

Prescription Drug Abuse and Pain Management Clinics

2014 Report to the 108th Tennessee General Assembly



TENNESSEE
DEPARTMENT OF
HEALTH

Our mission is to protect, promote and improve the health and prosperity of people in Tennessee.

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Executive Summary

Background

In recent years, the number of deaths in Tennessee caused by drug overdose has been higher than the number of deaths caused by motor vehicle accidents. *Death Statistics*, Office of Policy, Planning and Assessment, TN Department of Health (1999-2012). In fact, **in 2012, 1,094 people died of drug overdose in Tennessee compared to 958 people who died as the result a motor vehicle accident.**

In 2012, the legislature enacted the Prescription Safety Act. One requirement of the Act is that, effective April 1, 2013, practitioners who prescribe certain controlled substances must check the Controlled Substance Monitoring Database (CSMD) prior to issuing a new prescription to a patient and at least annually thereafter. *Tenn. Code Ann.* § 53-10-310(e)(1). The purpose of the requirement is to allow practitioners to identify patients who may have a substance abuse problem and/or who may be doctor shopping (i.e., going to different doctors for treatment and obtaining prescriptions from each one).

Pain Clinic Certification

Prior to the Prescription Safety Act of 2012, the General Assembly passed legislation in 2011 regulating pain clinics and requiring that all pain clinics register with the state. *Tenn. Code Ann.* § 63-1-301, *et seq.* The result of such registration is better oversight of pain clinics and the assurance that only qualified medical professionals own and work within the clinics.

There are currently 328 certified pain management clinics in Tennessee. That equates to one clinic per 19,805 Tennesseans. Random clinic inspections are not required by the law, but have been undertaken by the department as a best practice. During the 2013 calendar year:

- Six (6) clinic certifications were revoked, and one clinic certification was denied renewal.
- 37 clinic inspections were conducted (19 were the result of a complaint; 18 were random), and 19 of the inspections resulted in file closure with no violation.
- Five cases were referred to the Office of General Counsel for prosecution.

Director of Special Projects

In addition to the new legislation, the Department created the position of medical director of special projects. The medical director is charged with assisting the commissioner in creating guidelines for practitioners regarding the management and treatment of chronic pain. Addison Sharp Prescription Regulatory Act of 2013, *Tenn. Code Ann.* 63-1-401, *et. seq.*

Prosecution of Administrative Cases

The Department's Division of Health Licensure and Regulation, Office of General Counsel (OGC) has assigned several of its attorneys to a team that solely reviews and prosecutes cases involving inappropriate prescribing¹ and overprescribing². The team handles cases for all of the disciplines in which practitioners have the authority to prescribe controlled substances. The team ensures that cases are presented to the respective boards in a fair and consistent manner, which allows the boards to better protect the health and safety of the people of Tennessee.

2013 data reveals:

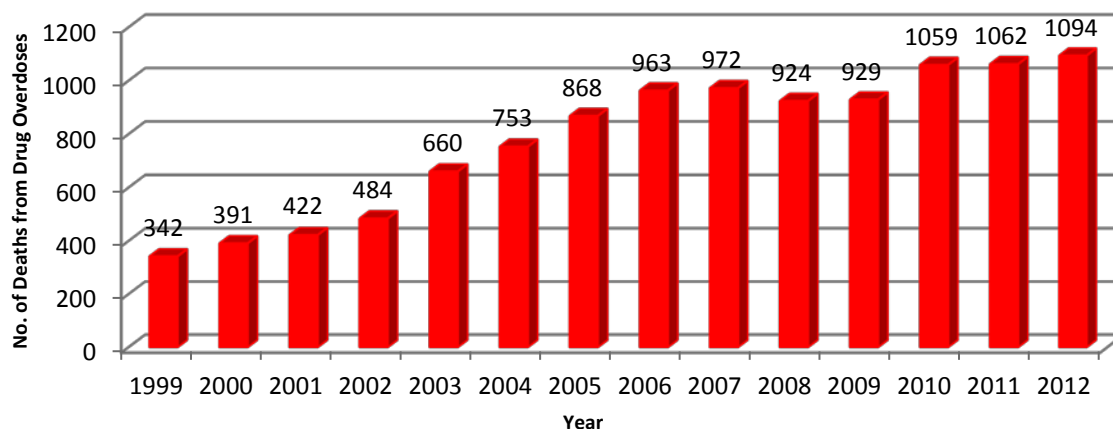
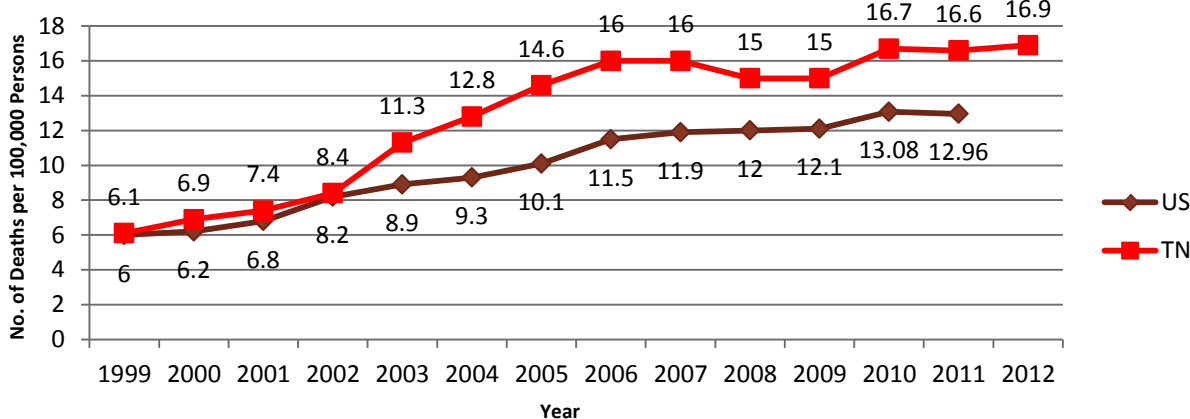
- OGC closed 31 prescribing cases, including eleven cases resulting in either the revocation or voluntary surrender of the practitioners' licenses.
- The Office of Investigations received 78 complaints of inappropriate prescribing and overprescribing
- OGC received 31 new cases. See Appendix A, Collective Charts – 2013 Prescribing Cases.

Prescription Drug Abuse in Tennessee

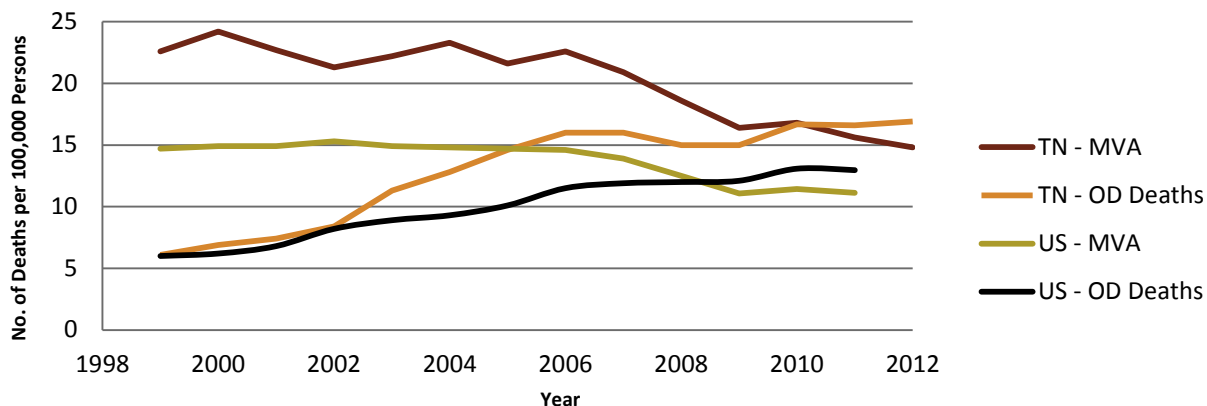
Prescription drug abuse is a serious problem in Tennessee. In 2001, there were 422 deaths resulting from drug overdose. In 2010, that number more than doubled to 1,059. *Death Statistics*, Office of Policy, Planning and Assessment, TN Department of Health (1999-2012). In 2011, that number increased to 1,062 and increased again in 2012 to 1,094. *Id.* The number of deaths in Tennessee resulting from drug overdose has outpaced the national death rate per 100,000 people since 2002. In 2008, there were approximately 12 overdose deaths per 100,000 nationally. *Drug Poisoning Deaths in the United States, 1980-2008*, Data Brief 81, National Center for Health Statistics (NCHS). In Tennessee, the rate was approximately 15 deaths per 100,000 people. *Death Statistics*, Office of Policy, Planning and Assessment, TN Department of Health. In recent years, the number of deaths in Tennessee caused by drug overdose has been higher than the number of deaths caused by motor vehicle accidents. *Id.*

¹ Inappropriate prescribing occurs when a practitioner does not follow the standard of care in determining whether controlled substances should be prescribed. For example, the practitioner does not perform any diagnostic testing, physical exam, or x-rays to confirm a chronic pain source prior to writing a prescription for controlled substances.

² Overprescribing occurs when a practitioner does not follow the standard of care in the amount of controlled substances prescribed. For example, the documentation in the medical record (e.g., the patient's complaint, physical exam, diagnostic testing, etc.) does not justify the amount of controlled substances prescribed.

Table 1 - Tennessee Resident Deaths from Drug Overdoses**Table 2 - Death Rates from Drug Overdoses per 100,000 population, Tennessee vs. U.S.****Table 3: Drug Overdose Deaths vs. Motor Vehicle Traffic Deaths**

**Death Rates per 100,000 population
Tennessee vs US**



The most prescribed controlled substances are prescription opioids used to treat pain. In 2010, the top three most prescribed controlled substances in Tennessee were hydrocodone (e.g., Lortab, Lorcet, Vicodin), alprazolam (e.g., Xanax), and oxycodone (e.g., OxyContin, Roxicodone). *Report to the 107th Tennessee General Assembly*, TN Department of Health Controlled Substance Monitoring Database Committee (2011). In 2010, the number of pills prescribed of the aforementioned substances represented 51 pills of hydrocodone for every Tennessean above the age of 12; 22 pills of alprazolam for every Tennessean above the age of 12; and 21 pills of oxycodone for every Tennessean above the age of 12. *Id.* In 2013, these substances remained the three most prescribed substances. *Report to the 108th Tennessee General Assembly*, TN Department of Health Controlled Substance Monitoring Database Committee (2014).

New Certification Process for Pain Clinics

In 2011, the General Assembly enacted Public Chapter 340, which created Tennessee Code Annotated § 63-1-301, *et. seq.* This legislation created a certification process for pain management clinics and required that all clinics register with the state. *Id.* Each clinic must have a medical director who meets certain educational and training requirements. Additionally, the medical director cannot have any prior disciplinary action related to inappropriately prescribing, dispensing, administering, supplying or selling a controlled substance or any criminal convictions for offenses involving the distribution of illegal prescription drugs or controlled substances as defined in T.C.A. § 39-17-402. T.C.A. § 63-1-309(b)(1), (2). Convicted felons are prohibited from serving as medical directors. *Id.*

There are currently 328 certified pain clinics in Tennessee, which amounts to one clinic per 19,805 Tennesseans. During the 2013 calendar year, there were 37 clinic inspections, 18 of which were random. Nineteen of those inspections resulted in no action against the clinic. Five were referred to the Office of General Counsel. The rest were closed administratively³. The Department's goal is to obtain sufficient staff and training so that every pain clinic may be audited at least every three years.

Table 4:

<i>Inspection Activity</i>	<i>Jan</i>	<i>Feb</i>	<i>Mar</i>	<i>Apr</i>	<i>May</i>	<i>Jun</i>	<i>Jul</i>	<i>Aug</i>	<i>Sep</i>	<i>Oct</i>	<i>Nov</i>	<i>Dec</i>	<i>YTD</i>
Investigation Audits	0	2	0	1	14	2	2	2	2	8	2	2	37

³ To close a complaint administratively means that the complaint was closed without any public disciplinary action on the license of the practitioner.

Table 5:

<i>Inspection Results</i>	<i>Jan</i>	<i>Feb</i>	<i>Mar</i>	<i>Apr</i>	<i>May</i>	<i>Jun</i>	<i>Jul</i>	<i>Aug</i>	<i>Sep</i>	<i>Oct</i>	<i>Nov</i>	<i>Dec</i>	<i>YTD</i>
Closed - No Violation	0	2	0	1	3	1	2	1	2	4	2	1	19
Letter of Concern	0	0	0	0	7	0	0	0	0	0	0	0	7
Letter of Warning	0	0	0	0	2	0	0	0	0	1	0	0	3
Referred to OGC	0	0	0	0	2	1	0	1	0	0	0	1	5
Investigation Requested	0	0	0	0	0	0	0	0	0	1	0	0	1
Clinic Closed	0	0	0	0	0	0	0	0	0	2	0	0	2
Total Closed Cases	0	2	0	1	14	2	2	2	2	8	2	2	37

Regulating the Treatment of Chronic Pain

In addition to the legislation passed by the General Assembly, the Department created the position of medical director of special projects, whose duties include facilitating the creation of guidelines for prescribing opioids, benzodiazepines, barbiturates, and carisoprodol as required by T.C.A. § 63-1-401, *et. seq.* The medical director has traveled throughout the state discussing pain management with practitioners and getting feedback on the upcoming guidelines. Additionally, the medical director collected data on the top 50 prescribing practitioners in the state of Tennessee and has used that data to assist in educating practitioners and identifying areas of concern. A large percentage of the top 50 prescribers were advanced practice nurses. To curb the prescribing practices of midlevel providers (i.e., advanced practice nurses, physician assistants), the General Assembly passed legislation prohibiting midlevel providers from prescribing more than a 30 day, non-refillable supply of controlled substances without the approval of the supervising physician. T.C.A. § 63-19-107(2)(B)(iii).

Enforcement

In addition to the Department's creation of the position of medical director of special projects, the Department's Bureau of Health Licensure and Regulated Boards, Office of General Counsel reassigned several of its current attorney staff to review and prosecute contested cases involving inappropriate prescribing and overprescribing (the "prescribing team"). The prescribing team prosecutes cases before all of the boards overseeing practitioners who have the authority to prescribe controlled substances. This approach allows for consistency in the handling of disciplinary actions against practitioners who are accused of inappropriate prescribing or overprescribing.

In 2013, the Office of Investigations received 78 complaints of inappropriate prescribing and overprescribing, as follows:

Table 6:

<i>Jan</i>	<i>Feb</i>	<i>Mar</i>	<i>Apr</i>	<i>May</i>	<i>Jun</i>	<i>Jul</i>	<i>Aug</i>	<i>Sep</i>	<i>Oct</i>	<i>Nov</i>	<i>Dec</i>	<i>YTD</i>
5	9	18	6	7	6	4	10	3	5	3	2	78

Of those 78 complaints, OGC was assigned 31 new cases for prosecution. See Appendix A, Collective Charts – 2013 Prescribing Cases. Such prosecution resulted in the closure of 31 cases. Three cases resulted in the revocation of a practitioner’s license.⁴ Eight cases resulted in the practitioner voluntarily surrendering his/her license.⁵ One practitioner was suspended, and six were placed on probation.⁶ Three medical doctors were publicly reprimanded. The remaining eight cases were either closed with a Letter of Warning or no action. Sometimes, after a case arrives in OGC and the Respondent (i.e., the accused practitioner) is contacted, the Respondent presents additional information that is sufficient to refute the allegations against him/her. Other times, further investigation, including review by an expert, determines that there is insufficient evidence to pursue a contested case before the respective board. Letters of warning are distributed when the allegations against the practitioner raise concern, but there is insufficient evidence to pursue a contested case.

Conclusion

The Department is working hard to protect the people of Tennessee from the effects of prescription drug abuse. Appropriate measures have been taken to impose stricter regulations on practitioners who prescribe controlled substances in an effort to reduce the number of patients being adversely affected by inappropriate prescribing or overprescribing.

⁴ Of the three revocations, one involved a physician and the other two involved advanced practice nurses.

⁵ Of the eight voluntary surrenders, one involved a dentist and the other seven were physicians.

⁶ A physician assistant was suspended. Four medical doctors, one osteopathic doctor, and one advanced practice nurse were placed on probation.

Appendix A. – 2013 Prescribing Cases

Cases Opened in the Office of General Counsel

<i>New Cases Received</i>	<i>Jan</i>	<i>Feb</i>	<i>Mar</i>	<i>Apr</i>	<i>May</i>	<i>Jun</i>	<i>Jul</i>	<i>Aug</i>	<i>Sep</i>	<i>Oct</i>	<i>Nov</i>	<i>Dec</i>	<i>YTD</i>
D.D.S.	0	0	0	1	0	0	0	0	0	1	0	0	2
M.D.	3	3	1	2	1	0	3	5	0	1	0	0	19
P.A.	0	0	0	0	0	1	0	0	0	1	0	0	2
A.P.N./R.N.	0	0	0	1	0	0	0	2	0	0	1	3	7
D.O.	0	0	0	0	0	1	0	0	0	0	0	0	1
D.P.M.	0	0	0	0	0	0	0	0	0	0	0	0	0
TOTAL:	3	3	1	4	1	2	3	7	0	3	1	3	31

Case Closures in the Office of General Counsel

<i>Cases Closed - by Case</i>	<i>Jan</i>	<i>Feb</i>	<i>Mar</i>	<i>Apr</i>	<i>May</i>	<i>Jun</i>	<i>Jul</i>	<i>Aug</i>	<i>Sep</i>	<i>Oct</i>	<i>Nov</i>	<i>Dec</i>	<i>YTD</i>
Closed - No Action	1	0	0	0	0	0	0	0	0	0	0	0	1
Closed - Civil Penalty	0	0	0	0	0	0	0	0	0	0	0	0	0
Closed - Warning	0	0	2	1	1	0	0	0	0	1	1	1	7
Closed - Reprimand	0	0	0	0	1	0	1	0	1	0	0	0	3
Closed - Lic. Limited	0	0	0	0	0	0	0	0	0	0	0	0	0
Closed - Probation	0	0	0	0	1	0	0	1	3	0	1	0	6
Closed - Suspension	1	0	0	0	0	0	0	0	0	0	0	0	1
Closed - Lic. Surrendered	3	0	2	0	0	0	0	0	1	0	2	0	8
Closed - Revocation	0	1	0	0	0	0	0	0	0	0	0	2	3
Closed - Other	2	0	0	0	0	0	0	0	0	0	0	0	2
Total Closed Cases	7	1	4	1	3	0	1	1	5	1	4	3	31

<i>Cases Closed - by Respondent</i>	<i>Jan</i>	<i>Feb</i>	<i>Mar</i>	<i>Apr</i>	<i>May</i>	<i>Jun</i>	<i>Jul</i>	<i>Aug</i>	<i>Sep</i>	<i>Oct</i>	<i>Nov</i>	<i>Dec</i>	<i>YTD</i>
Closed - No Action	1	0	0	0	0	0	0	0	0	0	0	0	1
Closed - Civil Penalty	0	0	0	0	0	0	0	0	0	0	0	0	0
Closed - Warning	0	0	2	1	1	0	0	0	0	1	1	1	7
Closed - Reprimand	0	0	0	0	1	0	1	0	1	0	0	0	3
Closed - Lic. Limited	0	0	0	0	0	0	0	0	0	0	0	0	0
Closed - Probation	0	0	0	0	1	0	0	1	2	0	1	0	5
Closed - Suspension	1	0	0	0	0	0	0	0	0	0	0	0	1
Closed - Lic. Surrendered	1	0	1	0	0	0	0	0	1	0	2	0	5
Closed - Revocation	0	1	0	0	0	0	0	0	0	0	0	1	2
Closed - Other	1	0	0	0	0	0	0	0	0	0	0	0	1
Total Closed Cases	4	1	3	1	3	0	1	1	4	1	4	2	25

By Specific Board

Dental

<i>Cases Closed - by Case</i>	<i>Jan</i>	<i>Feb</i>	<i>Mar</i>	<i>Apr</i>	<i>May</i>	<i>Jun</i>	<i>Jul</i>	<i>Aug</i>	<i>Sep</i>	<i>Oct</i>	<i>Nov</i>	<i>Dec</i>	<i>YTD</i>
Closed - No Action	0	0	0	0	0	0	0	0	0	0	0	0	0
Closed - Civil Penalty	0	0	0	0	0	0	0	0	0	0	0	0	0
Closed - Warning	0	0	0	0	0	0	0	0	0	0	0	0	0
Closed - Reprimand	0	0	0	0	0	0	0	0	0	0	0	0	0
Closed - Lic. Limited	0	0	0	0	0	0	0	0	0	0	0	0	0
Closed - Probation	0	0	0	0	0	0	0	0	0	0	0	0	0
Closed - Suspension	0	0	0	0	0	0	0	0	0	0	0	0	0
Closed - Lic. Surrendered	0	0	0	0	0	0	0	0	1	0	0	0	1
Closed - Revocation	0	0	0	0	0	0	0	0	0	0	0	0	0
Closed - Other	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Closed Cases	0	0	0	0	0	0	0	0	1	0	0	0	1

<i>Cases Closed - by Respondent</i>	<i>Jan</i>	<i>Feb</i>	<i>Mar</i>	<i>Apr</i>	<i>May</i>	<i>Jun</i>	<i>Jul</i>	<i>Aug</i>	<i>Sep</i>	<i>Oct</i>	<i>Nov</i>	<i>Dec</i>	<i>YTD</i>
Closed - No Action	0	0	0	0	0	0	0	0	0	0	0	0	0
Closed - Civil Penalty	0	0	0	0	0	0	0	0	0	0	0	0	0
Closed - Warning	0	0	0	0	0	0	0	0	0	0	0	0	0
Closed - Reprimand	0	0	0	0	0	0	0	0	0	0	0	0	0
Closed - Lic. Limited	0	0	0	0	0	0	0	0	0	0	0	0	0
Closed - Probation	0	0	0	0	0	0	0	0	0	0	0	0	0
Closed - Suspension	0	0	0	0	0	0	0	0	0	0	0	0	0
Closed - Lic. Surrendered	0	0	0	0	0	0	0	0	1	0	0	0	1
Closed - Revocation	0	0	0	0	0	0	0	0	0	0	0	0	0
Closed - Other	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Closed Cases	0	0	0	0	0	0	0	0	1	0	0	0	1

Board of Medical Examiners

<i>Cases Closed - by Case</i>	<i>Jan</i>	<i>Feb</i>	<i>Mar</i>	<i>Apr</i>	<i>May</i>	<i>Jun</i>	<i>Jul</i>	<i>Aug</i>	<i>Sep</i>	<i>Oct</i>	<i>Nov</i>	<i>Dec</i>	<i>YTD</i>
Closed - No Action	1	0	0	0	0	0	0	0	0	0	0	0	1
Closed - Civil Penalty	0	0	0	0	0	0	0	0	0	0	0	0	0
Closed - Warning	0	0	2	1	1	0	0	0	0	0	1	1	6
Closed - Reprimand	0	0	0	0	1	0	1	0	1	0	0	0	3
Closed - Lic. Limited	0	0	0	0	0	0	0	0	0	0	0	0	0
Closed - Probation	0	0	0	0	1	0	0	0	3	0	0	0	4
Closed - Suspension	0	0	0	0	0	0	0	0	0	0	0	0	0
Closed - Lic. Surrendered	3	0	2	0	0	0	0	0	0	0	2	0	7
Closed - Revocation		1		0	0	0	0	0	0	0	0	0	1
Closed - Other	2	0	0	0	0	0	0	0	0	0	0	0	2
Total Closed Cases	6	1	4	1	3	0	1	0	4	0	3	1	24

<i>Cases Closed - by Respondent</i>	<i>Jan</i>	<i>Feb</i>	<i>Mar</i>	<i>Apr</i>	<i>May</i>	<i>Jun</i>	<i>Jul</i>	<i>Aug</i>	<i>Sep</i>	<i>Oct</i>	<i>Nov</i>	<i>Dec</i>	<i>YTD</i>
Closed - No Action	1	0	0	0	0	0	0	0	0	0	0	0	1
Closed - Civil Penalty	0	0	0	0	0	0	0	0	0	0	0	0	0
Closed - Warning	0	0	2	1	1	0	0	0	0	0	1	1	6
Closed - Reprimand	0	0	0	0	1	0	1	0	1	0	0	0	3
Closed - Lic. Limited	0	0	0	0	0	0	0	0	0	0	0	0	0
Closed - Probation	0	0	0	0	1	0	0	0	2	0	0	0	3
Closed - Suspension	0	0	0	0	0	0	0	0	0	0	0	0	0
Closed - Lic. Surrendered	1	0	1	0	0	0	0	0	0	0	2	0	4
Closed - Revocation	0	1	0	0	0	0	0	0	0	0	0	0	1
Closed - Other	1	0	0	0	0	0	0	0	0	0	0	0	1
Total Closed Cases	3	1	3	1	3	0	1	0	3	0	3	1	19

Board of Medical Examiners Committee on Physician Assistants

<i>Cases Closed - by Case</i>	<i>Jan</i>	<i>Feb</i>	<i>Mar</i>	<i>Apr</i>	<i>May</i>	<i>Jun</i>	<i>Jul</i>	<i>Aug</i>	<i>Sep</i>	<i>Oct</i>	<i>Nov</i>	<i>Dec</i>	<i>YTD</i>
Closed - No Action	0	0	0	0	0	0	0	0	0	0	0	0	0
Closed - Civil Penalty	0	0	0	0	0	0	0	0	0	0	0	0	0
Closed - Warning	0	0	0	0	0	0	0	0	0	0	0	0	0
Closed - Reprimand	0	0	0	0	0	0	0	0	0	0	0	0	0
Closed - Lic. Limited	0	0	0	0	0	0	0	0	0	0	0	0	0
Closed - Probation	0	0	0	0	0	0	0	0	0	0	0	0	0
Closed - Suspension	1	0	0	0	0	0	0	0	0	0	0	0	1
Closed - Lic. Surrendered	0	0	0	0	0	0	0	0	0	0	0	0	0
Closed - Revocation	0	0	0	0	0	0	0	0	0	0	0	0	0
Closed - Other	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Closed Cases	1	0	0	0	0	0	0	0	0	0	0	0	1

<i>Cases Closed - by Respondent</i>	<i>Jan</i>	<i>Feb</i>	<i>Mar</i>	<i>Apr</i>	<i>May</i>	<i>Jun</i>	<i>Jul</i>	<i>Aug</i>	<i>Sep</i>	<i>Oct</i>	<i>Nov</i>	<i>Dec</i>	<i>YTD</i>
Closed - No Action	0	0	0	0	0	0	0	0	0	0	0	0	0
Closed - Civil Penalty	0	0	0	0	0	0	0	0	0	0	0	0	0
Closed - Warning	0	0	0	0	0	0	0	0	0	0	0	0	0
Closed - Reprimand	0	0	0	0	0	0	0	0	0	0	0	0	0
Closed - Lic. Limited	0	0	0	0	0	0	0	0	0	0	0	0	0
Closed - Probation	0	0	0	0	0	0	0	0	0	0	0	0	0
Closed - Suspension	1	0	0	0	0	0	0	0	0	0	0	0	1
Closed - Lic. Surrendered	0	0	0	0	0	0	0	0	0	0	0	0	0
Closed - Revocation	0	0	0	0	0	0	0	0	0	0	0	0	0
Closed - Other	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Closed Cases	1	0	0	0	0	0	0	0	0	0	0	0	1

Nursing

<i>Cases Closed - by Case</i>	<i>Jan</i>	<i>Feb</i>	<i>Mar</i>	<i>Apr</i>	<i>May</i>	<i>Jun</i>	<i>Jul</i>	<i>Aug</i>	<i>Sep</i>	<i>Oct</i>	<i>Nov</i>	<i>Dec</i>	<i>YTD</i>
Closed - No Action	0	0	0	0	0	0	0	0	0	0	0	0	0
Closed - Civil Penalty	0	0	0	0	0	0	0	0	0	0	0	0	0
Closed - Warning	0	0	0	0	0	0	0	0	0	1	0	0	1
Closed - Reprimand	0	0	0	0	0	0	0	0	0	0	0	0	0
Closed - Lic. Limited	0	0	0	0	0	0	0	0	0	0	0	0	0
Closed - Probation	0	0	0	0	0	0	0	1	0	0	0	0	1
Closed - Suspension	0	0	0	0	0	0	0	0	0	0	0	0	0
Closed - Lic. Surrendered	0	0	0	0	0	0	0	0	0	0	0	0	0
Closed - Revocation	0	0	0	0	0	0	0	0	0	0	0	2	2
Closed - Other	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Closed Cases	0	0	0	0	0	0	0	1	0	1	0	2	4

<i>Cases Closed - by Respondent</i>	<i>Jan</i>	<i>Feb</i>	<i>Mar</i>	<i>Apr</i>	<i>May</i>	<i>Jun</i>	<i>Jul</i>	<i>Aug</i>	<i>Sep</i>	<i>Oct</i>	<i>Nov</i>	<i>Dec</i>	<i>YTD</i>
Closed - No Action	0	0	0	0	0	0	0	0	0	0	0	0	0
Closed - Civil Penalty	0	0	0	0	0	0	0	0	0	0	0	0	0
Closed - Warning	0	0	0	0	0	0	0	0	0	1	0	0	1
Closed - Reprimand	0	0	0	0	0	0	0	0	0	0	0	0	0
Closed - Lic. Limited	0	0	0	0	0	0	0	0	0	0	0	0	0
Closed - Probation	0	0	0	0	0	0	0	1	0	0	0	0	1
Closed - Suspension	0	0	0	0	0	0	0	0	0	0	0	0	0
Closed - Lic. Surrendered	0	0	0	0	0	0	0	0	0	0	0	0	0
Closed - Revocation	0	0	0	0	0	0	0	0	0	0	0	1	1
Closed - Other	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Closed Cases	0	0	0	0	0	0	0	1	0	1	0	1	3

Board of Osteopathic Examination

<i>Cases Closed - by Case</i>	<i>Jan</i>	<i>Feb</i>	<i>Mar</i>	<i>Apr</i>	<i>May</i>	<i>Jun</i>	<i>Jul</i>	<i>Aug</i>	<i>Sep</i>	<i>Oct</i>	<i>Nov</i>	<i>Dec</i>	<i>YTD</i>
Closed - No Action	0	0	0	0	0	0	0	0	0	0	0	0	0
Closed - Civil Penalty	0	0	0	0	0	0	0	0	0	0	0	0	0
Closed - Warning	0	0	0	0	0	0	0	0	0	0	0	0	0
Closed - Reprimand	0	0	0	0	0	0	0	0	0	0	0	0	0
Closed - Lic. Limited	0	0	0	0	0	0	0	0	0	0	0	0	0
Closed - Probation	0	0	0	0	0	0	0	0	0	0	1	0	1
Closed - Suspension	0	0	0	0	0	0	0	0	0	0	0	0	0
Closed - Lic. Surrendered	0	0	0	0	0	0	0	0	0	0	0	0	0
Closed - Revocation	0	0	0	0	0	0	0	0	0	0	0	0	0
Closed - Other	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Closed Cases	0	0	0	0	0	0	0	0	0	0	1	0	1

<i>Cases Closed - by Respondent</i>	<i>Jan</i>	<i>Feb</i>	<i>Mar</i>	<i>Apr</i>	<i>May</i>	<i>Jun</i>	<i>Jul</i>	<i>Aug</i>	<i>Sep</i>	<i>Oct</i>	<i>Nov</i>	<i>Dec</i>	<i>YTD</i>
Closed - No Action	0	0	0	0	0	0	0	0	0	0	0	0	0
Closed - Civil Penalty	0	0	0	0	0	0	0	0	0	0	0	0	0
Closed - Warning	0	0	0	0	0	0	0	0	0	0	0	0	0
Closed - Reprimand	0	0	0	0	0	0	0	0	0	0	0	0	0
Closed - Lic. Limited	0	0	0	0	0	0	0	0	0	0	0	0	0
Closed - Probation	0	0	0	0	0	0	0	0	0	0	1	0	1
Closed - Suspension	0	0	0	0	0	0	0	0	0	0	0	0	0
Closed - Lic. Surrendered	0	0	0	0	0	0	0	0	0	0	0	0	0
Closed - Revocation	0	0	0	0	0	0	0	0	0	0	0	0	0
Closed - Other	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Closed Cases	0	0	0	0	0	0	0	0	0	0	1	0	1

Board of Podiatric Medical Examiners

<i>Cases Closed - by Case</i>	<i>Jan</i>	<i>Feb</i>	<i>Mar</i>	<i>Apr</i>	<i>May</i>	<i>Jun</i>	<i>Jul</i>	<i>Aug</i>	<i>Sep</i>	<i>Oct</i>	<i>Nov</i>	<i>Dec</i>	<i>YTD</i>
Closed - No Action	0	0	0	0	0	0	0	0	0	0	0	0	0
Closed - Civil Penalty	0	0	0	0	0	0	0	0	0	0	0	0	0
Closed - Warning	0	0	0	0	0	0	0	0	0	0	0	0	0
Closed - Reprimand	0	0	0	0	0	0	0	0	0	0	0	0	0
Closed - Lic. Limited	0	0	0	0	0	0	0	0	0	0	0	0	0
Closed - Probation	0	0	0	0	0	0	0	0	0	0	0	0	0
Closed - Suspension	0	0	0	0	0	0	0	0	0	0	0	0	0
Closed - Lic. Surrendered	0	0	0	0	0	0	0	0	0	0	0	0	0
Closed - Revocation	0	0	0	0	0	0	0	0	0	0	0	0	0
Closed - Other	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Closed Cases	0	0	0	0	0	0	0	0	0	0	0	0	0

<i>Cases Closed - by Respondent</i>	<i>Jan</i>	<i>Feb</i>	<i>Mar</i>	<i>Apr</i>	<i>May</i>	<i>Jun</i>	<i>Jul</i>	<i>Aug</i>	<i>Sep</i>	<i>Oct</i>	<i>Nov</i>	<i>Dec</i>	<i>YTD</i>
Closed - No Action	0	0	0	0	0	0	0	0	0	0	0	0	0
Closed - Civil Penalty	0	0	0	0	0	0	0	0	0	0	0	0	0
Closed - Warning	0	0	0	0	0	0	0	0	0	0	0	0	0
Closed - Reprimand	0	0	0	0	0	0	0	0	0	0	0	0	0
Closed - Lic. Limited	0	0	0	0	0	0	0	0	0	0	0	0	0
Closed - Probation	0	0	0	0	0	0	0	0	0	0	0	0	0
Closed - Suspension	0	0	0	0	0	0	0	0	0	0	0	0	0
Closed - Lic. Surrendered	0	0	0	0	0	0	0	0	0	0	0	0	0
Closed - Revocation	0	0	0	0	0	0	0	0	0	0	0	0	0
Closed - Other	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Closed Cases	0	0	0	0	0	0	0	0	0	0	0	0	0