

IN AND BEFORE THE OKLAHOMA STATE BOARD
OF MEDICAL LICENSURE AND SUPERVISION
STATE OF OKLAHOMA

FILED

NOV 16 2001

STATE OF OKLAHOMA)
EX REL. THE OKLAHOMA BOARD)
OF MEDICAL LICENSURE)
AND SUPERVISION,)

OKLAHOMA STATE BOARD OF
MEDICAL LICENSURE & SUPERVISION

Plaintiff,)

v.)

Case No. 01-09-2400

KALPANA MOHANDAS, M.D.,)
SPECIAL TRAINING LICENSE NO. 20421,)

Defendant.)

COMPLAINT

COMES NOW the Plaintiff, the State of Oklahoma ex rel. the Oklahoma State Board of Medical Licensure and Supervision (the "Board"), by and through its attorney, Elizabeth A. Scott, Assistant Attorney General, and for its Complaint against the Defendant, Kalpana Mohandas, M.D., alleges and states as follows:

1. The Board is a duly authorized agency of the State of Oklahoma empowered to license and oversee the activities of physicians and surgeons in the State of Oklahoma pursuant to 59 Okla. Stat. §480 *et seq.*
2. Defendant, Kalpana Mohandas, M.D., holds Oklahoma special training license no. 20421
3. From October 1999 through December 14, 2000, Defendant was a resident in the Anesthesiology Residency Program at the University of Oklahoma Health Sciences Center in Oklahoma City, Oklahoma.
4. On or about September 20, 2000, Defendant was placed on probation based upon faculty evaluations that she was falling below the expected standard for her stage in training, that she was failing to meet the performance standards, and that she scored below the 1% level nationally on her in-training examinations. Defendant's probation was to last until the end of November 2000, at which time her performance would be reviewed.
5. On or about December 14, 2000, Defendant was notified that she had not satisfied

the terms of her probation and that she was terminated from the residency program. Specifically, it was determined that she had fallen so far behind in knowledge that she would be unable to catch up, that she had little insight into a patient's condition relative to the anesthetic implications, that she played a passive role in patient planning and management, and that she had a lack of basic and specialty knowledge of anesthesia. Defendant additionally received unsatisfactory evaluations during her probationary period.

6. On or about July 1, 2001, Defendant entered the Family Practice Residency Program at the University of Oklahoma Health Sciences Center, Southwest Oklahoma Family Practice Clinic in Lawton, Oklahoma.

7. On or about August 7, 2001, Defendant submitted her Application for Renewal of her Special Training License in the State of Oklahoma for the period September 2, 2001 through September 1, 2001. On her Application for Renewal, Defendant was asked the following question: "Since the last renewal or initial licensure (whichever is most recent): Have you been denied privileges, lost privileges or received discipline by any hospital or other professional medical organization?" In response to this question, the Defendant answered "NO".

8. During the time Defendant was an anesthesiology resident, Defendant performed numerous procedures at which time patient care was jeopardized due to Defendant's acts of negligence or her inability to perform the required procedures with appropriate skill and knowledge.

9. Defendant is guilty of unprofessional conduct in that she:

A. Engaged in conduct which is likely to deceive, defraud or harm the public in violation of 59 O.S. §509(9) and OAC 435:10-7-4(11).

B. Engaged in gross or repeated negligence in the practice of medicine and surgery in violation of OAC 435:10-7-4(15).

C. Engaged in practice or other behavior which demonstrates an incapacity or incompetence to practice medicine and surgery in violation of OAC 435:10-7-4(18).

D. Engaged in fraud or misrepresentation in applying for or procuring a medical license or in connection with applying for or procuring periodic reregistration of a medical license in violation of OAC 435:10-7-4(8).

E. Violated any provision of the medical practice act or the rules and regulations of the Board or of an action, stipulation, or

agreement of the Board in violation of 59 O.S. §509(14) and OAC 435:10-7-4(39).

F. Used a false, fraudulent or deceptive statement in a document connected with the practice of medicine and surgery in violation of OAC 435:10-7-4(19).

Conclusion

WHEREFORE, the Plaintiff respectfully requests that the Board conduct a hearing, and, upon proof of the allegations contained herein, impose such disciplinary action as authorized by law, up to and including suspension or revocation and any other appropriate action with respect to Defendant's medical license, and an assessment of costs and attorney's fees incurred in this action as provided by law.

Respectfully submitted,



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