BEFORE THE BOARD OF MEDICAL EXAMINERS OF THE STATE OF NEVADA

* * * * *

In the Matter of Charges and Complaint

Against:

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RAVISHANKAR SRINIVAS KONCHADA, M.D.

Respondent.

Case No. 22-42571-1

FEB 1 7 2022

NEVADA STATE BOARD OF MEDICAL EXAMINERS

COMPLAINT

The Investigative Committee¹ (IC) of the Nevada State Board of Medical Examiners (Board), by and through Donald K. White, Esq., Deputy General Counsel and attorney for the IC, having a reasonable basis to believe that Ravishankar Srinivas Konchada, M.D. (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:

- Respondent was at all times relative to this Complaint a Medical Doctor holding an 1. active license to practice medicine in the State of Nevada (License No. 15389). Respondent was originally licensed by the Board on June 24, 2014.
- Patient A's true identity is not disclosed herein to protect his privacy, but is 2. disclosed in the Patient Designation served upon Respondent along with a copy of this Complaint.
 - Patient A² was a forty-four (44) year-old male at the time of the events at issue. 3.
- Patient A was seen on or about July 19, 2015 at St. Rose Dominican Hospital, San 4. Martin Campus complaining of a severe headache, slurred speech and right-sided weakness.

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¹ The Investigative Committee of the Nevada State Board of Medical Examiners, at the time this formal 27 Complaint was authorized for filing, was composed of Board members Mr. M. Neil Duxbury, Chairman, Aury Nagy, M.D. and Michael C. Edwards, M.D., FACS. 28

² Patient A's true identity is not disclosed herein to protect his privacy, but is disclosed in the Patient Designation served upon Respondent along with a copy of this Complaint.

- 5. On July 20, 2015 Patient A underwent a CT of his head without contrast and that report was read by another provider with findings of "no acute intracranial process."
- 6. On or about July 20, 2015, Patient A underwent an MRI of the brain without contrast.
- 7. Respondent interpreted the report with a finding of "no acute infarct" and "chronic occlusion of the internal carotid artery."
 - 8. On or about July 21, 2015, Patient A suffered a serious stroke.
- 9. Respondent, by failing to interpret the MRI correctly and in a timely manner, put Patient A in a situation where it was too late for treatment such as tpa IV initially and subsequent endovascular therapy to have any effect.
- 10. Due to the delay in interpreting the MRI, which subsequently led to a lack of tpa IV administration and endovascular therapy, Patient A eventually suffered from acute infarct in the left posterior basal ganglia internal capsule.

COUNT I

NRS 630.301(4) - Malpractice

- 11. All of the allegations contained in the above paragraphs are hereby incorporated by reference as though fully set forth herein.
- 12. NRS 630.301(4) provides that malpractice of a physician is grounds for initiating disciplinary action against a licensee.
- 13. NAC 630.040 defines malpractice as "the failure of a physician, in treating a patient, to use the reasonable care, skill, or knowledge ordinarily used under similar circumstances."
- 14. As demonstrated by, but not limited to, the above-outlined facts, Respondent failed to use the reasonable care, skill or knowledge ordinarily used under similar circumstances when rendering medical services to Patient A.
- 15. By reason of the foregoing, Respondent is subject to discipline by the Board as provided in NRS 630.352.

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COUNT II

NRS 630.306(1)(b)(2) - Violation of Standards of Practice Established by Regulation

- All of the allegations contained in the above paragraphs are hereby incorporated by 16. reference as though fully set forth herein.
- Violation of a standard of practice adopted by the Board is grounds for disciplinary 17. action pursuant to NRS 630.306(1)(b)(2).
- NAC 630.210 requires a physician to seek consultation with another provider of 18. health care in doubtful or difficult cases whenever it appears that consultation may enhance the quality of medical services.
- Respondent failed to timely seek consultation with regard to Patient A's medical 19. condition from on or about July 20, 2015. Respondent should have consulted with an appropriate care provider to address the doubtfulness of, or difficulty in, the diagnosis of Patient A's medical condition. A timely consultation may have confirmed or denied such a diagnosis and may have enhanced the quality of medical care provided to Patient A with regard to suffering too long from an eschemic stroke without any treatment..
- By reason of the foregoing, Respondent is subject to discipline by the Nevada State 20. Board of Medical Examiners as provided in NRS 630.352.

WHEREFORE, the Investigative Committee prays:

- That the Board give Respondent notice of the charges herein against him and give 1. 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;
- That the Board set a time and place for a formal hearing after holding an Early 2. Case Conference pursuant to NRS 630.339(3);
- That the Board determine what sanctions to impose if it determines there has been 3. a violation or violations of the Medical Practice Act committed by Respondent;
- That the Board make, issue and serve on Respondent its findings of fact, 4. conclusions of law and order, in writing, that includes the sanctions imposed; and

OFFICE OF THE GENERAL COUNSEL Nevada State Board of Medical Examiners

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

DATED this 17th day of February, 2022.

INVESTIGATIVE COMMITTEE OF THE NEVADA STATE BOARD OF MEDICAL EXAMINERS

By:

DONALD K. WHITE, J.D. Senior Deputy General Counsel

9600 Gateway Drive Reno, NV 89521 Tel: (775) 688-2559

Email: <u>dwhite@medboard.nv.gov</u>
Attorney for the Investigative Committee

VERIFICATION

STATE OF NEVADA)
	: ss.
COUNTY OF WASHOE)

Bret W. Frey, M.D., having been duly sworn, hereby deposes and states under penalty of perjury that he is the Chairman of the Investigative Committee of the Nevada State Board of Medical Examiners that authorized the Complaint against the Respondent herein; that he has read the foregoing Complaint; and that based upon information discovered in the course of the investigation into a complaint against Respondent, he believes that the allegations and charges in the foregoing Complaint against Respondent are true, accurate and correct.

DATED this 17th day of February, 2022.

INVESTIGATIVE COMMITTEE OF THE NEVADA STATE BOARD OF MEDICAL EXAMINERS

By:

Chairman of the Investigative Committee