

**BEFORE THE MINNESOTA
BOARD OF VETERINARY MEDICINE**

In the Matter of
Douglas Price Jacobs, D.V.M.
License No. 06198

**AGREEMENT FOR
CORRECTIVE ACTION**

This Agreement for Corrective Action ("Agreement") is entered into by and between Douglas Price Jacobs, D.V.M ("Licensee") and the Complaint Review Committee ("Committee") of the Minnesota Board of Veterinary Medicine ("Board"), pursuant to the authority of Minn. Stats. § 156.127, subd. 2 and § 214.103, subd. 6(a). Licensee and the Committee hereby concur that this Agreement shall be based on the following:

FACTS

1. On May 13, 1998, Licensee was licensed as a veterinarian in the State of Minnesota.
2. While Licensee was employed as a veterinarian at a Ham Lake Veterinary Hospital ("Clinic") in Ham Lake, Minnesota, the following occurred:
 - a. On February 9, 2016, at the request of Licensee's associate, Licensee performed exploratory abdominal surgery on Mukki, a 5-year-old female German Shepherd Dog, owned by G. K. and T. K.
 - b. Licensee removed an enlarged intraabdominal abnormal kidney that was adhered to the left ovarian pedicle. Extensive hemorrhage resulted but was controlled before Licensee performed an ovariohysterectomy.

c. Mukki's recovery from anesthesia was prolonged, prompting three reassessments of her blood hematocrit and total protein. Licensee failed to note a significant drop in total protein or to properly document the necessity for three reassessments.

d. Mukki was discharged to her owner's care by Licensee's staff before she could walk without assistance. Licensee did not document his recommendation for overnight veterinary monitoring by an emergency clinic.

e. Intraabdominal bleeding overnight necessitated emergency surgery and transfusion. Large blood clots were found at the site of multiple ligatures.

f. Licensee's medical record for Mukki lacked documentation of physical examination before or after surgery, interpretation of post-surgical hematocrit and total protein, and owner communication.

g. On June 15 2016, Licensee met with the Committee, composed of Michelle Vaughn, DVM, Board member, and Amy Kizer, D.V.M., Board member, to discuss allegations made in a Notice of Conference dated May 17, 2016. Andrew Pettit, Assistant Attorney General, represented the Committee at the conference. Robert Kuderer represented Licensee. Julia Wilson, D.V.M., Executive Director of the Board, also attended the conference.

CORRECTIVE ACTION

3. Based on the available information and discussion at the conference, Licensee and Committee agree that the conduct above violates Minn. Stat. § 156.081, subd. 2(11) and (12) and Minn. R. 9100.0700, subp. 1(A), and 9100.0800 subp. 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 must submit documentation of all of his veterinary continuing education from the most recent license renewal period, March 1, 2014 to February 29, 2016.

b. Within three months of the date of this Agreement, Licensee shall submit to the Review Committee evidence of completion of at least six (6) hours of continuing education on the topic of veterinary medical records. Licensee shall submit written documentation, such as measurable learning objectives and qualifications of the instructor, in order to receive preapproval from the Review Committee of classes Licensee takes in fulfillment of this requirement. For purposes of this requirement, the Review Committee preapproves the "Veterinary Medical Records Online Course" offered by James F. Wilson, D.V.M., J.D., through Iowa State University.

OTHER INFORMATION

4. Upon Licensee's satisfactory completion of the corrective action referenced in paragraphs 3 above, the Committee agrees to dismiss the complaint(s) concerning the matters referenced in paragraph 2. 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.

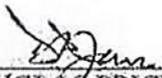
6. Licensee has been advised by Committee representatives that Licensee may choose to be represented by legal counsel in this matter, and has elected to be represented by Robert Kuderer, Esq., Erickson, Zierke, Kuderer & Madsen, P.A., Minneapolis, Minnesota.

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.

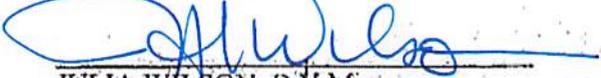
8. This agreement is not disciplinary action. See Minnesota Statutes section 214.103, subdivision 6. However, this agreement is classified as public data pursuant to Minnesota Statutes section 13.41, subdivision 5.

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.

Dated: Aug 1, 2016


DOUGLAS PRICE JACOBS, D.V.M.
LICENSEE

Dated: August 3, 2016


JULIA WILSON, D.V.M.
EXECUTIVE DIRECTOR
FOR THE COMPLAINT REVIEW
COMMITTEE