

COMMONWEALTH OF MASSACHUSETTS

Middlesex, SS

Division of Administrative Law Appeals
Docket No. RM -17-935

BOARD OF REGISTRATION IN MEDICINE,
Petitioner,
v.
DEBRA LITTLE, M.D.
Respondent.

JOINT STIPULATION

Debra Little, M.D. (the "Respondent"), the Respondent's attorney, and Complaint Counsel (hereinafter referred to jointly as the "Parties") agree that this Joint Stipulation shall be filed with the Administrative Magistrate for the Division of Administrative Law Appeals ("DALA") as a resolution of questions of material fact and law as set forth by the Statements of Allegations in the above matter. The Respondent admits to the Findings of Fact described below and agrees that the Administrative Magistrate and the Board of Registration in Medicine (the "Board") may make the Conclusions of Law as set forth below.

FINDINGS OF FACT

1. The Respondent was born on May 20, 1958. She graduated from the Wayne State University School of Medicine in 2003. She has been licensed to practice medicine in Massachusetts under certificate number 235270 since 2008. She is also currently licensed in the State of Michigan. She specializes in psychiatry.
2. Patient A is a female who was forty-five years old in 2011.
3. The Respondent treated Patient A beginning in 2011.

Stipulation – Debra Little, M.D.

4. The Respondent failed to follow the standard of care in several respects when treating Patient A including but not limited to the following:
 - a. Failing to obtain or document an adequate history, and perform an adequate assessment, rationale, or treatment plan during the initial visit.
 - b. Prescribing stimulants and benzodiazepines for five months without assessment of risk, or ongoing maintenance of control of medication.
 - c. Failing to include a discussion of the assessment or rationale for treatment.
 - d. Terminating Patient A's care in an inappropriate manner.
5. In 2013, Patient A complained to the Board about the Respondent.
6. The Respondent failed to cooperate with the Board's investigation by submitting a written response to the Board in which she made one or more false statements and accused Patient A of making "grossly false and inaccurate" allegations.
7. Within a month of the Respondent's response to the Board and before the Board made further inquiry of the Respondent, the Respondent submitted a supplemental response to the Board.
8. In her supplemental response, the Respondent admitted to making the above false statements to the Board, and she corrected the same.

CONCLUSIONS OF LAW

- A. The Respondent has violated G.L. c. 112, § 5, eighth par. (c) and 243 CMR 1.03(5)(a)3 by engaging in conduct that places into question the Respondent's competence to practice medicine including practicing medicine with negligence on repeated occasions.
- B. The Respondent has violated 243 CMR 1.03(5)(a)16 by failing to furnish the Board, its investigators or representatives, documents to which the Board is legally entitled.

C. The Respondent has engaged in conduct that undermines the public confidence in the integrity of the medical profession. See *Levy v. Board of Registration in Medicine*, 378 Mass. 519 (1979) and *Raymond v. Board of Registration in Medicine*, 387 Mass. 708 (1982).

SANCTION AND ORDER

The Parties expressly acknowledge that the Board may impose sanctions against the Respondent based upon the above Findings of Fact and Conclusions of Law. The Parties hereby jointly agree to recommend to the Board that it impose the sanction set forth below. The Parties understand that the recommended sanction is not binding on the Board, and that the Board may wish to impose a different sanction on the Respondent.

At the time the Board considers this Stipulation, it will inform the Parties of its inclination as to sanction. If the Board's sanction is different from the one recommended by the Parties, the Respondent will be given an opportunity to either accept or reject the proposed sanction. If the Respondent rejects the proposed sanction, then the matter will continue through the adjudicatory process pursuant to Mass. Gen. Laws c. 30A and 801 CMR 1.00 et seq.

The Respondent's license to practice medicine in the Commonwealth of Massachusetts is hereby reprimanded.

EXECUTION OF THIS STIPULATION

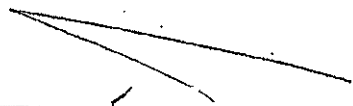
The Parties agree that the approval of this Stipulation is left to the discretion of the Administrative Magistrate and the Board. As to any matter this Stipulation leaves to the discretion of the Administrative Magistrate or the Board, neither the Respondent, nor anyone else acting on her behalf, has received any promises or representations regarding the same.

The signatures of the Parties are expressly conditioned on the Administrative Magistrate and the Board accepting this Stipulation.

If the Administrative Magistrate rejects any provision contained in this Stipulation, the entire document shall be deemed null and void and the matter will be scheduled for a hearing pursuant to Mass. Gen. Laws c. 30A and 801 CMR 1.00 et seq.

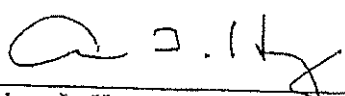
If the Board rejects any provision in this Stipulation or modifies the Sanction and said modification is rejected by the Respondent, the entire document shall be null and void and the matter will be recommitted to DALA for appropriate proceedings and an eventual hearing pursuant to Mass. Gen. Laws c. 30A and 801 CMR 1.00 et seq.

Neither the Parties nor anyone else may rely on the Stipulation in either the proceedings or hearing referenced in the preceding paragraph or in any appeal therefrom.



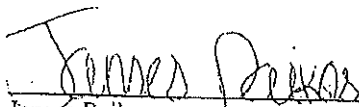
Debra Little, M.D.
Respondent

6/2/2021
Date



Andrew L. Hyams, Esq.
Attorney for Respondent

6/8/2021
Date



James Paikos
Complaint Counsel *KAC*

6/9/21
Date