



I do hereby certify this to be a complete, accurate, and true copy of the document which is on file or is of record in the offices of the Texas Board of Nursing.

*William C. Thomas*  
Executive Director of the Board

Executive Director of the Board

BEFORE THE TEXAS BOARD OF NURSING

\*\*\*\*\*

In the Matter of  
Vocational Nurse License Number 190427  
issued to CRYSTAL DAWN BROUSSARD

www

## ORDER OF THE BOARD

On this day, the Texas Board of Nursing, hereinafter referred to as the Board, accepted the voluntary surrender of Vocational Nurse License Number 190427, issued to CRYSTAL DAWN BROUSSARD, hereinafter referred to as Respondent. This action was taken in accordance with Section 301.453(c), Texas Occupations Code.

Respondent waived representation by counsel, informal proceedings, notice and hearing.

The Board makes the following Findings of Fact and Conclusions of Law.

## FINDINGS OF FACT

1. Respondent is currently licensed to practice vocational nursing in the State of Texas.
2. Respondent waived representation by counsel, informal proceedings, notice and hearing.
3. Respondent received a Certificate in Vocational Nursing from Lamar University - Port Arthur, Port Arthur, Texas on August 15, 2003. Respondent was licensed to practice vocational nursing in the State of Texas on September 24, 2003.

4. Respondent's nursing employment history includes:

9/2003 - 8/2006	Unknown
-----------------	---------

9/2006 - 3/2011	Staff Nurse	Beaumont Pediatric Center Beaumont, Texas
-----------------	-------------	--

4/2011 - Present	Unknown
------------------	---------

5. On or about April 9, 2010 through April 4, 2011, while employed with Beaumont Pediatric Center, Beaumont, Texas, Respondent telephonically passed unauthorized prescriptions for Vicodin, Vicoprofen and Tussionex for herself and her son, I.B., using the name and DEA numbers assigned to Nate Roesler, M.D., Gail Hubbard, M.D. and T.R. Brown, M.D. at Walgreens Pharmacy in Beaumont, Texas, as follows:

Date	Patient Name	Medication	Physician's name
4/9/2010	Crystal Broussard	30 Vicoprofen	Nathan Roesler, M.D.
6/18/2010	Crystal Broussard	30 Hydrocodone	Gail Hubbard, M.D.
3/30/2011	Crystal Broussard	30 Vicodin with 3 refills	T. Brown, M.D.
1/21/2010	Ian Broussard	8 oz. Tussionex	Nate Roesler, M.D.
5/14/2010	Ian Broussard	8 oz. Tussionex	Nate Roesler, M.D.
4/4/2011	Ian Broussard	8 oz. Tussionex	Nate Roesler, M.D.

Respondent's conduct was deceiving to the pharmacy and in violation of Chapter 481 of the Texas Health and Safety Code (Texas Controlled Substances Act).

6. Formal Charges were filed on August 8, 2012.
7. Formal Charges were mailed to Respondent on August 9, 2012.
8. On November 12, 2012, the Board received a statement from Respondent expressing her desire to voluntarily surrender her right to practice vocational nursing in the State of Texas. A copy of Respondent's statement, dated November 9, 2012, is attached and incorporated herein by reference as part of this Order.
9. The Board policy implementing Rule 213.29 in effect on the date of this Agreed Order provides discretion by the Executive Director for consideration of conditional reinstatement after proof of twelve (12) consecutive months of abstinence from alcohol and drugs followed by licensure limitations/stipulations and/or peer assistance program participation.
10. The Board finds that there exists serious risks to public health and safety as a result of impaired nursing care due to intemperate use of controlled substances or chemical dependency.

#### CONCLUSIONS OF LAW

1. Pursuant to Texas Occupations Code, Sections 301.451-301.555, the Board has jurisdiction over this matter.

2. Notice was served in accordance with law.
3. The evidence received is sufficient to prove violation(s) of 22 TEX. ADMIN. CODE §217.12(10)(E)&(13).
4. The evidence received is sufficient cause pursuant to Section 301.452(b)(10), Texas Occupations Code, to take disciplinary action against Vocational Nurse License Number 190427, heretofore issued to CRYSTAL DAWN BROUSSARD, including revocation of Respondent's license(s) to practice nursing in the State of Texas.
5. Under Section 301.453(c), Texas Occupations Code, the Board has the authority to accept the voluntary surrender of a license.
6. Under Section 301.453(d), Texas Occupations Code, the Board may impose conditions for reinstatement of licensure.
7. Any subsequent reinstatement of this license will be controlled by Section 301.452 (b), Texas Occupations Code, and 22 TAC §§213.26-.29, and any amendments thereof in effect at the time of the reinstatement.

THE BALANCE OF THIS PAGE INTENTIONALLY LEFT BLANK.

CONTINUED ON NEXT PAGE.

ORDER

NOW, THEREFORE, IT IS ORDERED that the voluntary surrender of Vocational Nurse License Number 190427, heretofore issued to CRYSTAL DAWN BROUSSARD, to practice nursing in the State of Texas, is accepted by the Executive Director on behalf of the Texas Board of Nursing. In connection with this acceptance, the Board imposes the following conditions:

1. RESPONDENT SHALL NOT practice vocational nursing, use the title of vocational nurse or the abbreviation LVN or wear any insignia identifying herself as a vocational nurse or use any designation which, directly or indirectly, would lead any person to believe that RESPONDENT is a vocational nurse during the period in which the license is surrendered.
2. RESPONDENT SHALL NOT petition for reinstatement of licensure until: one (1) year has elapsed from the date of this Order; and, RESPONDENT has obtained objective, verifiable proof of twelve (12) consecutive months of sobriety immediately preceding the petition.
3. Upon petitioning for reinstatement, RESPONDENT SHALL satisfy all then existing requirements for relicensure.

IT IS FURTHER AGREED and ORDERED that this Order SHALL be applicable to Respondent's nurse licensure compact privileges, if any, to practice nursing in the State of Texas.

Effective this 13th day of November, 2012.

TEXAS BOARD OF NURSING

By:



Katherine A. Thomas, MN, RN, FAAN  
Executive Director on behalf  
of said Board