

**BEFORE THE MINNESOTA  
BOARD OF PSYCHOLOGY**

In the Matter of  
David Andros, M.S., L.P.  
License No. LP3170

STIPULATION AND  
CONSENT ORDER

IT IS HEREBY STIPULATED AND AGREED by David Andros, M.S., L.P. (Licensee), and the Minnesota Board of Psychology (Board) as follows:

1. During all times herein, Licensee has been and now is subject to the jurisdiction of the Board from which he holds a license to practice psychology in the State of Minnesota.

**FACTS**

2. For the purpose of this stipulation, the Board may consider the following facts as true:

a. **Background.** From January 1993 through August 1999, Licensee provided psychological services to client #1. Licensee began treating client #1 when she was 17 years old and documented more than 100 sessions with client #1. Client #1 was initially referred to Licensee by their church pastor for issues related to sexual abuse and depression. Licensee has no therapy notes for the time periods between approximately June 1994 and June 1997 and October 1997 and May 1998, during which time client #1 married, moved out of town and had a child. Licensee's diagnoses for client #1 included Depression, Posttraumatic Stress Disorder, Dissociative Identity Disorder (DID) and finally Borderline Personality Disorder at the time therapy terminated.

b. At the time he first met with client #1 in early January 1993, Licensee was aware client #1 had been sexually abused by her father and her brother. Licensee failed to properly document that he reported subsequent abuse of client #1 as evidenced by the following:

1) On January 31, 1993, Licensee documented that client #1 told his wife "her brother abused her this past Christmas but she had not told anyone yet." On

February 1, 1993, Licensee documented that he had a session with client #1 and they “[d]iscussed in more detail the assault from brother over Christmas.” On February 3, 1993, Licensee documented that he called the County Social Services regarding the abuse of client #1. On February 5, 1993, Licensee documented that he told client #1’s school counselor about client #1’s “recent sharing that sexual abuse happened just this Christmas.” Licensee’s file contains no documentation that he orally reported this abuse to the proper authorities in a timely manner (i.e., within 24 hours) or followed up any oral report with a written report within 72 hours.

2) On April 21, 1993, Licensee documented the following regarding client #1: “Read her journal[.] Didn’t want to tell you guys. Trailer not locked[.] Need to get out of there. Brother assaulted her 2x - [school counselor] & [name redacted] - advocate know.” Licensee’s records contain no clear documentation that he made an oral or written report about this abuse.

3) On November 26, 1993, Licensee documented that “[client #1] admits Dad abused her - last Thanksgiving - up in bedroom - sex - no protection. . . . I’ll discuss this w/ . . . sex. assault services[.] [Client #1] Reluctant to Discuss Details Re: Dad.” Licensee’s records contain no clear documentation that he made an oral or written report about this abuse.

c. Licensee failed to safeguard private information about client #1 obtained in the course of his practice and disclosed private information to others without client #1’s informed written consent. For example:

1) On January 11, 1993, Licensee documented that client #1 “gave OK-talk w/pastor [redacted], [school counselor].” Licensee’s file contains a written consent to share information with the school counselor but no informed written consent to share information about client #1 with the pastor.

2) On January 22, 1993, Licensee documented “permission talk to [redacted name #1].” Licensee’s file contains no informed written consent to share information about client #1 with this person.

3) On June 4, 1993, Licensee documented that client #1 “feels I talked w/[redacted name #2]. I asked [redacted name #2] to observe [client #1]’s interaction w/others - attention-seeking-talks about self-doesn’t ask questions of others. . . . Angry - wants to go home - ‘Don’t care if I’m abused.’ wants to terminate. . . . I affirmed I wanted to stick this out w/her to work thru issues. I suggested we clarify what can & can not be discussed w/[redacted name #2] w/o her permission.” Licensee’s file contains no informed written consent to share information about client #1 with [redacted name #2].

4) Licensee asserts that client #1 trusted his judgment and gave him verbal permission to talk to others to support her therapy. Licensee spoke with the pastor’s wife concerning client #1. Licensee noted that on “one occasion she was bothered that I talked to [redacted name #3], an older deacon about being on the prayer team and she did not know him.” Licensee’s file contains no informed written consent to share information about client #1 with either the pastor’s wife or [redacted name #3].

5) Licensee admits he had “several meetings or coffees” with client #1’s husband to describe what was happening in therapy with client #1. Licensee asserts that client #1 gave permission “but seemed nervous about those meetings.” Licensee’s records contain no informed written consent from client #1 to share information about her therapy with her husband.

d. Licensee failed to maintain appropriate professional boundaries with client #1, engaged in a dual relationship with client #1, and provided psychological services when his objectivity was impaired. Specifically, Licensee invited client #1 to his home on numerous occasions, agreed to be a father to her, invited her to move into his home, and included her in his family’s activities. Examples include, but are not limited to, the following:

1) On January 26, 1993, Licensee documented that “[o]n Sat. 1/23/93 1:30AM [client #1] called me at my night job. . . . [Client #1] did take us up on the invitation to come to our home. Given that she attends our church my wife and I deemed it appropriate for now. . . . [Client #1] arrived about 1:30 pm to my house. . . . She verified that she was quite depressed and had been afraid of hurting herself.”

2) On January 31, 1993, Licensee documented that client #1 “came for supper on Sat.30 at our invitation.”

3) On February 5, 1993, Licensee documented that “[w]e will continue to allow her [client #1] use of our home for safety reasons but it is just a stop gap measure.”

4) On February 17, Licensee documented that client #1 came for an emergency appointment at 10:30 a.m. and a suicide contract was arranged. Licensee documented the following on the afternoon of February 17: client #1 “currently resting at my home now though she says it’s ‘too noisy’ due to the children.”

5) On February 21, 1993, Licensee documented that client #1 “stayed over night at our house.”

6) On March 28, 1993, Licensee documented “at my home.”

7) In March 1993 or March 1994 [date unclear since Licensee’s notes are out of sequence], Licensee documented that client #1 was fearful of her brother and felt safer sleeping in her car. Client #1 reported sleeping in her car three or four times in the last couple weeks. Licensee wrote that he “invited her to our . . . .”

8) On August 30, 1993, Licensee documented that client #1 “stayed @ our house.”

9) On April 13, 1994, Licensee documented, “[Client #1] over at my house 4-12-94 . . . .”

10) On July 16, 1994, Licensee documented that client #1 reported that her brother “molested her 3-4 X last year - last time 2 weeks ago. . . . I’m scared. . . . Sad -

invited her stay our house on weekends - I'll have her lock up her room for added protection.” Licensee asserts that his notes are in reference to advising client #1 to lock her room at her trailer house.

11) For approximately six months beginning in 1998 and continuing into 1999, Licensee invited client #1 to move into his home after he diagnosed her with DID and she began to report experiencing incidents of alleged ritual and satanic abuse and being “accessed” by her abusers. Licensee asserts his overriding concern was to help keep client #1 safe when her husband worked nights. With respect to this issue, Licensee states, “To me, it became a higher moral obligation to help her with that safety - even with the significant personal cost. Therefore, I took on the rescuer role. . . . All my attempts to keep her safe, though altruistic, were clearly misguided.”

12) Licensee had client #1 photographed with his family in an extra portrait picture taken at their church.

13) Client #1 participated in Licensee’s Father’s Day activities and he accepted gifts from her.

14) Licensee gave client #1 a letter and signed it “Love, Dad.” Licensee asserts he wrote the letter at the request of client #1’s “Inner self helper.” Licensee made the following statements in the letter:

I’m glad I’m your New Real Dad and that Jesus wants me to always be that. He gave me a choice and I wanted to be your Dad even if I though (sic) I did not have to be. I will never hurt you. That’s wrong. Don’t let the enemy tell you I will. Just because “that’s what Dads do.” Good Dads Don’t hurt or use their daughters. I love you, want you, and look forward to you’re (sic) growing up. I am not mad at you, I won’t send you away. Jesus wants this for you too. What He says counts. He is helping Both of us. You need a Dad. You’re special. All these months now, I have never hurt you or touched you bad. This is so you can trust and know that good Dads are not to hurt you. Jesus would never ask me to be your Dad if I was going to hurt you. I know you will learn to trust but I know it’s hard for you. Jesus take her fear away. It’s a priviledge (sic) Jesus has given me to help and see you get free. You are never supposed to be hurt again. I am not quitting.

Licensee admits he crossed professional boundaries with client #1, stating, "I took on the role of being a safe dad. The 'dad' part was an improper role to take."

15) Shortly after Easter in 1999, Licensee asked client #1 to move out of his home after the new pastor at their church expressed concerns to Licensee regarding professional boundaries and a dual relationship surrounding client #1 living in his home. With respect to the pastor's concerns, Licensee states that the pastor "was not familiar with ritual abuse survivors."

e. After the break in therapy from October 1997 to May 1998, Licensee resumed therapy with client #1 on May 8, 1998. Licensee began treating client #1 for DID. Licensee describes his therapy with client #1 as a spiritually oriented approach with daily relational support. Licensee employed unproven experimental therapy techniques, practiced outside his areas of competency, failed to competently manage his therapy with client #1, and fostered dependency that resulted in harm to client #1 as described more fully below.

1) In July 1998, Licensee diagnosed client #1 as having Dissociative Identity Disorder. Specifically, on July 21, 1998, Licensee documented that client #1 "clearly has dissociative identity disorder. . . . Been suspicious of DID for sometime w/her." Licensee asserts that in the summer of 1998, fall 1998 and spring 1999 he attended seminars on ritual abuse and dissociative identity disorders. However, Licensee has no competency on file with the Board to treat DID clients.

2) On July 23, 1998, Licensee's session notes document that he gave client #1 a book on Multiple Personality Disorder. Licensee documented that client #1 "says she knows her DID is true but now feels crazy, like she's falling apart."

3) On July 28, 1998, Licensee's session notes document that client #1 "read MPD book - feels it fits her closely. Disc the book. Brought a map of 7 alters. Was up all night working on it. Book helped a lot."

4) Licensee asserts that his therapeutic objectives for client #1 were to "stabilize, process memories, manage the abreaction's (sic), encourage her to listen to the truths."

Licensee asserts that “[t]he pain would lift considerably once she sensed truths such as ‘I’m not there, now.’ ‘It’s not my fault.’ ‘Jesus is with me.’ ‘I’m not dirty or bad.’”

5) As a result of client #1’s reports of satanic and ritual abuse, Licensee invited client #1 to stay at his home. Specifically, Licensee states that “[a]round Halloween time, it was clear to me that she was very unlikely to stay safe do (sic) being accessed should any of her stories be true. . . . Full moons and ritual holidays were always very stressful for her.”

6) Licensee put a lock on the outside of client #1’s bedroom door in his home and told client #1 it was to keep her safe. However, Licensee used the lock to lock client #1 in the room, often against her wishes. Licensee asserts that client #1 requested the lock on her door and that her “inner self helper” alter requested the door be locked because “[e]ither she was concerned about switching at night and leaving without her host awareness or was especially worried on the nights of rituals corresponding to the full moons or ritual holidays.”

7) Client #1 lived in Licensee’s home for a period of approximately six months. During this time, one of his therapy objectives was to reparent client #1. For example:

a) Licensee reports that during a session one of client #1’s young alters said, “I need a Dad.” Licensee told client #1’s child alter, “I can be your Dad.”

b) At Licensee’s suggestion, client #1 joined his family for an extra portrait picture at their church to help her feel she was part of the family.

c) Licensee gave client #1 the letter referred to in paragraph 2.d.14) above as a “transitional object” for the purpose of assuring Little [client #1] one of her young alters, that she was cared for and could stay safe. Licensee states he “addressed on the note all the issues she was agitated about such as my choosing to be her dad, caring for her, not leaving, keeping her safe, etc.”

d) During the time client #1 lived in Licensee’s home, Licensee began a “tuck-in” routine with her at night. The “tuck-in” would last between five

minutes and half an hour and involved Licensee talking and praying with client #1. On more than one occasion, Licensee lay in bed next to client #1 until she fell asleep. Once the tuck-in routine was established, client #1 wanted it to continue. Licensee eventually found it “inconvenient and an irritant for me.”

e) On more than one occasion, Licensee held client #1 on his lap in a rocking chair in his home. Licensee told client #1 not to tell anyone about his holding her or rocking her. Licensee admits he held her on his lap for brief periods on occasion at the request of her young alter parts, but he denies that she was told not to tell.

8) During the last several months he worked with client #1, Licensee routinely held her when she cried, needed comforting, or shared her story. Licensee held client #1 on his lap during some therapy sessions. Licensee states he held “Big [client #1] at limited times” but “primarily it was with Little [client #1] or other age-regressed parts” he held.

9) By spring 1999, Licensee began trying to set limits with client #1. He asked her to move out of his home after the church pastor raised concerns about the living arrangement. Licensee also attempted to refer client #1 to a female therapist. Licensee noted at least the following problems with his attempts to set limits with client #1:

a) Licensee felt that a female counselor “would be of some advantage” to client #1 “due to effective limit settings and less transference issues.” When Licensee took client #1 to the female counselor’s office, client #1 was unwilling to talk to her. Licensee believes “[t]his was likely due to her fears of losing me.”

b) Licensee documented that client #1 called him at all hours of the day and night. Licensee states that after client #1 moved out “there would often be calls in the middle of the night, to my pager vibrating, by Little [client #1] who was the one up at night.”

c) Licensee noted that abandonment was a “frequent huge theme” for client #1. Licensee states that “[a]nytime my time with her was being cut back, or if I was gone, her core-split part age seven (Little [client #1]) would become very agitated. When I announced to Little [client #1] that she was to move out of my home, she became so agitated she

locked herself in the bathroom and exited out a first floor window and ran off to call Dad or uncle [persons she alleged abused her].”

d) Licensee states that “[t]he first night she moved out, Little [client #1] was in our house before 7AM crying. She obtained a key hidden in the garage. She just ‘wanted her Dad’ and had been up all night. She was upset when I said she could not do this. She wanted to be able to drive over daily to see me in the early morning.”

e) Licensee states that if he set firm limits client #1 “would become very upset and all therapy would greatly slow down and would take hours to repair the hurt and breach of trust she felt. No stories, no integration, nothing would seem to progress. Plus she appeared to be at greater risk of being accessed.”

10) By mid-April 1999, Licensee was “eager to remove” himself from being client #1’s therapist and transfer her therapy to a female therapist client #1 had seen a few times. Licensee’s plan was to continue working with client #1’s seven-year-old alter for up to two hours per day “in the hopes of finishing her last story and then start to see her ‘grow up’ as has been promised. As the growing up happens, then integration will follow which will significantly help her safety issues.”

11) On April 30, 1999, Licensee documented a 45-minute phone call from client #1. Licensee recorded client #1’s statements, including but not limited to the following: “You chose to help. You chose to become Dad. When you chose that, that’s when you have to do it. You can’t undo it or change it because it’s too hard. You had a choice. . . . Jesus wants you to be Dad and you know that.” Licensee documented that “Dad issue continues to be huge.”

12) On July 26, 1999, Licensee met with client #1 and her husband. Licensee’s notes for that session document Licensee’s concerns about client #1’s therapy issues negatively affecting her relationship with her husband. Licensee told client #1 and her husband that “[t]his counseling has been coming ahead of my own family at times. It’s out of balance. I don’t get some things done as needed. I’ve been disturbed by this a long time but kept ignoring

it.” Licensee also noted that “[t]he dependency has become huge, overwhelming, and unhealthy if left to continue.” “A full cut-off is necessary for now. . . . No phone calls, no daily contacts, no meetings, nite calls for now. I’ll say hi at church, at a game, and if I run into you in public.” “Seek counsel. [Female therapist] would be good in that you’ve already connected some with her.” Licensee noted that client #1 stated “this was abandonment and way too fast.”

13) Client #1 called Licensee on July 27 and July 28, 1999. On July 27, 1999, Licensee documented that client #1 “and her parts continue to have a very difficult time with the cut-off and are doing all kinds of appeals to get it to change. Part of the efforts to avoid abandonment.” On July 28, 1999, Licensee documented the following: “She talked about her complaint to my licensing board ‘I had to do this.’ ‘I couldn’t let you get away with this.’ ‘Are you my Dad or aren’t you?’ ‘How could you say your (sic) my Dad and then say I am not to talk to you?’ ‘You abandoned me. I had to file.’”

14) On July 30, 1999, Licensee had another meeting with client #1 and her husband. Client #1 told Licensee she had rescinded her complaint to the board. Licensee told client #1 he wanted her to see another therapist. He said he was willing to meet with the therapist and client #1 “to have L. [client #1] do final stories.” Licensee noted that “[t]he therapy with a threat of board complaint makes it . . . difficult to do. I noted to her that she filed a complaint against me within 24 hours yet I left her options to reach me and dialogue more by talking to her husband who could then approach me regarding what . . . both he and [client #1] would like to see happen. She said she had to complain because ‘You really hurt me.’” Licensee also documented that client #1 “is feeling exceptionally abandoned which is an issue I have been aware of for months.”

15) On August 1, 1999, Licensee wrote a letter to another professional “as a consultation request.” He described client #1 as “highly dissociative, alleged complaints of ritualistic abuse, and has alters that are borderline personality disordered.” Licensee then summarized his therapy with client #1. Licensee asked the consultant how he could “ethically extricate” himself from client #1. Licensee stated that “in terms of a complaint, it looks like

impaired objectivity and extreme dependency that has been present. I simply believed most of her stories, especially those of her past which have similar themes to other ritualistic abuse survivors. I wanted and tried to help her stay safe and found numerous examples of mind control and programs. I do believe I have allowed this to get out of control and find limit setting very difficult with her and never have run into this before with anyone.”

16) On August 1, 1999, Licensee recorded his notes from a phone call with the consultant. Among other things, the consultant advised Licensee that (a) he could not keep client #1 safe; (b) he should remove himself from the role of being her dad; (c) he should admit to client #1 that he made a mistake; and (d) “[t]he rules must change. She has been allowed to have too much control over the schedule. The therapist must be in strong control with these type of clients. See her on your schedule - not hers.” Licensee concluded his notes with the statement, “Wish I’d talked to him months ago.”

17) By letter dated August 3, 1999, Licensee notified client #1 and her husband that he made a mistake in taking on the role of Dad and that it “led to the enmeshed boundaries and literally slowed progress.” Licensee offered a “possible new schedule” of up to two hours of appointments per week and two phone calls up to one-half hour each for prayer.

18) On August 4, 1999, Licensee documented four telephone calls with client #1. He again noted that “[d]isengaging is very difficult for her. Abandonment feelings are huge for her.”

19) On August 6, 1999, Licensee documented a meeting with client #1. Licensee wrote, in part: “Discussed my letter to her. She thinks abandonment is wrong. Wanted to know whether I’m the counselor or father. [Client #1] says she feels she doesn’t have abandonment issues personally but maybe Little [client #1] does.”

20) On August 10, 1999, Licensee met with client #1 for two hours for “no charge.” Licensee documented that client #1’s seven-year-old alter asked him why he stopped being her dad. The alter also asked, “Why can’t you hold me?” after Licensee said he

wouldn't be holding her like he usually did. Client #1 told Licensee her husband hated Licensee and that Licensee had "done nothing but hurt us."

21) On August 17, 1999, client #1 canceled her appointment scheduled for August 19 and said she did not want to reschedule.

22) On August 26, 1999, Licensee went to client #1's place of employment and saw client #1, who was picking up her paycheck. Client #1 later called Licensee. Licensee documented that client #1 asked, "Why did you come where I work[?] I thought you were doing a total cut-off? You've lied to me - saying your (sic) my dad." Licensee also documented that client #1 wanted him "to return the father's day gifts because I got them under false pretense." Licensee discussed scheduling another session with client #1, but client #1 was unsure if she would take the session date offered. Licensee documented that client #1 said, "I don't plan ever to go to church again" and that she "[s]ounds hurt, bitter."

23) On August 30, 1999, client #1 came to Licensee's office to exchange CD players with Licensee. Client #1 told Licensee she was praying daily for his punishment. Licensee told client #1 someone had broken into his house and stolen his client appointment book and asked client #1 if she had a copy of his house key. Client #1 denied having a key and entering his house. Licensee's note documented that a mutual friend had told him client #1 had a key to his house and told her she wanted to get his clients' names so she could write to them and say how much Licensee hurt her. Licensee's note concluded with the statement, "A lot of borderline personality issues presenting."

f. Licensee failed to keep complete and accurate records for client #1 and further engaged in unprofessional conduct in that he failed to clarify his professional role with client #1 and the limits of that role with respect to documenting his services and arranging for payment for his services. For example:

1) Licensee asserts that between 1993 and 1997 he provided psychological services to client #1 on an "informal courtesy basis." He asserts that he saw client #1 on an informal pro bono basis and services were set up "as more of a relational

ministry.” However, Licensee’s records for client #1 for that time period reflect that he considered her his client. He kept progress notes, listed therapeutic goals, documented his therapeutic interventions (e.g., giving client #1 books, tapes and articles to read regarding her therapy issues and giving her homework to complete such as workbooks or journaling), and coordinated her care with other professionals, including client #1’s school counselor, two physicians, and county social services. Specifically, in letters to client #1’s psychiatrist, dated April 11 and August 14, 1993, Licensee referred to client #1 as “my client.” Records from client #1’s physician in Licensee’s files reflect that Licensee was providing counseling to client #1.

2) On several 1997 progress notes, Licensee wrote “CCS” for “courtesy counseling session” and did not charge client #1.

3) In 1998, Licensee billed some of client #1’s sessions to her insurance carrier but failed to maintain therapy notes documenting all of the sessions he billed. Licensee has no therapy records for August 16 and August 30, 1998. Licensee charged \$140.00 for each of these sessions and received payment for each session in the amount of \$132.42. Licensee asserts that he did have notes for these sessions but cannot locate them. He says he kept them in a separate file because the sessions were held on Sunday afternoons. He says he received \$105.94 for each session, not \$132.42.

4) In 1998, Licensee received approximately \$700.00 in insurance payments for services to client #1. After billing for some of client #1’s 1998 sessions, Licensee stated: “Though later she had new insurance, I chose not to bill due to the *dual role*, type of therapy, and the like.” (Emphasis added.)

5) In a document entitled “Summary of Events with [client #1],” dated November 10, 1999 (“summary”), Licensee wrote that he “basically stopped record keeping except for some unusual events and started it again when things began to get upset and decompensate.” Licensee also wrote, “In hindsight, it would have been better to not have engaged in a formalized counseling arrangement with her.”

6) In his summary, Licensee acknowledged client #1's dependency on him and noted, "It was difficult to have her see any other therapist. She felt very rejected." When Licensee arranged for client #1 to see a female therapist, he personally took client #1 to Minneapolis to meet with the therapist. Licensee wrote, "I paid for the first session plus paid for an additional consultation hour for myself. The church had offered her up to \$200/month to help with her counseling costs."

g. In his summary, Licensee concluded his remarks with the following statements about his errors in providing therapy to client #1:

In the last months I have been learning much about impaired objectivity, dual relationships, and issues with borderline personality disorders. Limits were not well set due to double bind issues that were allowed to grow. That has not happened with any other client. I believe a lot was done to keep her safe. She has not been suicidal for months as far as I know. . . . I can not prove anything she said and did have difficulty with some of the stories . . . . Her stories have some consistency with other ritual abuse survivors. It was helpful to listen to my pastor and my wife about dealing with the enmeshment. I am suspicious about some of her claims about being recently accessed due to some secondary gain of keeping bonded to me.

## REGULATIONS

3. The Board views Licensee's practices as described in paragraph 2 above to be in violation of statutes and rules enforced by the Board. Licensee agrees that the conduct cited above constitutes a violation of Minn. Stat. § 148.98 (1998) (code of conduct), Minn. Stat. § 148.941, subd. 2(a)(1) (1998) (violation of statute or rule Board is empowered to enforce); Minn. Stat. § 148.941, subd. 2(a)(3) (1998); Minn. R. 7200.5700 (unprofessional conduct); Minn. R. 7200.4600, subp. 1 (failure to limit his practice to areas of competence in which proficiency has been gained through education and training or experience and which have been stated in writing to the Board); Minn. R. 7200.4700, subp. 1 (failure to safeguard private information on a client); Minn. R. 7200.4810, subp. 1 (impaired objectivity); Minn. R. 7200.4810, subp. 2.A. (impaired objectivity/dual relationship with client); Minn.

R. 7200.4810, subp. 3 (failure to terminate services to a client and refer a client when the psychologist's objectivity or effectiveness became impaired during a professional relationship); and Minn. R. 7200.4900, subp. 1a. (failure to maintain an accurate or complete record for a client) and constitutes a reasonable basis in law and fact to justify the disciplinary action provided for in the order.

### **REMEDY**

4. Upon this stipulation and without any further notice of proceedings, the Board places Licensee's license in a RESTRICTED and CONDITIONAL status. Licensee's retention of his license is conditional upon his complying with and/or submitting or causing to be submitted at least the following:

a. ***Practice Restriction.*** Licensee is restricted from providing psychological services to any clients with satanic/ritual abuse (SRA) issues or a diagnosis of Dissociative Identity Disorder (DID). Within 30 days of the date this Stipulation and Consent Order is adopted by the Board, Licensee shall refer any current clients with DID or SRA issues to another provider.

b. ***Supervision of Licensee by Board-Approved Psychologist.*** Licensee shall practice psychology only under the supervision of a supervising psychologist approved in advance by the Complaint Resolution Committee (Committee) from a list of at least three names Licensee has submitted to the Committee. Licensee shall cause each psychologist listed to submit a current vitae to the Board for the Committee's review prior to its approval of a supervisor. The Committee reserves the right to reject all names submitted by Licensee. If the Committee rejects any submitted names, the Committee may require that Licensee submit additional names as described above, or the Committee may provide Licensee with the name of a supervisor. Licensee shall have no previous personal or professional relationship with the supervisor. Licensee shall obtain a supervising psychologist within one month of the date of this order and shall meet with the supervising psychologist no less than one hour per week for a

period of 24 months. The purpose of the meetings is to review Licensee's practice in the areas of client diagnoses, treatment planning, maintaining professional boundaries and ethics.

c. ***Supervisor's Reports.*** The supervising psychologist shall provide a report to the Committee every three months and at the time Licensee petitions to have the conditions removed from his license. The first report is due three months from the date supervision begins, and all subsequent reports shall be submitted on the first day of the month in which they are due. Each report shall provide and/or address:

- 1) In the first report, evidence Licensee's supervisor has received and reviewed a copy of the Stipulation and Consent Order;
- 2) The dates on which supervision took place with Licensee;
- 3) The method by which supervision was conducted;
- 4) A statement that all cases have been reviewed, any problems discovered in the review, and the resolution of the problems;
- 5) The supervisor's opinion as to Licensee's ability to provide competent services;
- 6) Any other information the supervisor believes would assist the Board in its ultimate review of this matter; and
- 7) At the time Licensee petitions for removal of the above-referenced conditions, the supervisor's report shall include an assessment of Licensee's ability to conduct himself in a fit, competent and ethical manner in the practice of psychology as well as whether Licensee exhibits an acceptable comprehension and knowledge of ethical issues encountered in practice as well as the ability to apply this knowledge.

d. ***Licensee's Own Reports.*** A report shall be submitted to the Committee every three months and at the time Licensee petitions to have the conditions removed from his license. The first report is due three months from the date supervision begins, and all subsequent reports shall be submitted by the first day of the month in which they are due. Each report shall provide and/or address:

- 1) A brief statement of the topics discussed at each supervision session;
- 2) What Licensee has learned from the consultations, including his own statement as to his comprehension and knowledge of ethical issues encountered in practice;
- 3) At the time Licensee petitions for removal of the conditions, Licensee's reasons for believing he is capable of conducting himself in a fit, competent, and ethical manner in the practice of psychology; and
- 4) Any other information Licensee believes would assist the Board in its ultimate review of this matter.

e. ***Boundaries Course.*** Within 30 days of the effective date of this Stipulation and Consent Order, Licensee shall arrange to enroll in the individualized professional boundaries training course taught by John Hung, Ph.D., L.P., or Janet Thomas, Psy.D., L.P. In the alternative, Licensee may, within 30 days of the effective date of this Stipulation and Consent Order, submit a boundaries course outline for approval by the Committee. Licensee shall complete the course within six months of the effective date of this Stipulation and Consent Order. All fees for the course shall be paid by Licensee. Successful completion of the boundaries course shall be determined by the Committee.

f. ***Report on Boundaries Course From Licensee.*** Within 30 days of completing the professional boundaries course referenced above, Licensee shall submit a report to the Committee which provides and addresses:

- 1) The dates Licensee began and completed the boundaries training course;
- 2) A brief statement of the topics covered in the professional boundaries training course;
- 3) A detailed discussion of what Licensee has learned from the boundaries training course, including Licensee's comprehension and knowledge of boundary

issues, as well as various ethical issues encountered in practice, and how this course will affect his practice in the future;

4) A detailed discussion of each boundary violation that occurred regarding the circumstances described in the Facts section of this Stipulation and Consent Order, including (a) how Licensee came to violate these boundaries; (b) the manner in which Licensee violated these boundaries; (c) the specific harm to specific individuals that resulted or could have resulted from the boundary violations; and (d) how Licensee now believes the boundary violations could have been averted;

5) A detailed discussion of the specific ways this course will affect Licensee's practice in the future;

6) Licensee's reasons for believing he is capable of conducting himself in a fit, competent, and ethical manner in the practice of psychology; and

7) Any other information Licensee believes would assist the Board in its ultimate review of this matter.

**g. Report on Boundaries Course From Instructor.** Within 60 days of completing the professional boundaries course referenced above, Licensee shall cause to be submitted to the Committee a report from the instructor of the professional boundaries course. This report shall address:

1) The extent of Licensee's participation in the course; and  
2) The instructor's assessment of Licensee's knowledge obtained from the course and opinion as to Licensee's recognition of boundary issues and Licensee's ethical fitness to engage in the practice of psychology.

**h. Graduate Course Work.** Licensee shall complete a graduate-level course in diagnosis and treatment planning that is the equivalent of three semester credits. This course shall be completed within 18 months of the date this Stipulation and Consent Order is adopted by the Board. Licensee shall obtain approval from the Committee before commencing the course. The course must be listed as part of a graduate program. Audited courses will not be accepted

for purposes of satisfying the terms of this Stipulation and Consent Order. Licensee shall cause the school to send directly to the Board office an official transcript documenting for the Committee that he received a passing grade in the course. Licensee shall submit a written analysis of how the course information will impact his practice. Licensee may apply this course to his continuing education requirement for licensure renewal.

i. ***Professional Responsibility Examination.*** Licensee shall take the examination described in Minn. R. 7200.3000, subp. 1.B., within 90 days of the date of this stipulation and retake the examination, if necessary, until obtaining a minimum passing score of 50 out of 60 correct answers.

j. ***Fine for Violation of Order.*** If any due date required by this Stipulation and Consent Order is not met, the Committee may fine Licensee \$100 per violation. Licensee shall pay the fine and correct the violation within five days after service on Licensee of a demand for payment and correction. If Licensee fails to do so, the Committee may impose additional fines not to exceed \$500 per violation. The total of all fines may not exceed \$5,000. Licensee waives the right to seek review of the imposition of these fines under the Administrative Procedure Act, by writ of certiorari under Minn. Stat. § 480A.06, by application to the Board, or otherwise. Neither the imposition of fines nor correction of the violation will deprive the Board of the right to impose additional discipline based on the violation.

k. ***Costs.*** Licensee is responsible for all costs incurred as a result of compliance with this Stipulation and Consent Order.

l. ***Applicability to Renewal Requirements.*** No condition imposed as a remedy by this Stipulation and Consent Order, including conditions directly related to a restriction, shall be used as a continuing education activity for the purpose of renewal of Licensee's license to practice psychology, unless it is specifically stated in this Stipulation and Consent Order that the condition may be used for this purpose.

5. All reports shall cover the entire reporting period and provide the bases upon which conclusions were drawn.

6. The Board or its authorized representatives shall have the right to discuss Licensee's condition with and obtain records from any person with whom Licensee has contact as a result of his compliance with this Stipulation and Consent Order or as a result of his being examined or his obtaining treatment, counseling, or other assistance on his own initiative or otherwise. Licensee shall execute and provide any health record or other waivers necessary for submission of the reports referenced in the stipulation to enable the Board to obtain the information it desires and to authorize the testimony of those contacted by the Board in any proceeding related to this matter.

7. The Board may, at any regularly scheduled meeting at which Licensee has made a timely petition, take any of the following actions:

- a. Remove the restriction or conditions attached to the license of Licensee;
- b. Amend the restriction or conditions attached to the license of Licensee;
- c. Continue the restriction or conditions attached to the license of Licensee upon his failure to meet his burden of proof; and
- d. Impose additional restrictions or conditions on the license of Licensee.

8. If Licensee shall fail, neglect, or refuse to fully comply with each of the terms, provisions, and conditions herein, the license of Licensee to practice psychology in the State of Minnesota shall be suspended immediately upon written notice by the Board to Licensee, such a suspension to remain in full force and effect until Licensee petitions the Board to terminate the suspension after a hearing. Nothing contained herein shall prevent the Board from revoking or suspending Licensee's license to practice psychology in the State of Minnesota after any such hearing.

9. If Licensee's license has been suspended pursuant to paragraph 8 above, Licensee may petition to have the suspension lifted at any regularly scheduled board meeting following Licensee's submission of a petition, provided that the petition is received by the Board at least 20 working days before the Board meeting. The Board shall grant the petition upon a clear showing by Licensee that he has corrected all violations of this Stipulation and Consent Order

that were the basis for the suspension. Based on the evidence presented, the Board may impose additional conditions or limitations upon reinstating Licensee's license.

10. This stipulation shall not in any way or manner limit or affect the authority of the Board 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 justifying disciplinary action which occurred before or after the date of this stipulation and which is not directly related to the specific facts and circumstances set forth herein.

11. In the event the Board at its discretion does not approve this settlement or a lesser remedy than indicated in this settlement, then, and in that event, this stipulation is withdrawn and shall be of no evidentiary value and shall not be relied upon nor introduced by either party to this stipulation, except that Licensee agrees that should the Board reject this stipulation and this case proceeds to hearing, Licensee will assert no claim that the Board was prejudiced by its review and discussion of this stipulation or of any records relating to this matter.

12. Any appropriate court may, upon application of the Board, enter its decree enforcing the order of the Board.

13. Licensee has been advised by Board representatives that he may choose to be represented by legal counsel in this matter. Although aware of his right to representation by counsel, Licensee has knowingly and expressly waived that right.

14. Licensee waives all formal hearings on this matter and all other procedures before the Board to which Licensee may be entitled under the Minnesota or United States constitutions, statutes, or rules and agrees that the order to be entered pursuant to the stipulation shall be the final order herein.

15. Licensee hereby acknowledges that he has read, understands, and agrees to this stipulation and has freely and voluntarily signed the stipulation without threat or promise by the Board or any of its members, employees, or agents. When signing the stipulation, Licensee acknowledges that he is fully aware that the stipulation shall be approved by the Board. The Board may either approve the Stipulation and Consent Order as proposed, approve the

Stipulation and Consent Order subject to specified change, or reject it. If the changes are acceptable to Licensee, the stipulation will then take effect and the order as modified will be issued. If the changes are unacceptable to Licensee or the Board rejects the stipulation, it will be of no effect except as specified herein.

16. This Stipulation and Consent Order constitutes a disciplinary action against Licensee.

17. This Stipulation and Consent Order is a public document and will be sent to all appropriate data banks.

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

BOARD OF PSYCHOLOGY

COMPLAINT RESOLUTION  
COMMITTEE



DAVID ANDROS, M.S., L.P.  
Licensee

Dated: 9-19-, 2000



JANE HOVLAND, Ph.D., L.P.

Dated: 3 November, 2000



RALPH MAVES, M.S., L.P.

Dated: 11/3/, 2000



SHARON ANDREWS

Dated: 11-3-, 2000

**ORDER**

Upon consideration of this stipulation and all the files, records, and proceedings herein,  
IT IS HEREBY ORDERED that the license of Licensee is placed in a RESTRICTED and  
CONDITIONAL status, and that all other terms of this stipulation are adopted and implemented  
by the Board this 3rd day of Nov, 2000.

MINNESOTA BOARD

OF PSYCHOLOGY



PAULINE WALKER-SINGLETON  
Executive Director

AG: 397281,v. 01