

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

FILED

MAR 22 2013

OKLAHOMA STATE BOARD OF
MEDICAL LICENSURE & SUPERVISION

STATE OF OKLAHOMA)	
EX REL. THE OKLAHOMA BOARD)	
OF MEDICAL LICENSURE)	
AND SUPERVISION,)	
Plaintiff,)	
)	
v.)	Case No: 12-09-4614
)	
CATHERINE LOUISE WHITE, M.D.)	
LICENSE NO. 27039)	
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, Scott Randall Sullivan, Special Prosecutor, and for its Complaint against the Defendant, Catherine Louise White, M.D., alleges and states as follows:

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 Title 59 O.S. §490 et seq.

Defendant Catherine Louise White, M.D., holds Oklahoma medical license no. 27039.

HISTORY

1. The Board received Defendant's application for an Oklahoma license on April 24, 2009. In the application, Defendant cited her last practice history as follows,

"5/08 to present.....Unemployed secondary to resignation from residency for personal reasons (i.e. infirm elderly in-laws requiring home care and being a poor match with residency program with differing philosophies concerning patient care.)"
2. While credentialing the Defendant, the Board received several documents and learned that Bill Johnson, MD, Acting Program Director at the University of Arizona Health Sciences Center, sent a letter to Defendant on June 13, 2007 informing her that she was not ready to assume independent leadership of a care team and that she did not meet the criteria for advancement from R-1 to R-2 (Resident 1 to Resident 2). He outlined an

improvement plan and requirements.

3. Again, on August 22, 2007, Dr. Johnson informed Defendant in writing that although she had improved in several of the competencies cited in the June 13, 2007 letter, she still fell short of the expectations and required improvement.
4. On March 10, 2008, Dr. Johnson met with Defendant and announced that she was being promoted to PGY-2 (Post Graduate Year 2) in May of 2008.
5. On May 1, 2009 Defendant was accepted in a residency program, "In His Image" in Tulsa, OK, to begin July 1, 2009, under the direction of Mitchell W. Duinick, M.D., ("Defendant's Residency Director").
6. Defendant was required to make a personal appearance before the Board on June 26, 2009, due to clinical competency and reasons for leaving her residency training in May of 2008. Defendant was granted her training license on July 1, 2009, followed by her full and active license on July 1, 2010.

FIRST APPOINTMENT AFTER RESIDENCY

7. Defendant applied for Family Medicine privileges at Newman Memorial Hospital on May 31, 2012, pending completing her residency on June 30, 2012. On August 6, 2012, Newman Memorial Hospital approved her appointment for active status with privileges in Family Medicine with Obstetrics for an initial provisional period of one year ending July 31, 2013.
8. Defendant began work at Newman Memorial Hospital on August 6, 2012. On August 7, 2012, Newman Memorial Hospital received Defendant's Residency Director's Residency Verification and letter. The letter stated that he (Dr. Duinick) and faculty members did not feel that Defendant had obtained a level of competency and ability to practice medicine independently on an inpatient basis, including providing maternity and obstetrical care. ***Dr. Duinick recommended that Defendant practice in an outpatient setting, not including severely ill or trauma patients.***
9. Defendant worked at Newman Memorial Hospital until August 21, 2012. Defendant was terminated on August 22, 2012.
10. Newman Memorial Hospital reported to the National Practitioner Data Bank on 08-22-2012 that Defendant had her clinical privileges revoked due to being recruited with an understanding that she possessed medical skills for a full spectrum primary care practice. The skills represented were for office, emergency, critical and obstetric care. Upon

receipt of a final report from her training program, it was determined that she did not possess the skill set represented. Therefore.....the privileges 'conditionally extended' were immediately terminated to address the potential for adverse affect on the health or welfare of patients.

11. That Defendant is guilty of unprofessional conduct in that she:

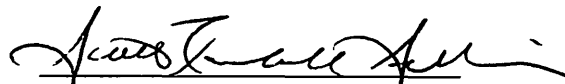
A. Was found to be physically or mentally unable to practice medicine and surgery with reasonable skill and safety in violation of Oklahoma Administrative Code 435:10-7-4.(17); and

B. Engaged in practice or other behavior that demonstrates an incapacity or incompetence to practice medicine and surgery in violation of Oklahoma Administrative Code 435:10-7-4.(18).

CONCLUSION

WHEREFORE, Plaintiff 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 the revocation or suspension of the Defendant's license to practice as a physician assistant in the State of Oklahoma, the assessment of costs and fees incurred in this action, and any other appropriate action with respect to Defendant's license to practice as a physician assistant in the State of Oklahoma.

Respectfully submitted,



Scott Randall Sullivan, OBA #11179
OKLAHOMA STATE BOARD OF
MEDICAL
LICENSURE AND SUPERVISION
101 N.E. 51st Street
Oklahoma City, OK 73105

Attorney for Plaintiff