



State of Vermont
Office of the Secretary of State

Office of Professional Regulation

89 Main Street, 3rd Floor
Montpelier, VT 05620-3402
sos.vermont.gov

James C. Condos, Secretary of State
Christopher D. Winters, Deputy Secretary
S. Lauren Hibbert, Director

December 12, 2022

Christina Crowders
2221 Riverside Dr.
Dayton, Ohio 45405-3522

CASE: In Re Christina Crowders
Docket No.: 2022-169

Dear Ms. Crowders:

Enclosed please find a copy of the approved *Stipulation and Consent Order*

For questions about complying with this Order, please contact the Case Manager at 802-828-2875

Sincerely,

DocuSigned by:

S. Lauren Hibbert

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S. Lauren Hibbert
Director

Enc: *Stipulation and Consent Order*

cc: Rachel Heath, Esq., Prosecuting Attorney
Kristin Donnelly, Case Manager

**STATE OF VERMONT
SECRETARY OF STATE
OFFICE OF PROFESSIONAL REGULATION
BOARD OF NURSING**

**In re: Christina M. Crowders
License no. 025.0135037**

) **Docket No. 2022-169**
)

Pre-Charge Stipulation and Consent Order

The matter captioned above arises from a complaint made to the Office of Professional Regulation. The parties to the case hereby agree to an expedited resolution of the matter as follows:

Stipulated Facts and Violations

1. Christina M. Crowders ("Respondent") of Dayton, Ohio is licensed as a Licensed Practical Nurse ("LPN") under license number 025.0135037. The State of Vermont first issued this license on January 10, 2020, and the license expired on January 31, 2022.
2. On or about February 9, 2020, while working as a traveling LPN at the Pines Health and Rehabilitation in Lyndonville, Vermont, Respondent lost a vile of morphine that contained 0.80ml of liquid injectable morphine (10mg/ml). The vile was never found.
3. On several occasions during her brief employment at the Pines from January 27, 2020 to February 10, 2020, Respondent inadequately documented medication administration, including failing to document pain assessments for narcotics and failing to document having administered medications in the medication administration records or nursing notes.
4. These acts constitute grounds for discipline because Respondent committed unprofessional conduct in violation of 3 V.S.A. § 129a(b) (Failure to practice competently by reason of any cause on a single occasion or on multiple occasions may constitute unprofessional conduct, whether actual injury to a client, patient, or customer has occurred. Failure to practice competently includes: (1) performance of unsafe or unacceptable patient or client care; or (2) failure to conform to the essential standards of acceptable and prevailing practice.)

Understandings

5. Respondent admits the facts above are true and the conditions below are necessary to protect the public.
6. Respondent understands that this Pre-Charge Stipulation and Consent Order will be reviewed and the tribunal may accept or reject the Order set forth below. If the tribunal rejects all or any portion of the Order, then this entire document shall be null and void.

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7. Respondent specifically waives any claim that any disclosures made to the tribunal during its review of this agreement prejudice Respondent's right to a fair and impartial hearing if this agreement is not accepted and proceeds to a merits hearing before the same tribunal.
8. Respondent has read this document fully and agrees it contains the entire agreement between the parties.
9. This Pre-Charge Stipulation and Consent Order is entered into voluntarily by Respondent after the opportunity to consult with legal counsel. Respondent has not been coerced by anyone into signing this Pre-Charge Stipulation and Consent Order.
10. Respondent voluntarily waives the right to a contested hearing and waives any right to appeal this Pre-Charge Stipulation and Consent Order.
11. Respondent is of sound mind and is not under the influence of drugs or alcohol when signing this Pre-Charge Stipulation and Consent Order.
12. Respondent agrees the Order set forth below may be entered, will be a binding Order upon Respondent, and will be made public.
13. Respondent understands that Respondent is responsible for all compliance costs associated with this Pre-Charge Stipulation and Consent Order and any violation of this Order may result in additional disciplinary action.

ORDER

Based upon the above stipulation, it is **ORDERED AND ADJUDGED** as follows:

- A. The Board of Nursing hereby **REPRIMANDS** Respondent's license. This reprimand will be attached to the license indefinitely.
- B. The Board of Nursing hereby **CONDITIONS** Respondent's license commencing with the date of entry of this Pre-Charge Stipulation and Consent Order:
 1. Re-issuance of License. Upon the commencement of these conditions, Respondent shall be issued a license labeled "conditioned."
 2. License Renewal. This Order does not automatically extend the license and Respondent must comply with the requirements for license renewal.
 3. Required Coursework. Respondent shall, at her own expense and within ninety (90) days of the date of entry of this Pre-Charge Stipulation and Consent Order, satisfactorily complete eight-hours of coursework pre-approved by the Enforcement Case Manager that pertains to medication errors and documentation. Respondent must provide satisfactorily

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completed workbooks and certificates of completion to the Case Manager.

*Coursework may not be counted toward any continuing education requirement of licensure.

- C. Upon compliance with and completion of all required conditions, Respondent must petition to remove any or all conditions from the license and demonstrate full compliance with the Order.
- D. Notwithstanding any provision above, Respondent must continue to meet all requirements to maintain licensure, for license renewal, and for license reinstatement.
- E. This Pre-Charge Stipulation and Consent Order is a matter of public record and may be reported to other licensing authorities as provided in 3 V.S.A. § 129(a).
- F. This Pre-Charge Stipulation and Consent Order will remain part of Respondent's licensing file and may be considered relative to any future disciplinary matter

AGREED TO:

Dated: 12/5/2022

By: _____

STATE OF VERMONT
SECRETARY OF STATE

DocuSigned by:
Rachel Heath

Rachel Heath
Prosecuting Attorney
(802) 828-0041
Rachel.heath@vermont.gov

Dated: 12/5/2022

By: _____

RESPONDENT

DocuSigned by:
Christina Crowders

Christina Crowders

APPROVED AND SO ORDERED:

Dated: 12/12/2022

By: _____

DocuSigned by:

Jennifer Laurent

EB1741915719477...
Board Chairperson

Date of Entry: 12/12/2022

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