



RICK SNYDER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF LICENSING AND REGULATORY AFFAIRS  
BUREAU OF HEALTH CARE SERVICES

STEVE ARWOOD  
DIRECTOR

In the Matter of

Nan Beth Alt, M.D.  
License Number: 43-01-045669

FILE NO.: 43-11-119855

PROOF OF SERVICE

State of Michigan )  
  )  
County of Ingham )

I, Marcie M. Anderson, of Lansing, County of Ingham, State of Michigan, do hereby state that on May 23, 2013, I sent the following documents to each of the parties listed below, enclosed in an envelope bearing postage fully prepaid, plainly addressed as follows:

CONSENT ORDER AND STIPULATION dated May 22, 2013

BY: (X) First Class Mail  
( ) Certified Mail, Return receipt requested

TO: Nan Beth Alt, M.D.  
Clinical Psychiatric Medicine PC  
4565 Wilson Ave., SW, Ste. 4  
Grandville, MI 49418

Leon J. Weiss  
Fieger Fieger Kenney Giroux & Danzig, P.C.  
19390 W. 10 Mile Road  
Southfield, MI 48075

By Interdepartmental Mail to:

Bill Hurth, Manager  
Bureau of Health Care Services  
Enforcement Unit

Debra M. Gagliardi  
Department of Attorney General  
Licensing & Regulation Division  
Lansing, MI

Marcie Anderson  
Marcie M. Anderson  
Health Professions Division

STATE OF MICHIGAN  
DEPARTMENT OF LICENSING AND REGULATORY AFFAIRS  
BUREAU OF HEALTH CARE SERVICES  
BOARD OF MEDICINE  
DISCIPLINARY SUBCOMMITTEE

In the Matter of

Nan Beth Alt, M.D.  
License No. 43-01-45669

Complaint No. 43-11-119855

CONSENT ORDER AND STIPULATION

CONSENT ORDER

An administrative complaint was filed with the Disciplinary Subcommittee of the Board of Medicine on September 6, 2012, charging Nan Beth Alt, M.D.

(Respondent) with having violated sections 16221(a), (b)(vi), (c)(ii) and (d)(iii) of the Public Health Code, 1978 PA 368, as amended, MCL 333.1101 *et seq.*

Based on the administrative complaint and after consultation with the Chairperson of the Board of Medicine, the Department summarily suspended Respondent's license to practice medicine by order dated September 7, 2012.

The parties have stipulated that the Disciplinary Subcommittee may enter this consent order. The Disciplinary Subcommittee has reviewed the stipulation contained in this document and agrees that the public interest is best served by resolution of the outstanding complaint. Therefore, the Disciplinary Subcommittee

finds that the allegations of fact contained in the complaint are true and that Respondent has violated sections 16221(a), (b)(vi), (c)(ii) and (d)(iii) of the Public Health Code.

Accordingly, for these violations, IT IS ORDERED:

The order of summary suspension previously issued is DISSOLVED.

Respondent's license is SUSPENDED for a period of six (6) months.

Respondent is placed on PROBATION for a period of eighteen (18) months commencing on the date her medical license is reinstated. Reduction of the probationary period shall occur only while Respondent is employed as a medical doctor. Respondent shall be automatically discharged from probation at the end of the probationary period provided Respondent has complied with the terms of this order. The terms and conditions of the probation, which Respondent must complete within the period of probation, are as follows:

- A. MEETING WITH A LICENSED, BOARD-APPROVED PSYCHIATRIST. Respondent shall meet twice a month, individually and in person, with a licensed, Board-approved psychiatrist in good standing ("Reviewing Psychiatrist") for a minimum of two hours a month to review Respondent's professional practice. These meetings shall occur at Respondent's Holland, Michigan practice site. The initial meeting shall occur by the end of the first month of probation. Subsequent meetings shall occur every other week thereafter until the period of probation ends. Within 7 days of the effective date of this order, Respondent shall provide the Sanction Monitoring Unit with the name of her proposed Reviewing Psychiatrist to the address. Respondent shall be responsible for

scheduling the time of the meetings with the Reviewing Psychiatrist. Prior to meeting, Respondent must give her Reviewing Psychiatrist a copy of this Order and the administrative complaint dated September 6, 2012. The Reviewing Psychiatrist shall be knowledgeable of Respondent's history and shall file reports with the department as further provided herein advising of Respondent's performance as a medical doctor.

- B. RECORDS REVIEW. During the period of probation, the designated Reviewing Psychiatrist shall review records of patients treated by Respondent, which shall include any and all laboratory tests ordered by Respondent. This review may occur at the meetings described in the above paragraph. The Reviewing Psychiatrist shall report on a quarterly basis whether Respondent is complying with the Public Health Code. If, at any time, Respondent fails to comply with the minimal standards of acceptable and prevailing practice, or appears unable to practice with reasonable skill and safety, her Reviewing Psychiatrist shall immediately notify the Department. In addition, the Department or its authorized representative may periodically contact the Reviewing Psychiatrist to discuss Respondent's compliance. By accepting the terms of this consent order and stipulation, Respondent has authorized the release of all necessary records and information.

During the period of probation, the Reviewing Psychiatrist shall also request a report reflecting Respondent's controlled substance prescribing practices from the Michigan Automated Prescription System (MAPS) each quarter. The Reviewing Psychiatrist shall check the MAPS report against information in Respondent's patient records. The Reviewing Psychiatrist need not verify every prescription on the MAPS report, but may randomly choose prescriptions to verify through the patient records.

- C. REVIEWING PSYCHIATRIST REPORTS. The Reviewing Psychiatrist shall file reports with the Department, as further provided below, advising of Respondent's work performance. If, at any time, Respondent fails to comply with minimal standards of acceptable and prevailing practice, or appears unable to practice with reasonable skill and safety, the Reviewing Psychiatrist shall immediately notify the Department.

- D. EMPLOYMENT CHANGE. Respondent shall report to the Department in writing any and all changes in her employment within 15 days of such change. If Respondent is not self-employed, she shall provide copies of this order and the complaint dated September 6, 2012, to each successor employer in any position in which she is working as a medical doctor.
- E. COMPLIANCE WITH THE PUBLIC HEALTH CODE. Respondent shall comply with all applicable provisions of the Public Health Code and rules promulgated under the Public Health Code.
- F. REPORT OF NON-EMPLOYMENT. If, at any time during the period of probation, Respondent is not employed as a medical doctor, she shall file a report of non-employment with the Department. Respondent shall file this report within 15 days after becoming unemployed. Respondent shall continue to file reports of non-employment on a quarterly basis until she returns to practice as a medical doctor. If Respondent subsequently returns to practice as a medical doctor, she shall notify the Department of this fact within 15 days after returning to practice.
- G. REPORTING PROCEDURE. Unless otherwise provided above, all reports required by the terms of probation shall be filed on a quarterly basis, the first report to be filed at the end of the third month of probation, and subsequent reports every month until Respondent is discharged from probation. In addition to receiving reports as required above, the Department or its authorized representative may periodically contact the reporting individuals or agencies to inquire of Respondent's progress. By accepting the terms of this consent order and stipulation, Respondent has authorized the release of all necessary records and information.
- H. PATIENT RECORDS. Within 90 (ninety) days of the effective date of this order, Respondent shall send a written notice to the last known address of each patient who received medical services at Respondent's satellite office located at 386 Garden Avenue, Holland, Michigan 49424 informing them how a patient may request access to, or copies of, his or her medical records. This notice shall also provide each patient with 30 days to

request a copy of his or her record or to designate where he or she would like his or her medical records transferred. By accepting the terms of this consent order and stipulation, Respondent has committed to ensuring that all patients who received medical service at her satellite office will be assured access to their complete medical records in accordance with all applicable state and federal laws.

- I. PENDING CRIMINAL PROSECUTION. Respondent is currently subject to criminal prosecution arising out of the same facts as contained in the administrative complaint. If Respondent is criminally convicted, the Department will not bring a new administrative complaint based on the conviction.
- J. COSTS AND EXPENSES. Respondent shall be responsible for all costs and expenses incurred in complying with the terms and conditions of this consent order.
- K. TIMELY COMPLIANCE. Respondent shall be responsible for the timely compliance with the terms of this consent order, including the timely filing of any documentation. Failure to comply within the time limitations provided will constitute a violation of this order.

Any violation of the Public Health Code by Respondent during the period of probation shall be deemed a violation of probation and constitute grounds for further disciplinary action.

Respondent is FINED \$5,000.00 to be paid by check, money order or cashier's check made payable to the State of Michigan (with complaint number 43-11-119855 clearly indicated on the check or money order) within one hundred twenty (120) days from the effective date of this order. The timely payment of the fine shall be Respondent's responsibility. Respondent shall mail the fine to: Sanction

Monitoring, Bureau of Health Care Services, Department of Licensing and Regulatory Affairs, P.O. Box 30185, Lansing, Michigan 48909.

Respondent shall direct any communications to the Department that are required by the terms of this order to: Sanction Monitoring Unit, Bureau of Health Care Services, Department of Licensing and Regulatory Affairs, P.O. Box 30670, Lansing, Michigan 48909.

If Respondent violates any term or condition set forth in this order, Respondent will be in violation of 1996 AACRS, R 338.1632, and section 16221(h) of the Public Health Code.

This order shall be effective on the date signed by the Chairperson of the Disciplinary Subcommittee or the Disciplinary Subcommittee's authorized representative, as set forth below.

Signed on May 22, 2013

MICHIGAN BOARD OF MEDICINE

By [Signature]  
Chairperson, Disciplinary Subcommittee

STIPULATION

The parties stipulate as follows:

1. Respondent does not contest the allegations of fact and law in the complaint. Respondent understands that, by pleading no contest, she does not admit the truth of the allegations but agrees that the Disciplinary Subcommittee may treat the allegations as true for resolution of the complaint and may enter an order treating the allegations as true.

2. Respondent understands and intends that, by signing this stipulation, she is waiving the right under the Public Health Code, rules promulgated under the Public Health Code, and the Administrative Procedures Act of 1969, 1969 PA 306, as amended, MCL 24.201 *et seq*, to require the Department to prove the charges set forth in the complaint by presentation of evidence and legal authority, and to present a defense to the charges before the Disciplinary Subcommittee or its authorized representative. Should the Disciplinary Subcommittee reject the proposed consent order, the parties reserve the right to proceed to hearing.

3. The Disciplinary Subcommittee may enter the above Consent Order, supported by Board conferee Richard Burney, M.D. Dr. Burney or an attorney from



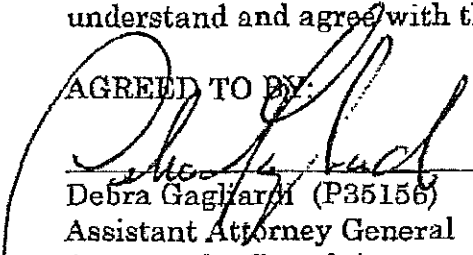
the Licensing and Regulation Division may discuss this matter with the Disciplinary Subcommittee in order to recommend acceptance of this resolution.

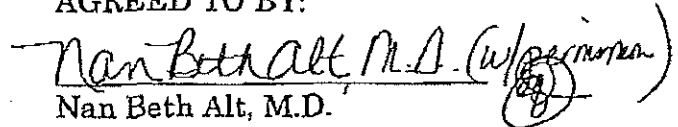
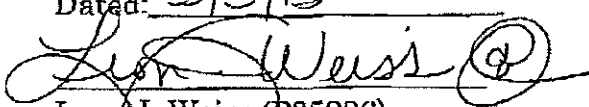
4. Dr. Burney and the parties considered the following factors in reaching this agreement:

- A. Respondent has been completely cooperative throughout the entire administrative process.
- B. Respondent has had no previous disciplinary action taken against her license since its issuance in 1983.
- C. Respondent denies knowledge of her father's medical licensure suspension or the use of her license to prescribe medications and order laboratory tests. She has produced corroborating evidence indicating that she was not involved in the billing or clerical operations of her practice.
- D. Although Respondent denies having knowledge of the unlawful manner in which her license was used, she admits to violating the Public Health Code in that she was grossly negligent in the management of her medical practice, and in the supervision and monitoring of her practice. This gross negligence was exhibited in the following ways:
  1. Respondent acknowledges and takes responsibility for her failure to review any documents relating to the financial aspects of her medical practice, including a failure to review monthly bank statements, as well as failure to review the practice's checkbook ledger so she could monitor the flow of money into and out of her practice.
  2. Respondent acknowledges and takes responsibility for her failure to monitor the finances of her medical practice with her employee and financial manager who was a signatory on her office checking account.

- 3. Respondent acknowledges and takes responsibility that her negligence contributed to the unlawful practice of medicine by Respondent's father, William Alt, who saw patients and fraudulently utilized Respondent's medical license number and her DEA controlled substances number.
- 4. Respondent acknowledges and takes responsibility for the fact that her negligence contributed to billings that resulted in payments to Respondent's medical practice that were fraudulently distributed by her employee and financial manager for medical services to William Alt who was not licensed to practice medicine.

By signing this stipulation, the parties confirm that they have read, understand and agree with the terms of the consent order.

AGREED TO BY:  
  
 Debra Gagliardi (P35156)  
 Assistant Attorney General  
 Attorney for Complainant  
 Dated: 3-5-13

AGREED TO BY:  
  
 Nan Beth Alt, M.D. (w/permission)  
 Respondent  
 Dated: 3/5/13  
  
 Leon J. Weiss (P35996)  
 Attorney for Respondent  
 Dated: 3/5/13

STATE OF MICHIGAN  
DEPARTMENT OF LICENSING AND REGULATORY AFFAIRS  
BUREAU OF HEALTH PROFESSIONS

In the Matter of

NAN BETH ALT, M.D.  
License Number: 43-01-045669

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TRUE COPY

STATE OF MICHIGAN )  
                                  )  
COUNTY OF INGHAM )

FILE NO.: 43-11-119855

PROOF OF SERVICE

I, Marcie M. Anderson, of Lansing, County of Ingham, State of Michigan, do hereby state that on September 11, 2012, I mailed the following documents to each of the parties listed below, enclosed in an envelope bearing postage fully prepaid, plainly addressed as follows:

ORDER OF SUMMARY SUSPENSION signed September 7, 2012; ADMINISTRATIVE COMPLAINT signed September 6, 2012.

By: (x) Certified Mail, Return Receipt Requested  
(x) First Class Mail

To: Nan Beth Alt, M.D.  
Clinical Psychiatric Medicine PC  
4565 Wilson Ave., SW, Ste. #4  
Grandville, MI 49418

By: (x) Interdepartmental Mail

To: Bill Hurth, Manager  
Enforcement Section  
Bureau of Health Professions

Robert J. Jenkins  
Department of Attorney General  
Licensing & Regulation Division  
Lansing, MI

Marcie M. Anderson

Marcie M. Anderson  
Enforcement Section  
Health Regulatory Division

STATE OF MICHIGAN  
DEPARTMENT OF LICENSING AND REGULATORY AFFAIRS  
BUREAU OF HEALTH PROFESSIONS  
BOARD OF MEDICINE  
DISCIPLINARY SUBCOMMITTEE

In the Matter of

Nan Beth Alt, M.D.  
License No. 43-01045669

Complaint No. 43-11-119855

ORDER OF SUMMARY SUSPENSION

An administrative complaint has been issued against Respondent under the Public Health Code, 1978 PA 368, as amended; MCL 333.1101 *et seq.*, promulgated rules, and the Administrative Procedures Act of 1969, 1969 PA 306, as amended; MCL 24.201 *et seq.*

After consideration of the documentation filed in this case and consultation with the Chairperson of the Board of Medicine, the Department concludes that the public health, safety or welfare requires emergency action, as allowed by section 16233(5) of the Public Health Code and section 92(2) of the Administrative Procedures Act.

THEREFORE, IT IS ORDERED that Respondent's license to practice medicine in the State of Michigan shall be summarily suspended commencing on the date this order is served.

Under 1996 AACS, R 338.1610, Respondent has the right to petition for the dissolution of this order of summary suspension. This petition shall clearly state that it is a Petition for Dissolution of Summary Suspension and shall be filed with the Department of Licensing and Regulatory Affairs, Bureau of Health Professions, P.O. Box 30670, Lansing, Michigan 48909, with a copy served upon the Department of Attorney General, Licensing & Regulation Division, P.O. Box 30754, Lansing, Michigan, 48909. Questions concerning the Order of Summary Suspension may be directed to (517) 373-1146. Upon receipt of such a petition, an administrative hearing will immediately be scheduled before an administrative law judge, who shall dissolve the order of summary suspension unless sufficient evidence is produced to support a finding that the public health, safety, or welfare requires emergency action and a continuation of the suspension order.

DEPARTMENT OF LICENSING AND  
REGULATORY AFFAIRS

By: Rae Ramsdell  
Rae Ramsdell, Director  
Bureau of Health Professions

Dated: 9/7/2012

STATE OF MICHIGAN  
DEPARTMENT OF LICENSING AND REGULATORY AFFAIRS  
BUREAU OF HEALTH PROFESSIONS  
BOARD OF MEDICINE  
DISCIPLINARY SUBCOMMITTEE

In the Matter of  
Nan Beth Alt, M.D.  
License No. 43-01-045669

Complaint No. 43-11-119855

ADMINISTRATIVE COMPLAINT

Attorney General Bill Schuette, through Assistant Attorney General Robert J. Jenkins, on behalf of the Department of Licensing and Regulatory Affairs, Bureau of Health Professions (Complainant), files this complaint against Nan Beth Alt, M.D., (Respondent) alleging upon information and belief as follows:

1. The Board of Medicine (Board), an administrative agency established by the Public Health Code, 1978 PA 368, as amended, MCL 333.1101 et seq., is empowered to discipline licensees under the Code through its Disciplinary Subcommittee (DSC).

2. Respondent is currently licensed to practice medicine pursuant to the Public Health Code and practices as a licensed psychiatrist. At all times relevant to this complaint, Respondent owned and operated Clinical Psychiatric Medicine located at 151 44<sup>th</sup> Street, Suite 5, Grandville, Michigan 49448.

3. Respondent's father, William Alt, M.D. (Dr. Alt) is an internal medicine physician whose license was suspended by the Board of Medicine Disciplinary Subcommittee in 2009 for incompetence. Dr. Alt was also convicted of practicing without a medical license in 2010.

4. Section 16221(a) of the Public Health Code (Code) provides the DSC with authority to take disciplinary action against Respondent for violation of general duty, consisting of negligence or failure to exercise due care, or any conduct, practice or condition that impairs, or may impair, the ability to safely and skillfully practice the health profession.

5. Section 16221(b)(vi) of the Code provides the DSC with authority to take disciplinary action against Respondent for a lack of good moral character.

6. Section 16221(c)(ii) of the Code provides the DSC with authority to take disciplinary action against Respondent for permitting the use of her medical license by an unauthorized person.

7. Section 16221(d)(iii) of the Code provides the DSC with the authority to take disciplinary action against Respondent for engaging in fraud or deceit in obtaining or attempting to obtain third party reimbursement.

8. Section 16226 of the Code authorizes the DSC to impose sanctions against a person licensed by the Board, if after opportunity for hearing, the DSC

determines that a licensee violated one or more of the subdivisions contained in section 16221 of the Code.

9. Section 16233(5) provides, in pertinent part, as follows:

"After consultation with the chair of the appropriate board or task force or his or her designee, the department may summarily suspend a license or registration if the public health, safety, or welfare requires emergency action in accordance with section 92 of the administrative procedures act of 1969, being section 24.292 of the Michigan Compiled Laws."

#### Factual Allegations

10. On January 17, 2011, D.V. (initials used to protect patient privacy), a male (DOB 11/18/23), presented to Spectrum Health Zeeland Community Hospital with an order for outpatient diagnostic services. Upon further questioning by hospital staff, D.V. insisted that the order came from Dr. Alt, not Respondent. D.V. further stated that he has never seen Respondent as a patient.

11. Jane Czerew, R.N., B.S.N., M.M., Vice President of Nursing Services and Quality Systems at Spectrum Health Zeeland Community Hospital (Zeeland), sent a March 18, 2010 letter to Respondent sharing her concerns regarding receipt of D.V.'s for outpatient diagnostic services. Ms. Czerew advised Respondent that D.V. insisted that Dr. Alt had ordered the test and that Respondent had never treated him though Respondent's signature appeared on the order.

12. In the March 18, 2010 letter, Ms. Czerew informed Respondent that Spectrum would no longer accept her orders for outpatient testing unless she verified the medical necessity of said tests.

13. Respondent sent a March 28, 2011 letter to Ms. Czerew indicating she had opened a satellite office in the same office as Dr. Alt at 386 Garden Avenue, Suite 2A, Holland, Michigan 49424. Respondent further stated that she was authorized to order tests to examine the entire human body and the biological impact on the brain. Respondent copied Dr. Alt on this letter.

14. On June 21, 2011, Department Investigator Jim Wiggins presented to Respondent's office at 386 Garden Avenue in Holland, Michigan. Dr. Alt was present at Respondent's office. After an attempt to question Dr. Alt, Dr. Alt stated that he would not speak further and referred all questions to his attorney.

15. Investigator Wiggins took pictures of signs on Respondent's door that indicated the office was that of both Respondent and Dr. Alt. Investigator Wiggins informed Dr. Alt that he could not practice medicine as his license was suspended.

16. On June 21, 2011, Investigator Wiggins interviewed Susan Sigler, employee for Attorney Kenneth A. Puzycki. Attorney Puzycki's office is located in the same building as Respondent's Holland office.



17. During the interview, Ms. Sigler advised that she has seen Dr. Alt in inside Respondent's office at least once a week. Whereas, she has only seen Respondent at the location approximately ten times within the last three years.

18. During a July 6, 2011 interview with Investigator Wiggins, patient D.V. stated that he had presented to Dr. Alt for treatment at 386 Garden Avenue in February of 2011. D.V. further stated that he did not know Dr. Alt's license was suspended.

19. Concerning treatment by Dr. Alt, patient D.V. stated that Dr. Alt would listen to his heart through a stethoscope, check his blood pressure, and discuss his current medication regimen. D.V. further stated that Dr. Alt discontinued two or three of his medications at his last visit. D.V. advised that he has never received treatment from Respondent.

20. On July 7, 2011, Ottawa County Sherriff's Department Detective Jeremy Baum served a search warrant on Respondent's office. Upon entry to Respondent's office, Detective Baum observed an elderly female patient in the waiting room.

21. Dr. Alt was present at Respondent's office. Detective Baum seized copies of patient D.V.'s medical records. Initially, Dr. Alt would only release D.V.'s 2007 records. Upon further demand, Dr. Alt released D.V.'s current medical file.

22. Detective Baum discovered numerous blank prescriptions signed by Respondent, with her name at the top of the prescription. These prescriptions listed Respondent's address as 386 Garden Ave., Holland, Michigan 49424.

23. According to Zeeland Hospital records, Respondent ordered approximately 8 laboratory tests from January 1, 2006 to January 17, 2009. After Respondent's father's medical license was suspended, Respondent ordered 87 outpatient diagnostic tests between January 18, 2009 to February 25, 2011.

#### COUNT I

Respondent's conduct as described above constitutes negligence, in violation of section 16221(a).

#### COUNT II

Respondent's conduct as described above constitutes a lack of good moral character, in violation of section 16221(b)(vi) of the Code.

#### COUNT III

Respondent's conduct, as described above, constitutes allowing an unauthorized person to use her medical license, in violation of section 16221(c)(ii) of the Code.

#### COUNT IV

Respondent's conduct, as described above, constitutes fraud or deceit in obtaining or attempting to obtain third party reimbursement, in violation of sections 16221(d)(iii) of the Code.

FURTHER, Complainant requests that pending the hearing and final determination Respondent's license to practice as a medical doctor in the State of Michigan continue to be summarily suspended pursuant to section 92 of the Administrative Procedures Act and section 16233(5) of the Public Health Code for the reason that, based upon the allegations set forth herein, to permit Respondent to continue to practice the profession constitutes a danger to the public health, safety and welfare requiring emergency action.

RESPONDENT IS HEREBY NOTIFIED that, pursuant to section 16231(7) of the Public Health Code, Respondent has 30 days from receipt of this complaint to submit a written response to the allegations contained in it. The written response shall be submitted to the Bureau of Health Professions, Department of Licensing and Regulatory Affairs, P.O. Box 30670, Lansing, Michigan, 48909, with a copy to the undersigned assistant attorney general. Further, pursuant to section 16231(8), failure to submit a written response within 30 days shall be treated as an admission of the allegations contained in the complaint and shall result in transmittal of the complaint directly to the Board's Disciplinary Subcommittee for imposition of an appropriate sanction.

Respectfully Submitted,

BILL SCHUETTE  
Attorney General



Robert J. Jenkins (P71141)  
Assistant Attorney General  
Licensing & Regulation Division  
525 W. Ottawa, 3<sup>rd</sup> Floor, Wms Bldg.  
P.O. Box 30758  
Lansing, Michigan 48909

Dated: September 6, 2012

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