

**Consideration of Change of Approval Status from Full with Warning to Conditional
 Kaplan School of Nursing in Corpus Christi, Texas
 Vocational Nursing Education Program**

Summary of Request:

Consider staff recommendation for a change in program approval status for Kaplan School of Nursing Vocational Nursing Education Program in Corpus Christi, Texas, based on review of the NCLEX-PN® examination pass rate, review of the 2011 Nursing Education Program Information Survey (NEPIS) , 2011 Compliance Audit for Nursing Education Programs (CANEP), compliance with Rule 214, and survey visit report.

HISTORICAL PERSPECTIVE:

- The Kaplan School of Nursing in Corpus Christi was approved by the Board at the February 2007 meeting as Career Centers of Texas,
- The NCLEX examination pass rate for the first graduates who tested during 2008 was 100%.
- The program has not been able to achieve a pass rate above 80% since 2008:

Year	BON Approval Status	NCLEX-PN® Pass Rate	Number of First Time Candidates (Passed/Total)
2011	Pending	74.12%	63/85
2010	Full with Warning April 2011	70.67%	53/75
2009	Full	73.91%	17/23
2008	Full	100%	23/23

NEPIS Data on Enrollment and Graduation Records for Two Years:

Year	Total Enrollment	New Admissions	Graduates
2011	107	90 (3 cohorts)	127
2010	121	120 (4 cohorts)	72

- Kaplan School of Nursing was required to complete a Self-Study report in 2010 because of the 2009 NCLEX-PN examination pass rate falling below the required 80%. The Self-Study report was received in the board office on May 17, 2010, and evaluated factors which contributed to graduates' performance and included a description of corrective measures to be implemented.
- A review of the Self-Study report by Board Staff suggested that possible contributing factors may have included readmission policies, turnover of faculty and new faculty without teaching experience, variations in the delivery of the curriculum, the level of examination questions, and grade inflation.
- Most of the corrective measures related to changes in NCLEX preparation processes.
- There have been at least five changes in directors since the program began. Cindy Sparks, MSN, RN, is currently serving as Interim Director.
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- Ms. Sparks elected to undertake a second Self-Study Report in February 2012 to reevaluate the program at this time and it was received in the Board office on February 28, 2012. The program has made several changes based upon the findings from this self-study report.
- Board Staff conducted a survey visit March 8-9, 2012, to discuss the current situation of the program with administration, the director, and faculty, and to evaluate the current curriculum delivery methods (See Attachment #1).
- Kaplan School of Nursing is accredited by the Accrediting Commission on Career Schools and Colleges (ACCSC).

Pertinent Findings from the Survey Visit:

- Board Staff met with the Kaplan campus president, Interim Director of the VN program, faculty, and students.
- Board Staff observed students in the classroom and skills laboratory setting.
- Board Staff toured the Kaplan College facility.
- The program has implemented changes to improve the success of the graduates and continues with additional interventions.
- Eight (8) full time and two (2) adjunct nursing faculty provide the instruction and clinical supervision for the program. Their tenure at Kaplan ranges from a few months to two years. All faculty are engaged in further education toward a BSN or MSN.
- There are presently ninety (90) students enrolled who will graduate and be ready to take the NCLEX examination in 2012.
- The program has over fifty (50) clinical contracts for a wide variety of clinical experiences.
- A new national curriculum has been developed and approved by the BON. The curriculum has been developed in response to faculty and student feedback from all campuses. Directors on all campuses have input into changes in the program of study.
- Kaplan has been responsive to a previous Board finding and has added a large faculty office and conference room.
- The director stated that their optimum number of students per quarterly cohort is between 30 and 40 students.
- Classes and clinical experiences are scheduled for Mondays through Thursdays, reserving Fridays for faculty tutoring, mentoring, and assisting students with clinical decision making activities and remediation as appropriate. Many students take advantage of this opportunity.
- Areas identified for improvement are in individualizing the syllabi to the local campus and revising the Total Program Evaluation Plan for more effective use to the faculty.

Rule 214.4(c)(3)(B)(i) states that “A program may be placed on conditional approval status if within one examination year from the date of the warning, the performance of first-time candidates on the NCLEX-PN examination fails to be at least 80%.” The program was placed on full with warning approval status at the April 2011 Board meeting.

Rule 214.4(a)(5) states that “Conditional approval is issued by the Board for a specified time to provide the program the opportunity to correct deficiencies. The program shall not admit students while on conditional status. The Board may establish specific criteria to be met in order for the program’s conditional approval status to be removed.”

Pros and Cons:

Pros:

- The program has continued to refine corrective measures to promote student success in the program.
- Changes that have been implemented in the program:
 - The admission criteria have been changed and strengthened.
 - Higher standards on admission testing have been established.
 - The program is reevaluating readmission policies.
 - Grading policies were changed in November 2011 to increase the rigor of the program.
 - Faculty are engaged in developing their process for test blueprinting and test analysis.
- The new curriculum to be implemented in April 2012 has incorporated changes responding to faculty and student feedback.

- The program has established contracts for numerous clinical learning experiences to meet clinical objectives.

Cons:

- The program has had a history of faculty and director turnover.
- The Total Program Evaluation Plan does not contain all required elements in Rule 214.13 for optimal use in decision-making.

Background for Recommendation:

Rule 215.4(a)(4) sets forth the parameters of conditional approval status as follows:

(4) Conditional approval is issued by the Board for a specified time to provide the program the opportunity to correct deficiencies.

(A) The program shall not admit students while on conditional status.

(B) The Board may establish specific criteria to be met in order for the program's conditional approval status to be removed.

Therefore, the purposes of conditional approval status are to allow faculty additional time to correct deficiencies which include improving the performance of graduates on the licensing examination and to protect additional students from the risk of receiving educational preparation that does not meet Board standards.

Staff Recommendation:

Staff recommend the following as indicated in the attached letter (Attachment #2):

1. Change the approval status of the Kaplan School of Nursing Vocational Education Program in Corpus Christi, Texas, from full with warning to conditional. The program may not admit students while on conditional status. The program will remain on conditional approval status until the program demonstrates a pass rate for first time test takers of at least 80% on the 2012 NCLEX-PN® examination. The NCLEX-PN examination year is January 1, 2012 through December 31, 2012. In addition, the program shall demonstrate full compliance with Rule 214 prior to a change in approval status.
2. Issue one recommendation related to enhancing the syllabi and one requirement regarding revisions to the Total Program Evaluation Plan.

**Summary of Survey Visit
Kaplan School of Nursing, Corpus Christi, Texas
Vocational Nursing Education Program**

Purpose of Survey Visit: Focus visit related to approval status

Date of Visit: March 8-9, 2012

Board Staff Conducting Visit: Janice I. Hooper, PhD, RN, Education Consultant

Board Staff met with:

- Jeriann Hix, President, Kaplan College, Corpus Christi
- Cindy Sparks, MSN, RN, Interim Director of VN Program
- Laura Spinelli, MSN, RN
- Five VN faculty members
- Nine (9) VN students in the first quarter
- Twenty (20) -???- VN students in the fourth quarter
- Terri Pappel, MSN, RN, Student Success Faculty

Board Staff reviewed curriculum and program materials prior to the visit.

Board Staff toured the facilities at Corpus Christi. Kaplan College is located in a business complex on a major highway. In response to a Board requirement in 2009, a large faculty office has been added and furnished to provide office and conference space for nursing faculty.

Findings:

Program of Study:

- The VN program is delivered in a twelve (12) -month, four quarter format. Each quarter includes twelve (12) weeks of didactic and clinical learning experiences.
- A new curriculum has been designed as a national curriculum, but Kaplan Corpus had input into the development. The curriculum plan has received Board Staff approval and will be implemented in April 2012. A matrix identifying the presence of the Differentiated Essential Competencies is in process.
- Board Staff will recommend that the program prepare an addendum to the national curriculum syllabi that will individualize the syllabi for the Corpus Christi students and will provide details about their assignments, grading, and course expectations.
- The new curriculum was revised based upon student and faculty feedback, and from evaluation data, to add a medical terminology course and a second quarter in anatomy and physiology.

Students:

- Board Staff met with nine (9) students currently enrolled in the first quarter who described classroom and clinical experiences.
- Several of the students are certified nurse assistants or medical assistants, while other have no work experience on health care. They were preparing for their first clinical experience in the long term care environment.
- Twenty (20) students in the fourth quarter cohort were interviewed in a computer classroom. They described their clinical experiences for the current class and spoke positively about the qualifications and skill level of the faculty.
- All students stated that the importance of their attendance in all classes was stressed by faculty.
- The majority of the students plan to proceed to advanced degrees following completion of this program.
- There are ninety (90) students who will graduate in 2012 in time to take the NCLEX-PN examination for 2012. In addition, the program has admitted a Spring cohort of thirty-eight (38) students.
- A complaint voiced by the students was their disappointment by unwelcoming behavior of licensed nurses in some of the clinical settings.
- Students suggested that the program engage a nursing faculty who would only supervise medication

- administration in the clinical sites to provide them greater opportunity in this nursing activity.
- Board Staff observed classroom activities where students were presenting case studies and engaging the class in discussion.
- Board Staff also observed students engaged in a clinical skills lab role-playing experience about feeding a patient with Parkinson's disease.

Faculty:

- The VN program has eight (8) full time and two (2) adjunct VN faculty. The faculty have been employed with the program for periods of time ranging from a few months to two (2) years. Faculty policies include a planned faculty orientation program with mentoring by another faculty member.
- The faculty are highly skilled in nursing with backgrounds in such areas as intensive care, neurological, and emergency room nursing.
- All faculty are enrolled in either BSN or MSN programs through Kaplan University's "gift of knowledge." They are actively incorporating many of the educational principles from their education into their teaching.
- The faculty described the clinical learning experiences they are supervising and their teaching strategies.
- Fridays are reserved for faculty tutoring, mentoring, and engaging the students in clinical decision making activities. Students take advantage of these opportunities.

Resources:

- Classrooms, computer laboratories, skills and simulation laboratory equipment, student break room are adequate for meeting program objectives.

Clinical Learning Experiences:

- The VN program has contracts with over fifty (50) clinical affiliating agencies and the settings provide an opportunity to meet clinical objectives.
- The program will be able to offer a clinical experience in mental health nursing in 2012.
- The clinical evaluation tools evaluate progressive experiences throughout the curriculum. The clinical experiences are imbedded in each course and students must pass both the clinical and didactic portions to progress.
- The 2011 NEPIS reports that the program requirements include:
 - 608 hours of didactic
 - 12 hours of computer practice
 - 192 hours of skills lab practice
 - 672 hours of faculty supervised hands-on patient care

Total Program Evaluation Plan:

- The program has developed a Total Program Evaluation Plan but not all required elements are present and the plan is not being used effectively.
- Faculty decisions based upon evaluation data is not being recorded in the faculty minutes, though in actuality, it is being done.
- Board Staff discussed possible improvements to the plan and its use with the director.

Draft letter

April 23, 2012

Cindy Sparks, MSN, RN, Interim Director
Vocational Nursing Education Program
Kaplan School of Nursing
1620 South Padre Island Drive, Suite 600
Corpus Christi, TX 78416

Dear Ms. Sparks:

At the April 19-20, 2012 meeting, the members of the Texas Board of Nursing discussed the approval status of the Kaplan School of Nursing Vocational Education Program in Corpus Christi, Texas, based upon the NCLEX-PN® examination pass rate for 2011, review of the 2011 Nursing Education Information Survey (NEPIS), Compliance Audit for Nursing Education Programs (CANEP), compliance with Rule 214, and the report of the survey visit. Members of the Board wish to thank you and,,, for being present at the meeting to answer questions.

Based upon the discussion and review of documents, it was the decision of the Board to change the approval status of the Kaplan School of Nursing Vocational Education Program in Corpus Christi, Texas, from full with warning to conditional approval status. The program may not admit students while on conditional status and shall remain on conditional status until the program demonstrates a pass rate for first time test takers of at least 80% on the 2012 NCLEX-PN® examination. The 2012 examination year is January 1, 2012 through December 31, 2012. In addition, the program shall also demonstrate compliance with Rule 214 prior to a change in approval status.

In addition, the Board issued the following recommendation and requirement:

Recommendation:

The program will consider developing an addendum to the program of study providing details that individualize the national curriculum to the local program with information on syllabi that will include descriptions of all student assignments and grading criteria for each assignment, required readings for each class session, clinical objectives (as well as course objectives), descriptions of laboratory and clinical experiences for each clinical course with grading criteria, and course/clinical schedules.

Requirement:

The program will revise the Total Program Evaluation Plan in a format to comply with Rule 214.13 and faculty minutes shall reflect the use of evaluation data in decision making.

A recommendation is a specific suggestion based upon program assessment indirectly related to the rules to which the program must respond but in a method of their choosing.

A requirement is a mandatory criterion based on program assessment directly related to the rule that must be addressed in the manner prescribed.

Please provide a plan for responding to the recommendation and requirement by November 1, 2012.

If you have any questions or if we may be of assistance, please contact board staff at (512) 305-6814.

Sincerely,

Kristin K. Benton, MSN, RN
President

Janice I. Hooper, PhD, RN
Nursing Consultant for Education

copy: Accrediting Commission on Career Schools and Colleges
Texas Workforce Commission
Jerriann Hix, President, Kaplan College, Corpus Christi