

**BEFORE THE MINNESOTA
BOARD OF VETERINARY MEDICINE
COMPLAINT REVIEW COMMITTEE**

In the Matter of
Haley A. Sundstrom, DVM
License No. 17419

**AGREEMENT FOR
CORRECTIVE ACTION**

This Agreement is entered into by and between Haley A. Sundstrom, DVM ("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 for a clinic that provides mobile end-of-life care to pets in Minneapolis, Minnesota, the following occurred:

a. Licensee examined Stella, an eleven-year-old female Long Hair Chihuahua owned by E.R., to assess her quality of life.

b. Licensee concurred with her owner that euthanasia was justifiable on the basis of Stella's spinal cord disease.

c. Licensee assured Stella's owner that the procedure would be pain-free. Licensee also discussed the potential side effects of administering both the sedative medications and euthanasia medication.

d. Licensee injected a combination of medications into Stella's epaxial muscles to induce anesthesia, which resulted in gasping and loud vocalization.

e. Licensee presumed that Stella was unconscious because she did not respond when her rear limb toes were pinched.

f. Licensee could not identify a peripheral vein to inject the euthanasia drug, pentobarbital, then performed an intracardiac injection.

g. Licensee recognized that Stella's owner was very upset and disturbed despite reassurances that Stella's vocalizations were not due to pain.

h. Licensee was aware that Stella's owner was very emotionally traumatized but did not subsequently communicate with her, relegating that responsibility to the regional supervisor.

2. Licensee's medical record was incomplete, lacking details of Stella's history, physical examination, quality of life assessment, controlled substances administered, a description of the euthanasia, and subsequent client communication.

3. On November 17, 2023, Licensee met with the Complaint Review Committee, composed of Julie Dahlke, DVM, Board member, and Raye Taylor, DVM, Board member, to discuss allegations regarding Licensee's practice of veterinary medicine contained in a Notice of Conference dated October 18, 2023. Priya Narayanan, Assistant Attorney General, represented the Complaint Review Committee during the conference and participated remotely. Dr. Julia Wilson, Executive Director of the Board, also participated. Fabian Hoffner, Esq., of The Hoffner Firm Ltd., in Minneapolis, Minnesota, represented Licensee.

CORRECTIVE ACTION

4. 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, subpart 1(A), (B), 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 to the Committee documentation of the continuing education Licensee applied to her most recent license renewal.

b. Within three months from the date of this Agreement, Licensee shall submit to the Committee evidence of completion of at least four (4) credit hours of continuing education on the topic of medical record keeping and client communication. For purposes of this requirement, the Committee preapproves the following four online courses offered by Dr. Sarah Babcock, Animal & Veterinary Legal Services: "Michigan: Medical Records & Veterinary Law"; "10 Top Medical Record Deficiencies"; and "Consent and Client Communication." The credits from this continuing education may not be applied to the requirements for Licensee's next license renewal.

c. Within six months from the date of this Agreement, Licensee shall submit to the Committee evidence of completion of at least ten (10) credit hours of continuing education on the topic of small animal euthanasia. For purposes of this requirement, the Committee preapproves the following online course "Euthanasia Master Program" provided by Companion Animal Euthanasia Training Academy (CAETA). The credits from this continuing education may not be applied to the requirements for Licensee's next license renewal.

d. Within three months of completion of the continuing education, Licensee shall submit her appointment schedule from the preceding three (3) months. The schedule must indicate the patient species for each appointment. Licensee will submit copies of complete medical records selected by the Committee for a feline patient and a canine patient presented for euthanasia. The records must meet the approval of the Committee.

OTHER INFORMATION

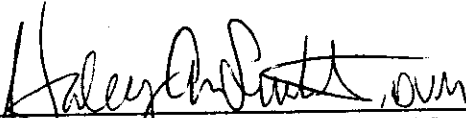
5. Upon Licensee's satisfactory completion of the corrective action referenced in paragraph 4 above, the Committee agrees to dismiss the complaint(s) concerning the matters referenced in paragraphs 1 and 2 above. The Committee shall be the sole judge of satisfactory completion. The Committee may reopen 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.

6. 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.


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 sections 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.


HALEY A. SUNDSTROM, DVM
Licensee

Dated: 4/16/24


JULIA WILSON, DVM
Executive Director

Dated: 4/23/24

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