

**BEFORE THE BOARD OF MEDICAL EXAMINERS
OF THE STATE OF NEVADA**

* * * * *

In the Matter of Charges and Complaint

Case No. 22-48045-1

Against:

ERIC JOSEPH PIPPI, PA-C,

Respondent.

FILED
FEB - 1 2022
NEVADA STATE BOARD OF
MEDICAL EXAMINERS
By: _____

COMPLAINT

The Investigative Committee¹ (IC) of the Nevada State Board of Medical Examiners (Board), by and through Ian J. Cumings, J.D., Deputy General Counsel and attorney for the IC, having a reasonable basis to believe that Eric Joseph Pippi, PA-C (Respondent) violated the provisions of Nevada Revised Statutes (NRS) Chapter 630 and Nevada Administrative Code (NAC) Chapter 630 (collectively, the Medical Practice Act), hereby issues its Complaint, stating the IC's charges and allegations as follows:

1. Respondent was at all times relative to this Complaint a physician assistant holding an active license to practice medicine in the State of Nevada (License No. PA1947). Respondent was originally licensed by the Board on March 21, 2018.

2. On March 12, 2021, the Oklahoma State Board of Medical Licensure and Supervision (Oklahoma Medical Board) entered an Order Accepting Voluntary Submittal to Jurisdiction (Order) for failing to complete twenty (20) hours of continuing medical education (CME) in 2019 and failing to complete forty (40) hours of CME by December 31, 2019. *See Exhibit 1.*

3. Respondent failed to self-report this disciplinary action to the Nevada State Board of Medical Examiners within thirty (30) days as required under NRS 630.306(1)(k).

¹ The Investigative Committee of the Nevada State Board of Medical Examiners, at the time this formal Complaint was authorized for filing, was composed of Board members Bret W. Frey, M.D., Chairman, Aury Nagy, M.D., Col. Eric D. Wade, USAF (Ret.).

1 **COUNT I**

2 **NRS 630.301(3) - Disciplinary Action by Another State Medical Board**

3 4. All of the allegations contained in the above paragraphs are hereby incorporated by
4 reference as though fully set forth herein.

5 5. NRS 630.301(3) provides that any disciplinary action, including, without limitation, the
6 revocation, suspension, modification or limitation of a license to practice any type of medicine,
7 taken by another state ... [o]r the surrender of the license or discontinuing the practice of medicine
8 while under investigation by any licensing authority is grounds for initiating disciplinary action or
9 denying licensure.

10 6. Respondent was disciplined by the Oklahoma State Board of Medical Licensure and
11 Supervision (Oklahoma Medical Board) for failing to complete twenty (20) hours of continuing
12 medical education (CME) in 2019 and failing to complete forty (40) hours of CME by
13 December 31, 2019.

14 7. By reason of the foregoing, Respondent is subject to discipline by the Board as provided in
15 NRS 630.352.

16 **COUNT II**

17 **NRS 630.306(1)(k) - Failure to Report Disciplinary Action**

18 8. All of the allegations contained in the above paragraphs are hereby incorporated by
19 reference as though fully set forth herein.

20 9. NRS 630.306(1)(k) provides that the failure by a licensee to report in writing,
21 within thirty (30) days, any disciplinary action taken against the licensee by another state is
22 grounds for initiating disciplinary action or denying licensure.

23 10. Respondent did not report to the Board in writing within thirty (30) days the
24 disciplinary action taken by the Oklahoma Medical Board.

25 11. By reason of the foregoing, Respondent is subject to discipline by the Nevada
26 Board as provided in NRS 630.352.

27 12. By reason of the foregoing, Respondent is subject to discipline by the Nevada
28 Board as provided in NRS 630.352.

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WHEREFORE, the Investigative Committee prays:

1. That the Board give Respondent notice of the charges herein against him and give him notice that he may file an answer to the Complaint herein as set forth in NRS 630.339(2) within twenty (20) days of service of the Complaint;

2. That the Board set a time and place for a formal hearing after holding an Early Case Conference pursuant to NRS 630.339(3);

3. That the Board determine what sanctions to impose if it determines there has been a violation or violations of the Medical Practice Act committed by Respondent;

4. That the Board award fees and costs for the investigation and prosecution of this case as outlined in NRS 622.400;

5. That the Board make, issue and serve on Respondent its findings of fact, conclusions of law and order, in writing, that includes the sanctions imposed; and

6. That the Board take such other and further action as may be just and proper in these premises.

DATED this 1st day of February, 2022.

INVESTIGATIVE COMMITTEE OF THE
NEVADA STATE BOARD OF MEDICAL EXAMINERS


By: 
IAN J. CUMINGS, J.D.
Deputy General Counsel
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Email: icumings@medboard.nv.gov
Attorney for the Investigative Committee

EXHIBIT 1

EXHIBIT 1

IN AND BEFORE THE OKLAHOMA STATE BOARD
OF MEDICAL LICENSURE AND SUPERVISION
STATE OF OKLAHOMA

FILED

MAR 12 2021

OKLAHOMA STATE BOARD OF
MEDICAL LICENSURE & SUPERVISION

STATE OF OKLAHOMA, *ex rel.*)
OKLAHOMA STATE BOARD)
OF MEDICAL LICENSURE)
AND SUPERVISION,)
)
Plaintiff,)
)
vs.)
)
ERIC JOSEPH PIPPI, P.A.,)
LICENSE NO. PA 2468,)
)
Defendant.)

Case No. 20-04-5896

**ORDER ACCEPTING
VOLUNTARY SUBMITTAL TO JURISDICTION**

The State of Oklahoma, ex rel. Oklahoma State Board of Medical Licensure and Supervision ("Board"), by and through the undersigned counsel for the Plaintiff, as represented by the Secretary of the Board, Billy H. Stout, M.D., and the Executive Director of the Board, Lyle Kelsey, along with Eric Joseph Pippi, P.A. ("Defendant"), Oklahoma Physician Assistant License no. 2468, who appears in person, (collectively, the "Parties"), and offer this Order Accepting Voluntary Submittal to Jurisdiction (herein, "Order" or "Agreement") for acceptance by the Board. Okla. Admin. Code § 435:5-1-5.1.

By voluntarily submitting to jurisdiction and entering into this Order, Defendant admits to the allegations herein contained and further acknowledges that a hearing before the Board could result in some sanction under the Oklahoma Allopathic Medical and Surgical Licensure and Supervision Act ("Act"). 59 O.S. § 480, *et seq.*

Defendant, Eric Joseph Pippi, P.A., states that he is of sound mind and is not under the influence of, or impaired by, any medication or drug and that he fully recognizes his right to appear before the Board for an evidentiary hearing on the allegations made against him. Defendant hereby voluntarily waives his right to a full hearing, submits to the jurisdiction of the Board and agrees to abide by the terms and conditions of this Order. Defendant acknowledges that he has read and understands the terms and conditions stated herein, and that this Agreement may be reviewed and discussed with him by legal counsel prior to execution.

If the Board does not accept this Order, the Parties stipulate that it shall be regarded as null and void. Admissions by Defendant herein, if any, shall not be regarded as evidence against him in a subsequent disciplinary hearing. Defendant will be free to defend himself and no inferences will be made from his willingness to have this Order accepted by the Board. The Parties stipulate that neither the presentation of this Order nor the Board's consideration of this

Order shall be deemed to have unfairly or illegally prejudiced the Board or its individual members and, therefore, shall not be grounds for precluding the Board nor any individual Board member from further participation in proceedings related to the matters set forth herein.

Findings of Fact

1. Defendant was required to complete twenty (20) hours of continuing education by December 31, 2018. Defendant failed to complete the required twenty (20) hours and, therefore, was then required to complete a total of forty (40) hours of continuing education no later than December 31, 2019.
2. Defendant failed to complete the forty (40) hours by December 31, 2019.

Conclusions of Law

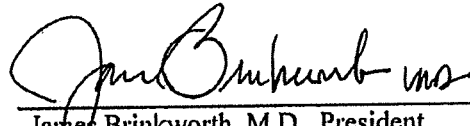
1. This Board is the duly authorized State agency empowered to license and oversee the activities of physician assistants in the State of Oklahoma pursuant to the Oklahoma Allopathic Medical and Surgical Licensure and Supervision Act, 59 O.S. 2011 & Supp. 2013, §§ 480-518.1.
2. Notice was given as required by law and the rules of the Board. 59 O.S. 2011, § 504 and Okla. Admin. Code §§ 435:3-3-5, 435:3-3-6.
3. The Board is authorized to suspend, revoke or order any other appropriate sanctions against the license of any Physician Assistant holding a license to practice in the State of Oklahoma for unprofessional conduct. 59 O.S. 519.1 et seq. Okla. Admin. Code § 435:15-5-11 and 59 O.S. § 503 and 509.1(F). This authority is quasi-judicial 59 O.S. § 513(A)(1).
4. Based on the foregoing, Defendant is guilty of unprofessional conduct as follows:
 - a. Licenses issued to the physician assistants shall be renewed annually on a date determined by the State Board of Medical Licensure and Supervision. Each application for renewal shall document that the physician assistant has earned at least twenty (20) hours of continuing medical education during the preceding calendar year in violation of Title 59 § 519.8 (A); and
 - b. Any applicant for renewal who does not meet the requirements for continuing education by December 31 of the previous calendar year may not renew until deficient hours are obtained and verified. Additionally, within the next calendar year the licensee will be required to obtain forty (40) hours of Category 1 CME. Failure to meet those additional requirements will result in further disciplinary action, in violation of Okla. Admin. Code § 435:15-3-17(d).

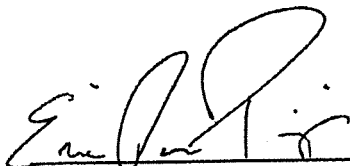
Orders

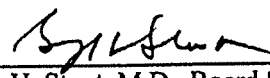
IT IS THEREFORE ORDERED by the Oklahoma State Board of Medical Licensure and Supervision as follows:

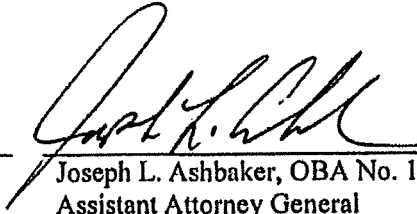
1. The Board hereby adopts the Agreement of the Parties in this Order Accepting Voluntary Submittal to Jurisdiction, including the findings of fact and conclusions of law stated herein.
2. **ERIC JOSEPH PIPPI, P.A.**, agrees and understands that he is formally reprimanded and understands that such reprimand will be reported to the National Practitioners Data Bank.
3. **ERIC JOSEPH PIPPI, P.A.**, agrees and understands that he is fined \$2,500.00 (five hundred dollars) which is to be paid within (6) six months of the date of this order.
4. Promptly upon receipt of an invoice, Defendant shall pay all costs of this action authorized by law, including without limitation, legal fees, investigation costs, staff time, salary and travel expenses, witness fees and attorney's fees.
5. A copy of this Order shall be provided to Defendant as soon as it is processed.

Dated this 26th day of Feb, 2021.


James Brinkworth, M.D., President
OKLAHOMA STATE BOARD OF MEDICAL
LICENSURE AND SUPERVISION


Eric Joseph Pippi, P.A.
License No. 2468
Defendant

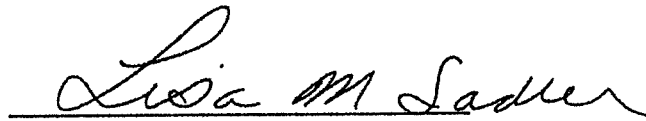

Billy H. Stout, M.D., Board Secretary
OKLAHOMA STATE BOARD OF MEDICAL
LICENSURE AND SUPERVISION



Joseph L. Ashbaker, OBA No. 19395
Assistant Attorney General
OKLAHOMA STATE BOARD OF MEDICAL
LICENSURE AND SUPERVISION
313 N.E. 21st Street
Oklahoma City, Oklahoma 73105
T: (405) 522-2974
F: (405) 522-4536

Subscribed and sworn to before me on Feb 26, 2021, by Eric Joseph Pippi
Defendant above named.

My Commission Expires:



3/22/2023
Commission # 1135953

Notary Public

