

**BEFORE THE MINNESOTA
BOARD OF VETERINARY MEDICINE**

In the Matter of
Dennis V. Lange, D.V.M.
License No. 06789

**AGREEMENT FOR
CORRECTIVE ACTION**

This Agreement for Corrective Action ("Agreement") is entered into by and between Dennis V. Lange, 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 June 17, 1989, Licensee became licensed as a veterinarian in Minnesota.
2. Licensee owns a veterinary practice in Audubon, Minnesota.
3. Licensee's practice was the primary provider of veterinary services for an animal rescue organization. In this role, Licensee inappropriately provided bulk supplies of antibiotics to the animal rescue organization. These antibiotics were dispensed to animals, even though Licensee never examined the animals to determine their medical conditions.
4. Licensee failed to maintain complete medical records for all animals he treated for the rescue organization.
5. On October 8, 2013, Licensee met with the Committee, composed of Joanne Schulman, D.V.M., Board member, and Barbara Fischley, D.V.M., Board member, to discuss allegations made in a Notice of Conference dated September 23, 2013. Bryan D. Huffman,

Assistant Attorney General, represented the Committee at the conference. Julia Wilson, D.V.M., Executive Director of the Board, also attended the conference.

6. Pursuant to Minn. Stat. § 156.081, subd. 2(12) (Unprofessional Conduct) and Minn. R. 9100.0800, subp. 1 (General Standard of Practice) and subp. 4 (Recordkeeping); Licensee and the Committee have agreed to enter into this Agreement for Corrective Action.

CORRECTIVE ACTION

Based on the foregoing information, Licensee and the Committee hereby agree to the following corrective action:

7. Within 30 days of the date of this Agreement, Licensee must submit to the Committee the dates, number of hours and titles of all continuing education courses taken by Licensee in the two-year period preceding his last license renewal.

8. Within four months of the date of this Agreement, Licensee must submit to the Committee evidence of completion of at least five hours of continuing education. The continuing education must be preapproved by the Committee and include the topics of veterinary medical records, veterinary law, and ethics. In order to obtain preapproval, Licensee must submit written documentation, such as measurable learning objectives and qualifications of the instructor. For purposes of this requirement, the Committee has preapproved modules 6 and 7 of the "*Online Veterinary Law and Ethics Course*" offered by James F. Wilson, D.V.M., J.D.

9. Within two months of completion of the preapproved continuing education set forth above, Licensee must submit the medical records of nine clinical cases for review by the Committee. Licensee's submissions should include three medical records in each of the following categories: (a) sick animals; (b) surgical cases; and (c) healthy animals presented for wellness services.

10. Within two months of the date of this Agreement, Licensee must read the Guidelines for Standards of Care in Animal Shelters ("Guidelines"), and implement a new standard operating procedure for animal shelters and rescues in his practice based upon the Guidelines. Licensee must send the new standard operating procedures to the Board for approval.

OTHER INFORMATION

11. Licensee has been advised by Committee representatives that Licensee may choose to be represented by legal counsel in this matter. Although aware of this opportunity, Licensee has elected not to be represented by counsel.

12. Upon Licensee's satisfactory completion of the corrective action referred to above, the Committee agrees to dismiss the complaint concerning the matters referred to in paragraph 3 above. Licensee agrees that the Committee will be the sole judge of satisfactory completion. Licensee understands that if, after dismissal, the Committee receives additional complaints alleging conduct similar to that referred to in the facts above, the Committee may reopen the dismissed complaints.

13. If Licensee fails to complete the corrective action satisfactorily or if the Committee receives additional complaints alleging conduct similar to that referred to in the facts above, the Committee may, in its discretion, reopen the investigation and proceed according to Minn. Stat. ch. 14, 156, and 214. Licensee agrees that failure to complete corrective action satisfactorily constitutes failure to cooperate under Minn. Stat. § 156.123 and may subject Licensee to disciplinary action by the Board.

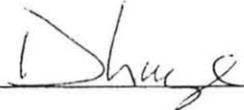
14. Licensee is responsible for all costs incurred as a result of compliance with this Agreement.

15. The effective date of this Agreement shall be the date it is executed by the Committee. The Agreement will remain in effect until the Committee dismisses the complaint, unless the Committee receives additional information that renders corrective action inappropriate. Upon receipt of such information, the Committee may, in its discretion, proceed according to Minn. Stat. ch. 14, 156, and 214.

16. Licensee understands this Agreement does not constitute disciplinary action. Licensee further understands and acknowledges this Agreement and the dismissal letter issued upon successful completion of the corrective action are classified as public data pursuant to Minn. Stat. § 13.41, subd. 5.

17. Licensee hereby acknowledges he has read and understands this Agreement and has 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: 11-30-2013



DENNIS V. LANGE, DVM
LICENSEE

Dated: 12/4/2013



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