

**Consideration for a Change in Approval Status from Full with Warning to Conditional
Platt College in Dallas, Texas
Vocational Nursing Education Program**

Summary of Request:

Consider the recommendation to change the approval status from full with warning to conditional for Platt College in Dallas, Texas, Vocational Nursing Education Program based upon the 2012 NCLEX-PN® examination pass rate, issues of noncompliance with Rule 214, review of the 2012 Nursing Education Information Survey (NEPIS), and findings from the Survey Visit on October 15, 2012.

Historical Perspective:

- Platt College - Dallas Vocational Nursing (VN) Education Program has been in operation since 2006.
- During the past five (5) years, the program the NCLEX-PN® examination pass rate has been 80% or above for only two (2) times as shown in the table:

NCLEX-PN® Examination Pass Rates:

Year	BON Approval Status	NCLEX-PN® Pass Rate	Number of First Time Candidates (Passed/Failed)
2012	Pending	46.51%	40/86
2011	Full with Warning	49.33% (Survey Visit)	37/75
2010	Full	76.54% (Self Study)	62/81
2009	Full	97.83%	45/46
2008	Full	40.00%	2/5
2007	Full	80.00%	12/15

NEPIS Data on Reported Enrollment and Graduation of Students:

Year	Total Enrollment	New Admissions	Graduates
2012	170	110 (4 cohorts)	81
2011	388	184 (5 cohorts)	118
2010	296	172 (4 cohorts)	89 (3 cohorts)

- The director reported to Board Staff on February 11, 2013, that ninety-eight (98) students are currently enrolled in the program. Their next admission date is April 1, 2013.
- Information in the 2012 NEPIS indicates that some applicants who met admission criteria were employed full time or they were not able to secure the financial aid needed to attend school or had other personal reasons for not enrolling in the program.
- Platt College is accredited by the Accrediting Commission of Career Schools and Colleges (ACCSC).
- The Dallas campus is owned and operated by the Platt College System, a proprietary institution that has been involved in vocational and professional nursing education since 1995. The Platt College System operates five (5) campuses in Oklahoma and the one (1) site in Dallas.
- Besides the VN program, the Dallas campus offers courses in medical/phlebotomy assistant, dental assistant, pharmacy technician, and medical office administrative specialist. Associate degrees are offered in health information technology, medical laboratory technician, network systems administration and security, and home entertainment and networking technology.

- The program has experienced nine (9) changes in the director position since it began operation in 2006. The current Director, Charlotte Stephenson, MSN, RN was approved for appointment in August 2012.
- In 2011, the program was required to submit a Self-Study Report due to the 2010 NCLEX-PN® examination pass rate of 76.54%. The program identified the following areas for correction: high faculty turnover; ineffective student-faculty relationships; ineffective teaching strategies; inadequate admission criteria; and failure to follow policies.
- Even though the program implemented corrective measures, the NCLEX-PN® pass rates for 2011 and 2012 have been below 50%.
- At the April 2012 Board meeting, the approval status of the program was changed to full approval with warning based upon an NCLEX examination pass rate below 80% for two consecutive years and noncompliance issues.
- The previous director, Ruth Eckenstein, M.Ed, RN, developed an extensive plan for program improvement to begin in February 2012, and she continues to assist in program improvement as Acting Dean of the nursing programs.
- A survey visit to Platt College was conducted on October 15, 2012 by Robin Caldwell, PhD, RN, CLNC, contract program evaluator. Dr. Caldwell identified several major areas of concern during the visit (see Attachment #1).

Summary of Major Concerns Identified During the Survey Visit

1. Clinical learning experiences are inadequate to meet requirements in Rule 214.
2. Faculty have not been trained to supervise high-fidelity simulation activities as clinical experiences.
3. The lack of adequate faculty policies for faculty orientation, development, and workload may have impacted the large faculty turnover and inconsistencies in instruction.
4. The length of the program is inconsistent with program documents.

Rationale for Staff Recommendation:

Staff recommendation is based upon requirements in Rule 214.4(c)(3)(B) and upon serious areas of noncompliance identified during the survey visit of October 15, 2012. The recommendation is to change the approval status to conditional and to issue three (3) requirements and one (1) recommendation to the program.

Rationale for Requirement #1:

Rule 214.9(e) *related to Program of Study* states that “The program of study shall include, but not be limited to, the five (5) areas described as follows. Faculty-supervised hands-on patient care clinical learning experiences in acute and non-acute settings may include long-term care, rehabilitation settings, clinics, respite or day care settings, or other settings where the clinical objectives may be met.” The five (5) areas listed in the Rule are: nursing care of children, maternity nursing, nursing care of the aged, nursing care of adults, and nursing care of individuals with mental health problems. Clinical learning experiences involving hands-on patient care at time of the survey visit were only being conducted in long term care facilities. This requirement is for the program to provide signed contracts and clinical schedules indicating a full range of clinical settings are available to the students.

Rationale for Requirement #2:

Rule 214.2 related to *Definitions* provides a full definition of *Simulation*, which implies that simulation is guided by trained faculty. Though the program is using simulation experiences, the faculty have not been trained to effectively guide the activities. This requirement is for the program to provide evidence to Board Staff that faculty have received appropriate training in using simulation as a clinical learning experience.

Rationale for Requirement #3:

Rule 214.7(a) related to *Faculty* states that “There shall be written personnel policies for nursing faculty that are in keeping with accepted educational standards and are consistent with the policies of the governing entity.” Required policies include ones related to faculty workload, faculty development, orientation, and evaluation. Though faculty policies are in place, findings from the survey visit indicated the policies have not been followed. This requirement is for the program director and faculty to review the faculty policies for adequacy and plan for implementation. Developing and implementing effective faculty policies should alleviate problems related to faculty workload, teaching effectiveness, and faculty turnover.

The program director shall provide copies of faculty policies related to workload, faculty development, orientation, and evaluation, and shall provide copies of the faculty minutes indicating policies are being followed.

Rule 214.4(c)(3)(B) states that "A program may be placed on conditional approval status if the pass rate of first-time NCLEX-PN® candidates ... is less than 80% for three (3) consecutive examination years; the faculty fails to implement appropriate corrective measures identified in the Self-Study Report or survey visit; the program has continued to engage in activities or situations that demonstrate to the Board that the program is not meeting Board requirements and standards..." The program was placed on full with warning approval status at the April 2012 Board meeting.

Rule 214.4(a)(4) states that "Conditional approval is issued by the Board for a specified time to provide the program opportunity to correct deficiencies. The program shall not enroll 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 changed."

Staff Recommendation:

Change the approval status of Platt College in Dallas, Texas Vocational Nursing Education Program from full with warning to conditional approval status. Further, move to impose the requirements and make the recommendation as indicated in the attached order. (See Attachment #2.)

**Summary of Survey Visit and Findings
Platt College in Dallas, Texas
Vocational Nursing Education Program**

Purpose of Survey Visit: Focus visit related to approval status (warning)

Date of Visit: October 15, 2012

Board Representative Conducting Visit: Robin Caldwell, PhD, RN, CLNC

Activities Carried out by Board Representative During the Survey Visit:

- Conducted an initial meeting with the VN Program Director and representatives from Platt Administration:
 - Charlotte Stephenson, MSN, RN, VN Program Director
 - Michael Pugliese, President of Platt College
 - Kayla Danyeur, Vice-President of Compliance for Platt College
 - Nichole Rodriguez-Terrell, Interim Director for Platt College - Dallas
- Interviewed four (4) full-time VN Program Faculty as a group:
 - Jeannine Long, BSN
 - Debbie Loftin, RN
 - Carol Sims, LVN
 - Kelly Johnson, LVN
- Interviewed nine (9) Junior Level VN Program Students as a group
- Toured the Platt College - Dallas Campus
- Briefly observed classroom teaching
- Reviewed program documents and records
- Conducted a summary conference with the VN Program Director and Platt Administration

General Findings:

- Platt administration expressed support for the implementation plan developed by Ms. Eckenstein and Ms. Stephenson.
- Dr. Caldwell validated that corrective measures related to instructional methods, test construction, admission policies, remediation strategies, incorporation of the Differentiated Essential Competencies of Graduates of Texas Nursing Programs (DECs) into the curriculum, orientation and evaluation of faculty, faculty development, faculty meetings, and Total Program Evaluation (TPE) are in progress..
- However, Dr. Caldwell identified the following areas of concern:
 - a. lack of adequate clinical learning experiences evidenced by the fact that all hands-on, direct-patient care experiences occur in long-term care and skilled facilities
 - b. lack of training for current faculty for instruction and evaluation of students in high-fidelity simulation
 - c. discrepancies in program length between information in the NEPIS and program schedules. Reported NEPIS data indicates that the program of study is fourteen (14) months in length for the day cohorts and seventeen (17) months for the evening cohorts. The program calendar indicated that actual program length is approximately seventeen (17) months and twenty (20) months respectively.
 - d. high rates of faculty turnover. At the time of the survey visit there had been fifteen (15) faculty resignations or terminations during 2012.

(Note: Information in the 2012 NEPIS states that “during the 2011-2012 time period, there were significant faculty turnover and many of the students were ESL, making it difficult to fully understand all of the dynamics of the nursing process and NCLEX activities to promote critical thinking skills.”)

Findings Related to Administration:

- Charlotte Stephenson, MSN, RN served as a faculty member in the program prior to her appointment as director. Ms. Stephenson has over thirty-seven (37) years experience in nursing and has an extensive background as an administrator in public health and community health agencies.

- Ms. Stephenson reported that the following corrective measures are currently being implemented:
The admission criteria have been strengthened with the addition of the HESI A2 examination.
Remediation and retention strategies have been implemented with the addition of a “Student Success Coach” and one-on-one tutoring available to students has been enhanced.
Instructional methods have been improved by updating lesson plans and adding interactive learning techniques (i.e. case studies, small group and individual assignments, and projects).
Orientation of new faculty members now occurs at the onset of employment and in-services for faculty development in the educator role will be offered.
Strategies will be introduced to improve test construction and item writing.
- Michael Pugliese, Platt College President, reported that while the program usually has five (5) admission periods each year, they have voluntarily cut back to four (4) admissions in 2011 in an effort to focus on stabilizing the program.
- In an effort to ensure program success, the VN Program Director is not required to carry a teaching load.

Findings Related to the Program of Study:

- The curriculum is logically organized and is based upon sound educational principles. However, the curriculum (syllabi, program, and course objectives) is currently being reviewed and revised for currency and to be in alignment with the DECs.
- NEPIS data indicates there are a total of 1,582 contact hours in the program of study: 716 didactic hours; 142 skills lab hours; and, 724 patient care clinical hours. All instruction is carried out in a face-to-face format.
- The program has recently made changes to grading criteria requiring that students achieve a passing grade on the HESI exam at the end of each course in order to progress.
- In response to questions about program length, the Director indicated that for future admissions, two long summer breaks will be omitted to ensure that the program of study will be completed in fourteen (14) months for the day program and seventeen (17) months for the evening program, respectively.

Findings Related to Faculty:

- The present VN faculty include four (4) full-time RN faculty, seven (7) full-time LVN faculty, and two (2) part-time RN faculty. Current faculty have been employed at Platt from a period of one (1) week to two (2) years. There are four (4) faculty vacancies.
- The RN faculty teach didactic courses while the LVN faculty are utilized as clinical instructors.
- High faculty turnover rates have been an ongoing problem for the program. The VN Director reported fifteen (15) faculty resignations or terminations thus far in 2012. Factors that seem to be related to faculty turnover are poor leadership and failure to follow program policies.
- Four (4) full-time faculty were available for interview, and they expressed optimism about the program, and stated that plans for faculty development has greatly improved faculty morale.
- Faculty reported that the Director has instituted bi-weekly faculty meetings to involve the faculty in decision-making and to ensure consistency in instruction.
- Full-time faculty are required to maintain a teaching load of twenty-four (24) classroom contact hours.
- Two (2) faculty stated that they often take work home in order to have time to prepare lesson plans and grade papers.
- Two (2) faculty are continuing their education for advanced degrees and suggested that a tuition reimbursement benefit from the employer would be very beneficial. Faculty also expressed a desire for funding and release time to pursue outside professional development opportunities.
- Faculty acknowledged that clinical experiences are conducted only in long-term care facilities and one (1) faculty reported that the program has been unsuccessful in obtaining affiliation agreements for acute care, pediatric, and maternity clinical learning experiences.

Findings Related to Students

- The VN Program currently has two (2) full-time day cohorts and two (2) part-time evening cohorts. According to the VN Director, there are currently eighty-one (81) students enrolled in the program.
- Nine (9) students were available for interview.
- Two (2) students expressed dissatisfaction with the length of the program, stating they enrolled with the belief that the program of study would be completed in fourteen (14) months, and were disappointed to learn that the actual time to complete the program is seventeen (17) months.
- Students complimented three (3) of the VN Faculty and the VN Director as being effective.

- Students reported recent improvement in the classroom instruction but noted that the quality of classroom and clinical instruction varies among faculty. They stated that some faculty do not provide grades and feedback in a timely manner.
- Students voiced concerns that clinical learning experiences in only long-term/skilled care facilities will not adequately prepare them for practice following graduation.
- Students reported that acute care, pediatric, and maternity clinical experiences are carried out in the computer lab through virtual clinical excursions and that clinical experiences are not scheduled to match related didactic in the classroom.
- Two (2) students voiced frustration with frequent changes in the student handbook and course syllabi.
- Students reported that opportunities to complete faculty and course evaluations have recently been implemented through online surveys.
- Students indicated that they received Declaratory Order and Eligibility information upon entering the program.
- (Note: The 2012 NEPIS indicated that the graduates from the program have a difficult time finding employment as LVNs because most employers prefer nurses with work experience.)

Findings Related to Clinical Learning Experiences:

- Dr. Caldwell reviewed the current six (6) active clinical affiliation agreements.
- Faculty supervised, hands-on, direct-patient care clinical learning experiences occur in the following long-term care/skilled facilities: Legacy at Willowbend, Lake Village at Lewisville, Baybrooke Village, Denton Senior Care, and CC Young.
- The program has high-fidelity simulation capabilities, however, faculty are not trained for the use of simulation and simulated clinical learning experiences.
- The program utilizes virtual clinical excursions for pediatric, maternity, and acute care clinical learning experiences.
- The VN Program Director and faculty reported that efforts to secure additional clinical learning experiences have not been successful.
- Dr. Caldwell reviewed the clinical evaluation tools and found that they are adequate to measure progression of knowledge. They are currently being revised to be in alignment with the DECs.

Findings related to Facilities, Resources, and Services:

- Platt College - Dallas occupies the first and third floor of a large high-rise building in north Dallas. Ample, open parking is available and the school is located near major highways and public transportation routes.
- The facilities are modern and spacious with numerous dedicated classrooms and skills/simulation labs.
- Audiovisual equipment is available in every classroom and the skills lab and simulation equipment are excellent.
- A full-time assistant has recently been hired to provide dedicated secretarial support to the program. Locked program files are located in her office.
- The program assistant's office is not located on the same floor with the director and is not conveniently accessible to the director and faculty.
- The director has a spacious, private office and faculty are provided with office space, equipment, and technology support.
- Adequate faculty/student lounges, break areas, and restrooms are available.
- A full-array of student services is available.
- There is a small physical library which is regularly used by students.
- Students have access to online holdings from campus or home, and the program has recently purchased sixty (60) lap tops for VN students.

Findings Related to Records and Reports:

- The program has an adequate Total Program Evaluation (TPE) Plan but it has not been consistently utilized in the past and data collection has been weak. In addition, other established policies pertaining to faculty meetings, orientation and evaluation have not been followed.
- The director is making changes that will ensure that policies and procedures are being utilized.

Pros and Cons:

Pros:

- Administration and the VN Director have identified areas for correction, have planned strategies to improve the program, and are in the process of implementing an extensive and comprehensive plan for program improvement with measurable action items and expected completion dates.
- Faculty and students expressed optimism regarding the changes being made in the program under the leadership of the new director and the Dean of Nursing.
- The curriculum is sound and logically organized and is currently being reviewed and revised to be in alignment with the DEC's.
- The director's teaching responsibilities are limited so she will have sufficient time for administrative duties.

Cons:

- The program has not secured adequate clinical learning experiences to meet the objectives of the program. All faculty supervised, hands-on, direct-patient care clinical learning experiences take place in long-term care and skilled facilities.
- The program has high-fidelity simulation capabilities but current faculty have not been trained in the use of clinical simulation.
- Discrepancies in the reported and actual length of the VN program were identified. Program length is reported to be fourteen (14) months for the day program and seventeen (17) months for the evening program. However, program length is approximately seventeen (17) months and twenty (20) months respectively.
- High faculty and director turnover rates have been an ongoing problem for the program which has significantly contributed to the instability in the program.
- Many faculty are newly hired and are inexperienced in prelicensure nursing education.
- Students report wide variations in the effectiveness of classroom and clinical instruction and in the evaluation of student performance.
- Full-time faculty report a workload of twenty-four (24) classroom contact hours which often prohibits them from having adequate time to maintain office hours, grade papers, and prepare lessons.
- The program assistant's office is not conveniently located to the director and faculty offices.

DRAFT LETTER

Charlotte Stephenson, MSN, RN, Director
Vocational Nursing Education Program
Platt College
2974 LBJ Freeway, Suite 300
Dallas, Texas 75234

Dear Ms. Stephenson:

At the April 18-19, 2013 meeting, the members of the Texas Board of Nursing discussed the approval status of Platt College Vocational Nursing Education Program in Dallas, Texas, based upon the 2012 NCLEX-PN® examination pass rate, review of the 2012 Nursing Education Information Survey (NEPIS), compliance with Rule 214, and the report of the October 15, 2012, 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 Platt College Vocational Nursing Education Program in Dallas, Texas, from full with warning to conditional approval status, and issue the requirements in the attached Board Order. A requirement is a mandatory criterion based upon program assessment directly related to the rules that must be addressed in the manner prescribed.

Sincerely,

Kathy Shipp, MSN, RN, FNP
President of the Board

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

copy: Mike Pugliese, President of Platt College
Texas Workforce Commission
Accrediting Commission of Career Schools and Colleges

BEFORE THE TEXAS BOARD OF NURSING

In the Matter of:

Platt College
Vocational Nursing Education Program
in Dallas, Texas

ORDER OF THE BOARD

A public meeting of the Texas Board of Nursing, hereinafter referred to as the Board, was held on April 18, 2013, 333 Guadalupe, Tower II, Room 225, Austin, Texas, to consider the approval status of Platt College Vocational Nursing Education in Dallas, Texas, based upon the NCLEX-PN® examination pass rate for 2012, review of the 2012 NEPIS, report of survey visit, and compliance with Rule 214 pursuant to Section 301.157, Texas Occupations code and 22 Tex. Admin. Code Chapter 214.

Board members in attendance were: Kathy Shipp, MSN, RN, FNP; Nina Almasy, MSN, RN; Deborah Hughes Bell, CLU, ChFC; Tamara Cowen, MN, RN; Sheri Denise Crosby, JD, SPHR; Marilyn J. Davis, RN, BSN, MPA; Shelby Ellzey, BBA; Richard Robert Gibbs, LVN; Kathy Leader-Horn, LVN; Mary LeBeck, MSN, RN; and Beverly Jean Nutall, LVN.

After review and due consideration of the filed materials, as well as the presentation by representatives from Platt College in Dallas, Texas, the Board hereby CHANGES the approval status of Platt College Vocational Nursing Education Program in Dallas, Texas, from FULL APPROVAL WITH WARNING to CONDITIONAL APPROVAL and hereby imposes the following conditions/requirements:

1. The program shall provide signed contracts and clinical schedules indicating that a full range of clinical settings are available to the students to Board Staff no later than July 1, 2013.
2. The program shall provide evidence to Board Staff that faculty have received appropriate training in using simulation as a clinical learning experience no later than July 1, 2013.
3. The program director and faculty shall review the faculty policies for adequacy and plan for implementation and shall provide copies of faculty policies related to workload, faculty development, orientation, and evaluation. In addition, the program shall provide copies of the faculty minutes indicating policies are being followed. Evidence of compliance with these requirements should be provided to Board Staff no later than July 1, 2013.
4. The program may not enroll students while on conditional status.

5. The program will remain on conditional approval status until the program demonstrates a pass rate for first time candidates of at least 80% on the 2013 NCLEX-PN® examination. The NCLEX-PN® examination year is January 1, 2013 through December 31, 2013.
6. The program must demonstrate full compliance with Rule 214 prior to consideration for a change in approval.

The Board further issues the following recommendation:

1. The administration, director, and faculty are encouraged to adjust the program length to be reasonable for students and to promote integrity of the program. A response to this recommendation should be submitted to Board Staff by July 1, 2013.

Entered this 18th day of April, 2013

Kathy Shipp, MSN, RN, FNP
President of the Board