## BEFORE THE MINNESOTA BOARD OF VETERINARY MEDICINE

In the Matter of Carly L. Campbell, D.V.M. License No. 25118 AGREEMENT FOR CORRECTIVE ACTION

This Agreement is entered into by and between Carly L. Campbell, D.V.M. ("Licensee"), and the Minnesota Board of Veterinary Medicine Complaint Review Committee ("Complaint Review Committee") based on Minnesota Statutes section 214.103, subdivision 6(a)(2). Licensee and the Complaint Review Committee agree to the following:

## **FACTS**

- 1. While Licensee practiced veterinary medicine at BluePearl Referral and Emergency Pet Hospital ("Clinic"), in Eden Prairie, Minnesota, the following occurred:
- a. Licensee assumed care of Georgie, a 7-year-old female mixed breed cat, owned by R.J. Georgie was presented as an emergency to the Clinic for an acute onset of hindlimb paralysis. A diagnosis of spinal cord damage secondary to spinal column luxation between the 9<sup>th</sup> and 10<sup>th</sup> thoracic vertebrae had been made by a colleague who first evaluated Georgie.
- b. Licensee advised Georgie's owner that, with surgery to stabilize the spinal column, there was up to an 80% possibility of sufficient neurological recovery for Georgie to become mobile again.
- c. Licensee failed to record in the cat's medical record a summary of her conversations with the owner.

- d. Georgie died during surgery.
- e. At the time of Georgie's transfer to her veterinary care, Licensee failed to record all details of Licensee's physical examination. Nor did Licensee promptly update the medical record following Georgie's death.
- 2. On March 26, 2020, Licensee met remotely via teleconference with the Complaint Review Committee, composed of Julie Dahlke, D.V.M., Board member, and Mary Olson, D.V.M., Board member, to discuss allegations regarding Licensee's practice of veterinary medicine contained in a Notice of Conference dated January 20, 2020. Kathleen Ghreichi, Assistant Attorney General, represented the Complaint Review Committee at the teleconference. Robert Kuderer, Esq., appeared remotely on behalf of Licensee. Dr. Julia Wilson, executive director of the Board, also attended remotely.

## **CORRECTIVE ACTION**

- 3. Based on the available information, Licensee and the Committee agree that the conduct above violates Minnesota Statutes section 156.081, subdivision 2(11) and (12); and Minnesota Rules 9100.0700, subparts 1(A) and (C); and 9100.0800, subparts 1 and 4. Licensee and the Committee have agreed to enter into this Agreement for Corrective Action as follows:
- a. Within one month from the date of this Agreement, Licensee shall submit documentation of the continuing education for Licensee's most recent license renewal.
- b. Within two months from the date of this Agreement, Licensee shall submit to the Committee evidence of completion of at least six (6) credit hours of continuing education on the topic of veterinary medical records. For purposes of this requirement, the Committee preapproves "Medical Record Keeping for Veterinarians," an online course offered by Drip

Learning Technologies. The credits from this continuing education may not be applied to the requirements for Licensee's next license renewal.

- c. Within two months from the date of this Agreement, Licensee shall submit to the Committee evidence of completion of at least four (4) credit hours of pre-approved continuing education on the topic of feline neurology. The credits from this continuing education may not be applied to the requirements for Licensee's next license renewal.
- d. Within two months following the conclusion of the medical records continuing education, Licensee must submit three (3) medical records that incorporate a client communication template to the Committee. These records must meet the approval of the Committee.

## OTHER INFORMATION

- 4. Upon Licensee's satisfactory completion of the corrective action referenced in paragraph 3 above, the Committee agrees to dismiss the complaint(s) concerning the matters referenced in paragraph 1. The Committee shall be the sole judge of satisfactory completion. The Committee may reopen this complaint if it receives newly discovered information that was not available to the Committee during the initial investigation, or if the Committee receives a new complaint that indicates a pattern of behavior or conduct.
- 5. If Licensee fails to complete the corrective action satisfactorily, the Committee may, at its discretion, reopen the investigation and proceed according to Minnesota Statutes chapter 156 (the Board's Practice Act) and Minnesota Statutes chapters 214 and 14. Licensee agrees that failure to complete the corrective action satisfactorily is failure to cooperate under Minnesota Statutes section 156.123 and may subject Licensee to disciplinary action by the Board.

6. Licensee has been advised by Committee representatives that Licensee may choose to be represented by legal counsel in this matter, and Licensee was represented by counsel.

7. This agreement shall become effective upon execution by the Board's Executive Director and shall remain in effect until the Committee dismisses the complaint, unless the Committee receives additional information that renders corrective action inappropriate. Upon receiving such information, the Committee may, at its discretion, proceed according to Minnesota Statutes chapter 156 (the Board's Practice Act) and Minnesota Statutes chapters 214 and 14.

8. This agreement is not disciplinary action. *See* Minnesota Statutes section 214.103, subdivision 6. However, this agreement is classified as public data pursuant to Minnesota Statutes section 13.41, subdivision 5, and 214.072, subdivision 3.

9. Licensee hereby acknowledges having read and understood this agreement and having voluntarily entered into it. This agreement contains the entire agreement between the Committee and Licensee, there being no other agreement of any kind, verbal or otherwise, which varies the terms of this agreement.

CARLY L. CAMPBELL, D.V.M.

Licensee

Dated: 5/2/2020

JULIA WILSON Executive Director

Dated: 5/4/20

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