

BEFORE THE IOWA BOARD OF VETERINARY MEDICINE

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IN THE MATTER OF	)	CASE NO. 15-045
	)	
LISA HINDLE-DEPPE, D.V.M.,	)	<b>COMBINED STATEMENT</b>
	)	<b>OF CHARGES, SETTLEMENT</b>
	)	<b>AGREEMENT, AND FINAL ORDER</b>
RESPONDENT.	)	

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**COMES NOW** the Iowa Board of Veterinary Medicine (“Board”) and Lisa Hindle-Deppe, D.V.M. (“Respondent”), and hereby enter into this Combined Statement of Charges, Settlement Agreement, and Final Order (Agreement and Order) pursuant to Iowa Code sections 17A.10, 272C.3(4), and 811 Iowa Administrative Code (IAC) 10.9.

**A. STATEMENT OF CHARGES**

1. Respondent was issued Iowa license 6933 on July 5, 2002. Respondent’s license is currently active and will next expire on June 30, 2017.
2. The Board has jurisdiction over the parties and the matter pursuant to Iowa Code chapters 17A, 169, and 272C.

**Count I**

3. Respondent is charged with failing to conform to the minimal standard of acceptable and prevailing practice in violation of 811 IAC 10.6(2)(c).

**Count II**

4. Respondent is charged with negligently failing to exercise due care in the delegation of veterinary services to or in supervision of employees or other individuals, whether or not injury results in violation of 811 IAC 10.6(2)(e).

## **B. FACTUAL CIRCUMSTANCES**

5. A complaint was received by the Board alleging that non-veterinarians were permitted or delegated the responsibility of administering rabies vaccinations while Respondent was away from the clinic; an assertion Respondent expressly denies.

6. As part of its standard protocol, medical records were received and reviewed by the Board.

7. The medical records reviewed by the Board indicated discrepancies between the serial numbers of vaccinations listed on certificates and in the medical records.

8. There was also concern that some of the vaccines administered had expired; an assertion Respondent expressly denies.

9. Respondent does not admit the Board's contentions, and expressly denies the same, but, in order to amicably resolve this matter, Respondent agrees to the terms set forth in Section C of this Agreement.

## **C. SETTLEMENT AGREEMENT AND FINAL ORDER**

10. Respondent, Lisa Hindle-Deppe, D.V.M., agrees to pay to the Board a civil monetary penalty of \$1,000.00 total. The funds shall be paid by check and made payable to the State of Iowa. Respondent shall remit full payment of the civil monetary penalty within 30 days of the date this Order is executed.

11. Respondent shall notify the owners of dogs named Blue and Vader that their rabies vaccinations need to be updated and shall revaccinate them at Respondent's sole expense. Proof of revaccination shall be provided to the Board within 30 days of the date this Order is executed.

12. Respondent shall take sections 6 and 7 of the Veterinary Law and Ethics course

offered on-line from Iowa State University's College of Veterinary Medicine, at her sole expense. These 5.75 hours are in addition to the hours normally required for any triennium and must be taken within 30 days of the date this Order is executed.

13. Respondent shall submit monthly rabies vaccine reports to the Board for 6 months from the date this Order is executed.

14. Respondent's license shall be put on probation for a period of one year from the date this Order is executed. While on probation, Respondent shall submit quarterly reports to the Board (on December 5, 2016, March 5, 2017, June 5, 2017, and September 5, 2017) which include information regarding her compliance with this Agreement and the nature and location of her practice as a veterinarian.

15. This Combined Statement of Charges, Settlement Agreement and Final Order constitutes the resolution of a contested case proceeding.

16. By entering into this Agreement and Order, Respondent voluntarily waives any rights to a contested case hearing on the allegations contained in the Agreement and Order and voluntarily waives any objections to the terms of the Agreement and Order, including the right to appeal.

17. This Agreement and Order is voluntarily submitted by Respondent to the Board for consideration.

18. Respondent acknowledges she has a right to be, and is, represented by counsel in this matter.

19. Respondent agrees that counsel for the State may present this Agreement and Order ex parte to the Board.

20. This Agreement and Order is subject to approval of the Board. If the Board fails

to approve this Agreement and Order it shall be of no force or effect to either party.

21. This Agreement and Order shall be part of Respondent's permanent record and shall be considered by the Board in determining the nature and severity of any disciplinary action to be imposed in the event of any future violation.

22. In the event Respondent violates or fails to comply with any of the terms of this Agreement and Order, the Board may initiate appropriate action to revoke or suspend Respondent's licenses or to impose other licensee discipline in accordance with Iowa Code section 272C.3(2)(a).

23. This Agreement and Order is a public record available for inspection and copying upon execution of the Agreement and Order in accordance with the requirements of Iowa Code chapter 22 and 272C.

24. The Board's approval of this Agreement and Order shall constitute a FINAL ORDER of the Board.

WHEREFORE, the terms and conditions of this Combined Statement of Charges, Settlement Agreement, and Final Order are agreed to and accepted by the Iowa Board of Veterinary Medicine and the Respondent.

Respondent(s)

Iowa Board of Veterinary Medicine

By: Lyn S. Hudak, DVM

By: DeWayne T. Hake, DVM

Date

10/19/16

Date

10/22/16

Copies to:

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