

**BEFORE THE MINNESOTA  
BOARD OF VETERINARY MEDICINE**

In the Matter of  
Heather Othilda Rehdantz, D.V.M.  
License No.

**STIPULATION AND ORDER**

**STIPULATION**

Heather Othilda Rehdantz, D.V.M. ("Licensee"), and the Minnesota Board of Veterinary Medicine Complaint Review Committee ("Committee") agree that the above-referenced matter may be resolved without trial of any issue or fact as follows:

**I.**

**JURISDICTION**

1. The Minnesota Board of Veterinary Medicine ("Board") is authorized pursuant to Minn. Stat. Ch. 156 to license and regulate veterinarians and to take disciplinary action as appropriate.

2. Licensee holds a license from the Board to practice veterinary medicine in the State of Minnesota and is subject to the jurisdiction of the Board with respect to the matters referred to in this Stipulation and Order.

**II.**

**COMPLAINT REVIEW COMMITTEE**

3. On June 3, 2015, Licensee met with the Complaint Review Committee. The Committee was composed of Board members Michelle Vaughn, D.V.M. and John Lawrence, D.V.M., Board Member. Julia Wilson, D.V.M., Executive Director of the Board, and Andrew Pettit, Assistant Attorney General, were also present. Jennifer C. Middleton, Assistant Attorney

General, appeared on behalf of the Committee. Licensee was represented by Fabian Hoffner, Esq.

### III.

#### FACTS

4. For purposes of Board of Veterinary Medicine proceedings only and without prejudice to Licensee in a proceeding in any other forum, the Board may consider the following as true:

A. Licensee practiced veterinary medicine without a license from 2013 to 2015.

B. On May 20, 2015, a Cease and Desist Order and Notice of Hearing was served upon Licensee.

C. On June 12, 2015, Licensee submitted all of the required components for her application for licensure to practice veterinary medicine in the State of Minnesota.

### IV.

#### LAWS

Licensee acknowledges that the facts and conduct described in section III above constitute violations of Minn. Stat. § 156.081, subd. 2(12), Minn. Stat. § 156.10, and Minn. Stat. § 156.12, subd. 1, and are sufficient grounds for the remedy set forth below.

### V.

#### DISCIPLINARY ACTION

3. IT IS HEREBY ORDERED that the Cease and Desist Order issued to Licensee on May 20, 2015, is hereby **RESCINDED** and shall have no further force and effect;

4. IT IS HEREBY ORDERED that Licensee is granted a license to practice veterinary medicine in the State of Minnesota.

5. The Board hereby places the following LIMITATIONS Licensee's license:

A. A licensed veterinarian must be present in the facility at all times that Licensee practices veterinary medicine while this Order is in effect.

6. The Board hereby places the following CONDITIONS on Licensee's license:

A. Licensee shall report to the Health Professionals Services Program (HPSP) within 30 days of the date that this Order takes effect for assessment to determine eligibility for enrollment and participation. If HPSP determines that Licensee is eligible, Licensee must enroll in HPSP and comply with the participation agreement.

B. Licensee shall submit to the Committee evidence of completion of the following continuing education:

1) Within three months of the date of this Order, Licensee shall submit to the Committee evidence of completion of all eight modules of Iowa State University's online Veterinary Law & Ethics course.

2) Within twelve months of the date of this Order, Licensee shall complete 20 hours of interactive continuing education on topics relevant to small animal medicine and surgery. Licensee must provide satisfactory evidence of completion of this continuing education to the Board.

3) The Board may, in its discretion, audit Licensee's continuing education compliance for future license renewals.

C. Licensee's must provide her employer(s) with a copy of this Stipulation and Order.

D. Licensee must cause the supervising veterinarian to submit quarterly reports regarding Licensee's practice of veterinary medicine on a form provided by the Board. It is the responsibility of the Licensee to ensure quarterly reports are submitted on time based on a

schedule provided by the Board while this Order is in effect. Quarterly reports of Licensee's performance must be satisfactory as judged by the Committee.

E. Licensee will provide to the Board copies of five medical records each quarter from patients under her care from a week of the Board's choosing while this Order is in effect. The Board shall contact the Licensee quarterly to inform her as to which week she shall submit records.

7. Licensee may petition for removal of the conditions and limitations on her license upon satisfactory completion of all conditions outlined in paragraph 7 and after completing at least 2,000 documented hours practicing veterinary medicine with satisfactory quarterly reports. Licensee's petition may be granted, if at all, as the evidence dictates and based upon the need to protect the public. The burden of proof will be upon Licensee to demonstrate by a preponderance of the evidence that she is capable of conducting himself in a fit and competent manner in the practice of veterinary medicine.

8. At the time of Licensee's petition, Licensee may be required to meet with the Board's Complaint Review Committee to discuss her petition. The Committee will make a recommendation to the full Board which will make a decision as discussed below.

9. Upon hearing Licensee's petition, the Board may deny Licensee's petition for an unencumbered license, continue the conditions and/or limitations imposed on Licensee's license, or grant Licensee an unencumbered license.

10. In the event Licensee resides or practices outside the State of Minnesota, Licensee must promptly notify the Board in writing of the location of her residence and all work sites. Periods of residency or practice outside of Minnesota will not be credited toward any period of Licensee's suspended, limited, or conditioned license in Minnesota unless Licensee demonstrates

that practice in another state conforms completely with Licensee's Minnesota license to practice veterinary medicine.

## VI.

### CONSEQUENCES OF A VIOLATION

11. *Hearing Before the Board.* If the Committee determines that Licensee has violated any term or condition of this Stipulation and Order, the Committee may schedule a hearing before the Board and serve on Licensee a Notice of Hearing for Alleged Non-Compliance With Stipulation and Order ("Notice"), which sets forth the allegations against Licensee and provides Licensee notice of the date, time, and place of the hearing before the Board. The procedures set forth in paragraph 13 below shall apply to the hearing.

12. *Hearing Procedures.* The following procedures shall apply:

A. *Response to Allegations in Notice.* At least seven days before the hearing, Licensee shall submit a written response to the allegations set forth in the Notice. If Licensee does not submit a timely response to the Board, the allegations may be deemed admitted.

B. *Hearing Before Board.* The Board shall hold a hearing before its own members in accordance with the procedures set forth in paragraph 13.c. below to determine whether the allegations are true and, if so, whether to take additional disciplinary action against Licensee, which may include any of the forms of disciplinary action set forth in Minnesota Statutes section 156.127.

C. *Evidence at Hearing/Burden of Proof/Waiver of Hearing Before Administrative Law Judge.* At the hearing before the Board, the Committee and Licensee may present affidavits made on personal knowledge or authenticated documents and may present argument based on such evidence in support of their positions. The record before the Board shall be limited to such affidavits, documents, and this Stipulation and Order. The Committee shall

file with the Board all evidence it intends to present at the hearing and shall serve a copy on Licensee at least 14 days before the hearing. Licensee shall file with the Board all evidence she intends to present at the hearing and shall serve a copy on the Committee at least seven days before the hearing. The Committee must prove by a preponderance of the evidence that Licensee has violated this Stipulation and Order. The Board shall issue a final order within 30 days of the hearing. Licensee waives a hearing before an administrative law judge and waives discovery, cross-examination of adverse witnesses; and other procedures governing administrative hearings or civil trials.

D. *Costs.* If the Committee proves by a preponderance of the evidence that Licensee has violated this Stipulation and Order, the Board may require Licensee to pay costs of the proceedings. The costs of the proceedings may include the cost paid by the Board to the Office of the Attorney General for investigative and legal services, the cost of reproducing records and documents, Board staff time, travel costs and expenses, and Board members' per diem reimbursements, travel costs, and expenses.

13. *Statutory Procedures.* Nothing herein shall limit the Committee's right to attempt to resolve an alleged violation of this Stipulation and Order through the procedures of Minnesota Statutes section 214.103, subdivision 6, or to initiate a contested case proceeding under Minnesota Statutes chapter 14 based on an alleged violation of this Stipulation and Order.

## VII.

### ADDITIONAL INFORMATION

14. Licensee knowingly and voluntarily waives a contested case hearing and all other procedures before the Board to which Licensee may be entitled under the Minnesota and United States constitutions, statutes, or rules.

15. Licensee knowingly and voluntarily waives any and all claims against the Board, the Minnesota Attorney General, the State of Minnesota, and their agents, employees and representatives related to the investigation of the conduct herein, or the negotiation or execution of this Stipulation and Order, which may otherwise be available to Licensee.

16. This Stipulation and Order, the files, records and proceedings associated with this matter shall constitute the entire record and may be reviewed by the Board in its consideration of this matter.

17. Licensee shall be responsible for all costs incurred as a result of compliance with this Stipulation and Order.

18. Licensee has read, understands, and agrees to this Stipulation and Order and has voluntarily signed the Stipulation and Order. Licensee is aware that this Stipulation and Order must be approved by the Board before it goes into effect. The Board may either approve the Stipulation and Order as proposed, approve it subject to specified changes, or reject it. If the changes are acceptable to Licensee, the Stipulation and Order will take effect and the Order as modified will be issued. If the changes are unacceptable to Licensee or if the Board rejects the Stipulation and Order, it will be of no effect except as specified below.

19. Licensee agrees that if the Board rejects this Stipulation and Order or a lesser remedy than indicated in this settlement, and this case comes again before the Board, Licensee will assert no claim that the Board was prejudiced by its review and discussion of this Stipulation and Order or of any records relating to it.

20. This Stipulation and Order does not limit the Board's authority to proceed against Licensee by initiating a contested case hearing or by other appropriate means on the basis of any act, conduct, or omission of Licensee which constitutes grounds for disciplinary action and which is not directly related to the specific facts and circumstances set forth in this document.

VIII.

DATA PRACTICES NOTICES

21. This Stipulation and Order constitutes disciplinary action by the Board and is classified as public data pursuant to Minnesota Statutes section 13.41, subdivision 5. Data regarding this action will be provided to data banks as required by Federal law or consistent with Board policy. While this Stipulation and Order is in effect, information obtained by the Board pursuant to this Order is considered active investigative data on a licensed health professional, and as such, is classified as confidential data pursuant to Minnesota Statutes section 13.41, subdivision 4.

22. This Stipulation contains the entire agreement between the parties, there being no other agreement of any kind, verbal or otherwise, which varies this Stipulation.

  
HEATHER O. REHDANTZ, D.V.M.  
Licensee

  
MICHELLE VAUGHN, D.V.M.  
Committee Member

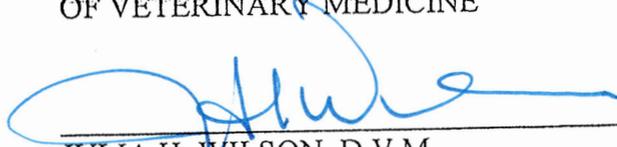
Dated: 06/30/15

Dated: 7/15/15

ORDER

Upon consideration of the Stipulation and all the files, records and proceedings herein, the terms of the Stipulation are approved and adopted, and the recommended remedy set forth in the Stipulation is hereby issued as an Order of this Board effective this 15<sup>th</sup> day of July, 2015.

MINNESOTA BOARD  
OF VETERINARY MEDICINE

  
JULIA H. WILSON, D.V.M.  
Executive Director