

**TRUE AND EXACT
COPY OF ORIGINAL**

**BEFORE THE MINNESOTA
BOARD OF MEDICAL PRACTICE**

In the Matter of
the Medical License of
Lian S. Chang, M.D.
Year of Birth: 1950
License Number: 34766

STIPULATION AND ORDER

IT IS HEREBY STIPULATED AND AGREED, by and between Lian S. Chang, M.D. ("Respondent"), and the Complaint Review Committee ("Committee") of the Minnesota Board of Medical Practice ("Board"), as follows:

1. During all times herein, Respondent has been and now is subject to the jurisdiction of the Board from which she holds a license to practice medicine and surgery in the State of Minnesota.

2. Respondent has been advised by Board representatives that she may choose to be represented by legal counsel in this matter. Respondent has chosen to be represented by Sarah M. Hoffman, Bassford Remele, 100 South Fifth Street, Suite 1500, Minneapolis, Minnesota 55402. The Committee was represented by Daniel S. Schueppert, Assistant Attorney General, 445 Minnesota Street, Suite 1400, St. Paul, Minnesota 55101, (651) 728-7238.

FACTS

3. For the purpose of this Stipulation, the Board may consider the following facts as true:

a. Respondent was licensed by the Board to practice medicine and surgery in the State of Minnesota on September 14, 1991.

b. On December 3, 2018, the Board received a complaint alleging that Respondent overmedicated a patient, a vulnerable adult and client of an assisted living facility where Respondent regularly saw patients.

c. In response to the complaint, the Board initiated an investigation including a review of Respondent's patient care and documentation. The investigation revealed that Respondent's medical record legibility, documentation, and polypharmacy medication management for geriatric psychiatric patients did not meet the minimum standard of acceptable and prevailing medical practice.

d. On March 25, 2021, Respondent met with the Committee to discuss the allegations. In Respondent's written response and during the conference, Respondent described her documentation practices and that she serves a complex patient population. The Committee discussed the matter and decided to offer Respondent this Stipulation and Order.

STATUTES

4. The Committee views Respondent's practices as inappropriate in such a way as to require Board action under Minnesota Statutes section 147.091, subdivision 1(k) (engaged in conduct that departs from or fails to conform to the minimal standards of acceptable and prevailing medical practice), and (o) (improperly managed medical records, including failure to maintain adequate medical records) (2020). Respondent agrees that the conduct cited above constitutes a reasonable basis in law and fact to justify the disciplinary action under this statute.

REMEDY

5. Upon this Stipulation and all of the files, records, and proceedings herein, and without any further notice or hearing herein, the Board may make and enter an order disciplining Respondent's license to practice medicine and surgery in the State of Minnesota as follows:

a. Respondent is **REPRIMANDED**.

b. Within six months of the date of this Order, Respondent shall complete the following pre-approved courses:

- i. Medical Records Management;
- ii. Health Insurance Portability and Accountability Act ("HIPAA") Compliance; and
- iii. Geriatric Psychopharmacology.

c. Within six months of completion of the above-reference coursework, Respondent shall undergo a chart audit;

d. Respondent may petition for reinstatement of an unconditional license upon submission of satisfactory evidence demonstrating completion of the terms and conditions of this Order. Upon hearing the petition, the Board may continue, modify, or remove the conditions set out herein.

6. Within ten days of signing the Stipulation to this Order, Respondent shall provide the Board with a list of all of Respondent's residences and work sites. Within seven days of any change, Respondent shall provide the Board with the new address and telephone information. The information shall be sent to Executive Director, Minnesota Board of Medical Practice, University Park Plaza, 2829 University Avenue S.E., Suite 500, Minneapolis, Minnesota 55414-3246.

7. If Respondent shall fail, neglect, or refuse to fully comply with each of the terms, provisions, and conditions herein, the Committee shall schedule a hearing before the Board. The Committee shall mail Respondent a notice of the violation alleged by the Committee and of the time and place of the hearing. Respondent shall submit a response to the allegations at least three

days prior to the hearing. If Respondent does not submit a timely response to the Board, the allegations may be deemed admitted.

At the hearing before the Board, the Committee and Respondent may submit affidavits made on personal knowledge and argument based on the record in support of their positions. The evidentiary record before the Board shall be limited to such affidavits and this Stipulation and Order. Respondent waives a hearing before an administrative law judge and waives discovery, cross examination of adverse witnesses, and other procedures governing administrative hearings or civil trials.

At the hearing, the Board will determine whether to impose additional disciplinary action, including additional conditions or limitations on Respondent's practice, or suspension or revocation of Respondent's license.

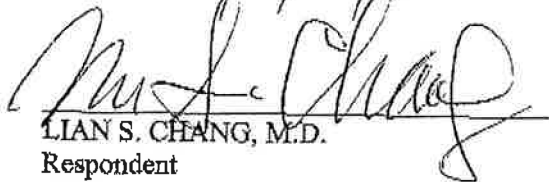
8. In the event the Board in its discretion does not approve this settlement, this Stipulation is withdrawn and shall be of no evidentiary value and shall not be relied upon nor introduced in any disciplinary action by either party hereto except that Respondent agrees that should the Board reject this Stipulation and if this case proceeds to hearing, Respondent will assert no claim that the Board was prejudiced by its review and discussion of this Stipulation or of any records relating hereto.

9. Respondent waives any further hearings on this matter before the Board to which Respondent may be entitled by Minnesota or United States constitutions, statutes, or rules and agrees that the Order to be entered pursuant to the Stipulation shall be the final Order herein.

10. Respondent hereby acknowledges that she has read and understands this Stipulation and has voluntarily entered into the Stipulation without threat or promise by the Board or any of its members, employees, or agents. This Stipulation contains the entire agreement between the

parties, there being no other agreement of any kind, verbal or otherwise, which varies the terms of this Stipulation.

Dated: 9/8/21


LIAN S. CHANG, M.D.
Respondent

Dated: 11/10/21


FOR THE COMMITTEE

ORDER

Upon consideration of this Stipulation and all the files, records, and proceedings herein,

IT IS HEREBY ORDERED that the terms of this Stipulation are adopted and implemented by the Board this 13th day of November, 2021.

MINNESOTA BOARD OF
MEDICAL PRACTICE

By: 