COMMONWEALTH OF MASSACHUSETTS

Middlesex, SS. Board of Registration in Medicine

Adjudicatory Case No. 2023-046

In the Matter of

MaRY CHRISTINA SIMPSON, M.D.

**STATEMENT OF ALLEGATIONS**

The Board of Registration in Medicine (Board) has determined that good cause exists to believe the following acts occurred and constitute a violation for which a licensee may be sanctioned by the Board. The Board therefore alleges that MARY CHRISTINA SIMPSON, M.D. (Respondent) has practiced medicine in violation of law, regulations, or good and accepted medical practice as set forth herein. The investigative docket number associated with this order to show cause isDocket No. 22-183.

# Biographical Information

1. The Respondent graduated from Temple University School of Medicine in 2004 and is certified by the America Board of Medical Specialties in Obstetrics and Gynecology. She has been licensed to practice medicine in Massachusetts under certificate number 273304 since January 11, 2018. The Respondent is also licensed to practice medicine in Rhode Island where she owns and operates a private practice that offers a variety of aesthetic services including Botox treatments.

Factual Allegations

1. The Respondent and the Rhode Island Board of Medical Licensure and Discipline (Rhode Island Board) executed a consent order that was ratified on or about March 9, 2022, and is attached hereto and incorporated herein by reference as **Attachment A**.
2. Pursuant to the consent order the Respondent agreed, in pertinent part, to the following facts:
   1. While working at Women and Infants Hospital, the Respondent improperly accessed and viewed the electronic medical records of an individual who she knew socially and did not have a physician-patient relationship with at Women and Infants Hospital but did treat at a non-Women and Infants related outpatient office. She accessed the records without authorization out of concern for the patient’s well-being and after she tried to contact the patient by traditional and non-traditional means in order to ascertain her health status.
   2. Based on a review of the Respondent’s medical records from her private practice, the Rhode Island Investigative Committee determined that (i) the records lacked sufficient documentation to justify the clinical course, treatment and procedures completed and did not meet the minimum accepted standard as determined by the Rhode Island Board; and (ii) the medical records also did not include evidence of patients’ chief complaint, history of present illness, review of systems or physical exam; and (iii) the records were not signed by a physician and the identity of the person performing a given procedure was unclear.
3. Pursuant to the consent order the Respondent agreed to a reprimand on her license, agreed to pay the Rhode Island Board an administrative fee of $2,200.00 and agreed to complete and successfully pass the Center for Personalized Education for Physicians (CPEP), Problem Based Ethics and Boundaries Course (Probe).

Legal Basis for Proposed Relief

1. Pursuant to 243 CMR 1.03(5)(a)12, the Board may discipline a physician upon proof satisfactory to a majority of the Board, that said physician has been discipline in another jurisdiction in any way by the proper licensing authority for reasons substantially the same as those set forth in G.L. c. 112, § 5 or 243 CMR 1.03(5), specifically:
   1. The Respondent committed misconduct in the practice of medicine. *See* 243 CMR 1.03(5)(a)18.
   2. The Respondent committed an offense against any provision of the laws of the Commonwealth relating to the practice of medicine, or any rule or regulation adopted thereunder, to wit: failing to maintain a medical record for each patient, which is adequate to enable the licensee or another provider to provide proper diagnosis and treatment. *See* 243 C.M.R 2.07(13)(a)
2. The Board may discipline a physician upon proof satisfactory to a majority of the Board that said physician has engaged in conduct which undermines the public confidence in the integrity of the medical profession. *See* *Levy v. Board of Registration in Medicine*, 378 Mass. 519 (1979); *Raymond v. Board of Registration in Medicine*, 387 Mass. 708 (1982).

The Board has jurisdiction over this matter pursuant to G.L. c. 112, §§ 5, 61 and 62. This adjudicatory proceeding will be conducted in accordance with the provisions of G.L. c. 30A and 801 CMR 1.01.

Nature of Relief Sought

The Board is authorized and empowered to order appropriate disciplinary action, which may include revocation or suspension of the Respondent's license to practice medicine. The Board may also order, in addition to or instead of revocation or suspension, one or more of the following: admonishment, censure, reprimand, fine, the performance of uncompensated public service, a course of education or training or other restrictions upon the Respondent's practice of medicine.

# Order

Wherefore, it is hereby **ORDERED** that the Respondent show cause why the Board should not discipline the Respondent for the conduct described herein.

By the Board of Registration in Medicine,

Signed by Julian N. Robinson, M.D.

Julian N. Robinson, M.D.

Board Chair

Date: December 7, 2023

To obtain a copy of the out-of-state disciplinary order, please contact the appropriate state’s medical licensing board directly.  A list of state medical boards and contact information is available at <https://www.fsmb.org/contact-a-state-medica-board/>.  You may also obtain a copy of the out-of-state disciplinary order by submitting a public records request (PRR) with the Massachusetts Board of Registration in Medicine.  PRR forms and additional information can be found at <https://www.mass.gov/board-of-registration-in-medicine-public-records>.