

IN THE MATTER OF
ASHLEY C. WILLIS, M.D.

Respondent

License Number: D63773

*** BEFORE THE**
*** MARYLAND STATE**
*** BOARD OF PHYSICIANS**
*** Case Number: 2223-0125B**

* * * * *

CONSENT ORDER

On January 11, 2024, Disciplinary Panel B (“Panel B” or the “Panel”) of the Maryland State Board of Physicians (the “Board”) charged Ashley C. Willis, M.D. (the “Respondent”), under the Maryland Medical Practice Act (the “Act”), Md. Code Ann., Health Occ. §§ 14-101 *et seq.* Panel B charged the Respondent under the following provisions of the Act:

Health Occ. § 14-404. License denial, suspension, or revocation.

(a) *In general.* - Subject to the hearing provisions of § 14-405 of this subtitle, a disciplinary panel, on the affirmative vote of a majority of the quorum of the disciplinary panel, may reprimand any licensee, place any licensee on probation, or suspend or revoke a license if the licensee:

.....

(4) Is professionally, physically, or mentally incompetent[.]

On February 28, 2024, Panel B was convened as a Disciplinary Committee for Case Resolution (“DCCR”) in this matter. Based on the negotiations occurring as a result of this DCCR, the Respondent agreed to enter into this Consent Order, consisting of Findings of Fact, Conclusions of Law, Order, and Consent.

FINDINGS OF FACT

Panel B makes the following Findings of Fact:

Background/Licensing information

1. The Respondent was originally issued a license to practice medicine in Maryland on October 11, 2005, under License Number D63773. The Respondent's license expires on September 30, 2025, subject to renewal.
2. The Respondent is board-certified in Internal Medicine.
3. At all relevant times, the Respondent practiced at a health care facility (the "Facility")¹ in Maryland.
4. On January 9, 2024, Panel B issued an *Order for Summary Suspension of License to Practice Medicine*, in which it summarily suspended the Respondent's Maryland medical license after determining that she has a health condition that affects her ability to practice medicine safely. Panel B took such action pursuant to its authority under Md. Code Ann., State Gov't § 10-226(c)(2) and Md. Code Regs. ("COMAR") 10.32.02.08B(7), concluding that the public health, safety or welfare imperatively requires emergency action.

The Complaint

5. The Board initiated an investigation of the Respondent after receiving a complaint (the "Complaint") on February 27, 2023, from a family member (the "Complainant") of a patient (the "Patient") of the Respondent. The Complainant alleged

¹ For confidentiality reasons, the name of the health care facility, and the identity of the Complainant, the Patient, and any other individuals referenced herein, will not be disclosed in this document.

that the Respondent acted in a belligerent, verbally abusive and unprofessional manner toward the Patient during office visits in January and February 2023, such that the Patient, who was severely debilitated due to significant medical conditions, was afraid to return for follow-up care with the Respondent. The Complainant stated that the Respondent improperly filled out the Patient's insurance paperwork, necessitating the Patient to return for a follow-up visit to correct the error. When the Patient brought the error to the Respondent's attention, the Respondent became "furious and belittled [the Patient's] well-being and instability." The Complainant referred to the Respondent's conduct as being "unethical and inhumane."

Board Investigation

6. As part of its investigation, the Board obtained the Respondent's written response to the Complaint, interviewed the Respondent, reviewed documents the Respondent submitted to the Board, obtained a portion of the Respondent's medical records, and referred the Respondent for an evaluation after the Respondent acted in an aberrant manner during the investigation.

Respondent's written response

7. By letter dated March 1, 2023, the Board notified the Respondent that a complaint had been filed against her and that it had opened a preliminary investigation into the matter. The Board provided the Respondent with a copy of the complaint and requested that she address the Complaint in a written response.

8. By email to the Board dated March 13, 2023, the Respondent submitted her written response to the allegations that were set forth in the Complaint. The Respondent's

response was incoherent and did not directly address her behavior toward the Patient. When commenting on her documentation, the Respondent stated, “Didn’t realize how sparse my note was until I looked at it.”

Subpoena for patient records and response

9. By letter dated August 9, 2023, the Board informed the Respondent that it had opened an expanded investigation of the Complaint. The letter contained a *subpoena duces tecum* for nine patient records, to be returned within ten business days. The cover letter also requested that the Respondent provide a summary of care for each patient and provide signed Certification of Medical Records forms for each patient.

10. On August 23, 2023, the Respondent, through office staff at the Facility where she practiced, provided the nine requested records. In a separate mailing dated August 23, 2023, the Respondent provided brief summaries of care for each patient. In addition, the Respondent submitted over 50 pages of documents that addressed religious and secular subjects, mainly consisting of poems, with and without illustrations. These documents were wholly unrelated to any of the patients whose records were subpoenaed or the issues involved in the Complaint.

Respondent’s interview

11. Through a letter and *subpoena ad testificandum* dated October 19, 2023, the Board directed the Respondent to appear for an in-person, under-oath interview at the Board’s offices on November 2, 2023.

12. By email dated October 30, 2023, the Respondent requested that her interview be rescheduled, claiming that she had a scheduling conflict. The Board rescheduled the interview for November 8, 2023.

13. Board staff conducted an under-oath interview of the Respondent on November 8, 2023. The Respondent arrived approximately one-half hour late for the interview. The Respondent exhibited unusual behavior during the interview, which included not making eye contact with Board staff and acting in a nervous manner. The Respondent spoke in a whisper during the interview and exhibited other unusual behavioral mannerisms, including twitching eyes.

14. Board staff informed the Respondent that they were unable to follow her previously submitted written response to the Complaint and requested that she address the allegations in her own words. Despite this request, the Respondent proceeded to read her written response verbatim, including grammatical errors, on the record. When Board staff asked the Respondent to refrain from reading her written response, the Respondent spoke over Board staff and continued to read aloud her written response verbatim.

15. During the interview, Board staff asked the Respondent several “yes” or “no” questions, to which the Respondent answered by nodding her head; when Board staff asked the Respondent to verbalize her responses, the Respondent continued to nod her head in response to questions posed throughout the interview. The Respondent spoke in a manner that required Board staff to ask her several times to speak in a louder, more audible voice. The Respondent took long pauses before answering questions and had difficulty giving

direct responses, and in response to some questions, struggled to form any sort of response. The Respondent would often ask Board staff to repeat their questions.

16. During the interview, the Respondent discussed her medical and medication history.² When Board staff asked the Respondent to address her practice of initiating discussions with patients on her views of religious doctrine, she stated that she tells her patients to pray to Jesus. After Board staff concluded recording the interview, the Respondent continued to make several comments about religious subjects, including that she “loves God” and “loves Jesus.”

17. About two hours after concluding the interview, the Respondent returned to the Board’s offices and stated that she had lost her cell phone. Board staff helped the Respondent look for the cell phone but could not find it. While standing near the building elevators, the Respondent again told Board staff that she “loves God” and hopes that was made clear no matter what she said during the interview. In response to Board staff stating that they would inform the Respondent if they found her cell phone, the Respondent stated, “God is magnificent” and to always remember that.

Referral for evaluation and findings

² For confidentiality and/or privacy reasons, the specific information the Respondent disclosed will not be stated in this document. Panel B was aware of this information at the time it voted to summarily suspend the Respondent’s medical license.

18. As part of the Board's investigation, the Board, pursuant to Health Occ. § 14-402(a),³ referred the Respondent to a Board-approved program (the "Program") for an independent evaluation to determine her present competency to practice medicine.

19. By letter dated November 15, 2023, the Board notified the Respondent that her evaluation would be conducted on November 27, 2023. On the morning of November 27, 2023, prior to the time scheduled for the interview, the Respondent requested that the evaluation be rescheduled, which the Program denied. The Respondent failed to present to the Program for the evaluation. The Board then rescheduled the evaluation for November 29, 2023. The Respondent did not present to the Program for the evaluation on that date, however.

20. By email dated December 1, 2023, the Board requested that the Respondent explain in writing why she failed to appear for both of the above appointments. The Respondent responded in an email dated December 1, 2023, stating, "I do not smoke cigarettes, drink alcohol, smoke marijuana or any other drug so I do not need rehab for any reason. Sorry, I missed your letter for an appointment. Please let me reschedule and I promise to attend."

21. The Board then scheduled the evaluation for December 6, 2023. On that date, a team of Program evaluators met with and evaluated the Respondent. The Program

³ Health Occ. § 14-402(a) states: In reviewing an application for licensure or in investigating an allegation brought against a licensed physician or any allied health professional regulated by the Board under this title, the Physician Rehabilitation Program may request the Board to direct, or the Board or a disciplinary panel on its own initiative may direct, the licensed physician or any allied health professional to an appropriate examination.

evaluators unanimously concluded that based on the Respondent's writings, interviews, behavior during the evaluation, complex medical history and other pertinent information, the Respondent "is not able to practice medicine safely."⁴

22. After performing the evaluation, the Program, on December 8, 2023, requested that the Respondent enter into a practice cessation agreement and sent her a practice cessation agreement form for that purpose. Although the Respondent agreed to cease practicing medicine, the Respondent has not signed the practice cessation agreement.

Other email correspondence

23. Shortly after the above evaluation, the Respondent sent a barrage of emails to the Board in which she attached: her medical records, including several imaging studies; poems she claimed she wrote, some of which contained religious content; photographs; and published medical information on bipolar disorder. Most of the emails were wholly unrelated to the Complaint or other issues that are pertinent to this matter.

24. The Respondent also sent many of the same emails to the Program, which forwarded them to the Board. Many of the emails the Respondent sent the Program were unrelated to the Complaint or other issues that are pertinent to this matter.

25. In response, the Program, on December 15, 2023, emailed the Respondent and requested that she refrain from sending any further emails to the Program.

⁴ For confidentiality and/or privacy reasons, the specific information contained in the report will not be disclosed in this document.

CONCLUSIONS OF LAW

Based upon the Findings of Fact, Panel B concludes that the Respondent is professionally, physically, or mentally incompetent, in violation of Health Occ. § 14-404(a)(4).

ORDER

It is, thus, on the affirmative vote of a majority of the quorum of Panel B, hereby **ORDERED** that the Order for Summary Suspension of License to Practice Medicine (“Order for Summary Suspension”), issued against the Respondent, on January 9, 2024, and the order affirming the Order for Summary Suspension, issued on January 25, 2024, are terminated as moot based upon the suspension ordered in this Consent Order; and it is further

ORDERED that the Respondent’s license to practice medicine in Maryland is **SUSPENDED**.⁵ During the suspension, the Respondent shall comply with the following terms and conditions of suspension:

1. During the suspension period, the Respondent, in Maryland, shall not:
 - (a) practice medicine;
 - (b) take any actions to hold herself out to the public as a current provider of medical services;
 - (c) authorize, allow or condone the use of the Respondent’s name or provider number by any health care practice or any other licensee or health care provider;
 - (d) function as a peer reviewer for the Board or for any hospital or other medical care facility in the State;
 - (e) prescribe or dispense medicine;
 - (f) perform any other act that requires an active medical license; and

⁵ If the Respondent’s license expires while the Respondent’s license is suspended, the suspension will be tolled.

2. The Respondent shall enroll in the Maryland Professional Rehabilitation

Program as follows:

(a) Within **5 business days**, the Respondent shall contact MPRP to schedule an initial consultation for enrollment;

(b) Within **15 business days**, the Respondent shall enter into a Participant Rehabilitation Agreement and Participant Rehabilitation Plan with MPRP;

(c) the Respondent shall fully and timely cooperate and comply with all MPRP's referrals, rules, requirements, and recommendations, including, but not limited to, the terms and conditions of the Participant Rehabilitation Agreement(s) and Participant Rehabilitation Plan(s) entered with MPRP, and shall fully participate and comply with all therapy, treatment, evaluations, and screenings as directed by MPRP;

(d) the Respondent shall sign and update the written release/consent forms requested by the Board and MPRP, including release/consent forms to authorize MPRP to make verbal and written disclosures to the Board and to authorize the Board to disclose relevant information to MPRP. The Respondent shall not withdraw her release/consent;

(e) the Respondent shall also sign any written release/consent forms to authorize MPRP to exchange with (i.e., disclose to and receive from) outside entities verbal and written information concerning the Respondent and to ensure that MPRP is authorized to receive the health care records of the Respondent. The Respondent shall not withdraw her release/consent;

(f) if, upon the authorization of MPRP, the Respondent transfers to a rehabilitation program in another state, the Respondent's failure to comply with any term or condition of that state's rehabilitation program, constitutes a violation of this Consent Order. The Respondent shall also sign any out-of-state written release/consent forms to authorize the Board to exchange with (i.e., disclose to and receive from) the out-of-state program verbal and written information concerning the Respondent, and to ensure that the Board is authorized to receive the medical records of the Respondent, including, but not limited to, mental health and drug and alcohol evaluation and treatment records. The Respondent shall not withdraw the release/consent; and

(g) the Respondent's failure to comply with any of the above terms or conditions including terms or conditions of the Participant Rehabilitation Agreement(s) or

Participant Rehabilitation Plan(s) constitutes a violation of this Consent Order; and it is further

ORDERED that a violation of suspension constitutes a violation of this Consent Order; and it is further

ORDERED that, after the Respondent has complied with all terms and conditions of the suspension and MPRP finds and notifies the Board that it is safe for the Respondent to return to the practice of medicine, the Respondent may submit a written petition to the Board to terminate the suspension. A Board disciplinary panel will determine whether the suspension is terminated. The Respondent shall appear before the disciplinary panel to discuss her petition. If a Board disciplinary panel determines that it is safe for the Respondent to return to the practice of medicine, the suspension will be terminated, and the disciplinary panel will issue an order with the terms and conditions it determines are reasonable and appropriate, which may include, but are not limited to, probation and probationary terms and conditions. If, after considering MPRP's determination that it is safe for the Respondent to return to the practice of medicine, the disciplinary panel determines that it is not safe for the Respondent to return to the practice of medicine, the suspension shall remain in effect under the terms and conditions the disciplinary panel finds reasonable and appropriate under the circumstances; and it is further

ORDERED that this Consent Order goes into effect upon the signature of the Executive Director of the Board or her designee. The Executive Director or her designee signs the Consent Order on behalf of Panel B; and it is further

ORDERED that the Respondent is responsible for all costs incurred in fulfilling the terms and conditions of this Consent Order; and it is further

ORDERED that, if the Respondent allegedly fails to comply with any term or condition imposed by this Consent Order, the Respondent shall be given notice and an opportunity for a hearing. If a disciplinary panel determines there is a genuine dispute as to a material fact, the hearing shall be before an Administrative Law Judge of the Office of Administrative Hearings followed by an exceptions process before a disciplinary panel; and if a disciplinary panel determines there is no genuine dispute as to a material fact, the Respondent shall be given a show cause hearing before a disciplinary panel; and it is further

ORDERED that, after the appropriate hearing, if the disciplinary panel determines that the Respondent has failed to comply with any term or condition imposed by this Consent Order, the disciplinary panel may reprimand the Respondent, place the Respondent on probation with appropriate terms and conditions, or impose a further suspension of the Respondent's medical license with appropriate terms and conditions, or revoke the Respondent's license to practice medicine in Maryland. The disciplinary panel may, in addition to one or more of the sanctions set forth above, impose a civil monetary fine on the Respondent; and it is further

ORDERED that this Consent Order is a public document. *See* Health Occ. §§ 1-607, 14-411.1(b)(2) and Gen. Prov. § 4-333(b)(6).

03/21/2024
Date

Signature On File

Christine A. Farrelly, Executive Director
Maryland State Board of Physicians

CONSENT

I, Ashley C. Willis, M.D., acknowledge that I have consulted with counsel before signing this Consent Order.

By this Consent, I agree to be bound by this Consent Order and all its terms and conditions and understand that the Panel will not entertain any request for amendments or modifications to any condition.

I assert that I am aware of my right to a formal evidentiary hearing, pursuant to Md. Code Ann., Health Occ. § 14-405, and Md. Code Ann., State Gov't §§ 10-201 *et seq.* concerning the charges. I waive this right and elect to sign this Consent Order instead.

I acknowledge the validity and enforceability of this Consent Order as if entered after the conclusion of a formal evidentiary hearing in which I would have had the right to counsel, to confront witnesses, to give testimony, to call witnesses on my behalf, and to all other substantive and procedural protections as provided by law. I waive those procedural and substantive protections. I acknowledge the legal authority and the jurisdiction of the Panel to initiate these proceedings and to issue and enforce this Consent Order. I voluntarily enter into, and agree to comply, with the terms and conditions set forth in this Consent Order as a resolution of the charges. I waive any right to contest the Findings of Fact and Conclusions of Law and Order set out in this Consent Order. I waive all rights to appeal this Consent Order.

I sign this Consent Order, without reservation, and fully understand its language and the meaning of its terms and conditions.

3/14/24
Date

Signature On File

Ashley C. Willis, M.D.
Respondent

NOTARY

STATE OF Maryland

CITY/COUNTY OF Howard

I HEREBY CERTIFY that, on this 6th day of March, 2024, before me, a Notary Public of the foregoing State and City/County, did personally appear Ashley C. Willis, M.D. and made oath in due form of law that signing the foregoing Consent Order was her voluntary act and deed.

AS WITNESSTH my hand and seal.

Lorenzo Mann
Notary Public

My commission expires: 11/20/27

