Consideration of Change in Approval Status
From Initial Approval to Initial Approval with Warning
ITT Technical Institute in Richardson, Texas
Associate Degree Nursing Education Program

Summary of Request:
Consider the proposed change in approval status for the ITT Technical Institute Breckinridge School of Nursing Associate Degree Nursing (ADN) Education Program in Richardson, Texas, from Initial Approval to Initial Approval with Warning based upon the 2015 NCLEX-RN® examination pass rate, findings in the 2015 Self-Study Report, and compliance with Rule 215.

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).
- Jane Allen, MSN, RN was instrumental in the development of the proposal and was the Program Director until January 2014.
- Debra Obera, MSN, RN became the Director in January 2014 and the current Director, Shanequa Averette, MSN, RN became the Director in June 2015.
- The program is currently on initial approval status. The first ADN students graduated in September 2013.
- The NCLEX-RN® examination pass rates for the past two years are provided in the table below:

<table>
<thead>
<tr>
<th>NCLEX Examination Year</th>
<th>BON Approval Status</th>
<th>NCLEX-RN® Examination Pass Rate</th>
<th>Number of First Time Candidates (Passed/Total)</th>
</tr>
</thead>
<tbody>
<tr>
<td>2015</td>
<td>Initial</td>
<td>48.65%</td>
<td>18/37</td>
</tr>
<tr>
<td>2014</td>
<td>Initial</td>
<td>45.83%</td>
<td>22/48</td>
</tr>
<tr>
<td>2013</td>
<td>New Program</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

- Due to the 2014 NCLEX-RN® examination pass rate of 45.83%, the Program Director and faculty were required to submit a Self-Study Report (SSR) in 2015 that would evaluate factors that may have contributed to the graduates’ performance on the NCLEX-RN® examination and a description of the corrective measures to be implemented.
- The Education Consultants conducted a conference call with the Program Director and faculty members on February 10, 2015, to discuss the process of developing the SSR. A comprehensive, in-depth SSR was received in the Board office on April 15, 2015.
- The Program Director and faculty members identified factors in the SSR that may have contributed to the decline in the pass rate and designed the following corrective measures:
- Review and revise policies regarding remediation, course failures, and readmissions;
- Develop criteria to recognize at-risk students & implement strategies for early identification and intervention;
- Strengthen the current faculty recruitment plan;
- Review and revise faculty orientation plan for all adjunct and full-time faculty;
- Restructure nursing faculty schedules to dedicate time to providing mandatory remediation, tutoring, working with at-risk students;
- Revise policies and restructure delivery of the Health Education Systems Incorporated (HESI) exit exam;
- Redesign space in simulation lab and include more simulation activities in the skills lab;
- Provide faculty development on simulation;
- Provide faculty development in inter-rater reliability and ensure consistency in grading; and
- Transition to all computerized testing by December 2014.

- On December 11, 2015, the Education Consultants conducted a telephone conference with the Program Director concerning changing the program's approval status from Initial Approval to Initial Approval with Warning at the Board meeting on January 21, 2016. The conference call provided an opportunity for Board Staff to discuss the process and implications of the warning status.
- The ITT ADN Program has provided a response letter to be included with the Board report (See Attachment #1).

**Rationale for Recommendations:**
Rule 215.4(c)(3)(A) states: “A warning may be issued to a program when the pass rate of first-time NCLEX-RN® candidates …. is less than 80% for two (2) consecutive examination years…”

The Education Guideline for writing a Self-Study Report requires that “The effects of the corrective measures should be evaluated as a part of the Total Program Evaluation Plan”.

**Staff Recommendations:**
Move to change the approval status for the ITT Technical Institute Breckinridge School of Nursing Associate Degree Nursing (ADN) Education Program in Richardson, Texas, from Initial Approval to Initial Approval with Warning based upon the 2015 NCLEX-RN® examination pass rate, findings in the 2015 Self-Study Report, and compliance with Rule 215, and impose the conditions and requirements in the attached letter and Board Order (Attachment #2).
December 18, 2015

Dr. Gayle Varnell
Tessa Board of Nursing
333 Guadalupe Street, Ste. 3-460
Austin, TX 78701

RE: NCLEX Improvement

Dear Dr. Varnell,

ITT Technical Institute – Richardson (BSNHS at ITT Richardson) has been working diligently to improve its NCLEX-RN scores and plans to continue working on meeting the TX BON requirements. BSNHS at ITT Richardson believes that the response below demonstrates that the program is taking the necessary steps to improve its NCLEX-RN scores.

The Nursing Chair and faculty have instituted an improvement plan to systematically address possible contributing factors to low NCLEX pass rates. The Chair and faculty also began reviewing and continually updating the TX BON Self Study report focusing on the identified factors that may have contributed to NCLEX examination pass rate and the corrective measures. An updated self-study report that identifies both the strengths and weaknesses of the nursing program will be submitted by December 30th, 2015. The 2015 NCLEX Improvement Plan identifies the possible root causes and actions to improve the student success rate. When analyzing the predictive factors included in the self-study, there was not one specific common denominator identified as an absolute predictor of NCLEX-RN® success or failure.

**Contributing Factors**

A significant contributing factor assessed in the plan was student performance on HESI A2 Testing test preparation affected by student working over 25 hours per week. In assessment of this factors compared to 2014, there were several findings:

- No significant difference between the HESI A2 admission scores of successful and non-successful first time NCLEX testers.

- The number of hours the students worked was determined to be a factor in the student success in the program and NCLEX success. Of the 2014 and 2015 students, over 50% of students self-reported to Nursing staff and career services they worked over 25 or more hours through their time in the program. The faculty instituted an orientation activity that informed the students of
the program expectations. In addition, resources have been provided to students, including more tutoring sessions offered, and the Chair and faculty have increased their monitoring of students’ course grades to assist students in the transition to the role of nursing student.

- Prior to testing, a review course was available to all students. The faculty determined that some students failed to use these resources and were overly confident entering the testing session or attempted to cram to learn nursing content prior to the exam.

- At risk students are identified by the nursing chair and faculty. An “at risk” student is defined as any student that has two or more of the following situations:
  - Is employed more than 20 hours per week,
  - Scores below an 80% on two exams in one subject,
  - Misses more than one class or one lab in one subject,
  - Has a final grade below an 80% in one nursing or general education course, and
  - Students whose re-entry appeal was approved.

At risk students meet with their faculty advisor and/or faculty at least once a week by conversing by email, phone or scheduled meeting. These discussions are documented through the student database system and through e-mail communication.

**NCLEX IMPROVEMENT EFFORTS**

1. **Testing and Evaluation**

   * **Computer Administered Exams**

At the start of the December 2014 quarter, BSNHS at ITT Richardson transitioned to computer administered exams for all course unit exams. This was one of several initiatives in a comprehensive plan for NCLEX Performance Improvement. Objectives of this initiative were as follows:

- To create an environment that prepares students for the testing environment of the NCLEX-RN exam.

- To reduce variability of any random elimination or credit of test questions after the exam is delivered in order to ensure that all students are treated and graded in an equitable fashion. Curriculum based rationales are offered (by Managing Director of Instructional Operations and course instructors/subject matter experts) for questions identified by faculty as “questionable”, equipping the faculty to make evidence based decisions during exam administration.

- To increase exam security and to standardize the exam administration process.
To provide for systematic evaluation and tracking of test questions through the Curriculum Work Order System so that test banks are reliably mapped to the student learning objectives and NCLEX-RN Exam.

The migration to computer administered exams has provided us the opportunity to identify faculty strengths as well as opportunities for training and improvement. An analysis of the testing process, and student results will be discussed at the next Nursing Faculty Organization meeting. Specifically, a course by course analysis comparing the September 2014 quarter exam results (on paper) vs. December 2014 results (on computers) have been completed. We will also develop a plan of action to address student concerns and opportunities to improve student outcomes identified by this evaluation.

As expected with this transition, students had mixed reactions to the move to computer administered exams. Some students provided positive verbal feedback, explaining that the computerized exams served to increase their focus of how to use the nursing process and think critically. These students verbalized support of the change and understand its rationale and realize that this change is positive and will assist them in adjusting to the NCLEX-RN style environment. Other students voiced concerns regarding the transition to computerized exams, fears of failing the exams, and concerns that the questions were different than questions taken on tests in previous quarters. Pre and post implementation meetings with nursing faculty and students made us aware of these concerns. The faculty and I take these concerns very seriously and have met with each student who has voiced concern or complaint.

b. Test-Review

The Chair, faculty, and Nursing Faculty Organization (NFO) continue to review tests. A review of the Course and Exit tests are completed at the Curriculum Committee meeting after students are given each quarter in terms of the overall scores and trends. The individual instructors who teach the related courses are responsible for completing an in-depth review of the breakdown of the exam(s) to ensure that all areas being tested on are covered in course. Instructors also look at any areas of weakness and revise their delivery of that content and/or add an assignment or activity. The NCLEX-RN pass rate and Exit HESI Scores are also reviewed at the NFO meetings (See Appendix A).

2. Students

a. Remediation Efforts

ITT Richardson holds live NCLEX review courses during the student’s senior quarter. The Nursing Chair attends one day of the review course each time it is held and each course instructor attends at least one day of the review course each time it is held.

Beginning in September of 2015, Nursing students at BSNHS at ITT Richardson were given access to the HESI/Saunders RN NCLEX Review Online Course. Students are provided access to this course at the start of NU1320T Clinical Concepts Nursing and Techniques II. The Chair and faculty have been encouraging
students to complete each module prior to taking the course HESI exam. The Chair and faculty inform students that the comprehensive exam for the modules will be given during Week 2 of the senior quarter. The Chair and faculty advise students already in their senior year to complete the course as soon as possible and the comprehensive exam is administered as planned.

b. Identifying At-Risk Students

The Nursing Chair created a binder to track “at risk” students – students receiving less than the 80% or unsatisfactory in clinical. The Nursing Chair meets with Nursing instructors weekly to update binder The Chair and faculty review students’ overall course grade, attendance, and subject matter tests and exit test scores. The Chair sends follow up emails to students and schedules 1:1 tutoring sessions to help “at risk” students succeed in nursing courses (See Appendix B). The tutoring schedule is posted in the student library/nursing lab for 1:1 sessions.

c. Scheduling

Beginning in the March 2016 quarter, NU1425T Pharmacology, NU2530T Adult Nursing I, NU2630T-Adult Nursing II, and NU299T Complex Care will meet twice each week (the theory hours split evenly between two different days with at least one day apart). Lab hours will not be split.

3. Faculty

a. Professional Development

Beginning in September of 2015, NCLEX training for campus didactic faculty and the nursing chair became mandatory. Faculty attended portions of the Kaplan NCLEX Review held at the campus to refresh their memory of NCLEX content. Faculty were also given the same access that students have to the Kaplan NCLEX Review so that they could view typical NCLEX questions and rationales at any time.

Campus Conference Calls

As of August 2015, BSNHS at ITT Richardson, including the Chair, Director, and District Manager, have been having monthly campus specific conference calls with BNSHS leadership. NCLEX training for campus didactic faculty and nursing chair became mandatory.

The overall improvement plan continues to focus on faculty development, test evaluation and analysis, curriculum delivery, and increased student resources to improve student and program outcomes. Lastly, we would like to thank Texas State Board of Nursing again for the opportunity to respond to its concerns and conference call on December 11, 2015.
Sincerely,

Shanequa Averette, RN, MSN
Nursing Chair
Breckinridge School of Nursing at ITT Technical Institute Richardson
2101 Waterview Parkway
Richardson, Texas 75080
DRAFT LETTER

January 25, 2016

Shanequa Averette, MS, RN, Director
Associate Degree Nursing Education Program
ITT Technical Institute
Breckinridge School of Nursing
2101 Waterview Parkway
Richardson, TX 75080

Dear Ms. Averette:

At the January 21-22, 2016 meeting, members of the Texas Board of Nursing (Board) discussed the approval status of the ITT Technical Institute Breckinridge School of Nursing Associate Degree Nursing Education Program in Richardson, Texas, based upon the NCLEX-RN® examination pass rate for 2015, findings in the 2015 Self-Study Report, and compliance with Rule 215.

Based upon the discussion and review of information, it was the decision of the Board to change the approval status of the ITT Technical Institute Breckinridge School of Nursing Associate Degree Nursing Education Program in Richardson, Texas from INITIAL APPROVAL to INITIAL APPROVAL WITH WARNING and impose the conditions and requirements in the attached Board Order.

If you have any questions or if we may be of any assistance, please contact Board Staff at gayle.vannell@bon.texas.gov or 512-621-5179.

Sincerely,

Katherine A. Thomas, MN, RN, FAAN
Executive Director

Copy: Rose Galloway, Director
BEFORE THE TEXAS BOARD OF NURSING

ORDER OF THE BOARD

In the Matter of
ITT Technical Institute Breckinridge School of Nursing
Associate Degree Nursing Education Program
Richardson, Texas

A public meeting of the Texas Board of Nursing, hereinafter referred to as the Board, was held on January 21, 2015, 333 Guadalupe, Tower II, Room 225, Austin, Texas, to consider the approval status of the ITT Technical Institute Breckinridge School of Nursing in Richardson, Texas, pursuant to Section 301.157, Texas Occupations Code and 22 Tex. Admin. Code Chapter 215, based upon the NCLEX-RN® examination pass rate for 2015, findings in the 2015 Self-Study Report, and compliance with Rule 215.

Representatives from the ITT Technical Institute Breckinridge School of Nursing Associate Degree Nursing Education Program in Richardson, Texas discussed the change in approval status during a conference call with Board Staff and were offered the opportunity to provide a written response for the Board’s consideration. After review and due consideration of the materials presented by Staff and filed by the ITT Technical Institute Breckinridge School of Nursing in Richardson, Texas, the Board hereby CHANGES the approval status of the ITT Technical Institute Breckinridge School of Nursing Associate Degree Nursing Education Program in Richardson, Texas from INITIAL APPROVAL to INITIAL APPROVAL WITH WARNING and imposes the following conditions and requirements:

1. In accordance with Rule 215.4(a)(3)(A), a program survey visit will be conducted by Board Staff during 2016.

2. An evaluation of the effectiveness of the corrective measures outlined in the 2015 Self-Study Report is to be submitted to Board Staff no later than June 1, 2016, per Education Guideline 3.2.1.a.

Entered this 21st day of January, 2016

__________________________________
Katherine A. Thomas, MN, RN, FAAN
Executive Director
On Behalf of the Texas Board of Nursing