

IN THE MATTER OF

HARPAL S. MANGAT, M.D.

Respondent

License Number: D58756

BEFORE THE

MARYLAND STATE

BOARD OF PHYSICIANS

Case Number: 2225-0190 B

CONSENT ORDER

On April 21, 2026, Disciplinary Panel B (“Panel B”) of the Maryland State Board of Physicians (the “Board”) charged **HARPAL S. MANGAT, M.D.** (the “Respondent”), License Number D58756, under the Maryland Medical Practice Act (the “Act”), codified at Md. Code Ann., Health Occ. (“Health Occ.”) §§ 14-101 *et seq.* (2021 Repl. Vol. & 2025 Supp.).

Panel B charged the Respondent with violating 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:

....

- (22) Fails to meet appropriate standards as determined by appropriate peer review for the delivery of quality medical and surgical care performed in an outpatient surgical facility, office, hospital, or any other location in this State [and]

....

- (40) Fails to keep adequate medical records as determined by appropriate peer review[.]

On June 24, 2026, 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 finds the following:

I. BACKGROUND

1. At all times relevant to these charges, the Respondent was and is licensed to practice medicine in the State of Maryland. The Respondent was originally licensed to practice medicine in Maryland on May 17, 2002, under license number D58756. His license is currently active and is scheduled to expire on September 30, 2027.

2. The Respondent is Board certified in Urgent Care Medicine.

3. At all relevant times the Respondent owned and practiced medicine at his private practice in Montgomery County, Maryland.¹

II. PRIOR BOARD ACTION

Consent Order, December 22, 2017

4. On April 21, 2017, the Board issued disciplinary charges against the Respondent under Case Number 2217-0017 after its investigation determined that he inappropriately prescribed non-controlled substances to himself on one occasion and to family members on twenty-one occasions; and controlled substances to one family member on four occasions.

¹ The Respondent’s private practice was located in Clarksburg, Maryland from approximately 2019-2024 and then relocated to Gaithersburg, Maryland.

5. On December 22, 2017, the Respondent resolved the charges under Case Number 2217-0017 by entering into a Consent Order with the Board wherein the Board found as a matter of law that he was guilty of unprofessional conduct in the practice of medicine, in violation of Health Occ. § 14-404(a)(3)(ii).² The Board reprimanded the Respondent and placed him on probation for a minimum of six months during which time the Board reviewed the Respondent's CDS prescriptions quarterly and the Respondent was ordered to complete a course in medical record keeping and billing.³

Advisory Letter, June 3, 2020

6. On June 3, 2020, the Board issued an Advisory Letter to the Respondent after conducting a preliminary investigation of a patient's medical record that did not reflect the patient's injury and were not signed at the time of the patient visit and examination. The Board advised the Respondent that keeping medical records in this manner could be construed as a failure to keep adequate medical records, in violation of Health Occ. § 14-404(a)(40), respectively.

III. THE COMPLAINT

7. On June 22, 2024, the Board received a complaint from a pharmacy employee⁴ who alleged multiple concerns, referred to as "red flags," regarding the Respondent's prescribing to a particular patient.

² The December 22, 2017 Consent Order is incorporated by reference and available upon request.

³ On June 27, 2018, the Board entered an Order Terminating Probation which found that the Respondent had complied with the terms and conditions of probation and that six (6) months had passed and ordered that the probation be terminated and that the reprimand remain in effect.

⁴ For confidentiality and privacy reasons, the names of individuals will not be identified by name in this document.

8. The Board opened an investigation into the Complaint. In furtherance of the investigation, the Board notified the Respondent of its investigation, directed him to submit a written response to the Complaint, and issued a *subpoena duces tecum* for the medical records of ten (10) patients (“Patients 1-10”). The Board also obtained a peer review of the Respondent’s practice.

IV. PEER REVIEWS

9. In furtherance of its investigation, the Board submitted the medical records for Patients 1-10 to two peer reviewers (the “Peer Reviewers”). The Peer Reviewers were both Board certified in family medicine. Both peer reviewers independently reviewed the materials and submitted reports to the Board.

10. In their reports, the Peer Reviewers concurred that the Respondent failed to meet appropriate standards for the delivery of quality medical care in three (3) out of the ten (10) patients reviewed.

11. Specifically, the Peer Reviewers found that for the three (3) patients, the Respondent failed to meet appropriate standards for the delivery of quality medical care for reasons including but not limited to the following areas:

- a. The Respondent prescribed patients highly addictive controlled substances without justification supporting their need or efficacy, over non-controlled alternatives. This included a patient with a history of substance use disorder. (Patient 1, 2, and 3)
- b. The Respondent failed to require patients to enter into controlled substance agreements or appropriately monitor patients through the Prescription Drug Monitoring Program (PDMP) and toxicology labs. (Patient 1 and 2).
- c. The Respondent failed to refer patients to behavioral health specialists

or psychiatrists for additional or alternative evaluation and/or treatment of patients' symptoms or conditions. (Patient 1 and 3).

12. The two peer reviewers also concurred that the Respondent failed to keep adequate medical records for ten (10) out of the ten (10) patients reviewed for reasons including, but not limited to, the following:

- a. The Respondent consistently failed to adequately document his patient assessment/plan including his justification for prescribing controlled substances. (Patients 1, 2, 3, 4, 5, 6, 7, 8, 9, and 10).
- b. The Respondent's medical documentation is missing references to a controlled substance agreement, PDMP reviews, and/or urine drug screens as a form of diversion prevention. (Patients 2, 3, 4, 5, 6, 7, 8, 9, and 10).

13. On or around September 2, 2025, Board investigators conducted an under-oath interview of the Respondent. The Respondent stated, among other things, that:

- i. He did not prescribe narcotics after September 1, 2025.
- ii. Prior to September 1, 2025, he did not ask patients to sign any drug contracts or informed consent forms.
- iii. Prior to the Board's inquiry, he did not check PDMP.

CONCLUSIONS OF LAW

Based upon the foregoing Findings of Fact, Disciplinary Panel B concludes that the Respondent failed to meet appropriate standards as determined by appropriate peer review for the delivery of quality medical and surgical care performed in an outpatient facility, office, hospital, or any other location in this State, in violation of Health Occ. § 14-404(a)(22); and failed to keep adequate medical records as determined by appropriate peer review, in violation of Health Occ. § 14-404(a)(40).

ORDER

It is thus, on the affirmative vote of a majority of the quorum of Panel B,
hereby:

ORDERED that the Respondent is **REPRIMANDED**; and it is further

ORDERED that the Respondent is placed on **PROBATION** for a **minimum period of ONE (1) YEAR**.⁵ During probation, the Respondent shall comply with the following terms and conditions of probation:

1. The Respondent is prohibited from prescribing and dispensing all Controlled Dangerous Substances (CDS) until after he has successfully completed the CDS prescribing course described in probation condition two (2). The prohibition on prescribing and dispensing goes into effect **forty-five** calendar days after the effective date of the Consent Order to give the Respondent adequate time to transition patients to other providers. The prohibition on prescribing and dispensing may be administratively terminated through an Order of the Panel upon the Respondent's proof of successful completion of the course.
2. Within **SIX (6) MONTHS**, the Respondent is required to take and successfully complete courses in **CDS prescribing** and **medical record keeping**. The following terms apply:
 - (a) it is the Respondent's responsibility to locate, enroll in and obtain the disciplinary panel's approval of the courses before the courses begin;
 - (b) the Respondent must provide documentation to the disciplinary panel that the Respondent has successfully completed the courses;
 - (c) the courses may not be used to fulfill the continuing medical education credits required for license renewal; and
 - (d) the Respondent is responsible for the cost of the courses; and
3. Within **SIX MONTHS**, the Respondent shall pay a civil fine of **\$2,500** by bank certified check or money order made payable to the Maryland Board of Physicians and mailed to P.O. Box 37217, Baltimore, Maryland 21297. The Board will not renew or reinstate the Respondent's license if the Respondent fails to timely pay the fine to the Board; and it is further

⁵ If the Respondent's license expires during the period of probation, the probation and the probationary terms and conditions are tolled.

ORDERED that the Respondent shall not apply for early termination of probation; and it is further

ORDERED that, after the Respondent has complied with all terms and conditions of probation and the minimum period of probation imposed by the Consent Order has passed, the Respondent may submit to the Board a written petition for termination of probation. After consideration of the petition, the probation may be terminated through an order of the disciplinary panel. The Respondent may be required to appear before the disciplinary panel to discuss his petition for termination. The disciplinary panel may grant the petition to terminate the probation, through an order of the disciplinary panel, if the Respondent has complied with all probationary terms and conditions and there are no pending complaints relating to the charges; and it is further

ORDERED that a violation of probation constitutes a violation of the 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 the 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 the 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 suspend 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 shall not be amended or modified and future requests for modification will not be considered; 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 the Consent Order goes into effect on the date the Consent Order is signed by the Executive Director of the Board or her designee. The Executive Director or her designee signs the Consent Order on behalf of the disciplinary panel which has imposed the terms and conditions of this Consent Order; and it is further

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

CONSENT

I, Harpal S. Mangat, M.D., acknowledge that I have consulted with counsel before signing this document.

By this Consent, I agree to be bound by this Consent Order and all its terms and conditions and understand that the disciplinary 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 pending charges. I waive this right and have elected 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 disciplinary 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 the 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 the Consent Order. I waive all rights to appeal this Consent Order.

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

7/9/26
Date

Signature on File

Harpal S. Mangat, M.D.

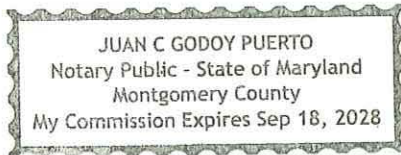
NOTARY

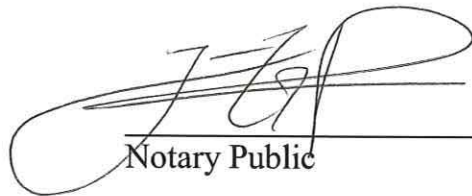
STATE OF Maryland

CITY / COUNTY OF Montgomery

I HEREBY CERTIFY that on this 9 day of July
2026, before me, a Notary Public of the foregoing State and City/County, personally
appeared Harpal S. Mangat, M.D. and made oath in due form of law that signing the
foregoing Consent Order was his voluntary act and deed.

AS WITNESSETH my hand and notarial seal.





Notary Public

My Commission expires: September 18, 2028

ACCEPTANCE

I, Christine A. Farrelly, Executive Director, sign this Consent Order on behalf of
Panel B.

07/10/2026
Date

Signature on File

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