



STATE OF WASHINGTON  
DEPARTMENT OF HEALTH  
Olympia, Washington 98504

RE: CHRISTINE LLOYD, MD  
Master Case No.: M2024-205  
Document: Statement of Allegations and Summary of  
Evidence

Regarding your request for information about the above-named practitioner; attached is a true and correct copy of the document on file with the State of Washington, Department of Health, Adjudicative Clerk's Office. These records are considered Certified by the Department of Health.

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:

Investigative, law enforcement, and crime victim information is exempt from public inspection and copying pursuant to RCW 42.56.240(1).

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

Public Disclosure Office  
PO Box 47808  
Tumwater, WA 98504  
Phone: (360)-236-4836

You may appeal the decision to withhold any information by writing to the Public Records Officer, Department of Health, P.O. Box 47808, Tumwater, WA 98504.

**STATE OF WASHINGTON  
WASHINGTON MEDICAL COMMISSION**

In the Matter of the License to Practice  
as a Physician and Surgeon of:

**CHRISTINE LLOYD, MD**  
License No. MD.MD.60309651

Respondent.

**No. M2024-205**

**STATEMENT OF ALLEGATIONS  
AND SUMMARY OF EVIDENCE**

The Executive Director of the Washington Medical Commission (Commission), on designation by the Commission, makes the allegations below, which are supported by evidence contained in Commission file number 2022-6819 and 2023-11046. The patients referred to in this Statement of Allegations and Summary of Evidence are identified in the attached Confidential Schedule.

**1. ALLEGATIONS**

1.1 On October 11, 2012, the state of Washington issued Respondent a license to practice as a physician and surgeon. Respondent is board certified in psychiatry. Respondent's license is currently active. Respondent reports that she is fully retired from practice and does not plan to renew her license at the time of its expiration.

**Patients A through F**

1.2 Respondent performed independent medical examinations (IME) of Patients A through F for the Washington State Department of Labor and Industries (L&I).

1.3 Respondent conducted examinations that did not meet the standard of care for the purpose of the exam.

1.4 Respondent's IME examinations and reports did not meet the standard of care regarding documentation of objective, sound, and sufficient medical information, the worker's history and clinical findings, and objective conclusions and recommendations supported by underlying rationale linked to the patient's medical history and clinical findings.

1.5 Because Respondent incorrectly believed that a patient must suffer a life-threatening injury in order to be diagnosed with posttraumatic stress disorder (PTSD), Respondent's reports for Patients A through E did not include a diagnosis of PTSD.

Suffering a life-threatening injury is not one of the diagnostic criteria for PTSD in the Diagnostic and Statistics Manual of Mental Disorders, fifth edition (DSM-5).

1.6 For Patients A, C, D, and F Respondent did not meet the standard of care for evaluation and documentation regarding whether the patients posed an imminent risk to themselves or others.

1.7 For Patients A through F, the diagnostic skill and reasoning that Respondent documented in the reports did not meet the standard of care.

## 2. SUMMARY OF EVIDENCE

- 2.1 Complaint and complainant interview in case 2023-11046.
- 2.2 Complaint and complainant interview in case 2022-6819.
- 2.3 Patient records for Patients A through F.
- 2.4 Witness statements in case 2023-11046.
- 2.5 Respondent's written statement and attachments in case 2023-11046.
- 2.6 Respondent's written statement and attachments in case 2022-6819.

## 3. ALLEGED VIOLATIONS

3.1 The facts alleged in Section 1, if proven, would constitute unprofessional conduct in violation of RCW 18.130.180(1), (4), & (7) which provide in part:

**RCW 18.130.180 Unprofessional conduct.** The following conduct, acts, or conditions constitute unprofessional conduct for any license holder under the jurisdiction of this chapter:

(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. The use of a nontraditional treatment by itself shall not constitute unprofessional conduct, provided that it does not result in injury to a patient or create an unreasonable risk that a patient may be harmed;

...

(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;

**RCW 51.08.165.** "Posttraumatic stress disorder" means a disorder that meets the diagnostic criteria for posttraumatic stress specified by the American psychiatric association in the diagnostic and statistics manual of mental disorders, fifth edition, or in a later edition as adopted by the department in rule.

**WAC 296-23-347 What are the independent medical examination (IME) provider's responsibilities in an examination?**

(2) The IME provider's responsibilities during the examination are to:

...

- (a) Conduct an examination that is unbiased, sound and sufficient to achieve the purpose and reason the examination was requested;
- (j) Conduct the examination with dignity and respect for the worker;...

**WAC 296-23-382 What information must be included in an independent medical examination (IME) report?**

(1) It is the department's intention to purchase objective examinations to ensure that sure and certain determinations are made of all benefits to which the worker might be entitled. The independent medical examination report must:

- (b) Contain objective, sound and sufficient medical information;
- (c) Document the review of the claim documents provided by the department or self-insurer;
- (d) Document the worker's history and the clinical findings;
- (e) Answer all the written questions posed by the department or self-insurer or include a description of what would be needed to address the questions;
- (f) Include objective conclusions and recommendations supported by underlying rationale that links the medical history and clinical findings;
- (g) Be in compliance with current department reporting policies; and
- (h) Be signed by the IME provider performing the examination.

**4. NOTICE TO RESPONDENT**

4.1 The Commission has determined that this case may be appropriate for resolution through a Stipulation to Informal Disposition (Stipulation) pursuant to RCW 18.130.172(2). A proposed Stipulation is attached, which contains the disposition the

Commission believes is necessary to address the conduct alleged in this Statement of Allegations and Summary of Evidence.

4.2 If Respondent agrees that the disposition imposed by the Stipulation is appropriate, Respondent should sign and date the Stipulation and return it within **twenty-eight (28) days** to the Washington Medical Commission at P.O. Box 47866, Olympia, Washington 98504-7866.

4.3 If Respondent does not agree that the terms and conditions contained in the Stipulation are appropriate, Respondent should contact Lisa Krynicky, Staff Attorney for the Washington Medical Commission, P.O. Box 47866, Olympia, Washington 98504-7866, (564) 233-8108 within **twenty-eight (28) days**.

4.4 If Respondent does not respond within **twenty-eight (28) days**, the Commission will assume Respondent has declined to resolve the allegations by means of a Stipulation.

4.5 If Respondent declines to resolve the allegations by means of a Stipulation pursuant to RCW 18.130.172(2), the Commission may proceed to formal disciplinary action against Respondent by filing a Statement of Charges, pursuant to RCW 18.130.172(3).

4.6 The cover letter enclosed with this Statement of Allegations and Summary of Evidence was mailed to the name and address currently on file for Respondent's license/Respondent's counsel. The Commission must be notified in writing if Respondent's name and/or address changes. The forms to update contact information with the Commission can be found here: <https://wmc.wa.gov/licensing/applications-and-forms>.

DATED: November 8, 2024.

STATE OF WASHINGTON  
WASHINGTON MEDICAL COMMISSION

*/s/ Kyle S. Karinen*

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KYLE KARINEN  
EXECUTIVE DIRECTOR

*Lisa C. Krynicky*  
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LISA C. KRYNICKI, WSBA NO. 58984  
COMMISSION STAFF ATTORNEY

**CONFIDENTIAL SCHEDULE**

**This information is confidential and is NOT to be released without the consent of the individual or individuals named herein. RCW 42.56.240(1)**

Patient A

Patient B

Patient C

Patient D

Patient E

Patient F

