

BEFORE THE
BOARD OF NATUROPATHIC MEDICINE
STATE OF OREGON

In the Matter of the License of:

Andersen, Lakshmi ND,

Licensee.

Case No. 20-12-49

**CONSENT ORDER AND SETTLEMENT
AGREEMENT**

1.

The Board of Naturopathic Medicine (Board) is the state agency responsible for licensing, regulating and disciplining naturopathic physicians in the State of Oregon, pursuant to Oregon Revised Statutes (ORS) chapter 685 and Oregon Administrative Rules (OAR) chapter 850. Andersen, Lakshmi N.D. (Licensee) is a licensed naturopathic physician in Oregon, and is subject to the jurisdiction of the Board.

2.

The Board issued a Notice of Proposed Disciplinary Action to Licensee on or about May 13, 2021. Licensee was provided the opportunity to request a hearing on the Notice. In lieu thereof, the parties wish to resolve this matter informally, without any hearing, appeal or judicial review, by entering this Settlement Agreement and Consent Order, pursuant to ORS 183.417(3) on the terms set forth below.

SETTLEMENT AGREEMENT

3.

The Board finds and the Licensee stipulates to the findings of violations described in the Notice of Proposed Disciplinary Action filed in this proceeding. The findings of facts and conclusions of law regarding those violations in the Notice of Proposed Disciplinary Action are incorporated by reference into this settlement agreement and consent order. Licensee agrees that the Board may enter the Consent Order set forth below, including the following terms and conditions:

- A. Civil penalties in the total amount of five thousand dollars (\$5,000);
- B. Two (2) years of probation, with the following conditions:
 - i. Continuing Education: In addition to the Board's annual continuing education requirements, during the first year of probation, Licensee shall complete 12 hours of Board approved continuing education hours as follows:
 - (a) Eight (8) hours focused on pain management and prescribing controlled substances.
 - (b) Four (4) hours focused on substance abuse disorders.
 - ii. Chart Review: Licensee will submit to the Board up to five (5) patient charts, quarterly, as requested by the Board for patients whom Licensee is currently prescribing controlled substances. The chart review will focus on Licensee controlled substance prescribing practices and charting of those practices. The Licensee is responsible for expenses related to quarterly chart reviews.
- C. Licensee shall comply with the statutes, rules and orders of the Board.
- D. Licensee's failure to comply with any term of this order, ORS chapter 685 or OAR chapter 850 shall be grounds for additional discipline by the Board.
- E. Licensee enters into this Settlement Agreement and Consent Order voluntarily and without any force or duress. Licensee states that the Board and Board staff have not made promises or

representations not stated herein to induce her to sign this document and agree to issuance of the Order.

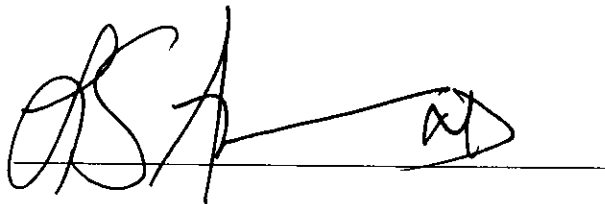
F. Licensee acknowledges that she has had the opportunity to seek the advice of legal counsel. Licensee further acknowledges that he understands and agrees to the terms of this Order.

G. Licensee understands that she has the right to a contested case hearing under the Administrative Procedures Act (ORS Chapter 183), and fully and finally waives any and all right to a hearing and any rights to appeal or otherwise challenge this Settlement Agreement and Consent Order.

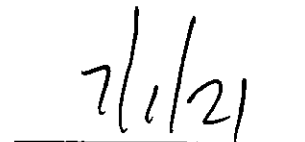
H. The parties acknowledge that this Settlement Agreement and Consent Order is a public document.

I. This Settlement Agreement and Consent Order shall take effect on the date it is signed by the Board.

IT IS SO STIPULATED.

A handwritten signature in black ink, appearing to be 'L. Andersen', written over a horizontal line.

Andersen, Lakshmi ND,

A handwritten date '7/1/21' written in black ink over a horizontal line.

Date

CONSENT ORDER

The Board issues the following order:

- A. Civil penalties in the total amount of five thousand dollars (\$5,000);
- B. Two (2) years of probation, with the following conditions:
 - i. Continuing Education: In addition to the Board's annual continuing education requirements, during the first year of probation, Licensee shall complete 12 hours of Board approved continuing education hours as follows:
 - (a) Eight (8) hours focused on pain management and prescribing controlled substances.
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DATED this 8 day of July 2021.

BOARD OF NATUROPATHIC MEDICINE

State of Oregon



Mary-Beth Baptista, Executive Director