

STATE OF MAINE  
BOARD OF LICENSURE IN MEDICINE

In re: )  
K. Shridhara Iyengar, M.D. ) AMENDMENT TO  
CONSENT AGREEMENT

This document is an amendment to the Consent Agreement entered into by K. Sridhara Iyengar, M.D. ("Dr. Iyengar"), the State of Maine Board of Licensure in Medicine ("the Board") and the State of Maine Department of the Attorney General.

Pursuant to paragraph 1 of the DISCIPLINE section on page 2 of the Consent Agreement, which states that, "... this decision shall incorporate any subsequent changes in term or conditions of the decision of the Medical Board of California ..."  
Dr. Iyengar's probation which began on March 1, 1995, is terminated. The effective date of the termination of probation is January 4, 1999. The Decision and Order of the Medical Board of California is incorporated and attached to this amendment.

WHEREFORE, Dr. Iyengar's probation is terminated and the Consent Agreement entered into by all parties in October, 1996 is no longer in effect. Dr. Iyengar continues to hold an active medical license.

DATED: June 26, 99

[Signature]  
K. SRIDHARA IYENGAR, M.D.

STATE OF California  
Orange County, S.S.

Personally appeared before me the above-named K. Sridhara Iyengar, M.D., and swore to the truth of the foregoing based upon his own personal knowledge, or upon information and belief, and so far as upon information and belief, he believes it is to be true

DATED: 6-26-99

[Signature]  
NOTARY PUBLIC



ANDREW KETTERER  
ATTORNEY GENERAL



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September 21, 1999

Michael A. Hodgins, Esq.  
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Re: K. Sridhara Iyengar, M.D.

Dear Mike:

Enclosed is a copy of the fully-executed amendment to the Consent Agreement of Dr. Iyengar. As requested, the Board terminated the Consent Agreement which was based on the agreement between Dr. Iyengar and the Medical Board of California which was terminated by that Board on January 4, 1999.

If you have any questions, please give me a call.

Sincerely,

  
RUTH E. McNIFF  
Assistant Attorney General

Enclosure—Copy of Consent Agreement

*STATE OF MAINE  
BOARD OF LICENSURE IN MEDICINE*

*IN RE: K. SRIDHARA* ) *CONSENT AGREEMENT*  
*IYENGAR, M.D.* )  
 )

This document is a Consent Agreement and Order, effective when signed by all parties, regarding discipline, renewal and the modification of an inactive license to practice medicine in the State of Maine held by K. SRIDHARA IYENGAR, M.D. The parties to the Consent Agreement are K. Sridhara Iyengar, M.D. (the "Licensee"), the State of Maine Board of Licensure in Medicine (the "Board") and the Maine Department of Attorney General. This Consent Agreement is issued pursuant to 10 M.R.S.A. § 8003(5)8A-1) and 32 M.R.S.A. § 3283-A.

FACTUAL BACKGROUND

Dr. Iyengar has held an inactive medical license in the State of Maine since 1979. He also holds an active medical license issued by the State of California. In 1995, Dr. Iyengar entered into a stipulation with the Medical Board of California and admitted he engaged in unprofessional conduct by forcing unwanted familiarities on female staff members at a hospital where he held privileges. The California State Medical Board revoked his license, stayed the revocation and placed him on probation for five (5) years. The conditions of Dr. Iyengar's probation required that he undergo a psychiatric evaluation and therapy, if necessary, participate in ongoing education about sexual harassment and file of quarterly reports with the California Medical Board. Dr. Iyengar is currently in full compliance with the terms of the California order and practicing medicine in California.

Dr. Iyengar through counsel has furnished counsel for the Board with copies of current documentation required by the order of the Medical Board of California including affidavit forms for the period 6/95-9/95; 9/95-11/95; 12/95-3/96; and 3/96-6/96. A letter dated 7/24/96 from the Senior Investigator and Probation Monitor to Dr. Iyengar certifying to Iyengar's compliance of the terms and conditions of his probation has also been furnished, together with copies of documentation having to do with the completion of a number of continuing education courses, including Harassment and Discrimination; Men and Women Communicating Effectively at Work, together with a book review of Sexual Harassment on the Job and a video review. Further, Dr. Iyengar, through counsel, has furnished a report from Dr. Raymond Anderson, Ph.D. with respect to his comprehensive examination of Dr. Iyengar, which was submitted to the Medical Board of California, together with other supportive material from a psychiatric consultant and Dr. Maung, all of which material was submitted to the California Board. Additionally, a

letter from Dr. Iyengar's California counsel to the Regional Medical Consultant of the Medical Board of California, dated May 23, 1995 explaining measures taken has been filed with the Board. Dr. Iyengar has also filed with the Board a application for renewal of his inactive registration in Maine under date of June 8, 1996 (filed by letter of June 27, 1996 by counsel).

It appears that Dr. Iyengar has followed the mandates of the California decision and he is currently under a probationary period of five years, running from the effective date of the California decision which was on or about March 1, 1995.

The Board was notified of the disciplinary action in California when Dr. Iyengar submitted his application for renewal of his Maine license in 1994. His renewal has been pending since that time. The Board received notice of the Stipulation and Order of the Medical Board of California in 1996 and issued a complaint for unprofessional conduct. Dr. Iyengar has been fully cooperative with this Board.

### DISCIPLINE.

The Board accepts the discipline imposed by the Medical Board of California and imposes the same discipline and conditions on Dr. Iyengar's Maine license.

1. Dr. Iyengar's license is suspended but stayed and he is placed on probation for five (5) years effective March 1, 1995 the effective date of the decision of the Medical Board of California. Dr. Iyengar's aforesaid application for renewal is granted subject to the conditions imposed herein and by any subsequent order entered as a result hereof. It is the intention of the parties that this decision shall incorporate any subsequent changes in the term or conditions of the decision of the Medical Board of California.

2. During the term of probation, Dr. Iyengar will abide by the conditions of probation ordered by the Medical Board of California. He will file duplicate reports with the Board of all reports or other documents which he is required to file with the Medical Board of California.

3. Violation of any terms of his probation in California or in Maine will result in the immediate revocation of the stay of suspension. Dr. Iyengar will have an opportunity to be heard on the issues of violation of probation as promptly thereafter as possible.

4. Upon successful completion of probation, Dr. Iyengar's Maine license shall be fully restored consistent with his application.

Dr. Iyengar understands that this Consent Agreement includes a final Board Order resolving this matter and by executing this Consent Agreement he waives all rights to a hearing before the Board and in the courts or to appeal the matter that is the subject of this Agreements except as provided herein.

Dated: October 10, 1996

  
K. SRIDHARA IYENGAR, M.D.

Witnessed:

  
JON R. DOYLE, ESQUIRE

Dated: 10-22-96

STATE OF MAINE BOARD OF  
LICENSURE IN MEDICINE

BY:

  
EDWARD DAVID, M.D., CHAIR

Dated: 10/21/96

  
RUTH E. MCNIFF  
ASSISTANT ATTORNEY GENERAL