

**BEFORE THE MINNESOTA
BOARD OF BEHAVIORAL HEALTH AND THERAPY**

In the Matter of
Wanda Crowe, LADC
License Number: 303561

**STIPULATION AND
CONSENT ORDER**

IT IS HEREBY STIPULATED AND AGREED by Wanda Crowe, LADC (“Licensee”), and the Minnesota Board of Behavioral Health and Therapy (“Board”) as follows:

1. During all times herein, Licensee has been and now is subject to the jurisdiction of the Board from which she holds a license to practice alcohol and drug counseling in the State of Minnesota.

FACTS

2. For the purposes of this Stipulation, the Board finds the following:

a. On March 7, 2013, the Board granted Licensee a license to practice alcohol and drug counseling in the State of Minnesota.

b. On April 12, 2024, the North Dakota Board of Addiction Counselor Examiners (“NDBACE”) and Licensee entered into a disciplinary Settlement Agreement (“Agreement”) suspending Licensee’s addiction counseling license in North Dakota for a period of twelve (12) months from the date of the Agreement. Prior to the removal of her suspension, Licensee must successfully complete 20 hours of continuing education related to client boundaries, submit a paper discussing her violations of professional ethics, and meet with the NDBACE pursuant to the Agreement. The Agreement establishes that Licensee violated NDBACE’s Code of Ethics, specifically its rules regarding engaging in a sexual relationship with a client or former client.

REGULATIONS

3. The Board views Licensee's practices as described in paragraph 2 above to be in violation of statutes and rules enforced by the Board. Licensee agrees that the conduct cited above constitutes a violation of Minn. Stat. § 148F.09, subd. 1(6) (has had any license, certificate, registration, privilege to take an examination, or other similar authority denied, revoked, suspended, canceled, limited, or not renewed for cause in any jurisdiction) and constitutes a reasonable basis in law and fact to justify the disciplinary action provided for in this order.

REMEDY

4. Upon this stipulation and without any further notice or proceedings, the Board hereby **SUSPENDS** Licensee's license to practice alcohol and drug counseling in the State of Minnesota. Licensee must not practice, attempt to practice, offer to practice, or advertise or hold herself out as authorized to practice as a licensed alcohol and drug counselor in Minnesota and shall not use the title "Licensed Alcohol and Drug Counselor," "LADC," or any designation which indicates Licensee is authorized to practice alcohol and drug counseling.

5. Licensee shall continue to renew her license every year as required by Minnesota Statutes section 148F.05 and shall continue to meet all renewal requirements. Licensee may renew her license at the inactive renewal fee.

6. Upon removal of the suspended status from her license issued by NDBACE, but no sooner than 12 months following the date Licensee's Agreement with NDBACE went into effect, Licensee may petition the Board to have the suspended status removed from her license. Licensee's license may be reinstated, if at all, as the evidence dictates and based upon the need to protect the public. Licensee may be required to meet with the Committee, at the Committee's discretion, to discuss her petition as well as her fitness to practice alcohol and drug counseling.

The burden of proof must be upon Licensee to demonstrate by a preponderance of the evidence that she is capable of conducting herself in a fit and competent manner in the practice of alcohol and drug counseling. Upon hearing the petition, the Board may continue, modify, or remove the conditions set forth herein. At the time of Licensee's petition, Licensee shall be required to comply with, at a minimum, the following:

a. **Compliance**. In connection with her petition, Licensee must show that she has fully complied with her NBDACE Agreement, including any subsequent amendments or modifications thereto, and that Licensee's license in North Dakota is no longer suspended. Licensee's activities completed for purposes of compliance with disciplinary action imposed by North Dakota, or for purposes of Licensee's compliance with this Order, shall not be counted towards Licensee's continuing education renewal requirements in Minnesota. Licensee agrees not to request the Board accept continuing education credit for such activities.

b. **Readings**. Licensee must read Minnesota Statutes chapter 148F.

c. **Coursework**. At the time of Licensee's Petition for reinstatement, Licensee must submit satisfactory evidence that while this order is in effect, Licensee completed and received a passing grade for at least four credits of coursework at an accredited university addressing ethics and professional issues in counseling. Licensee's proposed course is pre-approved by the Committee. If Licensee has reason not to complete the pre-approved course, Licensee must submit to the Committee for approval a syllabus or course description that includes goals, objectives, assignments, projects, methods, and frequency of evaluation, etc., for an alternate course. All costs and fees associated with the course must be paid by Licensee.

d. **Report**. Upon successful completion of Compliance, Readings, and Coursework required by this Order, Licensee must write and submit to the Committee a paper, addressing:

i. A detailed discussion reflecting on what Licensee has learned, including Licensee's comprehension and knowledge of professional boundaries issues Licensee encountered in her practice in reference to the specific circumstances giving rise to the NBDACE Agreement and this Order, and how Licensee plans to implement this knowledge in her future practice in Minnesota.

ii. A detailed discussion of the violations that occurred, including how Licensee came to violate professional boundaries, the manner in which Licensee harmed each individual that resulted, and the potential harm that could have resulted from Licensee's conduct, whether or how Licensee now believes the violations could have been averted, and Licensee's reasons for believing she is capable of conducting herself in a fit, competent, and ethical manner in the practice of counseling in Minnesota.

iii. Any other information Licensee believes would assist the Board in its ultimate review of this matter.

7. It is Licensee's responsibility to ensure all reports, evaluations, and documentation required to be filed with the Board pursuant to this Stipulation and Consent Order are timely filed by those making or preparing the report, evaluation, or documentation. Failure to file reports on or before their due date is a violation of this Stipulation and Consent Order. The information contained in the reports, evaluations, and documentation is confidential and must be submitted to the Board by United States Mail, courier, personal delivery, or other method approved by the Board.

CONSEQUENCES FOR NONCOMPLIANCE OR ADDITIONAL VIOLATIONS

8. If Licensee fails to comply with or violates this Stipulation and Consent Order, the Committee may, in its discretion, seek additional discipline either by initiating a contested case

proceeding pursuant to Minnesota Statutes chapter 14 or by bringing the matter directly to the Board pursuant to the following procedure:

a. The Committee will schedule a hearing before the Board. At least 20 days before the hearing, the Committee will mail Licensee a notice of the violation(s) alleged by the Committee. In addition, the notice will designate the time and place of the hearing. Within ten days after the notice is mailed, Licensee will submit a written response to the allegations. If Licensee does not submit a timely response to the Board, the allegations may be deemed admitted.

b. The Committee, in its discretion, may schedule a conference with Licensee prior to the hearing before the Board to discuss the allegations and to attempt to resolve the allegations through agreement.

c. Prior to the hearing before the Board, the Committee and Licensee may submit affidavits and written argument in support of their positions. At the hearing, the Committee and Licensee may present oral argument. Argument will not refer to matters outside the record. The evidentiary record will be limited to the affidavits submitted prior to the hearing and this Stipulation and Consent Order. The Committee will have the burden of proving by a preponderance of the evidence that a violation has occurred. If Licensee has failed to submit a timely response to the allegations, Licensee may not contest the allegations, but may present argument concerning the appropriateness of additional discipline. Licensee waives a hearing before an administrative law judge, discovery, cross-examination of adverse witnesses, and other procedures governing hearings pursuant to Minnesota Statutes chapter 14.

d. Licensee's correction of a violation before the conference, hearing, or meeting of the Board may be taken into account by the Board but will not limit the Board's authority to impose discipline for the violation. A decision by the Committee not to seek discipline

when it first learns of a violation will not waive the Committee's right to later seek discipline for that violation, either alone or in combination with other violations, at any time while Licensee's license is in a suspended status.

e. Following the hearing, the Board will deliberate confidentially. If the allegations are not proved, the Board will dismiss the allegations. If a violation is proved, the Board may impose additional discipline, including additional conditions or limitations on Licensee's practice, an additional period of suspension, additional conditions of reinstatement, or revocation of Licensee's license.

f. Nothing herein will limit the Committee's or the Board's right to temporarily suspend Licensee's license pursuant to Minnesota Statutes section 214.077, based on a violation of this Stipulation and Consent Order or based on conduct of Licensee not specifically referred to herein. Similarly, nothing herein shall limit the Committee's or the Board's right to automatically suspend Licensee's license pursuant to Minnesota Statutes section 148F.09, subdivision 1(12).

ADDITIONAL INFORMATION

9. Licensee waives the contested case hearing and all other procedures before the Board to which Licensee may be entitled under the Minnesota and United States constitutions, statutes, or rules.

10. Licensee waives any claims against the Board, the Minnesota Attorney General's Office, the State of Minnesota, and their agents, employees, and representatives related to the investigation of the conduct herein, or the negotiation or execution of this Stipulation and Consent Order, which may otherwise be available to Licensee.

11. Licensee has been advised that she may choose to be represented by an attorney in this matter. Licensee is represented by Megan Flom of Camrud Maddock Olson & Larson. The Committee is represented by Daniel Schueppert, Assistant Attorney General.

12. This Stipulation and Consent Order, the files, records, and proceedings associated with this matter will constitute the entire record and may be reviewed by the Board in its consideration of this matter.

13. Either party may seek enforcement of this Stipulation and Consent Order in any appropriate civil court.

14. Licensee has read, understands, and agrees to this Stipulation and Consent Order and has voluntarily signed the Stipulation and Consent Order. Licensee is aware this Stipulation and Consent Order must be approved by the Board before it goes into effect. The Board may either approve the Stipulation and Consent Order as proposed, approve it subject to specified change, or reject it. If the changes are acceptable to Licensee, the Stipulation and Consent Order will take effect and the order as modified will be issued. If the changes are unacceptable to Licensee or the Board rejects the Stipulation and Consent Order, it will be of no effect except as specified in the following paragraph.

15. Licensee agrees that if the Board rejects this Stipulation and Consent Order or a lesser remedy than indicated in this settlement, and this case comes again before the Board, Licensee will assert no claim that the Board was prejudiced by its review and discussion of this Stipulation and Consent Order or of any records relating to it.

16. This Stipulation and Consent Order constitutes a disciplinary action against Licensee.

DATA PRACTICES NOTICES

17. This Stipulation and Consent Order constitutes disciplinary action by the Board and is classified as public data pursuant to Minnesota Statutes section 13.41, subdivision 5. Data regarding this action will be provided to data banks as required by Federal law or consistent with Board policy. While this Stipulation and Consent Order is in effect, information obtained by the Board pursuant to this Order is considered active investigative data on a licensed health professional, and as such, is classified as confidential data pursuant to Minnesota Statutes section 13.41, subdivision 4.

18. This Stipulation contains the entire agreement between the parties, there being no other agreement of any kind, verbal or otherwise, which varies this Stipulation.

LICENSEE

Wanda Crowe, LADC
WANDA CROWE, LADC

Dated: 10.8.24

FOR THE COMPLAINT RESOLUTION
COMMITTEE

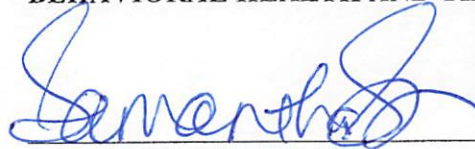
[Signature]
BOARD MEMBER

Dated: 10/24/2024

ORDER

Upon consideration of the Stipulation, the Board hereby **SUSPENDS** Licensee's license to practice alcohol and drug counseling and adopts all of the terms described above on this 25th day of October, 2024.

**MINNESOTA BOARD OF
BEHAVIORAL HEALTH AND THERAPY**



SAMANTHA STREHLO
Executive Director