

**BEFORE THE MINNESOTA
BOARD OF VETERINARY MEDICINE**

In the Matter of
Michael H. Williams, D.V.M.
License No. 04273

**AGREEMENT FOR
CORRECTIVE ACTION**

This Agreement for Corrective Action ("Agreement") is entered into by and between Michael H. Williams, 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 July 10, 1973, Licensee became licensed as a veterinarian in Minnesota.
2. Licensee conducts a veterinary practice in Austin, Minnesota.
3. The Board received a complaint alleging that Licensee failed to properly surgically remove a tumor and a lump on a 9-year-old dog owned by C.B. The Committee conducted an investigation into the complaint, which included review of medical records for the animal and correspondence with the Licensee.
4. On April 17, 2013, Licensee met with the Committee, composed of Michelle Vaughn, D.V.M., Board member, and John Lawrence, D.V.M., Board member, to discuss allegations made in a Notice of Conference dated March 20, 2013. Bryan Huffman, Assistant Attorney General, represented the Committee at the conference. John King, D.V.M., pro tem Executive Director of the Board and Julia Wilson, D.V.M., Executive Director of the Board, also attended the conference.

5. 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 to address the following concerns:

a. Licensee failed to adequately close the surgical incision after removal of a large mammary tumor.

b. Licensee failed to provide adequate padding in the bandage applied to the right forelimb following removal of a mass.

c. Licensee's medical records were incomplete. For example, Licensee's documentation failed to include the owner's signature on the surgical consent form, physical examination findings, presurgical diagnostic tests that were offered, documentation of client communication declining removal of other masses and histopathology on the tumor, and written discharge instructions.

d. Licensee failed to assess the diabetic dog's blood glucose concentrations prior to anesthesia.

CORRECTIVE ACTION

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

6. Within three months of the date of this Agreement, Licensee shall submit to the Board evidence of completion of at least five hours of continuing education on the topics of veterinary medical records, veterinary law, and ethics. Licensee shall submit written documentation, such as measurable learning objectives and qualifications of the instructor, in order to receive preapproval from the Committee of classes that Licensee takes in fulfillment of

this requirement. For purposes of this requirement, the Committee will approve modules 6 and 7 of the “*Online Veterinary Law and Ethics Course*” offered by James F. Wilson, D.V.M., J.D.

7. Within 12 months of the date of this Agreement, Licensee shall submit to the Board evidence of completion of:

a. At least four hours of continuing education on the topics of Companion Animal wound care and bandaging.

b. At least 7 hours of continuing education on the topic of Companion Animal soft tissue surgery including reconstructive techniques. These hours may include wet laboratories as well as lectures.

c. At least 2 hours of continuing education on the topics of Companion Animal anesthesia management of high risk patients and appropriate diagnostic screening.

d. At least 1 hour of continuing education on the topic of antibiotic use in Companion Animal surgical patients.

Licensee must receive course preapproval from the Committee prior to attending the courses. Licensee shall submit to the Committee written documentation, such as measurable learning objectives and qualifications of the instructor, in fulfillment of this requirement. These continuing education hours may not be counted towards the minimum requirement of 40 hours of continuing education required for subsequent license renewal.

8. Within 30 days of the date of this Agreement, Licensee shall 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.

OTHER INFORMATION

9. 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.

10. 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 shall 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.

11. 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.

12. Licensee shall be responsible for all costs incurred as a result of compliance with this Agreement.

13. The effective date of this Agreement shall be the date it is executed by the Committee. The Agreement shall 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.

14. 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.

15. 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: 7/5/2013

Michael H Williams DVM

MICHAEL H. WILLIAMS, D.V.M.
LICENSEE

Dated: 7/8/13

Julia Wilson

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