

**CONSENT AGREEMENT
BETWEEN
SREELATHA PULAKHANDAM, M.D.,
AND
THE STATE MEDICAL BOARD OF OHIO
Case No. 18-CRF-0063**

This Consent Agreement is entered into by and between Sreelatha Pulakhandam, M.D., [Dr. Pulakhandam], and the State Medical Board of Ohio [Board], a state agency charged with enforcing Chapter 4731., Ohio Revised Code.

Dr. Pulakhandam enters into this Consent Agreement being fully informed of her rights under Chapter 119., Ohio Revised Code, including the right to representation by counsel and the right to a formal adjudicative hearing on the issues considered herein.

BASIS FOR ACTION

This Consent Agreement is entered into on the basis of the following stipulations, admissions and understandings:

- A. The Board is empowered by Section 4731.22(B), Ohio Revised Code, to limit, revoke, suspend a certificate, refuse to register or reinstate an applicant, or reprimand or place on probation the holder of a certificate for violation of Section 4731.22(B)(22), Ohio Revised Code, for "any of the following actions taken by an agency responsible for authorizing, certifying, or regulating an individual to practice a health care occupation or provide health care services in this state or another jurisdiction, for any reason other than the nonpayment of fees; the limitation, revocation, or suspension of an individual's license to practice; acceptance of an imposition of probation; or issuance of an order of censure or other reprimand."
- B. The Board enters into this Consent Agreement in lieu of further formal proceedings based upon the allegations set forth in the Notice of Opportunity for Hearing issued on June 13, 2018, attached hereto as Exhibit A and incorporated herein by reference. The Board expressly reserves the right to institute additional formal proceedings based upon any other violations of Chapter 4731., Ohio Revised Code, whether occurring before or after the effective date of this Consent Agreement.
- C. Dr. Pulakhandam is licensed to practice medicine and surgery in the State of Ohio, License number 35.083088.
- D. Dr. Pulakhandam states that she is also licensed to practice medicine and surgery in the State(s) of Louisiana, Hawaii, Florida, Georgia and New Jersey.
- E. Dr. Pulakhandam admits to the factual and legal allegations contained in the June 13, 2018 Notice of Opportunity for Hearing.

AGREED CONDITIONS

Wherefore, in consideration of the foregoing and mutual promises hereinafter set forth, and in lieu of any formal proceedings at this time, Dr. Pulakhandam knowingly and voluntarily agrees with the Board to the following terms, conditions and limitations:

REPRIMAND

1. It is hereby ORDERED that Dr. Pulakhandam is REPRIMANDED.

PROBATIONARY TERMS:

2. Dr. Pulakhandam shall obey all federal, state, and local laws.

Releases; Quarterly Declarations and Appearances

3. Dr. Pulakhandam shall submit quarterly declarations under penalty of Board disciplinary action and/or criminal prosecution, stating whether there has been compliance with all the conditions of this Consent Agreement. The first quarterly declaration must be received in the Board's offices on the first day of the third month following the month in which this Consent Agreement becomes effective, or as otherwise requested by the Board. Subsequent quarterly declarations must be received in the Board's offices on or before the first day of every third month.
4. Dr. Pulakhandam shall appear in person for an interview before the full Board or its designated representative during the third month following the effective date of this Consent Agreement. Subsequent personal appearances must occur as otherwise requested by the Board. If an appearance is missed or is rescheduled for any reason, ensuing appearances shall be scheduled based on the appearance date as originally scheduled.

Required Courses

5. Within one year of the effective date of this Consent Agreement, or as otherwise approved by the Board, Dr. Pulakhandam shall provide acceptable documentation of successful completion of a course or courses dealing with the professional ethics. The exact number of hours and the specific content of the course or courses shall be subject to the prior approval of the Board or its designee. Any course taken in compliance with this provision shall be in addition to the Continuing Medical Education requirements for relicensure for the Continuing Medical Education period in which it is completed. In addition, at the time Dr. Pulakhandam submits the documentation of successful completion of the course dealing with professional ethics, she shall also submit to the Board a written report describing the course, setting forth what she learned from the course, and identifying with specificity how she will apply what she has learned to her practice in the future.

6. Within one year of the effective date of this Consent Agreement, or as otherwise approved by the Board, Dr. Pulakhandam shall provide acceptable documentation of successful completion of a course or courses dealing with medical recordkeeping. The exact number of hours and the specific content of the course or courses shall be subject to the prior approval of the Board or its designee. Any course taken in compliance with this provision shall be in addition to the Continuing Medical Education requirements for relicensure for the Continuing Medical Education period in which it is completed. In addition, at the time Dr. Pulakhandam submits the documentation of successful completion of the course dealing with professional ethics, she shall also submit to the Board a written report describing the course, setting forth what she learned from the course, and identifying with specificity how she will apply what she has learned to her practice in the future.

REQUIRED REPORTING BY LICENSEE

7. Within thirty days of the effective date of this Consent Agreement, Dr. Pulakhandam shall provide a copy of this Consent Agreement to all employers or entities with which she is under contract to provide health care services (including but not limited to third party payors) or is receiving training; and the Chief of Staff at each hospital where she has privileges or appointments. Further, Dr. Pulakhandam shall promptly provide a copy of this Consent Agreement to all employers or entities with which she contracts to provide health care services, or applies for or receives training, and the Chief of Staff at each hospital where she applies for or obtains privileges or appointments. In the event that Dr. Pulakhandam provides any health care services or health care direction or medical oversight to any emergency medical services organization or emergency medical services provider, within thirty days of the effective date of this Consent Agreement Dr. Pulakhandam shall provide a copy of this Consent Agreement to the Ohio Department of Public Safety, Division of Emergency Medical Services. Further, within thirty days of the date of each such notification, Dr. Pulakhandam shall provide documentation acceptable to the Secretary and Supervising Member of the Board demonstrating that the required notification has occurred.
8. Within thirty days of the effective date of this Consent Agreement, Dr. Pulakhandam shall provide a copy of this Consent Agreement by certified mail to the proper licensing authority of any state or jurisdiction in which she currently holds any professional license, as well as any federal agency or entity, including but not limited to the Drug Enforcement Agency, through which she currently holds any license or certificate. Dr. Pulakhandam further agrees to provide a copy of this Consent Agreement by certified mail at time of application to the proper licensing authority of any state in which she applies for any professional license or reinstatement of any professional license. Additionally, within thirty days of the effective date of this Consent Agreement, Dr. Pulakhandam shall provide a copy of this Consent Agreement to any specialty or subspecialty board of the American Board of Medical Specialties or the American Osteopathic Association Bureau of Osteopathic Specialists under which she currently holds or has previously held certification. Further, within thirty days of the date of each such notification, Dr. Pulakhandam shall provide documentation acceptable to the Secretary and Supervising Member of the Board demonstrating that the required notification has occurred.

9. Dr. Pulakhandam shall notify the Board in writing of any change of principal practice address or residence address within thirty days of such change.

DURATION/MODIFICATION OF TERMS

The Reprimand of Dr. Pulakhandam shall not terminate. Further, Dr. Pulakhandam shall not request termination of the probationary terms contained in this Consent Agreement until she submits, and the Board has accepted as satisfactory, both the documentation of successful completion of the required medical education courses set forth herein, as well as the corresponding written reports to the Board. Otherwise, the above terms, limitations and conditions may be amended or terminated in writing at any time upon the agreement of both parties.

In the event that the Board initiates future formal proceedings against Dr. Pulakhandam, including but not limited to issuance of a Notice of Opportunity for Hearing, this Consent Agreement shall continue in full force and effect until such time that it is superseded by ratification by the Board of a subsequent Consent Agreement or upon this Consent Agreement being superseded by a subsequent final Board Order taking effect.

In the event that any term, limitation, or condition contained in this Consent Agreement is determined to be invalid by a court of competent jurisdiction, Dr. Pulakhandam and the Board agree that all other terms, limitations, and conditions contained in this Consent Agreement shall be unaffected.

FAILURE TO COMPLY

If, in the discretion of the Secretary and Supervising Member of the Board, Dr. Pulakhandam appears to have violated or breached any term or condition of this Consent Agreement, the Board reserves the right to institute formal disciplinary proceedings for any and all possible violations or breaches, including but not limited to, alleged violations of the laws of Ohio occurring before the effective date of this Consent Agreement.

ACKNOWLEDGMENTS/LIABILITY RELEASE

By executing her signature on this Consent Agreement, Dr. Pulakhandam agrees that in the event the Board, in its discretion, does not ratify this Consent Agreement, this settlement offer is withdrawn and shall be of no evidentiary value and shall not be relied upon or introduced in any disciplinary action or appeal by either party. Dr. Pulakhandam and the Board further agree that if this Consent Agreement is not approved, it shall not constitute an admission against interest in this proceeding and shall not prejudice the ability of the Board to adjudicate this matter.

This Consent Agreement represents the sole and entire agreement of the parties hereto and supersedes all prior written or oral negotiations, agreements, or understandings between the parties. No party to this agreement has been induced to enter into the Consent Agreement by any representations or inducements except those expressly set forth in this written agreement. Further, all parties agree that to the extent any language in the agreement will be interpreted in a subsequent dispute, no ambiguous language shall be construed against the party drafting this Consent Agreement.

Dr. Pulakhandam acknowledges that she has had an opportunity to ask questions concerning the terms of this Consent Agreement and that all questions asked have been answered in a satisfactory manner.

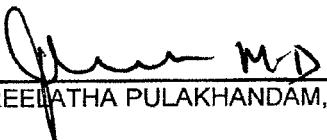
Any action initiated by the Board based on alleged violations of this Consent Agreement shall comply with the Administrative Procedure Act, Chapter 119., Ohio Revised Code.

Dr. Pulakhandam hereby releases the Board, its members, employees, agents, officers and representatives jointly and severally from any and all liability arising from the within matter.


This Consent Agreement shall be considered a public record as that term is used in Section 149.43, Ohio Revised Code. Further, this information may be reported to appropriate organizations, data banks and governmental bodies. Dr. Pulakhandam acknowledges that her social security number will be used if this information is so reported and agrees to provide her social security number to the Board for such purposes.

EFFECTIVE DATE

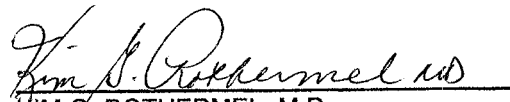
It is expressly understood that this Consent Agreement is subject to ratification by the Board prior to signature by the Secretary and Supervising Member and shall become effective upon the last date of signature below. Further, Dr. Pulakhandam specifically acknowledges that the electronic transmission of a scanned or photostatic copy of any executed signature to this Consent Agreement, upon being received by the Board, shall be deemed to have the full legal force and effect as the original.


SREEATHA PULAKHANDAM, M.D.


3/11/19
DATE


HEIDI DORN, ESQ
Attorney for Dr. Pulakhandam

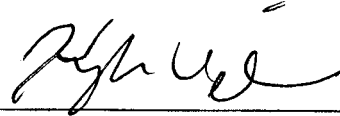
3/11/19
DATE


KIM G. ROTHERMEL, M.D.
Secretary

4-10-19
DATE


BRUCE R. SAFERIN, D.P.M.
Supervising Member

04/10/2019
DATE



KYLE C. WILCOX
Assistant Attorney General

4-10-19

DATE



State Medical Board of

Ohio

301 E. Broad St., 3rd Floor
Columbus, Ohio 43215
(614) 456-3934
www.med.ohio.gov

June 13, 2018

Case number: 18-CRF- 0063

Sreelatha Pulakhandam, M.D.
680 Millikens Bnd.
Covington, LA 70433-4528

Dear Doctor Pulakhandam:

In accordance with Chapter 119., Ohio Revised Code, you are hereby notified that the State Medical Board of Ohio [Board] intends to determine whether or not to limit, revoke, permanently revoke, suspend, refuse to grant or register or renew or reinstate your license or certificate to practice medicine and surgery, or to reprimand you or place you on probation for one or more of the following reasons:

- (1) On or about September 20, 2017, you entered into Consent Agreement with the Louisiana Board of Medical Examiners [Louisiana Consent Agreement], effective on or about October 16, 2017, wherein your license to practice medicine in the State of Louisiana was placed on probation for one year, with terms and conditions including practice monitoring and quarterly reports, and completion of courses in professionalism, medical ethics, and proper prescribing. The Louisiana Consent Agreement specifically addresses allegations that you may have been directing clinical staff to fill out pre-signed prescriptions, including prescriptions for drugs containing buprenorphine, a Schedule III controlled substance, and to complete medical records on your patients while you were out of the country. Additionally, the Consent Agreement indicates that you may have falsified medical records to indicate that you examined patients on dates when you were out of the country.

A copy of the Louisiana Consent Agreement is attached hereto and incorporated herein.

The Louisiana Consent Agreement, as alleged in paragraph (1), individually and/or collectively, constitutes, "[a]ny of the following actions taken by an agency responsible for authorizing, certifying, or regulating an individual to practice a health care occupation or provide health care services in this state or another jurisdiction, for any reason other than the nonpayment of fees: the limitation, revocation, or suspension of an individual's license to practice; acceptance of an individual's license surrender; denial of a license; refusal to renew or reinstate a license; imposition of probation; or issuance of an order of censure or other reprimand," as that clause is used in Section 4731.22(B)(22), Ohio Revised Code.

Furthermore, for any violations that occurred on or after September 29, 2015, the board may impose a civil penalty in an amount that shall not exceed twenty thousand dollars, pursuant to Section 4731.225, Ohio Revised Code. The civil penalty may be in addition to any other action the board may take under section 4731.22, Ohio Revised Code.

Mailed 6-14-18

Pursuant to Chapter 119., Ohio Revised Code, you are hereby advised that you are entitled to a hearing in this matter. If you wish to request such hearing, the request must be made in writing and must be received in the offices of the State Medical Board within thirty days of the time of mailing of this notice.

You are further advised that, if you timely request a hearing, you are entitled to appear at such hearing in person, or by your attorney, or by such other representative as is permitted to practice before this agency, or you may present your position, arguments, or contentions in writing, and that at the hearing you may present evidence and examine witnesses appearing for or against you.

In the event that there is no request for such hearing received within thirty days of the time of mailing of this notice, the State Medical Board may, in your absence and upon consideration of this matter, determine whether or not to limit, revoke, permanently revoke, suspend, refuse to grant or register or renew or reinstate your certificate or license to practice medicine and surgery or to reprimand you or place you on probation.

Please note that, whether or not you request a hearing, Section 4731.22(L), Ohio Revised Code, provides that "[w]hen the board refuses to grant or issue a license or certificate to practice to an applicant, revokes an individual's license or certificate to practice, refuses to renew an individual's license or certificate to practice, or refuses to reinstate an individual's license or certificate to practice, the board may specify that its action is permanent. An individual subject to a permanent action taken by the board is forever thereafter ineligible to hold a license or certificate to practice and the board shall not accept an application for reinstatement of the license or certificate or for issuance of a new license or certificate."

Copies of the applicable sections are enclosed for your information.

Very truly yours,



Kim G. Rothermel, M.D.
Secretary

KGR/AMM/jmb
Enclosures

CERTIFIED MAIL #91 7199 9991 7036 6912 2426
RETURN RECEIPT REQUESTED

LOUISIANA STATE BOARD OF MEDICAL EXAMINERS

630 Camp Street, New Orleans, LA 70130
www.lsbme.la.gov



Telephone: (504) 568-6820

FAX: (504) 568-8893

Writer's Direct Dial:

(504) _____

IN THE MATTER OF

Sreelatha Pulakhandam, M.D.
(Certificate No. 201314),

Respondent

No. 2016 - I - 585

CONSENT
ORDER

The above-entitled proceeding was docketed for investigation by the Louisiana State Board of Medical Examiners (the "Board") following the receipt information which indicated that Sreelatha Pulakhandam, M.D. ("Dr. Pulakhandam"), who is, and was at all times material to the facts and matters alleged herein, a physician duly licensed by the Board to practice medicine in the state of Louisiana pursuant to the Louisiana Medical Practice Act, La. Rev. Stat. §§37:1261 *et seq.*, as evidenced by Certificate No. 201314, may have been directing clinic staff to fill out pre-signed prescriptions, including prescriptions for drugs containing buprenorphine, a Schedule III controlled substance, and to complete medical records on her patients while she was out of the country. Additionally, Dr. Pulakhandam may have falsified medical records to indicate that she examined patients on dates when she was out of the country.

As evidenced by her subscription hereto, Dr. Pulakhandam acknowledges that the foregoing information could provide the Investigating Officer for the Board with probable cause to pursue formal administrative proceedings against her for violation of the Louisiana Medical Practice Act, La. Rev. Stat. §§37:1285A(6), (13), (18), (30), and the Board Rules,¹ constituting

¹ Pursuant to La. R.S. §37:1285(A), the Board may suspend, revoke, or impose probation or other restrictions on the license of an individual licensed to practice medicine in the State of Louisiana as a result of: "(6) [p]rescribing, dispensing, or administering legally controlled substances or any dependency-induced medication without legitimate medical justification therefore or in other than a legal or legitimate manner;" "(13) [u]nprofessional conduct, including but not limited to . . . intentionally falsifying or fraudulently altering records, or failing to create or maintain medical records . . . [and] enabling the unauthorized practice of medicine;" "(18) [k]nowingly performing any act which, in any way, assists an unlicensed person to practice medicine;" and "(30) [v]iolation of any rules and regulations of the board. . . ." Pursuant to the Board Rules, physicians may not "falsely create or alter a medical record or destroy a medical record except as authorized by law." La. Admin Code 46:XLV.7603(A)(10). . . Pursuant to the Board Rules, physicians may not "enter into any arrangement, as medical director or otherwise, that allows or condones an unlicensed individual to engage in the practice of medicine, as defined by R.S. 37:1261(1), in the absence of the

sufficient cause for the revocation, suspension or such other action against her license to practice medicine in the state of Louisiana as the Board may determine appropriate.

Recognizing her right to written notification of any charges that may be asserted against her as a result of this investigation, as well as the right to administrative adjudication of such charges, at which time she would be entitled to be represented by legal counsel, to call witnesses and to present evidence on her own behalf in defense or in mitigation of the charges made, and to a decision thereon by the Board based upon written findings of fact and conclusions of law, pursuant to La. Rev. Stat. §§49:955-965, Dr. Pulakhandam, nonetheless, hereby waives her right to formal adjudication and, pursuant to La. Rev. Stat. §49:955(D), consents to entry of the Order set forth hereinafter. Dr. Pulakhandam also acknowledges that she hereby waives any right to which she may be entitled pursuant to the Louisiana Administrative Procedure Act, La. Rev. Stat. §49:951, *et seq.*, or to which she otherwise may be afforded by any law to contest her agreement to or the force and effect of the Board's investigation or this document in any court or other forum. By her subscription hereto, Dr. Pulakhandam also hereby authorizes the I/O designated by the Board with respect hereto, to present this Consent Order to the Board for its consideration and to fully disclose to and discuss with the Board the nature and results of the investigation, and she waives any objection to such disclosures under La. Rev. Stat. §49:960. Dr. Pulakhandam expressly acknowledges that the disclosure of such information to the Board by the I/O shall be without prejudice to the I/O's authority to proceed with the filing and adjudication of an Administrative Complaint against her or to the Board's capacity to adjudicate such Complaint, should the Board decline to approve this Consent Order.

IT IS ORDERED that the license of Sreelatha Pulakhandam, M.D. to practice medicine in the state of Louisiana, as evidenced by Certificate No. 201314, is hereby placed on **PROBATION** for One (1) year; *provided, however*, that such licensure and Dr. Pulakhandam continuing exercise of rights and privileges granted thereby, shall be conditioned upon and subject to her acceptance of and strict compliance with the following terms, conditions and restrictions:

- (1) **Practice Monitoring and Quarterly Reports.** Within sixty (60) days of the effective date of this Order, Dr. Pulakhandam shall enter into an agreement with a Board-approved practice monitor to monitor and review Dr. Pulakhandam's medical practice during the probationary period. The practice monitor shall review no less than ten (10) records a quarter. The practice monitoring shall provide quarterly reports to the Board that will include an opinion as to whether Dr. Pulakhandam is practicing and documenting her patient's evaluation and treatment in accordance with the prevailing standards of a medical practice. Dr. Pulakhandam shall bear all costs associated with the practice monitor program.

physician's direction and immediate personal supervision—i.e., where the physician is physically present on the premises at all times that the unlicensed individual is on duty and retains full responsibility to patients for the training, delivery and results of all services rendered." La. Admin Code 46:XLV.7603(A)(7)(a).

(2) **Course on Professionalism and Medical Ethics.** Within one (1) year of the effective date of this Order, Dr. Pulakhandam shall attend and successfully complete a course (or courses) on professionalism and medical ethics. The course shall be approved in advance by the Board. On or before the expiration of one (1) year from the effective date of this Order Dr. Pulakhandam shall cause to be submitted to the Board written certification of satisfaction of the requirements of this provision.

(3) **Course on Proper Prescribing.** Within one (1) year of the effective date of this Order, Dr. Pulakhandam shall attend and successfully complete a course (or courses) on the proper prescribing of controlled substances. The course shall be approved in advance by the Board. On or before the expiration of one (1) year from the effective date of this Order Dr. Pulakhandam shall cause to be submitted to the Board written certification of satisfaction of the requirements of this provision.

(4) **Continuing Medical Education.** Dr. Pulakhandam shall obtain not less than fifty (50) credit hours per year during her probationary term through attendance at and participation in continuing medical education programs ("CME") accredited by the American College of Physicians, the American Medical Association, or such other national accrediting association or organization as the Board may approve in writing. On or before the anniversary of the effective date of this Order, Dr. Pulakhandam shall cause to be submitted to the Board written certification of the CME programs and credits completed by her during the preceding twelve (12) months.

(5) **Absence from State/Practice/Effect on Probation.** Should Dr. Pulakhandam at any time during the period of probation ordered herein be absent from the state of Louisiana, relocate to and/or take up residency in another state or country or discontinue practicing medicine for a period of thirty (30) days or more, or should she fail to renew her license to practice medicine in this state, she shall advise the Board in writing. In such instance, the probationary period ordered herein and all terms, conditions and restrictions thereof shall be deemed interrupted and extended and shall not commence to run until Dr. Pulakhandam notifies the Board in writing that she has returned to, relocated or taken up residency in, resumed the practice medicine in this state, or renewed her Louisiana medical license. In such instance, Dr. Pulakhandam shall not receive credit toward completion of the probationary period for the time during which she was absent from the State of Louisiana or while she was not engaged or licensed to practice medical psychology in this state.

(6) **Certification of Compliance with Probationary Terms.** At least sixty (60) days prior to the conclusion of the probationary term imposed herein, Dr. Pulakhandam shall provide the Board with an affidavit certifying that he has complied with each of the terms of probation imposed by this Order. The probationary period and all of its terms and conditions shall be, and shall be

In the Matter of:

Sreelatha Pulakhandam, M.D.

Consent Order

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deemed to be, extended and continued in full force and effect pending Dr. Pulakhandam compliance with the requirements of this provision.

(7) **Cooperation with Board's Probation and Compliance Officer.** Dr. Pulakhandam shall immediately notify the Board's Probation and Compliance Officer of any change in her current home and professional addresses and telephone numbers and she shall direct all matters required pursuant to this Consent Order to the attention of the Probation and Compliance Officer, with whom she shall cooperate on all matters and inquiries pertaining to her compliance with the terms, conditions and restrictions of this Order.

(8) **Probation Monitoring Fee.** For each year of the probationary term Dr. Pulakhandam shall pay the Board a probation monitoring fee of Three Hundred (\$300.00) Dollars. Payment of the initial fee shall be due not later than sixty (60) days from the effective date of this Order. All subsequent annual payments shall be due on or before the anniversary date of the initial fee payment.

(9) **Payment of Fine.** Within one (1) year of the effective date of this Order, Dr. Pulakhandam shall pay to the Board a fine in the amount of Five Thousand and no/100 (\$5,000.00) Dollars.


(10) **Effective Date.** This Consent Order shall be effective the date it is approved and accepted by the Board as shown by the signature of its representative below.

IT IS FURTHER ORDERED that any violation or failure of strict compliance with any of the terms, conditions or restrictions set forth by this Order by Dr. Pulakhandam shall be deemed adequate and sufficient cause, upon proof of such violation or failure, for such other action against Dr. Pulakhandam's license to practice medicine in the state of Louisiana as the Board may deem appropriate, as if such violations were enumerated among the causes provided in La. Rev. Stat. §37:1285(A).

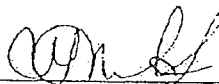
IT IS FURTHER ORDERED that this Order shall be, and shall be deemed to be, a public record.

Signed at New Orleans, Louisiana, and effective on this 16th day of October, 2017.

**LOUISIANA STATE BOARD
OF MEDICAL EXAMINERS**

CERTIFIED TRUE COPY

Docket Clerk
Louisiana State Board of Medical Examiners
Date 11/29/17

By:



Christy L. Valentine, M.D.
President

In the Matter of:
Sreeclatha Pulakhandam, M.D.

Consent Order

5

Acknowledgment and Consent on the following page

In the Matter of:

Sreelatha Pulakhandam, M.D.

Consent Order

6

ACKNOWLEDGMENT
AND CONSENT

STATE OF LOUISIANA

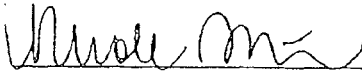
PARISH OF St. Tammany

I, SREELATHA PULAKHANDAM, M.D., hereby acknowledge, approve, accept and consent to entry of the above and foregoing Order, this 20th day of September, 2017.



SREELATHA PULAKHANDAM, M.D.

WITNESSES:



Signature

Nicole Smith

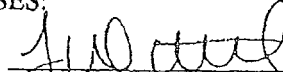
Typed Name

360 Emerald Forest Blvd Ste D

Address

Covington, LA 70433

City/State/Zip Code



Signature

Jacques Duteil

Typed Name

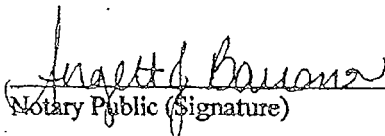
360 Emerald Forest Blvd Ste D

Address

Covington, LA 70433

City/State/Zip Code

Sworn to and subscribed before me this 20th day of September, 2017
in the presence of the two stated witnesses.



Notary Public (Signature)

Angela J. Barron 134386

Printed Name & Notary or Bar Number





State Medical Board of

Ohio

30 E. Broad St., 3rd Floor
Columbus, Ohio 43215
(614) 466-3934
www.med.ohio.gov

June 13, 2018

Case number: 18-CRF- 0063

Sreelatha Pulakhandam, M.D.
680 Millikens Bnd.
Covington, LA 70433-4528

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Mailed 6-14-18

Pursuant to Chapter 119., Ohio Revised Code, you are hereby advised that you are entitled to a hearing in this matter. If you wish to request such hearing, the request must be made in writing and must be received in the offices of the State Medical Board within thirty days of the time of mailing of this notice.

You are further advised that, if you timely request a hearing, you are entitled to appear at such hearing in person, or by your attorney, or by such other representative as is permitted to practice before this agency, or you may present your position, arguments, or contentions in writing, and that at the hearing you may present evidence and examine witnesses appearing for or against you.

In the event that there is no request for such hearing received within thirty days of the time of mailing of this notice, the State Medical Board may, in your absence and upon consideration of this matter, determine whether or not to limit, revoke, permanently revoke, suspend, refuse to grant or register or renew or reinstate your certificate or license to practice medicine and surgery or to reprimand you or place you on probation.

Please note that, whether or not you request a hearing, Section 4731.22(L), Ohio Revised Code, provides that "[w]hen the board refuses to grant or issue a license or certificate to practice to an applicant, revokes an individual's license or certificate to practice, refuses to renew an individual's license or certificate to practice, or refuses to reinstate an individual's license or certificate to practice, the board may specify that its action is permanent. An individual subject to a permanent action taken by the board is forever thereafter ineligible to hold a license or certificate to practice and the board shall not accept an application for reinstatement of the license or certificate or for issuance of a new license or certificate."

Copies of the applicable sections are enclosed for your information.

Very truly yours,



Kim G. Rothermel, M.D.
Secretary

KGR/AMM/jmb
Enclosures

CERTIFIED MAIL #91 7199 9991 7036 6912 2426
RETURN RECEIPT REQUESTED

LOUISIANA STATE BOARD OF MEDICAL EXAMINERS

630 Camp Street, New Orleans, LA 70130
www.lsbme.la.gov



Telephone: (504) 568-6820
FAX: (504) 568-8893
Writer's Direct Dial:

(504) _____

IN THE MATTER OF

Sreelatha Pulakhandam, M.D.
(Certificate No. 201314),

Respondent

No. 2016 - I - 585

CONSENT
ORDER

The above-entitled proceeding was docketed for investigation by the Louisiana State Board of Medical Examiners (the "Board") following the receipt information which indicated that Sreelatha Pulakhandam, M.D. ("Dr. Pulakhandam"), who is, and was at all times material to the facts and matters alleged herein, a physician duly licensed by the Board to practice medicine in the state of Louisiana pursuant to the Louisiana Medical Practice Act, La. Rev. Stat. §§37:1261 *et seq.*, as evidenced by Certificate No. 201314, may have been directing clinic staff to fill out pre-signed prescriptions, including prescriptions for drugs containing buprenorphine, a Schedule III controlled substance, and to complete medical records on her patients while she was out of the country. Additionally, Dr. Pulakhandam may have falsified medical records to indicate that she examined patients on dates when she was out of the country.

As evidenced by her subscription hereto, Dr. Pulakhandam acknowledges that the foregoing information could provide the Investigating Officer for the Board with probable cause to pursue formal administrative proceedings against her for violation of the Louisiana Medical Practice Act, La. Rev. Stat. §§37:1285A(6), (13), (18), (30), and the Board Rules,¹ constituting

¹ Pursuant to La. R.S. §37:1285(A), the Board may suspend, revoke, or impose probation or other restrictions on the license of an individual licensed to practice medicine in the State of Louisiana as a result of: "(6) [p]rescribing, dispensing, or administering legally controlled substances or any dependency-induced medication without legitimate medical justification therefore or in other than a legal or legitimate manner;" "(13) [u]nprofessional conduct, including but not limited to . . . intentionally falsifying or fraudulently altering records, or failing to create or maintain medical records . . . [and] enabling the unauthorized practice of medicine;" "(18) [k]nowingly performing any act which, in any way, assists an unlicensed person to practice medicine;" and "(30) [v]iolation of any rules and regulations of the board. . . ." Pursuant to the Board Rules, physicians may not "falsely create or alter a medical record or destroy a medical record except as authorized by law." La. Admin Code 46:XLV.7603(A)(10). Pursuant to the Board Rules, physicians may not "enter into any arrangement, as medical director or otherwise, that allows or condones an unlicensed individual to engage in the practice of medicine, as defined by R.S. 37:1261(1), in the absence of the

sufficient cause for the revocation, suspension or such other action against her license to practice medicine in the state of Louisiana as the Board may determine appropriate.

Recognizing her right to written notification of any charges that may be asserted against her as a result of this investigation, as well as the right to administrative adjudication of such charges, at which time she would be entitled to be represented by legal counsel, to call witnesses and to present evidence on her own behalf in defense or in mitigation of the charges made, and to a decision thereon by the Board based upon written findings of fact and conclusions of law, pursuant to La. Rev. Stat. §§49:955-965, Dr. Pulakhandam, nonetheless, hereby waives her right to formal adjudication and, pursuant to La. Rev. Stat. §49:955(D), consents to entry of the Order set forth hereinafter. Dr. Pulakhandam also acknowledges that she hereby waives any right to which she may be entitled pursuant to the Louisiana Administrative Procedure Act, La. Rev. Stat. §49:951, *et seq.*, or to which she otherwise may be afforded by any law to contest her agreement to or the force and effect of the Board's investigation or this document in any court or other forum. By her subscription hereto, Dr. Pulakhandam also hereby authorizes the I/O designated by the Board with respect hereto, to present this Consent Order to the Board for its consideration and to fully disclose to and discuss with the Board the nature and results of the investigation, and she waives any objection to such disclosures under La. Rev. Stat. §49:960. Dr. Pulakhandam expressly acknowledges that the disclosure of such information to the Board by the I/O shall be without prejudice to the I/O's authority to proceed with the filing and adjudication of an Administrative Complaint against her or to the Board's capacity to adjudicate such Complaint, should the Board decline to approve this Consent Order.

IT IS ORDERED that the license of Sreelatha Pulakhandam, M.D. to practice medicine in the state of Louisiana, as evidenced by Certificate No. 201314, is hereby placed on **PROBATION** for One (1) year; *provided, however*, that such licensure and Dr. Pulakhandam continuing exercise of rights and privileges granted thereby, shall be conditioned upon and subject to her acceptance of and strict compliance with the following terms, conditions and restrictions:

- (1) **Practice Monitoring and Quarterly Reports.** Within sixty (60) days of the effective date of this Order, Dr. Pulakhandam shall enter into an agreement with a Board-approved practice monitor to monitor and review Dr. Pulakhandam's medical practice during the probationary period. The practice monitor shall review no less than ten (10) records a quarter. The practice monitoring shall provide quarterly reports to the Board that will include an opinion as to whether Dr. Pulakhandam is practicing and documenting her patient's evaluation and treatment in accordance with the prevailing standards of a medical practice. Dr. Pulakhandam shall bear all costs associated with the practice monitor program.

physician's direction and immediate personal supervision—i.e., where the physician is physically present on the premises at all times that the unlicensed individual is on duty and retains full responsibility to patients for the training, delivery and results of all services rendered." La. Admin Code 46:XLV.7603(A)(7)(a).

(2) **Course on Professionalism and Medical Ethics.** Within one (1) year of the effective date of this Order, Dr. Pulakhandam shall attend and successfully complete a course (or courses) on professionalism and medical ethics. The course shall be approved in advance by the Board. On or before the expiration of one (1) year from the effective date of this Order Dr. Pulakhandam shall cause to be submitted to the Board written certification of satisfaction of the requirements of this provision.

(3) **Course on Proper Prescribing.** Within one (1) year of the effective date of this Order, Dr. Pulakhandam shall attend and successfully complete a course (or courses) on the proper prescribing of controlled substances. The course shall be approved in advance by the Board. On or before the expiration of one (1) year from the effective date of this Order Dr. Pulakhandam shall cause to be submitted to the Board written certification of satisfaction of the requirements of this provision.

(4) **Continuing Medical Education.** Dr. Pulakhandam shall obtain not less than fifty (50) credit hours per year during her probationary term through attendance at and participation in continuing medical education programs ("CME") accredited by the American College of Physicians, the American Medical Association, or such other national accrediting association or organization as the Board may approve in writing. On or before the anniversary of the effective date of this Order, Dr. Pulakhandam shall cause to be submitted to the Board written certification of the CME programs and credits completed by her during the preceding twelve (12) months.

(5) **Absence from State/Practice/Effect on Probation.** Should Dr. Pulakhandam at any time during the period of probation ordered herein be absent from the state of Louisiana, relocate to and/or take up residency in another state or country or discontinue practicing medicine for a period of thirty (30) days or more, or should she fail to renew her license to practice medicine in this state, she shall advise the Board in writing. In such instance, the probationary period ordered herein and all terms, conditions and restrictions thereof shall be deemed interrupted and extended and shall not commence to run until Dr. Pulakhandam notifies the Board in writing that she has returned to, relocated or taken up residency in, resumed the practice medicine in this state, or renewed her Louisiana medical license. In such instance, Dr. Pulakhandam shall not receive credit toward completion of the probationary period for the time during which she was absent from the State of Louisiana or while she was not engaged or licensed to practice medical psychology in this state.

(6) **Certification of Compliance with Probationary Terms.** At least sixty (60) days prior to the conclusion of the probationary term imposed herein, Dr. Pulakhandam shall provide the Board with an affidavit certifying that he has complied with each of the terms of probation imposed by this Order. The probationary period and all of its terms and conditions shall be, and shall be

deemed to be, extended and continued in full force and effect pending Dr. Pulakhandam compliance with the requirements of this provision.

(7) **Cooperation with Board's Probation and Compliance Officer.** Dr. Pulakhandam shall immediately notify the Board's Probation and Compliance Officer of any change in her current home and professional addresses and telephone numbers and she shall direct all matters required pursuant to this Consent Order to the attention of the Probation and Compliance Officer, with whom she shall cooperate on all matters and inquiries pertaining to her compliance with the terms, conditions and restrictions of this Order.

(8) **Probation Monitoring Fee.** For each year of the probationary term Dr. Pulakhandam shall pay the Board a probation monitoring fee of Three Hundred (\$300.00) Dollars. Payment of the initial fee shall be due not later than sixty (60) days from the effective date of this Order. All subsequent annual payments shall be due on or before the anniversary date of the initial fee payment.

(9) **Payment of Fine.** Within one (1) year of the effective date of this Order, Dr. Pulakhandam shall pay to the Board a fine in the amount of Five Thousand and no/100 (\$5,000.00) Dollars.


(10) **Effective Date.** This Consent Order shall be effective the date it is approved and accepted by the Board as shown by the signature of its representative below.

IT IS FURTHER ORDERED that any violation or failure of strict compliance with any of the terms, conditions or restrictions set forth by this Order by Dr. Pulakhandam shall be deemed adequate and sufficient cause, upon proof of such violation or failure, for such other action against Dr. Pulakhandam's license to practice medicine in the state of Louisiana as the Board may deem appropriate, as if such violations were enumerated among the causes provided in La. Rev. Stat. §37:1285(A).

IT IS FURTHER ORDERED that this Order shall be, and shall be deemed to be, a public record.

Signed at New Orleans, Louisiana, and effective on this 16th day of October, 2017.

**LOUISIANA STATE BOARD
OF MEDICAL EXAMINERS**

CERTIFIED TRUE COPY

Docket Clerk
Louisiana State Board of Medical Examiners
Date 11/29/17

By:



Christy L. Valentine, M.D.
President

In the Matter of:

Sreelatha Pulakhandam, M.D.

Consent Order

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Acknowledgment and Consent on the following page

ACKNOWLEDGMENT
AND CONSENT

STATE OF LOUISIANA

PARISH OF St. Tammany

I, SREELATHA PULAKHANDAM, M.D., hereby acknowledge, approve, accept and consent to entry of the above and foregoing Order, this 20th day of September, 2017.

Sreelatha Pulakhandam
SREELATHA PULAKHANDAM, M.D.

WITNESSES:

Nicole Smith
Signature

Nicole Smith
Typed Name

360 Emerald Forest Blvd Ste D
Address

Covington, LA 70433
City/State/Zip Code

Jacques Duteil
Signature

Jacques Duteil
Typed Name

360 Emerald Forest Blvd Ste D
Address

Covington, LA 70433
City/State/Zip Code

Sworn to and subscribed before me this 20th day of September, 2017
in the presence of the two stated witnesses.

Angela J. Barron
Notary Public (Signature)

Angela J. Barron 134335
Printed Name & Notary or Bar Number

