAM, M.D.

I, SREELATHA PULAKHANDAM, M.D., do declare under penalty of law that the foregoing is true and correct.

DATED: 6/12/20 Covington, LA 6/12/20
(City) (State) (Date)



SREELATHA PULAKHANDAM, M.D.
Respondent

Professional & Vocational Licensing Search

Department of Commerce & Consumer Affairs

General Licensee

License ID:	Active/Inactive:	Status	Expire Date:
MD-19624	--	CURRENT, VALID & IN GOOD STANDING	1/31/2022
Legal License Name:	Trade/Professional Name:	Entity:	Original License Date:
SREELATHA PULAKHANDAM	--	INDIVIDUAL	3/20/2018
Class Prefix:	Special Privilege:	Restriction:	Education Code:
--	--	--	--
Business Code	Conditions & Limitations:	Business Address:	
--	--		

License information on this site reflects information in the Professional and Vocational Licensing Division as of March 5, 2020; however, applications and forms are subject to standard processing time, and the information here does not reflect pending changes which are being reviewed. The site is updated daily, Monday through Friday, except holidays.

The State of Hawaii makes no guarantees as to the accuracy of the information accessed, the timeliness of the delivery of transactions, delivery to the correct party, preservation of the privacy and security of users and makes no warranties, including warranty of merchantability and fitness for a particular purpose. The DCCA/PVL web site receives the DCCA/PVL licensee information directly from the DCCA/PVL licensee database. The DCCA/PVL web site is considered a primary source for DCCA/PVL licensee information – It is the same licensee information the DCCA/PVL provides through other means and is true and correct to the best of our knowledge. User is advised that if the information obtained herein is to be reasonably relied upon, user should confirm the accuracy of such information with the provider thereof.

EXHIBIT 1

sufficient cause for the revocation, suspension or such other action against her license to practice medicine in the state of Louisiana as the Board may determine appropriate.

Recognizing her right to written notification of any charges that may be asserted against her as a result of this investigation, as well as the right to administrative adjudication of such charges, at which time she would be entitled to be represented by legal counsel, to call witnesses and to present evidence on her own behalf in defense or in mitigation of the charges made, and to a decision thereon by the Board based upon written findings of fact and conclusions of law, pursuant to La. Rev. Stat. §§49:955-965, Dr. Pulakhandam, nonetheless, hereby waives her right to formal adjudication and, pursuant to La. Rev. Stat. §49:955(D), consents to entry of the Order set forth hereinafter. Dr. Pulakhandam also acknowledges that she hereby waives any right to which she may be entitled pursuant to the Louisiana Administrative Procedure Act, La. Rev. Stat. §49:951, *et seq.*, or to which she otherwise may be afforded by any law to contest her agreement to or the force and effect of the Board's investigation or this document in any court or other forum. By her subscription hereto, Dr. Pulakhandam also hereby authorizes the I/O designated by the Board with respect hereto, to present this Consent Order to the Board for its consideration and to fully disclose to and discuss with the Board the nature and results of the investigation, and she waives any objection to such disclosures under La. Rev. Stat. §49:960. Dr. Pulakhandam expressly acknowledges that the disclosure of such information to the Board by the I/O shall be without prejudice to the I/O's authority to proceed with the filing and adjudication of an Administrative Complaint against her or to the Board's capacity to adjudicate such Complaint, should the Board decline to approve this Consent Order.

IT IS ORDERED that the license of Sreelatha Pulakhandam, M.D. to practice medicine in the state of Louisiana, as evidenced by Certificate No. 201314, is hereby placed on **PROBATION** for One (1) year; *provided, however*, that such licensure and Dr. Pulakhandam continuing exercise of rights and privileges granted thereby, shall be conditioned upon and subject to her acceptance of and strict compliance with the following terms, conditions and restrictions:

- (1) **Practice Monitoring and Quarterly Reports.** Within sixty (60) days of the effective date of this Order, Dr. Pulakhandam shall enter into an agreement with a Board-approved practice monitor to monitor and review Dr. Pulakhandam's medical practice during the probationary period. The practice monitor shall review no less than ten (10) records a quarter. The practice monitoring shall provide quarterly reports to the Board that will include an opinion as to whether Dr. Pulakhandam is practicing and documenting her patient's evaluation and treatment in accordance with the prevailing standards of a medical practice. Dr. Pulakhandam shall bear all costs associated with the practice monitor program.

physician's direction and immediate personal supervision—i.e., where the physician is physically present on the premises at all times that the unlicensed individual is on duty and retains full responsibility to patients for the training, delivery and results of all services rendered." La. Admin Code 46:XLV.7603(A)(7)(a).

(2) **Course on Professionalism and Medical Ethics.** Within one (1) year of the effective date of this Order, Dr. Pulakhandam shall attend and successfully complete a course (or courses) on professionalism and medical ethics. The course shall be approved in advance by the Board. On or before the expiration of one (1) year from the effective date of this Order Dr. Pulakhandam shall cause to be submitted to the Board written certification of satisfaction of the requirements of this provision.

(3) **Course on Proper Prescribing.** Within one (1) year of the effective date of this Order, Dr. Pulakhandam shall attend and successfully complete a course (or courses) on the proper prescribing of controlled substances. The course shall be approved in advance by the Board. On or before the expiration of one (1) year from the effective date of this Order Dr. Pulakhandam shall cause to be submitted to the Board written certification of satisfaction of the requirements of this provision.

(4) **Continuing Medical Education.** Dr. Pulakhandam shall obtain not less than fifty (50) credit hours per year during her probationary term through attendance at and participation in continuing medical education programs ("CME") accredited by the American College of Physicians, the American Medical Association, or such other national accrediting association or organization as the Board may approve in writing. On or before the anniversary of the effective date of this Order, Dr. Pulakhandam shall cause to be submitted to the Board written certification of the CME programs and credits completed by her during the preceding twelve (12) months.

(5) **Absence from State/Practice/Effect on Probation.** Should Dr. Pulakhandam at any time during the period of probation ordered herein be absent from the state of Louisiana, relocate to and/or take up residency in another state or country or discontinue practicing medicine for a period of thirty (30) days or more, or should she fail to renew her license to practice medicine in this state, she shall advise the Board in writing. In such instance, the probationary period ordered herein and all terms, conditions and restrictions thereof shall be deemed interrupted and extended and shall not commence to run until Dr. Pulakhandam notifies the Board in writing that she has returned to, relocated or taken up residency in, resumed the practice medicine in this state, or renewed her Louisiana medical license. In such instance, Dr. Pulakhandam shall not receive credit toward completion of the probationary period for the time during which she was absent from the State of Louisiana or while she was not engaged or licensed to practice medical psychology in this state.

(6) **Certification of Compliance with Probationary Terms.** At least sixty (60) days prior to the conclusion of the probationary term imposed herein, Dr. Pulakhandam shall provide the Board with an affidavit certifying that he has complied with each of the terms of probation imposed by this Order. The probationary period and all of its terms and conditions shall be, and shall be

deemed to be, extended and continued in full force and effect pending Dr. Pulakhandam compliance with the requirements of this provision.

(7) **Cooperation with Board's Probation and Compliance Officer.** Dr. Pulakhandam shall immediately notify the Board's Probation and Compliance Officer of any change in her current home and professional addresses and telephone numbers and she shall direct all matters required pursuant to this Consent Order to the attention of the Probation and Compliance Officer, with whom she shall cooperate on all matters and inquiries pertaining to her compliance with the terms, conditions and restrictions of this Order.

(8) **Probation Monitoring Fee.** For each year of the probationary term Dr. Pulakhandam shall pay the Board a probation monitoring fee of Three Hundred (\$300.00) Dollars. Payment of the initial fee shall be due not later than sixty (60) days from the effective date of this Order. All subsequent annual payments shall be due on or before the anniversary date of the initial fee payment.

(9) **Payment of Fine.** Within one (1) year of the effective date of this Order, Dr. Pulakhandam shall pay to the Board a fine in the amount of Five Thousand and no/100 (\$5,000.00) Dollars.

(10) **Effective Date.** This Consent Order shall be effective the date it is approved and accepted by the Board as shown by the signature of its representative below.

IT IS FURTHER ORDERED that any violation or failure of strict compliance with any of the terms, conditions or restrictions set forth by this Order by Dr. Pulakhandam shall be deemed adequate and sufficient cause, upon proof of such violation or failure, for such other action against Dr. Pulakhandam's license to practice medicine in the state of Louisiana as the Board may deem appropriate, as if such violations were enumerated among the causes provided in La. Rev. Stat. §37:1285(A).

IT IS FURTHER ORDERED that this Order shall be, and shall be deemed to be, a public record.

Signed at New Orleans, Louisiana, and effective on this 16th day of October, 2017.

**LOUISIANA STATE BOARD
OF MEDICAL EXAMINERS**

By:



Christy L. Valentine, M.D.
President

Acknowledgment and Consent on the following page

**ACKNOWLEDGMENT
AND CONSENT**

STATE OF LOUISIANA
PARISH OF St. Tammany

I, **SREELATHA PULAKHANDAM, M.D.**, hereby acknowledge, approve, accept and consent to entry of the above and foregoing Order, this 20th day of September, 2017.

Sreelatha Pulakhandam
SREELATHA PULAKHANDAM, M.D.

WITNESSES:

Nicole Smith
Signature
Nicole Smith
Typed Name

Privacy Information

Address

Privacy Information

City/State/Zip Code

Jacques Duteil
Signature
Jacques Duteil
Typed Name

Privacy Information

Address

Privacy Information

City/State/Zip Code

Sworn to and subscribed before me this 20th day of September, 2017
in the presence of the two stated witnesses.

Angela J. Barron
Notary Public (Signature)

Angela J. Barron 134335
Printed Name & Notary or Bar Number



**CONSENT AGREEMENT
BETWEEN
SREELATHA PULAKHANDAM, M.D.,
AND
THE STATE MEDICAL BOARD OF OHIO
Case No. 18-CRF-0063**

This Consent Agreement is entered into by and between Sreelatha Pulakhandam, M.D., [Dr. Pulakhandam], and the State Medical Board of Ohio [Board], a state agency charged with enforcing Chapter 4731., Ohio Revised Code.

Dr. Pulakhandam enters into this Consent Agreement being fully informed of her rights under Chapter 119., Ohio Revised Code, including the right to representation by counsel and the right to a formal adjudicative hearing on the issues considered herein.

BASIS FOR ACTION

This Consent Agreement is entered into on the basis of the following stipulations, admissions and understandings:

- A. The Board is empowered by Section 4731.22(B), Ohio Revised Code, to limit, revoke, suspend a certificate, refuse to register or reinstate an applicant, or reprimand or place on probation the holder of a certificate for violation of Section 4731.22(B)(22), Ohio Revised Code, for "any of the following actions taken by an agency responsible for authorizing, certifying, or regulating an individual to practice a health care occupation or provide health care services in this state or another jurisdiction, for any reason other than the nonpayment of fees; the limitation, revocation, or suspension of an individual's license to practice; acceptance of an imposition of probation; or issuance of an order of censure or other reprimand."
- B. The Board enters into this Consent Agreement in lieu of further formal proceedings based upon the allegations set forth in the Notice of Opportunity for Hearing issued on June 13, 2018, attached hereto as Exhibit A and incorporated herein by reference. The Board expressly reserves the right to institute additional formal proceedings based upon any other violations of Chapter 4731., Ohio Revised Code, whether occurring before or after the effective date of this Consent Agreement.
- C. Dr. Pulakhandam is licensed to practice medicine and surgery in the State of Ohio, License number 35.083088.
- D. Dr. Pulakhandam states that she is also licensed to practice medicine and surgery in the State(s) of Louisiana, Hawaii, Florida, Georgia and New Jersey.
- E. Dr. Pulakhandam admits to the factual and legal allegations contained in the June 13, 2018 Notice of Opportunity for Hearing.

EXHIBIT 3

AGREED CONDITIONS

Wherefore, in consideration of the foregoing and mutual promises hereinafter set forth, and in lieu of any formal proceedings at this time, Dr. Pulakhandam knowingly and voluntarily agrees with the Board to the following terms, conditions and limitations:

REPRIMAND

1. It is hereby ORDERED that Dr. Pulakhandam is REPRIMANDED.

PROBATIONARY TERMS:

2. Dr. Pulakhandam shall obey all federal, state, and local laws.

Releases; Quarterly Declarations and Appearances

3. Dr. Pulakhandam shall submit quarterly declarations under penalty of Board disciplinary action and/or criminal prosecution, stating whether there has been compliance with all the conditions of this Consent Agreement. The first quarterly declaration must be received in the Board's offices on the first day of the third month following the month in which this Consent Agreement becomes effective, or as otherwise requested by the Board. Subsequent quarterly declarations must be received in the Board's offices on or before the first day of every third month.
4. Dr. Pulakhandam shall appear in person for an interview before the full Board or its designated representative during the third month following the effective date of this Consent Agreement. Subsequent personal appearances must occur as otherwise requested by the Board. If an appearance is missed or is rescheduled for any reason, ensuing appearances shall be scheduled based on the appearance date as originally scheduled.

Required Courses

5. Within one year of the effective date of this Consent Agreement, or as otherwise approved by the Board, Dr. Pulakhandam shall provide acceptable documentation of successful completion of a course or courses dealing with the professional ethics. The exact number of hours and the specific content of the course or courses shall be subject to the prior approval of the Board or its designee. Any course taken in compliance with this provision shall be in addition to the Continuing Medical Education requirements for relicensure for the Continuing Medical Education period in which it is completed. In addition, at the time Dr. Pulakhandam submits the documentation of successful completion of the course dealing with professional ethics, she shall also submit to the Board a written report describing the course, setting forth what she learned from the course, and identifying with specificity how she will apply what she has learned to her practice in the future.

6. Within one year of the effective date of this Consent Agreement, or as otherwise approved by the Board, Dr. Pulakhandam shall provide acceptable documentation of successful completion of a course or courses dealing with medical recordkeeping. The exact number of hours and the specific content of the course or courses shall be subject to the prior approval of the Board or its designee. Any course taken in compliance with this provision shall be in addition to the Continuing Medical Education requirements for recensure for the Continuing Medical Education period in which it is completed. In addition, at the time Dr. Pulakhandam submits the documentation of successful completion of the course dealing with professional ethics, she shall also submit to the Board a written report describing the course, setting forth what she learned from the course, and identifying with specificity how she will apply what she has learned to her practice in the future.

REQUIRED REPORTING BY LICENSEE

7. Within thirty days of the effective date of this Consent Agreement, Dr. Pulakhandam shall provide a copy of this Consent Agreement to all employers or entities with which she is under contract to provide health care services (including but not limited to third party payors) or is receiving training; and the Chief of Staff at each hospital where she has privileges or appointments. Further, Dr. Pulakhandam shall promptly provide a copy of this Consent Agreement to all employers or entities with which she contracts to provide health care services, or applies for or receives training, and the Chief of Staff at each hospital where she applies for or obtains privileges or appointments. In the event that Dr. Pulakhandam provides any health care services or health care direction or medical oversight to any emergency medical services organization or emergency medical services provider, within thirty days of the effective date of this Consent Agreement Dr. Pulakhandam shall provide a copy of this Consent Agreement to the Ohio Department of Public Safety, Division of Emergency Medical Services. Further, within thirty days of the date of each such notification, Dr. Pulakhandam shall provide documentation acceptable to the Secretary and Supervising Member of the Board demonstrating that the required notification has occurred.
8. Within thirty days of the effective date of this Consent Agreement, Dr. Pulakhandam shall provide a copy of this Consent Agreement by certified mail to the proper licensing authority of any state or jurisdiction in which she currently holds any professional license, as well as any federal agency or entity, including but not limited to the Drug Enforcement Agency, through which she currently holds any license or certificate. Dr. Pulakhandam further agrees to provide a copy of this Consent Agreement by certified mail at time of application to the proper licensing authority of any state in which she applies for any professional license or reinstatement of any professional license. Additionally, within thirty days of the effective date of this Consent Agreement, Dr. Pulakhandam shall provide a copy of this Consent Agreement to any specialty or subspecialty board of the American Board of Medical Specialties or the American Osteopathic Association Bureau of Osteopathic Specialists under which she currently holds or has previously held certification. Further, within thirty days of the date of each such notification, Dr. Pulakhandam shall provide documentation acceptable to the Secretary and Supervising Member of the Board demonstrating that the required notification has occurred.

9. Dr. Pulakhandam shall notify the Board in writing of any change of principal practice address or residence address within thirty days of such change.

DURATION/MODIFICATION OF TERMS

The Reprimand of Dr. Pulakhandam shall not terminate. Further, Dr. Pulakhandam shall not request termination of the probationary terms contained in this Consent Agreement until she submits, and the Board has accepted as satisfactory, both the documentation of successful completion of the required medical education courses set forth herein, as well as the corresponding written reports to the Board. Otherwise, the above terms, limitations and conditions may be amended or terminated in writing at any time upon the agreement of both parties.

In the event that the Board initiates future formal proceedings against Dr. Pulakhandam, including but not limited to issuance of a Notice of Opportunity for Hearing, this Consent Agreement shall continue in full force and effect until such time that it is superseded by ratification by the Board of a subsequent Consent Agreement or upon this Consent Agreement being superseded by a subsequent final Board Order taking effect.

In the event that any term, limitation, or condition contained in this Consent Agreement is determined to be invalid by a court of competent jurisdiction, Dr. Pulakhandam and the Board agree that all other terms, limitations, and conditions contained in this Consent Agreement shall be unaffected.

FAILURE TO COMPLY

If, in the discretion of the Secretary and Supervising Member of the Board, Dr. Pulakhandam appears to have violated or breached any term or condition of this Consent Agreement, the Board reserves the right to institute formal disciplinary proceedings for any and all possible violations or breaches, including but not limited to, alleged violations of the laws of Ohio occurring before the effective date of this Consent Agreement.

ACKNOWLEDGMENTS/LIABILITY RELEASE

By executing her signature on this Consent Agreement, Dr. Pulakhandam agrees that in the event the Board, in its discretion, does not ratify this Consent Agreement, this settlement offer is withdrawn and shall be of no evidentiary value and shall not be relied upon or introduced in any disciplinary action or appeal by either party. Dr. Pulakhandam and the Board further agree that if this Consent Agreement is not approved, it shall not constitute an admission against interest in this proceeding and shall not prejudice the ability of the Board to adjudicate this matter.

This Consent Agreement represents the sole and entire agreement of the parties hereto and supersedes all prior written or oral negotiations, agreements, or understandings between the parties. No party to this agreement has been induced to enter into the Consent Agreement by any representations or inducements except those expressly set forth in this written agreement. Further, all parties agree that to the extent any language in the agreement will be interpreted in a subsequent dispute, no ambiguous language shall be construed against the party drafting this Consent Agreement.

Dr. Pulakhandam acknowledges that she has had an opportunity to ask questions concerning the terms of this Consent Agreement and that all questions asked have been answered in a satisfactory manner.

Any action initiated by the Board based on alleged violations of this Consent Agreement shall comply with the Administrative Procedure Act, Chapter 119., Ohio Revised Code.

Dr. Pulakhandam hereby releases the Board, its members, employees, agents, officers and representatives jointly and severally from any and all liability arising from the within matter.

This Consent Agreement shall be considered a public record as that term is used in Section 149.43, Ohio Revised Code. Further, this information may be reported to appropriate organizations, data banks and governmental bodies. Dr. Pulakhandam acknowledges that her social security number will be used if this information is so reported and agrees to provide her social security number to the Board for such purposes.

EFFECTIVE DATE

It is expressly understood that this Consent Agreement is subject to ratification by the Board prior to signature by the Secretary and Supervising Member and shall become effective upon the last date of signature below. Further, Dr. Pulakhandam specifically acknowledges that the electronic transmission of a scanned or photostatic copy of any executed signature to this Consent Agreement, upon being received by the Board, shall be deemed to have the full legal force and effect as the original.


SREENATHA PULAKHANDAM, M.D.

3/11/19
DATE


KIM G. ROTHERMEL, M.D.
Secretary

4-10-19
DATE

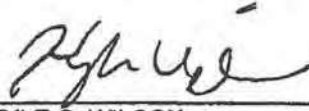

HEIDI DORN, ESQ
Attorney for Dr. Pulakhandam

3/11/19
DATE


BRUCE R. SAFERIN, D.P.M.
Supervising Member

04/10/2019
DATE

CONSENT AGREEMENT
SREELATHA PULAKHANDAM, M.D.
PAGE 6



KYLE C. WILCOX
Assistant Attorney General

4-10-19

DATE

Rev. 08-09-2017

Exhibit A



State Medical Board of
Ohio

3700
1000
1000
1000

June 13, 2018

Case number: 18-CRF- 0063

Sreelatha Pulakhandam, M.D.

Privacy Information

Dear Doctor Pulakhandam:

In accordance with Chapter 119., Ohio Revised Code, you are hereby notified that the State Medical Board of Ohio [Board] intends to determine whether or not to limit, revoke, permanently revoke, suspend, refuse to grant or register or renew or reinstate your license or certificate to practice medicine and surgery, or to reprimand you or place you on probation for one or more of the following reasons:

- (1) On or about September 20, 2017, you entered into Consent Agreement with the Louisiana Board of Medical Examiners [Louisiana Consent Agreement], effective on or about October 16, 2017, wherein your license to practice medicine in the State of Louisiana was placed on probation for one year, with terms and conditions including practice monitoring and quarterly reports, and completion of courses in professionalism, medical ethics, and proper prescribing. The Louisiana Consent Agreement specifically addresses allegations that you may have been directing clinical staff to fill out pre-signed prescriptions, including prescriptions for drugs containing buprenorphine, a Schedule III controlled substance, and to complete medical records on your patients while you were out of the country. Additionally, the Consent Agreement indicates that you may have falsified medical records to indicate that you examined patients on dates when you were out of the country.

A copy of the Louisiana Consent Agreement is attached hereto and incorporated herein.

The Louisiana Consent Agreement, as alleged in paragraph (1), individually and/or collectively, constitutes, "[a]ny of the following actions taken by an agency responsible for authorizing, certifying, or regulating an individual to practice a health care occupation or provide health care services in this state or another jurisdiction, for any reason other than the nonpayment of fees: the limitation, revocation, or suspension of an individual's license to practice; acceptance of an individual's license surrender; denial of a license; refusal to renew or reinstate a license; imposition of probation; or issuance of an order of censure or other reprimand," as that clause is used in Section 4731.22(B)(22), Ohio Revised Code.

Furthermore, for any violations that occurred on or after September 29, 2015, the board may impose a civil penalty in an amount that shall not exceed twenty thousand dollars, pursuant to Section 4731.225, Ohio Revised Code. The civil penalty may be in addition to any other action the board may take under section 4731.22, Ohio Revised Code.

Mailed 6-14-18

Pursuant to Chapter 119., Ohio Revised Code, you are hereby advised that you are entitled to a hearing in this matter. If you wish to request such hearing, the request must be made in writing and must be received in the offices of the State Medical Board within thirty days of the time of mailing of this notice.

You are further advised that, if you timely request a hearing, you are entitled to appear at such hearing in person, or by your attorney, or by such other representative as is permitted to practice before this agency, or you may present your position, arguments, or contentions in writing, and that at the hearing you may present evidence and examine witnesses appearing for or against you.

In the event that there is no request for such hearing received within thirty days of the time of mailing of this notice, the State Medical Board may, in your absence and upon consideration of this matter, determine whether or not to limit, revoke, permanently revoke, suspend, refuse to grant or register or renew or reinstate your certificate or license to practice medicine and surgery or to reprimand you or place you on probation.

Please note that, whether or not you request a hearing, Section 4731.22(L), Ohio Revised Code, provides that "[w]hen the board refuses to grant or issue a license or certificate to practice to an applicant, revokes an individual's license or certificate to practice, refuses to renew an individual's license or certificate to practice, or refuses to reinstate an individual's license or certificate to practice, the board may specify that its action is permanent. An individual subject to a permanent action taken by the board is forever thereafter ineligible to hold a license or certificate to practice and the board shall not accept an application for reinstatement of the license or certificate or for issuance of a new license or certificate."

Copies of the applicable sections are enclosed for your information.

Very truly yours,



Kim G. Rothermel, M.D.
Secretary

KGR/AMM/jmb
Enclosures

CERTIFIED MAIL #91 7199 9991 7036 6912 2426
RETURN RECEIPT REQUESTED

LOUISIANA STATE BOARD OF MEDICAL EXAMINERS

630 Camp Street, New Orleans, LA 70130

www.lsbme.la.gov



Telephone: (504) 568-6820

FAX: (504) 568-6893

Writer's Direct Dial:

(504) _____

IN THE MATTER OF

Sreelatha Pulakhandam, M.D.
(Certificate No. 201314),

Respondent

No. 2016 - I - 585

CONSENT
ORDER

The above-entitled proceeding was docketed for investigation by the Louisiana State Board of Medical Examiners (the "Board") following the receipt information which indicated that Sreelatha Pulakhandam, M.D. ("Dr. Pulakhandam"), who is, and was at all times material to the facts and matters alleged herein, a physician duly licensed by the Board to practice medicine in the state of Louisiana pursuant to the Louisiana Medical Practice Act, La. Rev. Stat. §§37:1261 *et seq.*, as evidenced by Certificate No. 201314, may have been directing clinic staff to fill out pre-signed prescriptions, including prescriptions for drugs containing buprenorphine, a Schedule III controlled substance, and to complete medical records on her patients while she was out of the country. Additionally, Dr. Pulakhandam may have falsified medical records to indicate that she examined patients on dates when she was out of the country.

As evidenced by her subscription hereto, Dr. Pulakhandam acknowledges that the foregoing information could provide the Investigating Officer for the Board with probable cause to pursue formal administrative proceedings against her for violation of the Louisiana Medical Practice Act, La. Rev. Stat. §§37:1285A(6), (13), (18), (30), and the Board Rules,¹ constituting

¹ Pursuant to La. R.S. §37:1285(A), the Board may suspend, revoke, or impose probation or other restrictions on the license of an individual licensed to practice medicine in the State of Louisiana as a result of: "(6) [p]rescribing, dispensing, or administering legally controlled substances or any dependency-induced medication without legitimate medical justification therefore or in other than a legal or legitimate manner;" "(13) [u]nprofessional conduct, including but not limited to . . . intentionally falsifying or fraudulently altering records, or failing to create or maintain medical records . . . [and] enabling the unauthorized practice of medicine;" "(18) [k]nowingly performing any act which, in any way, assists an unlicensed person to practice medicine;" and "(30) [v]iolation of any rules and regulations of the board. . . ." Pursuant to the Board Rules, physicians may not "falsely create or alter a medical record or destroy a medical record except as authorized by law." La. Admin Code 46:XLV.7603(A)(10). " Pursuant to the Board Rules, physicians may not "enter into any arrangement, as medical director or otherwise, that allows or condones an unlicensed individual to engage in the practice of medicine, as defined by R.S. 37:1261(1), in the absence of the

sufficient cause for the revocation, suspension or such other action against her license to practice medicine in the state of Louisiana as the Board may determine appropriate.

Recognizing her right to written notification of any charges that may be asserted against her as a result of this investigation, as well as the right to administrative adjudication of such charges, at which time she would be entitled to be represented by legal counsel, to call witnesses and to present evidence on her own behalf in defense or in mitigation of the charges made, and to a decision thereon by the Board based upon written findings of fact and conclusions of law, pursuant to La. Rev. Stat. §§49:955-965, Dr. Pulakhandam, nonetheless, hereby waives her right to formal adjudication and, pursuant to La. Rev. Stat. §49:955(D), consents to entry of the Order set forth hereinafter. Dr. Pulakhandam also acknowledges that she hereby waives any right to which she may be entitled pursuant to the Louisiana Administrative Procedure Act, La. Rev. Stat. §49:951, *et seq.*, or to which she otherwise may be afforded by any law to contest her agreement to or the force and effect of the Board's investigation or this document in any court or other forum. By her subscription hereto, Dr. Pulakhandam also hereby authorizes the I/O designated by the Board with respect hereto, to present this Consent Order to the Board for its consideration and to fully disclose to and discuss with the Board the nature and results of the investigation, and she waives any objection to such disclosures under La. Rev. Stat. §49:960. Dr. Pulakhandam expressly acknowledges that the disclosure of such information to the Board by the I/O shall be without prejudice to the I/O's authority to proceed with the filing and adjudication of an Administrative Complaint against her or to the Board's capacity to adjudicate such Complaint, should the Board decline to approve this Consent Order.

IT IS ORDERED that the license of Sreelatha Pulakhandam, M.D. to practice medicine in the state of Louisiana, as evidenced by Certificate No. 201314, is hereby placed on **PROBATION** for One (1) year; *provided, however*, that such licensure and Dr. Pulakhandam continuing exercise of rights and privileges granted thereby, shall be conditioned upon and subject to her acceptance of and strict compliance with the following terms, conditions and restrictions:

- (1) **Practice Monitoring and Quarterly Reports.** Within sixty (60) days of the effective date of this Order, Dr. Pulakhandam shall enter into an agreement with a Board-approved practice monitor to monitor and review Dr. Pulakhandam's medical practice during the probationary period. The practice monitor shall review no less than ten (10) records a quarter. The practice monitoring shall provide quarterly reports to the Board that will include an opinion as to whether Dr. Pulakhandam is practicing and documenting her patient's evaluation and treatment in accordance with the prevailing standards of a medical practice. Dr. Pulakhandam shall bear all costs associated with the practice monitor program.

physician's direction and immediate personal supervision—i.e., where the physician is physically present on the premises at all times that the licensed individual is on duty and retains full responsibility to patients for the training, delivery and results of all services rendered." La. Admin Code 46:XLV.7603(A)(7)(e).

(2) **Course on Professionalism and Medical Ethics.** Within one (1) year of the effective date of this Order, Dr. Pulakhandam shall attend and successfully complete a course (or courses) on professionalism and medical ethics. The course shall be approved in advance by the Board. On or before the expiration of one (1) year from the effective date of this Order Dr. Pulakhandam shall cause to be submitted to the Board written certification of satisfaction of the requirements of this provision.

(3) **Course on Proper Prescribing.** Within one (1) year of the effective date of this Order, Dr. Pulakhandam shall attend and successfully complete a course (or courses) on the proper prescribing of controlled substances. The course shall be approved in advance by the Board. On or before the expiration of one (1) year from the effective date of this Order Dr. Pulakhandam shall cause to be submitted to the Board written certification of satisfaction of the requirements of this provision.

(4) **Continuing Medical Education.** Dr. Pulakhandam shall obtain not less than fifty (50) credit hours per year during her probationary term through attendance at and participation in continuing medical education programs ("CME") accredited by the American College of Physicians, the American Medical Association, or such other national accrediting association or organization as the Board may approve in writing. On or before the anniversary of the effective date of this Order, Dr. Pulakhandam shall cause to be submitted to the Board written certification of the CME programs and credits completed by her during the preceding twelve (12) months.

(5) **Absence from State/Practice/Effect on Probation.** Should Dr. Pulakhandam at any time during the period of probation ordered herein be absent from the state of Louisiana, relocate to and/or take up residency in another state or country or discontinue practicing medicine for a period of thirty (30) days or more, or should she fail to renew her license to practice medicine in this state, she shall advise the Board in writing. In such instance, the probationary period ordered herein and all terms, conditions and restrictions thereof shall be deemed interrupted and extended and shall not commence to run until Dr. Pulakhandam notifies the Board in writing that she has returned to, relocated or taken up residency in, resumed the practice medicine in this state, or renewed her Louisiana medical license. In such instance, Dr. Pulakhandam shall not receive credit toward completion of the probationary period for the time during which she was absent from the State of Louisiana or while she was not engaged or licensed to practice medical psychology in this state.

(6) **Certification of Compliance with Probationary Terms.** At least sixty (60) days prior to the conclusion of the probationary term imposed herein, Dr. Pulakhandam shall provide the Board with an affidavit certifying that he has complied with each of the terms of probation imposed by this Order. The probationary period and all of its terms and conditions shall be, and shall be

deemed to be, extended and continued in full force and effect pending Dr. Pulakhandam compliance with the requirements of this provision.

(7) **Cooperation with Board's Probation and Compliance Officer.** Dr. Pulakhandam shall immediately notify the Board's Probation and Compliance Officer of any change in her current home and professional addresses and telephone numbers and she shall direct all matters required pursuant to this Consent Order to the attention of the Probation and Compliance Officer, with whom she shall cooperate on all matters and inquiries pertaining to her compliance with the terms, conditions and restrictions of this Order.

(8) **Probation Monitoring Fee.** For each year of the probationary term Dr. Pulakhandam shall pay the Board a probation monitoring fee of Three Hundred (\$300.00) Dollars. Payment of the initial fee shall be due not later than sixty (60) days from the effective date of this Order. All subsequent annual payments shall be due on or before the anniversary date of the initial fee payment.

(9) **Payment of Fine.** Within one (1) year of the effective date of this Order, Dr. Pulakhandam shall pay to the Board a fine in the amount of Five Thousand and no/100 (\$5,000.00) Dollars.

(10) **Effective Date.** This Consent Order shall be effective the date it is approved and accepted by the Board as shown by the signature of its representative below.

IT IS FURTHER ORDERED that any violation or failure of strict compliance with any of the terms, conditions or restrictions set forth by this Order by Dr. Pulakhandam shall be deemed adequate and sufficient cause, upon proof of such violation or failure, for such other action against Dr. Pulakhandam's license to practice medicine in the state of Louisiana as the Board may deem appropriate, as if such violations were enumerated among the causes provided in La. Rev. Stat. §37:1285(A).

IT IS FURTHER ORDERED that this Order shall be, and shall be deemed to be, a public record.

Signed at New Orleans, Louisiana, and effective on this 16th day of October, 2017.

**LOUISIANA STATE BOARD
OF MEDICAL EXAMINERS**

CERTIFIED TRUE COPY
[Signature]
Docket Clerk
Louisiana State Board of Medical Examiners
Date 11/24/17

By: *[Signature]*
Christy L. Valentine, M.D.
President

Acknowledgment and Consent on the following page

**ACKNOWLEDGMENT
AND CONSENT**

STATE OF LOUISIANA
PARISH OF St. Tammany

I, SREELATHA PULAKHANDAM, M.D., hereby acknowledge, approve, accept and consent to entry of the above and foregoing Order, this 20th day of September, 2017.

Sreelatha Pulakhandam
SREELATHA PULAKHANDAM, M.D.

WITNESSES:

Nicole Smith
Signature

Nicole Smith
Typed Name

Privacy Information
Address

Privacy Information
City/State/Zip Code

Jacques Duteil
Signature

Jacques Duteil
Typed Name

Privacy Information
Address

Privacy Information
City/State/Zip Code

Sworn to and subscribed before me this 20th day of September, 2017
in the presence of the two stated witnesses.

Angela J. Barron
Notary Public (Signature)

Angela J. Barron 134385
Printed Name & Notary or Bar Number





State Medical Board of
Ohio

300 Broad St., 3rd Floor
Columbus, Ohio 43215
(614) 456-3934
www.med.ohio.gov

June 13, 2018

Case number: 18-CRF- 0063

Sreelatha Pulakhandam, M.D.

Privacy Information

Dear Doctor Pulakhandam:

In accordance with Chapter 119., Ohio Revised Code, you are hereby notified that the State Medical Board of Ohio [Board] intends to determine whether or not to limit, revoke, permanently revoke, suspend, refuse to grant or register or renew or reinstate your license or certificate to practice medicine and surgery, or to reprimand you or place you on probation for one or more of the following reasons:

- (1) On or about September 20, 2017, you entered into Consent Agreement with the Louisiana Board of Medical Examiners [Louisiana Consent Agreement], effective on or about October 16, 2017, wherein your license to practice medicine in the State of Louisiana was placed on probation for one year, with terms and conditions including practice monitoring and quarterly reports, and completion of courses in professionalism, medical ethics, and proper prescribing. The Louisiana Consent Agreement specifically addresses allegations that you may have been directing clinical staff to fill out pre-signed prescriptions, including prescriptions for drugs containing buprenorphine, a Schedule III controlled substance, and to complete medical records on your patients while you were out of the country. Additionally, the Consent Agreement indicates that you may have falsified medical records to indicate that you examined patients on dates when you were out of the country.

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Mailed 6-14-18

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You are further advised that, if you timely request a hearing, you are entitled to appear at such hearing in person, or by your attorney, or by such other representative as is permitted to practice before this agency, or you may present your position, arguments, or contentions in writing, and that at the hearing you may present evidence and examine witnesses appearing for or against you.

In the event that there is no request for such hearing received within thirty days of the time of mailing of this notice, the State Medical Board may, in your absence and upon consideration of this matter, determine whether or not to limit, revoke, permanently revoke, suspend, refuse to grant or register or renew or reinstate your certificate or license to practice medicine and surgery or to reprimand you or place you on probation.

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Copies of the applicable sections are enclosed for your information.

Very truly yours,



Kim G. Rothermel, M.D.
Secretary

KGR/AMM/jmb
Enclosures

CERTIFIED MAIL #91 7199 9991 7036 6912 2426
RETURN RECEIPT REQUESTED

LOUISIANA STATE BOARD OF MEDICAL EXAMINERS

630 Camp Street, New Orleans, LA 70130
www.lsbme.la.gov



Telephone: (504) 568-8820
FAX: (504) 568-8883
Writer's Direct Dial:

(504) _____

IN THE MATTER OF

Sreelatha Pulakhandam, M.D.
(Certificate No. 201314),

Respondent

No. 2016 - I - 585

CONSENT
ORDER

The above-entitled proceeding was docketed for investigation by the Louisiana State Board of Medical Examiners (the "Board") following the receipt information which indicated that Sreelatha Pulakhandam, M.D. ("Dr. Pulakhandam"), who is, and was at all times material to the facts and matters alleged herein, a physician duly licensed by the Board to practice medicine in the state of Louisiana pursuant to the Louisiana Medical Practice Act, La. Rev. Stat. §§37:1261 *et seq.*, as evidenced by Certificate No. 201314, may have been directing clinic staff to fill out pre-signed prescriptions, including prescriptions for drugs containing buprenorphine, a Schedule III controlled substance, and to complete medical records on her patients while she was out of the country. Additionally, Dr. Pulakhandam may have falsified medical records to indicate that she examined patients on dates when she was out of the country.

As evidenced by her subscription hereto, Dr. Pulakhandam acknowledges that the foregoing information could provide the Investigating Officer for the Board with probable cause to pursue formal administrative proceedings against her for violation of the Louisiana Medical Practice Act, La. Rev. Stat. §§37:1285A(6), (13), (18), (30), and the Board Rules,¹ constituting

¹ Pursuant to La. R.S. §37:1285(A), the Board may suspend, revoke, or impose probation or other restrictions on the license of an individual licensed to practice medicine in the State of Louisiana as a result of: "(6) [p]rescribing, dispensing, or administering legally controlled substances or any dependency-induced medication without legitimate medical justification therefore or in other than a legal or legitimate manner;" "(13) [u]nprofessional conduct, including but not limited to . . . intentionally falsifying or fraudulently altering records, or failing to create or maintain medical records . . . [and] enabling the unauthorized practice of medicine;" "(18) [k]nowingly performing any act which, in any way, assists an unlicensed person to practice medicine;" and "(30) [v]iolation of any rules and regulations of the board. . . ." Pursuant to the Board Rules, physicians may not "falsely create or alter a medical record or destroy a medical record except as authorized by law." La. Admin Code 46:XLV.7603(A)(10). . . Pursuant to the Board Rules, physicians may not "enter into any arrangement, as medical director or otherwise, that allows or condones an unlicensed individual to engage in the practice of medicine, as defined by R.S. 37:1261(1), in the absence of the

sufficient cause for the revocation, suspension or such other action against her license to practice medicine in the state of Louisiana as the Board may determine appropriate.

Recognizing her right to written notification of any charges that may be asserted against her as a result of this investigation, as well as the right to administrative adjudication of such charges, at which time she would be entitled to be represented by legal counsel, to call witnesses and to present evidence on her own behalf in defense or in mitigation of the charges made, and to a decision thereon by the Board based upon written findings of fact and conclusions of law, pursuant to La. Rev. Stat. §§49:955-965, Dr. Pulakhandam, nonetheless, hereby waives her right to formal adjudication and, pursuant to La. Rev. Stat. §49:955(D), consents to entry of the Order set forth hereinafter. Dr. Pulakhandam also acknowledges that she hereby waives any right to which she may be entitled pursuant to the Louisiana Administrative Procedure Act, La. Rev. Stat. §49:951, *et seq.*, or to which she otherwise may be afforded by any law to contest her agreement to or the force and effect of the Board's investigation or this document in any court or other forum. By her subscription hereto, Dr. Pulakhandam also hereby authorizes the I/O designated by the Board with respect hereto, to present this Consent Order to the Board for its consideration and to fully disclose to and discuss with the Board the nature and results of the investigation, and she waives any objection to such disclosures under La. Rev. Stat. §49:960. Dr. Pulakhandam expressly acknowledges that the disclosure of such information to the Board by the I/O shall be without prejudice to the I/O's authority to proceed with the filing and adjudication of an Administrative Complaint against her or to the Board's capacity to adjudicate such Complaint, should the Board decline to approve this Consent Order.

IT IS ORDERED that the license of Sreelatha Pulakhandam, M.D. to practice medicine in the state of Louisiana, as evidenced by Certificate No. 201314, is hereby placed on **PROBATION** for One (1) year, *provided, however*, that such licensure and Dr. Pulakhandam continuing exercise of rights and privileges granted thereby, shall be conditioned upon and subject to her acceptance of and strict compliance with the following terms, conditions and restrictions:

- (1) **Practice Monitoring and Quarterly Reports.** Within sixty (60) days of the effective date of this Order, Dr. Pulakhandam shall enter into an agreement with a Board-approved practice monitor to monitor and review Dr. Pulakhandam's medical practice during the probationary period. The practice monitor shall review no less than ten (10) records a quarter. The practice monitoring shall provide quarterly reports to the Board that will include an opinion as to whether Dr. Pulakhandam is practicing and documenting her patient's evaluation and treatment in accordance with the prevailing standards of a medical practice. Dr. Pulakhandam shall bear all costs associated with the practice monitor program.

physician's direction and immediate personal supervision—i.e., where the physician is physically present on the premises at all times that the unlicensed individual is on duty and retains full responsibility to patients for the training, delivery and results of all services rendered." La. Admin Code 46:XLV.7603(A)(7)(a).

(2) **Course on Professionalism and Medical Ethics.** Within one (1) year of the effective date of this Order, Dr. Pulakhandam shall attend and successfully complete a course (or courses) on professionalism and medical ethics. The course shall be approved in advance by the Board. On or before the expiration of one (1) year from the effective date of this Order Dr. Pulakhandam shall cause to be submitted to the Board written certification of satisfaction of the requirements of this provision.

(3) **Course on Proper Prescribing.** Within one (1) year of the effective date of this Order, Dr. Pulakhandam shall attend and successfully complete a course (or courses) on the proper prescribing of controlled substances. The course shall be approved in advance by the Board. On or before the expiration of one (1) year from the effective date of this Order Dr. Pulakhandam shall cause to be submitted to the Board written certification of satisfaction of the requirements of this provision.

(4) **Continuing Medical Education.** Dr. Pulakhandam shall obtain not less than fifty (50) credit hours per year during her probationary term through attendance at and participation in continuing medical education programs ("CME") accredited by the American College of Physicians, the American Medical Association, or such other national accrediting association or organization as the Board may approve in writing. On or before the anniversary of the effective date of this Order, Dr. Pulakhandam shall cause to be submitted to the Board written certification of the CME programs and credits completed by her during the preceding twelve (12) months.

(5) **Absence from State/Practice/Effect on Probation.** Should Dr. Pulakhandam at any time during the period of probation ordered herein be absent from the state of Louisiana, relocate to and/or take up residency in another state or country or discontinue practicing medicine for a period of thirty (30) days or more, or should she fail to renew her license to practice medicine in this state, she shall advise the Board in writing. In such instance, the probationary period ordered herein and all terms, conditions and restrictions thereof shall be deemed interrupted and extended and shall not commence to run until Dr. Pulakhandam notifies the Board in writing that she has returned to, relocated or taken up residency in, resumed the practice medicine in this state, or renewed her Louisiana medical license. In such instance, Dr. Pulakhandam shall not receive credit toward completion of the probationary period for the time during which she was absent from the State of Louisiana or while she was not engaged or licensed to practice medical psychology in this state.

(6) **Certification of Compliance with Probationary Terms.** At least sixty (60) days prior to the conclusion of the probationary term imposed herein, Dr. Pulakhandam shall provide the Board with an affidavit certifying that he has complied with each of the terms of probation imposed by this Order. The probationary period and all of its terms and conditions shall be, and shall be

deemed to be, extended and continued in full force and effect pending Dr. Pulakhandam compliance with the requirements of this provision.

(7) **Cooperation with Board's Probation and Compliance Officer.** Dr. Pulakhandam shall immediately notify the Board's Probation and Compliance Officer of any change in her current home and professional addresses and telephone numbers and she shall direct all matters required pursuant to this Consent Order to the attention of the Probation and Compliance Officer, with whom she shall cooperate on all matters and inquiries pertaining to her compliance with the terms, conditions and restrictions of this Order.

(8) **Probation Monitoring Fee.** For each year of the probationary term Dr. Pulakhandam shall pay the Board a probation monitoring fee of Three Hundred (\$300.00) Dollars. Payment of the initial fee shall be due not later than sixty (60) days from the effective date of this Order. All subsequent annual payments shall be due on or before the anniversary date of the initial fee payment.

(9) **Payment of Fine.** Within one (1) year of the effective date of this Order, Dr. Pulakhandam shall pay to the Board a fine in the amount of Five Thousand and no/100 (\$5,000.00) Dollars.

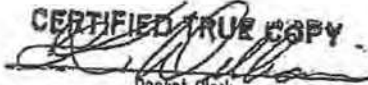
(10) **Effective Date.** This Consent Order shall be effective the date it is approved and accepted by the Board as shown by the signature of its representative below.

IT IS FURTHER ORDERED that any violation or failure of strict compliance with any of the terms, conditions or restrictions set forth by this Order by Dr. Pulakhandam shall be deemed adequate and sufficient cause, upon proof of such violation or failure, for such other action against Dr. Pulakhandam's license to practice medicine in the state of Louisiana as the Board may deem appropriate, as if such violations were enumerated among the causes provided in La. Rev. Stat. §37:1285(A).

IT IS FURTHER ORDERED that this Order shall be, and shall be deemed to be, a public record.

Signed at New Orleans, Louisiana, and effective on this 16th day of October, 2017.

**LOUISIANA STATE BOARD
OF MEDICAL EXAMINERS**

CERTIFIED TRUE COPY

Docket Clerk
Louisiana State Board of Medical Examiners
Date 11/29/17

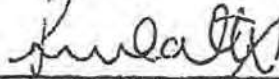
By: 
Christy L. Valentine, M.D.
President

Acknowledgment and Consent on the following page

**ACKNOWLEDGMENT
AND CONSENT**

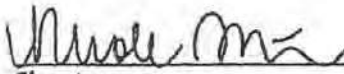
STATE OF LOUISIANA
PARISH OF St. Tammany

I, SREELATHA PULAKHANDAM, M.D., hereby acknowledge, approve, accept and consent to entry of the above and foregoing Order, this 20th day of September, 2017.



SREELATHA PULAKHANDAM, M.D.

WITNESSES:

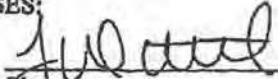


Signature
Nicole Smith

Typed Name
[Redacted]

Privacy Information
Address
[Redacted]

Privacy Information
City/State/Zip Code



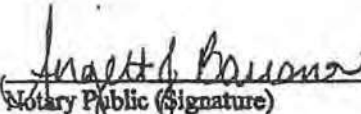
Signature
Jacques Duteil

Typed Name
[Redacted]

Privacy Information
Address
[Redacted]

Privacy Information
City/State/Zip Code

Sworn to and subscribed before me this 20th day of September, 2017
in the presence of the two stated witnesses.



Notary Public (Signature)

Angela J. Barron 134385

Printed Name & Notary or Bar Number



STATE OF FLORIDA
BOARD OF MEDICINE

Final Order No. DOH-19-0722-^S-MQA

FILED DATE: APR 30 2019
Department of Health
By: Bryce Sanders
Deputy Agency Clerk

DEPARTMENT OF HEALTH,

Petitioner,

vs.

DOH CASE NO.: 2017-19955
LICENSE NO.: ME0100632

SREELATHA PULAKHANDAM, M.D.,

Respondent.

FINAL ORDER

THIS CAUSE came before the BOARD OF MEDICINE (Board) pursuant to Sections 120.569 and 120.57(4), Florida Statutes, on April 5, 2019, in West Palm Beach, Florida, for the purpose of considering a Settlement Agreement (attached hereto as Exhibit A) entered into between the parties in this cause. Upon consideration of the Settlement Agreement, the documents submitted in support thereof, the arguments of the parties, and being otherwise fully advised in the premises,

IT IS HEREBY ORDERED AND ADJUDGED that the Settlement Agreement as submitted be and is hereby approved and adopted in toto and incorporated herein by reference with the following clarification:

The costs set forth in Paragraph 3 of the Stipulated Disposition shall be set at \$1,340.45.

EXHIBIT 4

Accordingly, the parties shall adhere to and abide by all the terms and conditions of the Settlement Agreement as clarified above.

This Final Order shall take effect upon being filed with the Clerk of the Department of Health.

DONE AND ORDERED this 26th day of April,
2019.

BOARD OF MEDICINE

Cynthia A. Kemp for
Cynthia Kemp, J.D., Executive Director
For Steven Rosenberg, M.D., Chair

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Final Order has been provided by U.S. Mail to SREELATHA PULAKHANDAM, M.D., 680 Millikens Bend, Covington, Louisiana 70433; to Julia Ingle, Esquire, Lubell Rosen, 200 S. Andrews Avenue, Suite 900, Fort Lauderdale, Florida 33301; by email to Allison Dudley, Assistant General Counsel, Department of Health, at Allison.Dudley@flhealth.gov; and by email to Edward A. Tellechea, Chief Assistant Attorney General, at

Ed.Tellechea@myfloridalegal.com this 30th day of
April, 2019.

Brygel Sanders

Deputy Agency Clerk

Mission:

To protect, promote & improve the health of all people in Florida through integrated state, county & community efforts.



Ron DeSantis
Governor

Vision: To be the Healthiest State in the Nation

MEMORANDUM

DATE: April 26, 2019
TO: Mark Whitten, J.D. Bureau Chief
Bureau of Health Care Practitioner Regulation
FROM: Claudia J. Kemp
Executive Director, Board of Medicine
SUBJECT: Delegation of Authority

This is to advise you that while I am out of the office Friday, April 26, 2019, the following Program Operations Administrator is delegated to serve as Acting Executive Director for the Board of Medicine.

Crystal Sanford Program Operations Administrator (850) 245- 4132

CK/rh

cc:

Sylvia Sanders
Staff, Board of Medicine
Board and Council Chairs

Florida Department of Health
Division of Medical Quality Assurance
Bureau of Health Care Practitioner Regulation / Board of Medicine
4052 Bald Cypress Way, Bin C-03 • Tallahassee, Florida 32399
PHONE: 850/245-4131 FAX: 850/412-1268 or 850/486-0596
FloridaHealth.gov

 **Accredited Health Department**
Public Health Accreditation Board

**STATE OF FLORIDA
DEPARTMENT OF HEALTH**

DEPARTMENT OF HEALTH,

Petitioner,

v.

DOH Case No. 2017-19955

SREELATHA PULAKHANDAM, M.D.,

Respondent.

SETTLEMENT AGREEMENT

Sreelatha Pulakhandam, M.D., referred to as the "Respondent," and the Department of Health, referred to as "Department," stipulate and agree to the following Agreement and to the entry of a Final Order of the Board of Medicine, referred to as "Board," incorporating the Stipulated Facts and Stipulated Disposition in this matter.

Petitioner is the state agency charged with regulating the practice of medicine pursuant to Section 20.43, Florida Statutes, and Chapter 456, Florida Statutes, and Chapter 458, Florida Statutes.

STIPULATED FACTS

1. At all times material hereto, Respondent was a licensed physician in the State of Florida having been issued license number ME 100632.
2. The Department charged Respondent with an Administrative Complaint that was filed and properly served upon Respondent alleging violations of Chapter 458, Florida Statutes, and the rules adopted pursuant thereto. A true and correct copy of the Administrative Complaint is attached hereto as Exhibit A.

3. For purposes of these proceedings, Respondent neither admits nor denies the allegations of fact contained in the Administrative Complaint.

STIPULATED CONCLUSIONS OF LAW

1. Respondent admits that, in her capacity as a licensed physician, she is subject to the provisions of Chapters 456 and 458, Florida Statutes, and the jurisdiction of the Department and the Board.

2. Respondent admits that the facts alleged in the Administrative Complaint, if proven, would constitute violations of Chapters 456 and 458, Florida Statutes.

3. Respondent agrees that the Stipulated Disposition in this case is fair, appropriate and acceptable to Respondent.

STIPULATED DISPOSITION

1. **Letter Of Concern** - The Board shall issue a Letter of Concern against Respondent's license.

2. **Fine** - The Board shall impose an administrative fine of ~~Six~~ ***Thousand Five Hundred Dollars and Zero Cents (\$6,500.00)*** against Respondent's license which Respondent shall pay to: Payments, Department of Health, Compliance Management Unit, Bin C-76, P.O. Box 6320, Tallahassee, FL 32314-6320, within sixty (60) days from the date of filing of the Final Order accepting this Agreement ("Final Order"). **All fines shall be paid by cashier's check or money order.** Any change in the terms of payment of any fine imposed by the Board **must be approved in advance by the Probation Committee of the Board.**

RESPONDENT ACKNOWLEDGES THAT THE TIMELY PAYMENT OF THE FINE IS HER LEGAL OBLIGATION AND RESPONSIBILITY AND RESPONDENT AGREES TO CEASE PRACTICING IF THE FINE IS NOT PAID AS AGREED IN THIS SETTLEMENT AGREEMENT. SPECIFICALLY, IF RESPONDENT HAS NOT RECEIVED WRITTEN CONFIRMATION WITHIN 75 DAYS OF THE DATE OF FILING OF THE FINAL ORDER THAT THE FULL AMOUNT OF THE FINE HAS BEEN RECEIVED BY THE BOARD OFFICE, RESPONDENT AGREES TO CEASE PRACTICE UNTIL RESPONDENT RECEIVES SUCH WRITTEN CONFIRMATION FROM THE BOARD.

3. **Reimbursement of Costs** - Pursuant to Section 456.072, Florida Statutes, Respondent agrees to pay the Department for the Department's costs incurred in the investigation and prosecution of this case ("Department costs"). Such costs exclude the costs of obtaining supervision or monitoring of the practice, the cost of quality assurance reviews, any other costs Respondent incurs to comply with the Final Order, and the Board's administrative costs directly associated with Respondent's probation, if any. Respondent agrees that the amount of Department costs to be paid in this case is *Three Hundred Twenty-Six Dollars and Sixty-One Cents (\$326.61)*, but shall not exceed *Two Thousand Three Hundred Twenty-Six Dollars and Sixty-One Cents (\$2,326.61)*. Respondent will pay such Department costs to: Payments, Department of Health, Compliance Management Unit, Bln C-76, P.O. Box 6320, Tallahassee, FL 32314-6320, within sixty (60) days from the date of filing of the Final Order. **All costs shall be paid by cashier's check or money order.** Any change in the terms of payment of

costs imposed by the Board must be approved in advance by the Probation Committee of the Board.

RESPONDENT ACKNOWLEDGES THAT THE TIMELY PAYMENT OF THE COSTS IS HER LEGAL OBLIGATION AND RESPONSIBILITY AND RESPONDENT AGREES TO CEASE PRACTICING IF THE COSTS ARE NOT PAID AS AGREED IN THIS SETTLEMENT AGREEMENT. SPECIFICALLY, IF RESPONDENT HAS NOT RECEIVED WRITTEN CONFIRMATION WITHIN 25 DAYS OF THE DATE OF FILING OF THE FINAL ORDER THAT THE FULL AMOUNT OF THE COSTS NOTED ABOVE HAS BEEN RECEIVED BY THE BOARD OFFICE, RESPONDENT AGREES TO CEASE PRACTICE UNTIL RESPONDENT RECEIVES SUCH WRITTEN CONFIRMATION FROM THE BOARD.

4. Laws And Rules Course - Respondent shall document completion of a Board-approved laws and rules course within one (1) year from the date the Final Order is filed.

5. Continuing Medical Education – "Risk Management" – Respondent shall complete this requirement and document such completion within one (1) year from the date the Final Order is filed. Respondent shall satisfy this requirement in one of the two following ways:

(a) Respondent shall complete five (5) hours of CME in "Risk Management" after first obtaining written advance approval from the Board's Probation Committee of such proposed course, and shall submit documentation of such completion,

In the form of certified copies of the receipts, vouchers, certificates, or other official proof of completion, to the Board's Probation Committee; or

(b) Respondent shall complete (5) five hours of CME in risk management by attending one full day or eight (8) hours, whichever is more, of disciplinary hearings at a regular meeting of the Board of Medicine. In order to receive such credit, Respondent must sign in with the Executive Director of the Board before the meeting day begins, Respondent must remain in continuous attendance during the full day or eight (8) hours of disciplinary hearings, whichever is more, and Respondent must sign out with the Executive Director of the Board at the end of the meeting day or at such other earlier time as affirmatively authorized by the Board. Respondent may not receive CME credit in risk management for attending the disciplinary hearings portion of a Board meeting unless the Respondent is attending the disciplinary hearings portion for the sole purpose of obtaining the CME credit in risk management. In other words, Respondent may not receive such credit if appearing at the Board meeting for any other purpose, such as pending action against Respondent's medical license.

STANDARD PROVISIONS

1. Appearance - Respondent is required to appear before the Board at the meeting of the Board where this Agreement is considered.
2. No Force or Effect until Final Order - It is expressly understood that this Agreement is subject to the approval of the Board and the Department. In this regard, the foregoing paragraphs (and only the foregoing paragraphs) shall have no force

and effect unless the Board enters a Final Order incorporating the terms of this Agreement.

3. **Continuing Medical Education** - Unless otherwise provided in this Agreement Respondent shall first submit a written request to the Probation Committee for approval prior to performance of said CME course(s). Respondent shall submit documentation to the Board's Probation Committee of having completed a CME course in the form of certified copies of the receipts, vouchers, certificates, or other papers, such as physician's recognition awards, documenting completion of this medical course within one (1) year of the filing of the Final Order in this matter. All such documentation shall be sent to the Board's Probation Committee, regardless of whether some or any of such documentation was provided previously during the course of any audit or discussion with counsel for the Department. CME hours required by this Agreement shall be in addition to those hours required for renewal of licensure. Unless otherwise approved by the Board's Probation Committee, such CME course(s) shall consist of a formal, live lecture format.

4. **Addresses** - Respondent must provide current residence and practice addresses to the Board. Respondent shall notify the Board in writing within ten (10) days of any changes of said addresses.

5. **Future Conduct** - In the future, Respondent shall not violate Chapter 456, 458 or 893, Florida Statutes, or the rules promulgated pursuant thereto, or any other state or federal law, rule, or regulation relating to the practice or the ability to practice medicine to include, but not limited to, all statutory requirements related to practitioner

profile and licensure renewal updates. Prior to signing this agreement, the Respondent shall read Chapters 456, 458 and 893 and the Rules of the Board of Medicine, at Chapter 6488, Florida Administrative Code.

6. **Violation of Terms** - It is expressly understood that a violation of the terms of this Agreement shall be considered a violation of a Final Order of the Board, for which disciplinary action may be initiated pursuant to Chapters 456 and 458, Florida Statutes.

7. **Purpose of Agreement** - Respondent, for the purpose of avoiding further administrative action with respect to this cause, executes this Agreement. In this regard, Respondent authorizes the Board to review and examine all investigative file materials concerning Respondent prior to or in conjunction with consideration of the Agreement. Respondent agrees to support this Agreement at the time it is presented to the Board and shall offer no evidence, testimony or argument that disputes or contravenes any stipulated fact or conclusion of law. Furthermore, should this Agreement not be accepted by the Board, it is agreed that presentation to and consideration of this Agreement and other documents and matters by the Board shall not unfairly or illegally prejudice the Board or any of its members from further participation, consideration or resolution of these proceedings.

8. **No Preclusion Of Additional Proceedings** - Respondent and the Department fully understand that this Agreement and subsequent Final Order will in no way preclude additional proceedings by the Board and/or the Department against

Respondent for acts or omissions not specifically set forth in the Administrative Complaint attached as Exhibit A.

9. Waiver Of Attorney's Fees And Costs - Upon the Board's adoption of this Agreement, the parties hereby agree that with the exception of Department costs noted above, the parties will bear their own attorney's fees and costs resulting from prosecution or defense of this matter. Respondent waives the right to seek any attorney's fees or costs from the Department and the Board in connection with this matter.

10. Waiver of Further Procedural Steps - Upon the Board's adoption of this Agreement, Respondent expressly waives all further procedural steps and expressly waives all rights to seek judicial review of or to otherwise challenge or contest the validity of the Agreement and the Final Order of the Board Incorporating said Agreement.

[Signatures appear on the following page.]

SIGNED this 01st day of Oct., 2018.


Sreelatha Pulakhandam M.D.

STATE OF ~~FLORIDA~~ LA
COUNTY OF St. Tammany

BEFORE ME personally appeared Sreelatha Pulakhandam, whose
identity is known to me or who produced LA DL (type of
identification) and who, under oath, acknowledges that her signature appears above
for a settlement agreement.

SWORN TO and subscribed before me this 01 day of Oct.,
2018.

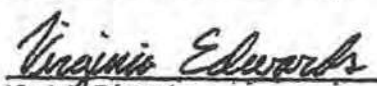

NOTARY PUBLIC

Salvatore A. Morikano, II
Notary Public for Life
Parish of St. Tammany, LA
Notary ID #98181

My Commission Expires:

APPROVED this 2nd day of October, 2018.

Celeste Philip, MD, MPH
Surgeon General and Secretary

By: 
Virginia Edwards
Assistant General Counsel
Department of Health

**STATE OF FLORIDA
DEPARTMENT OF HEALTH**

DEPARTMENT OF HEALTH,

PETITIONER,

v.

CASE NO. 2017-19955

SREELATHA PULAKHANDAM, M.D.,

RESPONDENT.

ADMINISTRATIVE COMPLAINT

Petitioner Department of Health files this Administrative Complaint before the Board of Medicine against Respondent Sreelatha Pulakhandam, M.D., and alleges:

1. Petitioner is the state agency charged with regulating the practice of Medicine pursuant to Section 20.43, Florida Statutes; Chapter 456, Florida Statutes; and Chapter 458, Florida Statutes.

2. At all times material to this Complaint, Respondent was a licensed medical doctor within the state of Florida, having been issued license number ME 100632.

3. Respondent's address of record is

Privacy Information

Privacy Information

4. On or about October 16, 2017, the Louisiana State Board of Medical Examiners took action against the Respondent's Louisiana medical license in Consent Order 2016-I-585 due to Respondent allegedly directing clinical staff to fill out pre-signed prescriptions and complete medical records for patients while Respondent was out of the country, and for falsifying records to indicate medical exams were performed by Respondent when Respondent was out of the county.

5. The Consent Order placed Respondent on probation for one year, requiring supervision and the submission of quarterly reports; requires the completion of courses on professionalism, ethics, and proper prescribing; requires 50 hours of continued medical education; and assessed a fine of five thousand dollars (\$5,000).

6. The October 16, 2017 Consent Order was offered in response to or in anticipation of the filing of administrative charges against Respondent's license to practice medicine in Louisiana.

7. Respondent did not report the Louisiana Board action to the Florida Board of Medicine, in writing, within thirty (30) days.

8. Respondent did not update her practitioner profile with the Louisiana Board action within fifteen (15) days.

Count I

9. Petitioner re-alleges and incorporates by reference paragraphs one (1) through six (6), as if fully set forth herein.

10. Section 458.331(1)(b), Florida Statutes (2017), provides that having a license or the authority to practice medicine revoked, suspended, or otherwise acted against, including the denial of licensure, by the licensing authority of any jurisdiction, including its agencies or subdivisions, constitutes grounds for disciplinary action by the Board of Medicine. The licensing authority's acceptance of a Consent Order shall be construed as action against the physician's license.

11. On or about October 16, 2017, the Louisiana State Board of Medical Examiners took action against the Respondent's Louisiana medical license via Consent Order 2016-I-585.

12. Based on the foregoing, respondent has violated Section 458.331(1)(b), Florida Statutes (2017), by having her Louisiana medical license acted against by the licensing authority of Louisiana.

Count II

13. Petitioner re-alleges and incorporates by reference paragraphs one (1) through seven (7), as if fully set forth herein.

14. Section 458.331(1)(kk), Florida Statutes (2017), provides that failing to report to the Board of Medicine, in writing, within 30 days, when action, as defined in Section 458.331(1)(b), Florida Statutes, is taken against one's license to practice as a physician in another state, territory or country, constitutes grounds for discipline by the Board of Medicine.

15. Respondent failed to report the October 16, 2017, action taken against her Louisiana medical license by Louisiana State Board of Medical Examiners to the Florida Board of Medicine, in writing, within 30 days.

16. Based on the foregoing, Respondent has violated Section 458.331(1)(kk), Florida Statutes (2017).

Count III

17. Petitioner re-alleges and incorporates by reference paragraphs one (1) through eight (8), as if fully set forth herein.

18. Section 456.072(1)(w), Florida Statutes (2017), provides that failing to comply with the requirements for profiling and credentialing, including but not limited to, failing to provide initial information, failing to timely provide updated information, or making misleading, untrue, deceptive, or fraudulent representations on a profile, credentialing, or initial

or renewal licensure application constitutes grounds for discipline by the Board of Medicine.

19. Respondent failed to update her practitioner profile to reflect the October 16, 2017 action taken against her Louisiana medical license by Louisiana State Board of Medical Examiners.

20. Based on the foregoing, Respondent has violated Section 456.072(1)(w), Florida Statutes (2017).

WHEREFORE, the Petitioner respectfully requests that the Board of Medicine enter an order imposing one or more of the following penalties: permanent revocation or suspension of Respondent's license, restriction of practice, Imposition of an administrative fine, issuance of a reprimand, placement of the Respondent on probation, corrective action, refund of fees billed or collected, remedial education and/or any other relief that the Board deems appropriate.

[Signature appears on the following page.]

SIGNED this 21st day of May, 2018.

Celeste Phillip, MD, MPH
Surgeon General and Secretary

Virginia Edwards

Virginia Edwards
Assistant General Counsel
Florida Bar Number 1003243
DOH-Prosecution Services Unit
4052 Bald Cypress Way-Bln C-65
Tallahassee, Florida 32399-3265
Telephone: (850) 558-9892
Facsimile: (850) 245-4684
Email: Virginia.Edwards@flhealth.gov

FILED
DEPARTMENT OF HEALTH
DEPUTY CLERK
CLERK Amber Greene
DATE MAY 21 2018

PCP Date: May 18, 2018

PCP Members: Georges El-Bahri, M.D.; Sarvam TerKonda, M.D.; Brigette Goersch

NOTICE OF RIGHTS

Respondent has the right to request a hearing to be conducted in accordance with Section 120.569 and 120.57, Florida Statutes, to be represented by counsel or other qualified representative, to present evidence and argument, to call and cross-examine witnesses and to have subpoena and subpoena duces tecum issued on his or her behalf if a hearing is requested.

A request or petition for an administrative hearing must be in writing and must be received by the Department within 21 days from the day Respondent received the Administrative Complaint, pursuant to Rule 28-106.111(2), Florida Administrative Code. If Respondent fails to request a hearing within 21 days of receipt of this Administrative Complaint, Respondent waives the right to request a hearing on the facts alleged in this Administrative Complaint pursuant to Rule 28-106.111(4), Florida Administrative Code. Any request for an administrative proceeding to challenge or contest the material facts or charges contained in the Administrative Complaint must conform to Rule 28-106.2015(5), Florida Administrative Code.

Mediation under Section 120.573, Florida Statutes, is not available to resolve this Administrative Complaint.

NOTICE REGARDING ASSESSMENT OF COSTS

Respondent is placed on notice that Petitioner has incurred costs related to the investigation and prosecution of this matter. Pursuant to Section 456.072(4), Florida Statutes, the Board shall assess costs related to the investigation and prosecution of a disciplinary matter, which may include attorney hours and costs, on the Respondent in addition to any other discipline imposed.

**STATE OF FLORIDA
DEPARTMENT OF HEALTH**

DEPARTMENT OF HEALTH,

PETITIONER,

v.

CASE NO. 2017-19955

SREELATHA PULAKHANDAM, M.D.,

RESPONDENT.

ADMINISTRATIVE COMPLAINT

Petitioner Department of Health files this Administrative Complaint before the Board of Medicine against Respondent Sreelatha Pulakhandam, M.D., and alleges:

1. Petitioner is the state agency charged with regulating the practice of Medicine pursuant to Section 20.43, Florida Statutes; Chapter 456, Florida Statutes; and Chapter 458, Florida Statutes.

2. At all times material to this Complaint, Respondent was a licensed medical doctor within the state of Florida, having been issued license number ME 100632.

3. Respondent's address of record is **Privacy Information**

Privacy Information

4. On or about October 16, 2017, the Louisiana State Board of Medical Examiners took action against the Respondent's Louisiana medical license in Consent Order 2016-I-585 due to Respondent allegedly directing clinical staff to fill out pre-signed prescriptions and complete medical records for patients while Respondent was out of the country, and for falsifying records to indicate medical exams were performed by Respondent when Respondent was out of the county.

5. The Consent Order placed Respondent on probation for one year, requiring supervision and the submission of quarterly reports; requires the completion of courses on professionalism, ethics, and proper prescribing; requires 50 hours of continued medical education; and assessed a fine of five thousand dollars (\$5,000).

6. The October 16, 2017 Consent Order was offered in response to or in anticipation of the filing of administrative charges against Respondent's license to practice medicine in Louisiana.

7. Respondent did not report the Louisiana Board action to the Florida Board of Medicine, in writing, within thirty (30) days.

8. Respondent did not update her practitioner profile with the Louisiana Board action within fifteen (15) days.

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11. On or about October 16, 2017, the Louisiana State Board of Medical Examiners took action against the Respondent's Louisiana medical license via Consent Order 2016-I-585.

12. Based on the foregoing, respondent has violated Section 458.331(1)(b), Florida Statutes (2017), by having her Louisiana medical license acted against by the licensing authority of Louisiana.

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16. Based on the foregoing, Respondent has violated Section 458.331(1)(kk), Florida Statutes (2017).

Count III

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18. Section 456.072(1)(w), Florida Statutes (2017), provides that failing to comply with the requirements for profiling and credentialing, including but not limited to, failing to provide initial information, failing to timely provide updated information, or making misleading, untrue, deceptive, or fraudulent representations on a profile, credentialing, or initial

or renewal licensure application constitutes grounds for discipline by the Board of Medicine.

19. Respondent failed to update her practitioner profile to reflect the October 16, 2017 action taken against her Louisiana medical license by Louisiana State Board of Medical Examiners.

20. Based on the foregoing, Respondent has violated Section 456.072(1)(w), Florida Statutes (2017).

WHEREFORE, the Petitioner respectfully requests that the Board of Medicine enter an order imposing one or more of the following penalties: permanent revocation or suspension of Respondent's license, restriction of practice, imposition of an administrative fine, issuance of a reprimand, placement of the Respondent on probation, corrective action, refund of fees billed or collected, remedial education and/or any other relief that the Board deems appropriate.

[Signature appears on the following page.]

SIGNED this 21st day of May, 2018.

Celeste Philip, MD, MPH
Surgeon General and Secretary

Virginia Edwards

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FILED
DEPARTMENT OF HEALTH
DEPUTY CLERK
CLERK Amber Greene
DATE MAY 21 2018

PCP Date: May 18, 2018

PCP Members: Georges El-Bahri, M.D.; Sarvam TerKonda, M.D.; Brigette Goersch

NOTICE OF RIGHTS

Respondent has the right to request a hearing to be conducted in accordance with Section 120.569 and 120.57, Florida Statutes, to be represented by counsel or other qualified representative, to present evidence and argument, to call and cross-examine witnesses and to have subpoena and subpoena duces tecum issued on his or her behalf if a hearing is requested.

A request or petition for an administrative hearing must be in writing and must be received by the Department within 21 days from the day Respondent received the Administrative Complaint, pursuant to Rule 28-106.111(2), Florida Administrative Code. If Respondent fails to request a hearing within 21 days of receipt of this Administrative Complaint, Respondent waives the right to request a hearing on the facts alleged in this Administrative Complaint pursuant to Rule 28-106.111(4), Florida Administrative Code. Any request for an administrative proceeding to challenge or contest the material facts or charges contained in the Administrative Complaint must conform to Rule 28-106.2015(5), Florida Administrative Code.

Mediation under Section 120.573, Florida Statutes, is not available to resolve this Administrative Complaint.

NOTICE REGARDING ASSESSMENT OF COSTS

Respondent is placed on notice that Petitioner has incurred costs related to the investigation and prosecution of this matter. Pursuant to Section 456.072(4), Florida Statutes, the Board shall assess costs related to the investigation and prosecution of a disciplinary matter, which may include attorney hours and costs, on the Respondent in addition to any other discipline imposed.