



STATE OF WASHINGTON  
DEPARTMENT OF HEALTH  
Olympia, Washington 98504

RE: Rahul Khurana, MD  
Master Case No.: M2011-1187  
Document: Statement of Allegations

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 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: **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

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

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

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

**RAHUL KHURANA, MD**  
License No. MD00046271

Respondent

No. M2011-1187

**STATEMENT OF ALLEGATIONS  
AND SUMMARY OF EVIDENCE**

**FILED**  
OCT 11 2011  
Adjudicative Clerk

The Disciplinary Manager of the Medical Quality Assurance Commission (Commission), on designation by the Commission, makes the allegations below, which are supported by evidence contained in program file number 2011-156402.

**1. ALLEGATIONS**

1.1 On April 6, 2006, the state of Washington issued Respondent a license to practice as a physician and surgeon. Respondent's license is currently active. Respondent is board-certified in psychiatry.

1.2 On or about January 27, 2011, the Idaho State Board of Medicine (Idaho Board) and Respondent entered into a Stipulation and Order, which remains in force for a minimum of five years prior to any request for termination.

1.3 The Idaho Board based the Stipulation and Order on information received that Respondent may have engaged in excessive personal use of alcohol and marijuana.

1.4 The terms of the Stipulation and Order required Respondent to complete a drug and alcohol evaluation and comply with the recommendations of said evaluation.

1.5 In April 2011, Respondent completed a three day inpatient substance abuse evaluation. The evaluation recommended diagnostic monitoring through the Washington Physician's Health Program (WPHP) rather than the Idaho program since Respondent had moved to Washington.

1.6 On or about May 10, 2011, Respondent signed a six month diagnostic monitoring contract with WPHP and self-reported to the Commission's medical director.

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1.7 On or about July 22, 2011, the Commission received a letter from Charles Meredith, MD, Interim Medical Director of WPHP. Dr. Meredith states that Respondent is in full compliance with his WPHP contract and "able to practice medicine with reasonable safety to patients within the context of treatment and monitoring."

## 2. SUMMARY OF EVIDENCE

2.1 Idaho State Board of Medicine, Stipulation and Order, In the Matter of Rahul Khurana, MD, License No. M-9458, Case No. BOM-2010-438.

2.2 Respondent's statement dated June 6, 2011.

2.3 Letter from Charles Meredith, MD, Interim Medical Director of WPHP date stamped received June 22, 2011.

## 3. ALLEGED VIOLATIONS

3.1 The facts alleged in Section 1, if proven, would constitute unprofessional conduct in violation of RCW 18.130.180 (5), which provides in part:

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

...

(5) Suspension, revocation, or restriction of the individual's license to practice any health care profession by competent authority in any state, federal, or foreign jurisdiction, a certified copy of the order, stipulation, or agreement being conclusive evidence of the revocation, suspension, or restriction;

...

## 4. NOTICE TO RESPONDENT

4.1 The Commission has determined that this case may be appropriate for resolution through a Stipulation to Informal Disposition pursuant to RCW 18.130.172(2). A proposed Stipulation to Informal Disposition 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 to Informal Disposition is appropriate, Respondent should sign and date the Stipulation to

Informal Disposition and return it within fourteen (14) days to the Medical Quality Assurance Commission at PO Box 47866, Olympia, WA 98504-7866.

4.3 If Respondent does not agree that the terms and conditions contained in the Stipulation to Informal Disposition are appropriate, Respondent should contact Karen Caillé, Staff Attorney for the Medical Quality Assurance Commission, PO Box 47866, Olympia, WA 98504-7866, (360) 236-2788 within fourteen (14) days.

4.4 If Respondent does not respond within fourteen (14) days, the Commission will assume Respondent has declined to resolve the allegations by means of a Stipulation to Informal Disposition.

4.5 If Respondent declines to resolve the allegations by means of a Stipulation to Informal Disposition 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 must notify, in writing, the Commission if Respondent's name and/or address changes.

DATED: October 11, 2011.

STATE OF WASHINGTON  
DEPARTMENT OF HEALTH  
MEDICAL QUALITY ASSURANCE  
COMMISSION

Margaret E. Jensen, Executive Director for  
DANI NEWMAN  
DISCIPLINARY MANAGER

Karen M. Caillé  
KAREN M. CAILLE, WSBA #31351  
DEPARTMENT OF HEALTH STAFF ATTORNEY



STATE OF WASHINGTON  
DEPARTMENT OF HEALTH  
Olympia, Washington 98504

RE: Rahul Khurana, MD  
Master Case No.: M2011-1187  
Document: Stipulation to Informal Disposition

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 Office. These records are considered Certified by the Department of Health.

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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:

**RAHUL KHURANA, MD**  
License No. MD00046271

Respondent.

**No. M2011-1187**

**STIPULATION TO INFORMAL  
DISPOSITION**

Pursuant to the Uniform Disciplinary Act, Chapter 18.130 RCW, the Medical Quality Assurance Commission (Commission) issued a Statement of Allegations and Summary of Evidence (Statement of Allegations) alleging the conduct described below. Respondent does not admit any of the allegations. This Stipulation to Informal Disposition (Stipulation) is not formal disciplinary action and shall not be construed as a finding of unprofessional conduct or inability to practice.

**1. ALLEGATIONS**

1.1 On April 6, 2006, the state of Washington issued Respondent a license to practice as a physician and surgeon. Respondent's license is currently active. Respondent is board-certified in psychiatry.

1.2 On or about January 27, 2011, the Idaho State Board of Medicine (Idaho Board) and Respondent entered into a Stipulation and Order, which remains in force for a minimum of five years prior to any request for termination.

1.3 The Idaho Board based the Stipulation and Order on information received that Respondent may have engaged in excessive personal use of alcohol and marijuana.

1.4 The terms of the Stipulation and Order required Respondent to complete a drug and alcohol evaluation and comply with the recommendations of said evaluation.

1.5 In April 2011, Respondent completed a three day inpatient substance abuse evaluation. The evaluation recommended diagnostic monitoring through the

Washington Physician's Health Program (WPHP) rather than the Idaho program since Respondent had moved to Washington.

1.6 On or about May 10, 2011, Respondent signed a six month diagnostic monitoring contract with WPHP and self-reported to the Commission's medical director.

1.7 On or about July 22, 2011, the Commission received a letter from Charles Meredith, MD, Interim Medical Director of WPHP. Dr. Meredith states that Respondent is in full compliance with his WPHP contract and "able to practice medicine with reasonable safety to patients within the context of treatment and monitoring."

## 2. STIPULATION

2.1 The Commission alleges that the conduct described above, if proven, would constitute a violation of RCW 18.130.180(5).

2.2 The parties wish to resolve this matter by means of a Stipulation to Informal Disposition (Stipulation) pursuant to RCW 18.130.172(1).

2.3 Respondent agrees to be bound by the terms and conditions of this Stipulation.

2.4 This Stipulation is of no force and effect and is not binding on the parties unless and until it is accepted by the Commission.

2.5 If the Commission accepts the Stipulation it will be reported to the Health Integrity and Protection Databank (HIPDB)(45 CFR Part 61), the Federation of State Medical Board's Physician Data Center, and elsewhere as required by law. HIPDB will report this Stipulation to the National Practitioner Data Bank (45 CFR Part 60).

2.6 The Statement of Allegations and this Stipulation are public documents. They will be placed on the Department of Health web site, disseminated via the Commission's listserv, and disseminated according to the Uniform Disciplinary Act (Chapter 18.130 RCW). They are subject to disclosure under the Public Records Act, Chapter 42.56 RCW, and shall remain part of Respondent's file according to the state's records retention law and cannot be expunged.

2.7 The Commission agrees to forego further disciplinary proceedings concerning the allegations.

2.8 Respondent agrees to successfully complete the terms and conditions of this informal disposition.

2.9 A violation of the provisions of Section 3 of this Stipulation, if proved, would constitute grounds for discipline under RCW 18.130.180 and the imposition of sanctions under RCW 18.130.160.

### 3. INFORMAL DISPOSITION

The Commission and Respondent stipulate to the following terms.

3.1 **Probation.** The Commission places Respondent's license on PROBATION for an indefinite period of time. Respondent can petition for termination of this Stipulation when Idaho releases Respondent from the terms of the Stipulation and Order of the Idaho State Board of Medicine.

3.2 **Compliance with WPHP Contract.** Respondent shall continue to comply with all terms and conditions of his current contract with the Washington Physicians Health Program (WPHP) for the duration of the contract. If WPHP requests Respondent to enter into a subsequent contract, Respondent will do so and will comply with all terms and conditions of the subsequent contract.

3.3 **Waiver of Confidentiality.** Respondent agrees to sign a waiver of confidentiality and release of information from WPHP to the Medical Quality Assurance Commission. In so doing, Respondent understands and agrees that should he fail to fully comply with the requirements of the WPHP, all information compiled by the WPHP regarding his participation in the WPHP will be made available to the Commission.

3.4 **Quarterly Reports.** Respondent shall request and authorize WPHP to prepare and submit written reports to the Commission. WPHP will provide quarterly reports to the Commission's compliance officer indicating Respondent's status in the program, and his ability to practice medicine with reasonable skill and safety. Respondent will maintain satisfactory status until he successfully completes the program and is discharged from WPHP. Violation of his agreement with WPHP may result in further disciplinary action, including issuing a Statement of Charges.

3.5 **Copy of Stipulation.** Respondent agrees to provide a copy of this Stipulation to the medical staff director or Chief Executive Officer of each hospital or clinic where he has privileges. Respondent shall notify the Commission in writing of any employment or change in employment in the health care field. The notification must be



made within thirty days of the employment or change in employment and shall include the complete new employment address and telephone number, including the name and address of hospitals for which he has privileges.

3.6 **Cost Recovery.** Respondent shall reimburse costs to the Commission in the amount of \$1000 which must be received by the Commission within ninety days of the date of entry of this Stipulation to Informal Disposition. The reimbursement shall be paid 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 at P.O. Box 1099, Olympia, Washington 98507-1099.

3.7 **Termination of Stipulation.** Respondent may not petition to terminate this Stipulation to Informal Disposition until Idaho releases Respondent from the terms of the Stipulation and Order of the Idaho State Board of Medicine, and he has completed his contract with WPHP and is discharged with WPHP staff approval. Following a written petition to terminate, unless the Commission decides to waive an appearance, Respondent will appear before the Commission, at a date and time designated by the Commission, and will provide proof of his release from the Idaho Stipulation and Order and completion of his contract with the WPHP and proof that he has otherwise complied with the terms of this Stipulation to Informal Disposition.

3.8 **Obey Laws.** Respondent must obey all federal, state and local laws and all administrative rules governing the practice of the profession in Washington.

3.9 **Costs.** Respondent must assume all costs of complying with this Stipulation.

3.10 **Violations.** If Respondent violates any provision of this Stipulation in any respect, the Commission may take further action against Respondent's license.

3.11 **Change of Address.** Respondent must inform the Commission and the Adjudicative Clerk Office in writing, of changes in his residential and/or business address within thirty (30) days of such change.

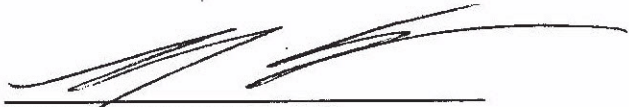
3.12 **Effective Date.** The effective date of this Stipulation to Informal Disposition is the date the Adjudicative Clerk Office places the signed Stipulation into the U.S. mail. If required, Respondent shall not submit any fees or compliance documents until after the effective date of this Stipulation.

**4. COMPLIANCE WITH SANCTION RULES**

4.1 The Commission applies WAC 246-16-800, *et seq.*, to determine appropriate sanctions, including stipulations to informal disposition under RCW 18.130.172. Respondent's alleged conduct, that he is under a stipulation in another state, is not described in a sanction schedule. Therefore, under WAC 246-16-800(2)(d), the Commission uses its judgment to determine appropriate sanctions.

**5. RESPONDENT'S ACCEPTANCE**

I, RAHUL KHURANA, MD, Respondent, certify that I have read this Stipulation to Informal Disposition in its entirety; that my counsel of record, if any, has fully explained the legal significance and consequence of it; that I fully understand and agree to all of it; and that it may be presented to the Commission without my appearance. If the Commission accepts the Stipulation to Informal Disposition, I understand that I will receive a signed copy.

  
\_\_\_\_\_  
RAHUL KHURANA, MD  
RESPONDENT

10/21/11  
\_\_\_\_\_  
DATE

N/A  
\_\_\_\_\_  
, WSBA #  
ATTORNEY FOR RESPONDENT

\_\_\_\_\_  
DATE

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**6. COMMISSION'S ACCEPTANCE**

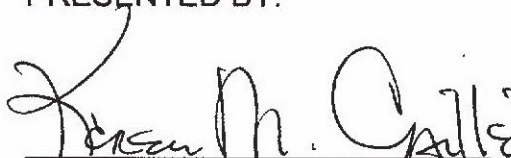
The Commission accepts this Stipulation to Informal Disposition. All parties shall be bound by its terms and conditions.

DATED: 17 November, 2011.

STATE OF WASHINGTON  
DEPARTMENT OF HEALTH  
MEDICAL QUALITY ASSURANCE COMMISSION

  
\_\_\_\_\_  
PANEL CHAIR

PRESENTED BY:

  
\_\_\_\_\_  
KAREN M. CAILLE, WSBA #31351  
DEPARTMENT OF HEALTH STAFF ATTORNEY



STATE OF WASHINGTON  
DEPARTMENT OF HEALTH  
Olympia, Washington 98504

RE: Rahul Khurana, MD  
Master Case No.: M2011-1187  
Document: Release from Informal Disposition

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 Office. These records are considered Certified by the Department of Health.

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The following information has been withheld:

Respondent's residential address, including street, city, and zip code pursuant to RCW 42.56.050, RCW 42.56.350(2)

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

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MEDICAL QUALITY ASSURANCE COMMISSION  
PO Box 47866, Olympia, WA 98504-7866

**FILED**  
OCT 09 2012  
Adjudicative Clerk

October 4, 2012

Rahul Khurana, MD  
[REDACTED]

Re: Master Case No.: M2011-1187  
Case No.: 2011-156402  
Credential No.: MD00046271

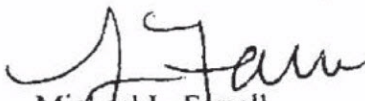
Dear Dr Khurana:

This letter is to officially inform you and other interested parties that the Medical Quality Assurance Commission has released you from the requirements of the *Stipulation to Informal Disposition* signed on November 17, 2011. You have demonstrated satisfactory compliance with the terms and conditions of the agreement. The Stipulation is terminated and you are now released from the requirements of the Stipulation effective upon receipt of this letter.

The Department of Health Medical Quality Assurance Commission wishes you well in your future endeavors as a physician and surgeon.

If you have any questions concerning this matter, please contact Bob Horner, Compliance Officer at (360) 236-2763 or write to the Department of Health, Medical Quality Assurance Commission, PO Box 47866, Olympia, WA 98504-7866.

Sincerely,

  
Michael L. Farrell  
Legal Unit Manager

cc: Adjudicative Service Unit  
Karen Caille, Staff Attorney

