



STATE OF WASHINGTON
DEPARTMENT OF HEALTH
Olympia, Washington 98504

RE: Sue M. Wood, M.D.
Docket No.: 03-05-A-1019MD
Document: Statement of Charges

Regarding your request for information about the above-named practitioner, certain information may have been withheld pursuant to Washington state laws. While those laws require that most records be disclosed on request, they also state that certain information should not be disclosed.

The following information has been withheld:

The identity of the complainant if the person is a consumer, health care provider, or employee, pursuant to RCW 43.70.075 (Identity of Whistleblower Protected) and/or the identity of a patient, pursuant to RCW 70.02.020 (Medical Records - Health Care Information Access and Disclosure)

If you have any questions or need additional information regarding the information that was withheld, please contact:

Adjudicative Clerk Office
P.O. Box 47879
Olympia, WA 98504-7879
Phone: (360) 236-4677
Fax: (360) 586-2171

You may appeal the decision to withhold any information by writing to the Deputy Secretary, Department of Health, P.O. Box 47890, Olympia, WA 98504-7890.

STATE OF WASHINGTON
DEPARTMENT OF HEALTH
MEDICAL QUALITY ASSURANCE COMMISSION

FILED
NOV 16 2005
Adjudicative Clerk Office

In the Matter of the License to Practice)
As a Physician and Surgeon of:) **Docket No. 03-05-A-1019MD**
)
SUE M. WOOD, M.D.) **STATEMENT OF CHARGES**
License No. MD00011229)
)
Respondent.)
_____)

The Program Manager of the Medical Quality Assurance Commission, on designation by the Commission, makes the allegations below, which are supported by evidence contained in program case file No. 2002-05-0003MD. The patients referred to in this Statement of Charges are identified in an attached Confidential Schedule.

Section 1: ALLEGED FACTS

1.1 Sue M. Wood, M.D., Respondent, was issued a license to practice as a physician by the state of Washington on April 13, 1970. Respondent is a non-Board-Certified psychiatrist.

1.2 Respondent has a long-standing personal friendship with Patient A. Respondent has prescribed pain, anxiety, and sleep medications for Patient A since 1996. Respondent has treated Patient A with Dexedrine for adult attention deficit disorder. Respondent has counseled Patient A in Respondent's office, at Patient A's and Respondent's homes, and on the phone. Respondent has never billed Patient A for this treatment nor kept an established patient record for Patient A.

1.3 In May 2000, Patient A was told by a pharmacist that someone had just picked up a prescription under her name. Patient A contacted Respondent who told

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Patient A that the medication was for Respondent's family member, Patient B, but there had been a "mix-up". Respondent told Patient A that this would not happen again.

1.4 In April 2002, Patient A had occasion to review her pharmacy records for the past ten years. When she reviewed the prescriptions she saw numerous prescriptions that were not hers. She contacted Respondent who told her that she would "dummy up" a record and billing. She had Patient A come to Respondent's office to pick up the papers for information to create a patient chart.

1.5 When Respondent was interviewed by the Department of Health Investigator she told the investigator that Patient A had been a patient since 1996 and that she had prescribed Dexedrine, valium, and Xanax for her. When asked if she could produce a patient record for Patient A, Respondent initially told the investigator that she could. When asked again about the patient record, Respondent said she only had prescription information for Patient A. Eventually Respondent confessed that a family member had picked up prescriptions for Xanax under Patient A's name.

1.6 Patient A confirmed that for one pharmacy, Xanax prescriptions written by Respondent and filled on 11/██/99, 12/██/99, 02/██/00, 03/██/00, 04/██/00, 05/██/00, 05/██/00, 06/██/00, 08/██/00, 09/██/00, and 11/██/00 were not received by Patient A. Patient A also attested that she had never had a prescription filled at a second pharmacy for the period of 01/01 to 04/02 even though prescription records document 11 prescriptions written by Respondent or Patient A.

1.7 Respondent used her prescriptive authority to obtain medications for a family member in the name of another person. Respondent kept no patient records for the family member for whom the medications were ultimately prescribed.

Section 2: ALLEGED VIOLATIONS

2.1 The violations alleged in this section constitute grounds for disciplinary action pursuant to RCW 18.130.180 and the imposition of sanctions under 18.130.160.

2.2 The facts alleged in paragraphs 1.1 through 1.7 constitute unprofessional conduct in violation of RCW 18.130.180 (1), (4), (6), (7), and (13) which provide in part:

"(1) The commission of any act involving moral turpitude, dishonesty, or corruption relating to the practice of the person's profession, whether the act constitutes a crime or not...

(4) Incompetence, negligence, or malpractice which results in injury to a patient or which creates an unreasonable risk that a patient may be harmed...

(6) The possession, use, prescription for use, or distribution of controlled substance or legend drugs in any way other than for legitimate or therapeutic purposes, diversion of controlled substances or legend drugs, the violation of any drug law, or prescribing controlled substances for oneself;

(7) Violation of any state or federal statute or administrative rule regulating the profession in question, including any statute or rule defining or establishing standards of patient care or professional conduct or practice."

(13) Misrepresentation or fraud in any aspect of the conduct of the business or profession;

RCW 69.50.308 Prescriptions.

(e) A valid prescription or lawful order of a practitioner, in order to be effective in legalizing the possession of controlled substances, must be issued in good faith for a legitimate medical purpose by one authorized to prescribe the use of such controlled substance. An order purporting to be a prescription not in the course of professional treatment is not a valid prescription or lawful order of a practitioner within the meaning and intent of this chapter; and the

person who knows or should know the person is filling such an order, as well as the person issuing it, can be charged with a violation of this chapter;

RCW 69.50.403 Prohibited acts: C – Penalties.

(a) It is unlawful for any person knowingly or intentionally:

...

(3) To obtain or attempt to obtain a controlled substance,

or procure or attempt to procure the administration of a controlled substance, (i) by fraud, deceit, misrepresentation, or subterfuge;...or(iv) by use of a false name or the giving of a false address.

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Section 3: NOTICE TO RESPONDENT

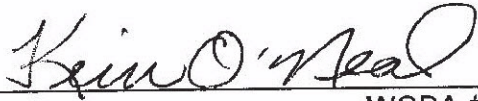
The charges in this document affect the public health, safety and welfare. The Program Manager of the Commission directs that a notice be issued and served on Respondent as provided by law, giving Respondent the opportunity to defend against these charges. If Respondent fails to defend against these charges, Respondent shall be subject to discipline pursuant to RCW 18.130.180 and the imposition of sanctions under 18.130.160.

DATED this 14th day of November, 2005.

STATE OF WASHINGTON
DEPARTMENT OF HEALTH
MEDICAL QUALITY ASSURANCE COMMISSION



Lisa Noonan
Program Manager



WSBA # 12939
Assistant Attorney General Prosecutor

FOR INTERNAL USE ONLY. INTERNAL TRACKING NUMBERS:

Program File No. 2002-05-0003MD

CONFIDENTIAL SCHEDULE

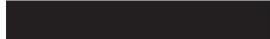
Sue M. Wood, MD

Program No. 2002-05-0003MD

Docket No. 03-05-A-1019MD

This information is confidential and is NOT to be released without the consent of the individual or individuals named herein. RCW 42.17.310(1)(d)

Patient A:



Patient B:





STATE OF WASHINGTON
DEPARTMENT OF HEALTH
Olympia, Washington 98504

RE: Sue M. Wood
Docket No.: 03-05-A-1019MD
Document: Final Order

Regarding your request for information about the above-named practitioner, certain information may have been withheld pursuant to Washington state laws. While those laws require that most records be disclosed on request, they also state that certain information should not be disclosed.

The following information has been withheld: **NONE**

If you have any questions or need additional information regarding the information that was withheld, please contact:

Customer Service Center
P.O. Box 47865
Olympia, WA 98504-7865
Phone: (360) 236-4700
Fax: (360) 586-2171

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**STATE OF WASHINGTON
DEPARTMENT OF HEALTH
MEDICAL QUALITY ASSURANCE COMMISSION**

In the Matter of the License to Practice
as a Physician And Surgeon of

SUE M. WOOD
License No. MD00011229

Respondent.

Docket No. 03-05-A-1019MD

**STIPULATED FINDINGS OF
FACT, CONCLUSIONS OF LAW
AND AGREED ORDER**

The Medical Quality Assurance Commission (Commission), by and through James McLaughlin, Department of Health Staff Attorney, and Respondent, Sue Wood, MD, represented by counsel, Thomas H. Fain, stipulate and agree to the following:

Section 1: PROCEDURAL STIPULATIONS

1.1 Respondent is licensed to practice as a physician and surgeon in the state of Washington.

1.2 On November 14, 2005 the Commission issued a Statement of Charges against Respondent.

1.3 In the Statement of Charges, the Commission alleges that Respondent violated RCW 18.130.180(1), (4), (6), (7), and (13); RCW 69.50.308(e); and RCW 68.50.403(a)(3).

1.4 Respondent understands that the State is prepared to proceed to a hearing on the allegations in the Statement of Charges.

1.5 Respondent understands that if the allegations are proven at a hearing, the Commission has the authority to impose sanctions pursuant to RCW 18.130.160.

1.6 Respondent has the right to defend against the allegations in the Statement of Charges by presenting evidence at a hearing.

1.7 Respondent waives the opportunity for a hearing on the Statement of Charges provided that the Commission accepts this Agreed Order.

1.8 The parties agree to resolve this matter by means of this Stipulated Findings of Fact, Conclusions of Law, and Agreed Order (Agreed Order).

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1.9 Respondent understands that this Agreed Order is not binding unless and until it is signed and accepted by the Commission.

1.10 If the Commission accepts this Agreed Order, it is subject to the federal reporting requirements pursuant to Section 1128E of the Social Security Act and 45 CFR Part 61, RCW 18.130.110 and any other applicable interstate/national reporting requirements. It is a public document and will be available on the Department of Health web site.

1.11 If the Commission rejects this Agreed Order, Respondent waives any objection to the participation at hearing of any Commission members who heard the Agreed Order presentation.

Section 2: FINDINGS OF FACT

The State and Respondent acknowledge that the evidence is sufficient to justify the following findings:

2.1 Sue Wood, Respondent, was issued a license to practice as a physician and surgeon by the state of Washington in April 1970. Respondent's license is currently active.

2.2 Respondent used her prescriptive authority to obtain controlled medications for Patient B, a close relative, in the name of Patient A, a close family friend. Respondent did not keep records for either patient.

Section 3: CONCLUSIONS OF LAW

The State and Respondent agree to the entry of the following Conclusions of Law:

3.1 The Commission has jurisdiction over Respondent and over the subject matter of this proceeding.

3.2 Respondent has committed unprofessional conduct in violation of RCW 18.130.180(4), (6), and (7); and RCW 69.50.308(e).

3.3 The above violations provide grounds for imposing sanctions under RCW 18.130.160.

Section 4: AGREED ORDER

Based on the Findings of Fact and Conclusions of Law, Respondent agrees to entry of the following Agreed Order:

4.1 Within one year of the effective date of this Agreed Order, Respondent shall satisfactorily complete the Professional/Problem Based Ethics Course (ProBE), taught by The Ethics Group, LLC, at New Brunswick, New Jersey. The Ethics Group can be contacted at (908) 522-8740, or www.EthicsGroup.org. In order to "satisfactorily complete" the course, Respondent must obtain an assessment of "unconditional." If Respondent obtains an assessment of "conditional" or "negative," the Commission may impose additional terms or conditions.

4.2 Within six months of the effective date of this Agreed Order, Respondent shall successfully complete the on-line self study course entitled "Practice Protection: The Principles of Risk Management." This course is found at www.physins/risk/course.html.

4.3 Respondent shall pay a fine of two thousand dollars (\$2,000) within six (6) months of the effective date of this Agreed Order. Payment shall be by certified or cashier's check or money order, made payable to the Department of Health and mailed to the Department of Health, Medical Quality Assurance Commission, P.O. Box 1099, Olympia, WA 98507-1099.

4.4 Respondent shall obey all federal, state and local laws and all administrative rules governing the practice of the profession in Washington.

4.5 Respondent is responsible for all costs of complying with this Agreed Order.

4.6 Respondent shall inform the Commission and the Adjudicative Service Unit, in writing, of changes in Respondent's residential and/or business address within thirty (30) days of the change.


4.7 The effective date of this Agreed Order is the date the Adjudicative Service Unit places the signed Agreed Order into the U.S. mail. If required, Respondent shall not submit any fees or compliance documents until after the effective date of this Agreed Order.

Section 5: FAILURE TO COMPLY

Protection of the public requires practice under the terms and conditions imposed in this order. Failure to comply with the terms and conditions of this order may result in suspension of the credential after a show cause hearing. If Respondent fails to comply with the terms and conditions of this order, the Commission may hold a hearing to require Respondent to show cause why the credential should not be suspended. Alternatively, the Commission may bring additional charges of unprofessional conduct under RCW 18.130.180(9). In either case, Respondent will be afforded notice and an opportunity for a hearing on the issue of non-compliance.

Section 6: ACCEPTANCE

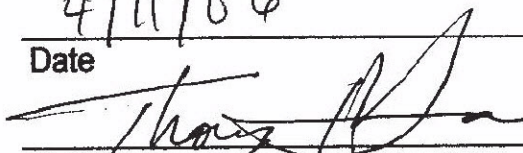
I, SUE WOOD, Respondent, have read, understand and agree to this Agreed Order. This Agreed Order may be presented to the Commission without my appearance. I understand that I will receive a signed copy if the Commission accepts this Agreed Order.



SUE WOOD
Respondent

4/11/06

Date



THOMAS FAIN, WSBA#07117
Attorney for Respondent

4/27/06

Date

Section 7: ORDER

The Commission accepts and enters this Stipulated Findings of Fact, Conclusions of Law and Agreed Order.

DATED: April 27, 2006

STATE OF WASHINGTON
DEPARTMENT OF HEALTH
MEDICAL QUALITY ASSURANCE
COMMISSION

James R. Cook, MD
PANEL CHAIR

Presented by:

Jim McLaughlin
JAMES MCLAUGHLIN, WSBA #27349
DEPARTMENT OF HEALTH STAFF ATTORNEY

April 27, 2006
Date

FOR INTERNAL USE ONLY:

PROGRAM NO. 2002-05-0003MD



STATE OF WASHINGTON
DEPARTMENT OF HEALTH
Olympia, Washington 98504

RE: Sue. M. Wood
Docket No.: 03-05-A-1019MD
Document: Order Terminating Conditions of Agreed Order

Regarding your request for information about the above-named practitioner, certain information may have been withheld pursuant to Washington state laws. While those laws require that most records be disclosed on request, they also state that certain information should not be disclosed.

The following information has been withheld: **NONE**

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**STATE OF WASHINGTON
DEPARTMENT OF HEALTH
MEDICAL QUALITY ASSURANCE COMMISSION**

In the Matter of

SUE M. WOOD

Credential No. MD00011229

Respondent

Docket No. 03-05-A-1019MD

**ORDER TERMINATING
CONDITIONS OF AGREED ORDER**

This matter came before the Medical Quality Assurance Commission (Commission) on February 22, 2007. Staff Attorney James McLaughlin presented evidence from the Respondent's compliance file. Respondent did not appear, nor was she required to appear.

Section 1: PROCEDURAL HISTORY

On November 14, 2005, the Commission issued a Statement of Charges. On April 27, 2006, the Commission and Respondent entered into a *Stipulated Findings of Fact, Conclusions of Law and Agreed Order* (Agreed Order). The Agreed Order, among other terms and conditions required Respondent to satisfactorily complete the Professional/Problem Based Ethics Course (ProBE), required her to complete the course entitled "Practice Protection: The Principles of Risk Management," and required her to pay a \$2,000 fine. Evidence from Respondent's compliance file indicates that Respondent has completed the requirements of the Agreed Order.

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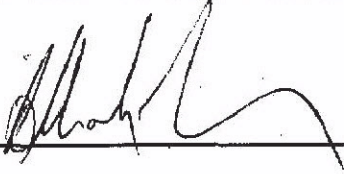
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Section 2: FINDINGS AND ORDER OF RELEASE

Based on the evidence presented, the Commission finds that Respondent has satisfied the terms of the Agreed Order, and now releases Respondent from the Agreed Order.

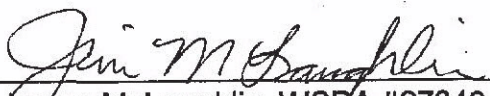
DATED this 23 day February, 2007.

STATE OF WASHINGTON
DEPARTMENT OF HEALTH
MEDICAL QUALITY ASSURANCE COMMISSION



Panel Chair

Prepared and presented by:



James McLaughlin, WSPA #27349
Staff Attorney

FOR AGENCY'S INTERNAL TRACKING:

Program File No. 2002-05-0003PA