

IN THE MATTER OF	*	BEFORE THE
SUSAN R. CLANZY, M.D.	*	MARYLAND STATE
Respondent	*	BOARD OF PHYSICIANS
License Number: D60902	*	Case Number: 2220-0148

* * * * *

CONSENT ORDER

On December 17, 2021, Disciplinary Panel A (“Panel A”) of the Maryland State Board of Physicians (the “Board”) charged **SUSAN R. CLANZY, M.D.** (the “Respondent”), License Number D60902, with violating Maryland Medical Practice Act (the “Act”), Md. Code Ann., Health Occ. §§ 14-101 *et seq.* (2021 Repl. Vol.).

Specifically, Panel A charges the Respondent with violating the following provisions of the Act under Health Occ. § 14-404:

- (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[.]

On February 9, 2022, Panel A was convened as a Disciplinary Committee for Case Resolution (“DCCR”) in this matter. Based on 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, and Order.

FINDINGS OF FACT

Panel B finds:

I. Background

1. At all times relevant, 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 September 29, 2003, under License Number D60902. The Respondent's medical license is scheduled for renewal on September 30, 2022.

2. At all times relevant, the Respondent practiced general medicine as a solo practitioner in Baltimore, Maryland.

II. Referral from the Maryland Office of Controlled Substances Administration

3. The Board initiated an investigation of the Respondent after receiving a referral, dated October 18, 2019, from the Maryland Office of Controlled Substances Administration (“OCSA”). In its referral, OCSA stated that in its professional judgment, the Respondent was prescribing “opiates, benzodiazepines, and other drugs with abuse/diversion potential to a patient population with a history of drug abuse and drug diversion.”

III. Respondent’s written response and interview

4. The Respondent provided a written response to the OCSA referral and was interviewed by Board staff on September 22, 2020. In her written response and Board interview, the Respondent stated that she treated approximately 63 patients with opiate dependence and approximately 70 patients for chronic pain. The Respondent stated that she monitored patient compliance using drug contracts, urine drug screens and the

Chesapeake Regional Information System for our Patients (“CRISP”). She stated that beginning in 2019, she started referring chronic pain patients to pain management specialists.

IV. Peer review

5. As part of its investigation, the Board issued a subpoena to the Respondent for ten patient records and supporting materials and ordered a practice review. The review was performed by two physicians who are board-certified in anesthesiology and pain medicine. The reviewers independently concluded that in eight of the ten cases reviewed, the Respondent failed to meet appropriate standards for the delivery of quality medical care (“Patients 1 through 8”).¹

6. Specifically, the reviewers found that the Respondent failed to meet appropriate standards for the delivery of quality medical care for reasons including, but not limited to:

- (a) Failing to closely monitor patient compliance by checking CRISP and/or the Prescription Drug Monitoring Program on frequent and regular basis (Patients 1, 3, 4 and 8).
- (b) Prescribing narcotic analgesics and other drugs with abuse potential without proper justification to patients who are already on high-dose methadone maintenance (Patients 1, 2, 3, 4, 5 and 6).

¹ For confidentiality reasons, the names of patients have not been disclosed in this Order.

- (c) Failing to closely monitor patient compliance through frequent and regular urine drug screens (“UDS”) (Patients 1, 2, 3, 4, 5, 7 and 8).
- (d) Failing to appropriately address inconsistent UDS results (Patients 1, 2, 4, 5, 6 and 7).
- (e) Failing to determine the functional benefits of medications prescribed (Patients 1, 2, 3, 4, 5, 6 and 8).
- (f) Failing to offer alternative treatment options for chronic pain issues (Patients 1, 2, 3, 4, 5, 6, 7 and 8).
- (g) Failing to refer patients for specialty consultation in chronic pain (Patients 1, 2, 3, 4, 5, 6, 7 and 8).
- (h) Failing to perform comprehensive physical examination or order diagnostic testing to determine etiology of patients’ pain (Patients 1, 2, 3, 4, 5, 6, 7 and 8).

CONCLUSIONS OF LAW

Based on the foregoing Findings of Fact, Panel A concludes as a matter of law that the Respondent failed to meet the appropriate standards for the delivery of quality medical care, in violation of Health Occ. § 14-404(a)(22).

ORDER

It is thus by Disciplinary Panel A of the Board, hereby:

ORDERED that the Respondent, Susan R. Clanzy, M.D., License No. D60902, is **REPRIMANDED**; and it is further

ORDERED that the Respondent is placed on **PROBATION** for a minimum of **TWO YEARS** and 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) under Criminal Law § 5-401 et seq. until after she has successfully completed the courses described in condition 2 and has a supervisor approved by the Panel as described in condition 3. The CDS prohibition may be administratively terminated through an Order of the Panel until successful completion of the courses and after the Panel has approved the Respondent's proposed supervisor;
2. **Within six (6) months**, the Respondent is required to take and successfully complete a course in **CDS prescribing**. The following terms apply:
 - (a) it is the Respondent's responsibility to locate, enroll in and obtain the disciplinary panel's approval of the course before the course is begun;
 - (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;
 - (d) the Respondent is responsible for the cost of the courses; and it is further
3. Following completion of the courses, the Respondent shall be subject to supervision for a minimum of one year (four quarterly reports) by a disciplinary panel-approved supervisor² who is board-certified in internal medicine or family medicine as follows:

- (a) within **30 CALENDAR DAYS** of the effective date of this Consent Order, the Respondent shall provide the disciplinary panel with the name,

² If the Respondent is not practicing medicine, the supervision shall begin when the Respondent resumes the practice of medicine and the disciplinary panel has approved the proposed supervisor. The Respondent shall submit the name of a proposed supervisor within 30 days of resuming the practice of medicine and shall be subject to supervision by a disciplinary panel approved supervisor upon the return to the practice of medicine.

pertinent professional background information of the supervisor whom the Respondent is offering for approval, and written notice to the disciplinary panel from the supervisor confirming his or her acceptance of the supervisory role of the Respondent and that there is no personal or professional relationship with the supervisor;

(b) the Respondent's proposed supervisor, to the best of the Respondent's knowledge, should not be an individual who is currently under investigation, and has not been disciplined by the Board within the past five years;

(c) if the Respondent fails to provide a proposed supervisor's name within 30 calendar days from the effective date of the order, the Respondent's license shall be automatically suspended from the 31st day until the Respondent provides the name and background of a supervisor;

(d) the disciplinary panel, in its discretion, may accept the proposed supervisor or request that the Respondent submit a name and professional background, and written notice of confirmation from a different supervisor;

(e) the supervision begins after the disciplinary panel approves the proposed supervisor;

(f) the disciplinary panel will provide the supervisor with a copy of this Consent Order and any other documents the disciplinary panel deems relevant;

(g) the Respondent shall grant the supervisor access to patient records selected by the supervisor from a list of all patients, which shall, to the extent practicable, focus on the type of treatment at issue in the Respondent's charges;

(h) if the supervisor for any reason ceases to provide supervision, the Respondent shall immediately notify the Board and shall not practice medicine beyond the 30th day after the supervisor has ceased to provide supervision and until the Respondent has submitted the name and professional background, and written notice of confirmation, from a proposed replacement supervisor to the disciplinary panel;

(i) it shall be the Respondent's responsibility to ensure that the supervisor:
(1) reviews the records of 10 patients each month, such patient records to be chosen by the supervisor and not the Respondent;

(2) meets in-person with the Respondent at least once each month and discuss in-person with the Respondent the care the Respondent has provided for these specific patients;

(3) be available to the Respondent for consultations on any patient;

(4) maintains the confidentiality of all medical records and patient information;

(5) provides the Board with quarterly reports which detail the quality of the Respondent's practice, any deficiencies, concerns, or needed improvements, as well as any measures that have been taken to improve patient care; and

(6) immediately reports to the Board any indication that the Respondent may pose a substantial risk to patients;

(j) the Respondent shall follow any recommendations of the supervisor;

(k) if the disciplinary panel, upon consideration of the supervisory reports and the Respondent's response, if any, has a reasonable basis to believe that the Respondent is not meeting the standard of quality care or failing to keep adequate medical records in his or her practice, the disciplinary panel may find a violation of probation after a hearing;

4. The Respondent agrees that the CDS Registration issued by the Office of Controlled Substances Administration will be restricted to the same categories of CDS or Opioids as limited by this Order;

5. The Respondent's delegation agreement shall be modified to prohibit the respondent from supervising Physician Assistants in their prescribing of the categories of CDS as limited by this Order;

6. During probation the Respondent is prohibited from certifying patients for the medical use of cannabis;

7. The disciplinary panel may issue administrative subpoenas to the Maryland Prescription Drug Monitoring Program on a quarterly basis for the Respondent's CDS prescriptions. The administrative subpoenas will request the Respondent's CDS prescriptions from the beginning of each quarter; and it is further

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 imposed by the Consent Order, the Respondent may submit a written petition for termination of probation. After consideration of the petition, the Respondent's probation may be administratively terminated 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 the effective date of the Consent Order is 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 a violation of probation constitutes a violation of the Consent Order; 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 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 radiography 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 the effective date of the Consent Order is 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 the Respondent is responsible for all costs incurred in fulfilling the terms and conditions of this Consent Order; 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).

03/11/2022
Date

Signature On File

Christine A. Farrelly 
Executive Director 
Maryland State Board of Physicians

CONSENT

I, Susan R. Clanzy, M.D., assert that I am aware of my right to consult with and be represented by counsel in considering this Consent Order and in any proceedings that would otherwise result from the charges currently pending. I have chosen to proceed without counsel and I acknowledge that the decision to proceed without counsel is freely and voluntarily made.

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.

Signature On File

Date 3/7/22

(Susan R. Clanzy, M.D.)
License No. D60902)

NOTARY

STATE OF MD

CITY / COUNTY OF Howard

I HEREBY CERTIFY that on this 7th day of 03 2022, before me, a Notary Public of the foregoing State and City/County, personally appeared Susan R. Clanzly, M.D., and made oath in due form of law that signing the foregoing Consent Order was her voluntary act and deed.

AS WITNESSETH my hand and notarial seal.

HYUN BUM LEE
04/17/2025
HOWARD COUNTY


Notary Public

My Commission expires: 04/17/2025