

**Consideration of Survey Visit Report for
ITT Technical Institute Breckinridge School of Nursing in Richardson, Texas
Associate Degree Nursing Education Program**

Summary of Request:

Consider the survey report for the July 29, 2014 focused visit to ITT Technical Institute Breckinridge School of Nursing Associate Degree Nursing (ADN) Education Program in Richardson, Texas. The visit was conducted related to a student complaint received by Board Staff about allegations of grades being altered to possibly increase the pass rate or benefit a specific group of students. The survey visit was conducted by Gayle Varnell, PhD, APRN, CPNP-PC, Nursing Consultant for Education.

Historical Perspective:

- The ADN Program at ITT Technical Institute was approved by the Board in January 2011 and began enrolling students in June 2011.
- ITT Technical Institute is accredited by the Accrediting Council for Independent Colleges and Schools (ACICS).
- The program is currently on initial approval status. The first ADN students graduated in September 2013. To date there have been two other graduating cohorts in December 2013 and June 2014.
- A former student from ITT Technical Institute submitted a lengthy letter of complaint to both the Texas Workforce Commission (TWC) and the Enforcement Department at the BON on July 7, 2014.
- The allegations prompted a joint unannounced survey visit with the TWC on July 29, 2014.

Survey Visit Findings:

- Jane Allen, MS, RN, was instrumental in the development of the proposal and was the program director until January 2014.
- Debra Obera, MSN, RN was approved to serve as director in January 2014.
- ITT currently employs four (4) full-time and two (2) part-time faculty members. They are currently advertising for a fifth full-time faculty position.
- Breckinridge School of Nursing at ITT Technical Institute in Richardson is a part of a larger organization that uses a standardized nursing curriculum and standard policies across the country. This makes it difficult for the local program director to have full authority over the program and to implement measures to ensure compliance with Rule 215.
- The common, core curriculum, standardized lesson plans and exams restrict creativity, innovation, and the ability to make changes to the program when desirable.
- There is a need for faculty development in test construction and item analysis.
- Board Staff concluded that the complaint was not substantiated as a violation of Rule 215 but related more to school policy and processes.

Pros and Cons:

Pros:

- The director and college administration are willing to take measures for the program to be in full compliance with Rule 215.

Cons:

- There is a need for faculty development in test construction and item analysis.

Staff Recommendation:

Move to accept the survey visit report (See draft letter in Attachment #2).

Summary of a Survey Visit
ITT Technical Institute Breckinridge School of Nursing (BSN) in Richardson, Texas
Associate Degree Nursing Education Program

Purpose of Visit: Focused visit related to student complaint

Date(s) of Survey Visit: July 29, 2014

Board Staff Conducting Survey Visit: Gayle Varnell, PhD, RN, Nursing Consultant for Education

NOTE: This was a joint visit with Texas Workforce Commission (TWC):

L. Earl Woolbright, Integrated Service Area Manager

Jill Werner, Assistant Integrated Service Area Manager

BON Education Consultant and TWC Staff met with:

- Rose Galloway, Campus Director
- Bruce Bundeali, Dean of Academic Affairs
- Debra Obera, Director ADN Program

- Board Staff were unable to visit with faculty teaching the course with the student complaint as she had resigned.
- Board Staff reviewed documents that pertained directly to the student complaint including, the exam in question, student's scantrons, grading criteria, course syllabi, and Classroom and Clinical Procedures to Supplement Course Syllabus – Academic Misconduct statement.
- Prior to the survey visit, Board staff reviewed in-house file documents including the August 2013 Survey Report, the 2014 NEPIS, and the 2014 CANEP.

Findings Related to Administration:

- Interviews with the program director, campus director, and dean of academic affairs indicated that they were aware of the student complaint before the visit.
- The director stated that she was unaware of this event until after the grades had been distributed to the students and issues had been brought to her attention.
- The Academic Dean and the chair of the ADN nursing program met with the faculty member.

Findings Related to Program of Study:

- The course syllabi and test bank are generated at the national level.
- When there is a concern about questions on an exam, the faculty member is required to use a curriculum work order (CWO) to further evaluate the exam. The CWO system is a web portal that facilitates the ability of campus level nursing faculty and leadership to initiate curriculum correction, discussion, and change at the individual campus level. In the case of the exam in question, this was not done.
- The nursing program consists of nine (9) quarters.
- Thirty (30) students are admitted in March and September each year.
- The retention rate for the nursing program is approximately 86.01% with twenty-one (21) individual course failures from March 2013 through the June 2014 quarter.

Findings Related to Faculty:

- It was identified that in the March 2014 quarter, one faculty member evaluated an exam and awarded six (6) additional points.
- The practice followed by the faculty member was not consistent with the test analysis process that was previously conducted by this instructor.
- According to the director, when this incident was identified, the instructor completed the appropriate test analysis and awarded the appropriate grades.
- The faculty in question has since resigned and was unavailable during the visit.

Findings Related to Students:

- One hundred four (104) students are currently enrolled in the nursing program.
 - Thirty (30) students are in the second quarter
 - Twenty-eight (28) students are in the fourth quarter
 - Twenty-three (23) students are in the sixth quarter
 - Twenty-three (23) are in the eighth quarter
- Six (6) of the seven (7) students who initially failed the June 5th exam achieved a passing score with the grade adjustment. The student who filed the complaint did not pass and consistently had failing grades for the course.
- Although the student who failed had an opportunity to be readmitted, the course was not being offered the next quarter. The student was given an opportunity to take a course that he/she had previously passed and chose not to return.

Findings Related to Records and Reports:

- After the exam in question, seven (7) students were told that they had failed the course by the course instructor.
- The course instructor reviewed the exam and gave credit for six (6) questions which made six (6) of the seven (7) students pass the course.
- One (1) student did not pass.
- The dean asked the faculty member how she determined which questions to eliminate and her response indicated it was not based on sound academic principles used in item analysis.
- It was after this encounter that it became apparent that the practice of giving undeserved credit on exams had been going on throughout the program, thus substantiating the complaint.
- The instructor for this course has since resigned and was unavailable.

Findings from the meetings, interviews, and review of files and documents:

- The faculty, director, and administration are aware of the complaint and have taken steps to ensure that faculty understand the policies for test analysis and review.
- The Curriculum Work Order system has been initiated and faculty have attended a faculty meeting regarding this.
- The director and administration have taken steps to assist the faculty in obtaining the knowledge needed to do test construction and item analysis.
- Additional resources have been incorporated into the curriculum including NCLEX practice exams, patient case studies, a comprehensive NCLEX-RN Review Program, as well as a three (3) day live review program to assist the students in the program.

DRAFT LETTER

October 24, 2014

Debra A. Obera, MSN, RN
Chair-Breckinridge School of Nursing and Health Sciences
ITT Technical Institute
2101 Waterview Parkway
Richardson, TX 75080-2208

Dear Ms. Obera:

At the October 23-24, 2014 meeting, members of the Texas Board of Nursing discussed the report of the July 29, 2014 survey visit conducted by Board staff to ITT Technical Institute Breckinridge School of Nursing Richardson, Texas Associate Degree Nursing Education Program. Based upon the discussion and review of documents, it was the decision of the Board to accept the report of the survey visit.

Sincerely,

Katherine Thomas, MN, RN, FAAN
Executive Director

copy: Texas Workforce Commission (TWC)
Rose Galloway, Campus Director
Bruce Bundeali, Dean of Academic Affairs