Proposal to Establish a New Nursing Education Program  
Edwin’s Healthcare Institute in Stafford, Texas  
Vocational Nursing Education Program

Summary of Request:
Consider the Edwin’s Healthcare Institute (EHI) proposal to establish a new Vocational Nursing (VN) Education Program in Stafford, Texas, and the survey visit report (See Attachment #1). The final proposal was provided electronically to members of the Texas Board of Nursing (Board).

Historical Perspective:
- EHI was established in Stafford in 2017 for the purpose of educating individuals interested in studying to become Licensed Vocational Nurses (LVNs). Since 2007, EHI has conducted face-to-face NCLEX-RN/PN Review Courses in Stafford, Texas, that are 12 weeks in length and offered four times per year. There is an average annual enrollment in the review seminar of 150-180 nursing students. No other programs are offered at EHI at this time.

- The success of the NCLEX Review Program spread by word-of-mouth over the years and resulted in gradual growth of the program and many requests for EHI to offer a primary educational track in nursing. The proposal sets forth that the development of a VN Program was a logical starting point, as it provides a one-year program that can easily be accommodated in the current campus location.

- The school is privately owned and governed by a Board of Directors. EHI is approved and regulated by the Texas Workforce Commission, Career Schools and Colleges. Initial (and full) approval was granted in June 2017. The license is renewed annually, and EHI has current approval to operate as a school.

- The first draft of the proposal was received in the Board office on September 28, 2018, and reviewed by Board Staff. After a comprehensive evaluation of the second draft in April 2019, the proposal was deemed complete. A site visit was conducted on June 12, 2019, by Education Consultant Beverly Skloss, MSN, RN.

Summary of Proposal:
Overview of the Proposal:
- EHI proposes to establish a new VN Education Program in Stafford, Texas. The proposal requests enrollment of an initial cohort of 30 students and a continuing annual enrollment of one cohort of 30 students for the first five years of operation. There will be no part-time option and no transfer students will be accepted during the first five years of operation.
The proposed VN Education Program is an 81-quarter credit hour program designed to be completed in 12 months of full-time study, with a one-week break between each quarter. The total 1404 contact hour program is comprised of 576 didactic contact hours and 828 skills laboratory and hands-on clinical contact hours.

Clinical learning experiences will be offered in healthcare facilities in the Stafford area. Clinical affiliations include: Cambridge Health and Rehabilitation Centre, Windsor Quail Valley Post-Acute Healthcare, Legend Oaks Healthcare and Rehabilitation of Northwest Houston, Wilcrest Medical Center, Wilcrest Children’s Clinic, Just 4 Kids Pediatrics, Kindred Hospital Sugar Land, and Fort Bend Women’s Center.

Rationale and Need for the Program:

- The school is located at 435 Murphy Road, Suite P, in Stafford, Texas. Stafford is a city with over 18,000 residents located in the Houston-The Woodlands-Sugar Land Metropolitan Statistical Area (MSA) in the eastern region of the state.

- The Houston MSA is comprised of 12 counties with a combined population of 6,076,092. Stafford, a bedroom community of Houston, experienced a 3.3% growth in population from 17,722 in 2010 to an estimated 18,315 in 2017. With population growth comes the need for more healthcare providers, including LVNs, to support new and growing healthcare facilities.

- One of the cornerstones of the Houston economy is the healthcare and medical research industry. The Texas Medical Center is home to 54 medicine-related institutions, including 21 hospitals and eight specialty institutions, eight academic and research institutions, three medical schools, six nursing schools, and schools of dentistry, public health, pharmacy, and other health-related practices.

- The development of a new VN Program in Stafford arose from not only the demand for more LVNs in the surrounding healthcare facilities, but also from the desire of the owners to provide the entry level nursing knowledge and skill set for an ethnically diverse population seen in this area of Houston.

- Data were obtained through a telephone survey of nursing directors and administrators during July 2017 through February 2018 and showed 113 vacancies for LVNs. The data show a continued high demand for LVNs in the Houston/Stafford area.

- The goal for the new VN Program is to maintain one annual cohort of 30 students with a high retention and graduation rate through excellence in teaching while providing an educational environment to meet the particular learning needs of an ethnically diverse student population. The ethnicities represented in this community are: Indian, Pilipino, Vietnamese, Chinese, and African American. The nursing program will support a more ethnically diverse LVN workforce for the community.
• The six VN Programs within a 25-mile radius of EHI in the Houston/Stafford area are: Bell Tech Institute, Houston Community College, San Jacinto College North, San Jacinto College South, Texas Health School, and the Vocational Nursing Institute. Although these six programs reported receiving a total of 552 qualified applications, 270 qualified applications were not accepted. Reasons cited for not enrolling to capacity include: a lack of clinical space, limited classroom space, and lack of budgeted faculty positions. According to the proposal, the data show that the existing VN Programs in the Houston area are not able to satisfy the demand.

• Letters of support from community leaders in the Stafford area indicate strong support for the proposed VN Program.

Administration and Organization:
• As stated in the school catalog, “At Edwin’s Healthcare Institute, our mission is to provide students with the necessary tools and foundations to foster their advancement in nursing education.” This mission arose from the long standing NCLEX-RN/PN Review Program and the commitment of the founder and school director, Aleyamma “Leena” Daniel, RN, BSN. It is the mission of the school to offer nursing education, and the proposed VN Program will be the first formal educational program offering.

• The owners of EHI are committed to providing total support with the necessary resources including financial support for the implementation and continuation of the VN Program. Funding will be available through incoming revenue streams, tuition, and existing assets to support the new nursing program operation. Since the NCLEX Review Program was established in 2011, EHI has made profits that were invested in the campus operations.

• A budget for the first two years of operation for the EHI VN Program was prepared by the administration and the VN Program Director. The budget includes funds allocated to director and faculty salaries, secretarial and support staff salaries, skills laboratory equipment, media and instructor resources, medical supplies (consumable and non-consumable), and computers.

• The VN Program Director reports directly to the School Director. The VN Program Director has the responsibility and full authority to administer all aspects of the VN Program.

• Valerie Berger, MSN, RN, the proposed Program Director, is an accomplished nurse educator. Ms. Berger has 40 years of professional nursing experience with seven years devoted to nursing education. Ms. Berger has held numerous leadership positions as Director of Nursing, Chief Nursing Officer, and Vice President of Nursing in a variety of home health agencies, acute care hospitals, and long-term care facilities.

Faculty:
• A total of three faculty members, two full-time and one part-time, will be hired to provide a traditional 10:1 student-to-instructor ratio for clinical instruction. This plan will allow the
director and faculty to experience repetition and consistency in teaching assignments from year to year, so that courses can be evaluated and refined over time, striving toward best practices and excellence in instruction.

- Eighteen qualified applicants for the faculty positions have been identified to date, but not yet hired. The hiring process will begin as soon as the program is scheduled for approval by the Board. Seventeen of the 18 qualified applicants have teaching experience and all have many years of experience in the nursing profession. The majority of the applicants hold a Master of Science in Nursing Degree.

**Students:**
- EHI ownership will coordinate all aspects of student recruitment and marketing for the new program, relying on the long-standing relationships with participants who completed the EHI NCLEX Review Program over the past seven years. These individuals have maintained contact with the School Director, Leena Daniels, as nursing professionals working in the Houston/Stafford area.

- Two professional nursing organizations, the Indian American Nurses Association of Greater Houston and the alumni of Holy Family Hospital Nursing Program, New Delhi, India, use the EHI campus as a monthly meeting location for their members. The campus also allows the Indian Pentecostal Church of Houston to hold their weekly bible study in the facility as well as charitable organizations that wish to hold free medical screening camps, seminars, and conferences. These direct connections to the nursing workforce should allow EHI to market to individuals already working in the healthcare field.

- EHI representatives will attend local high school career fairs in the Houston/Stafford area to directly reach high school juniors and seniors who are interested in nursing. Stafford High School has a College and Career Center and the Health Science Academy within the Center provides a Certified Nurse’s Aide training program. EHI plans to form a partnership with the Center to encourage graduates to consider the EHI VN Program. A list of interested individuals is maintained by the school and they will be contacted once EHI has been approved to establish a new VN Program.

- The Student Handbook contains a consent form indicating students were provided information about eligibility for licensure.

**Program of Study:**
- The mission of the EHI VN Program is to train and develop a graduate vocational nurse who is educationally prepared to provide safe and compassionate patient-centered care within the established legal, ethical, and professional standards. This preparation provides the graduate with the skills necessary to function in a structured health care setting as a member of the multidisciplinary team utilizing the nursing process and sound clinical reasoning when providing care.
• Central to the EHI VN Program philosophy of nursing are the core components: the vocational nurse, the patient, and the healthcare environment. Nursing care takes place in the healthcare environment that may include structured healthcare settings, the patient’s home, and the community. The nurse’s role is to be an advocate in obtaining continuity of care as the patient navigates the choices and obstacles in the healthcare environment.

• The philosophy, mission, and education outcomes provide a basis for the nursing program curriculum threads. These threads are elements of knowledge and instruction that are emphasized throughout the four-quarter program and are clearly identified in the course descriptions. The mission, philosophy, and education outcomes are evident in course objectives, unit objectives, course assignments, clinical objectives, clinical evaluation tools, standards of nursing student conduct, and the learning environment on campus.

• The nursing program is designed to be completed in four quarters (12 months) of full-time study. Each quarter is 12 weeks in length followed by a one-week break, for a total of 52 weeks in the entire program. The nursing curriculum follows a linear progression making each quarter a prerequisite to the next.

Clinical Learning Experiences:

• The goal of EHI is to not further strain the current demands of student nurse rotations on the limited number of acute care hospitals in the area; therefore, EHI has chosen to focus clinical learning experiences in partnership with long-term care facilities, long-term acute care hospitals, rehabilitation hospitals, ambulatory clinics, and doctor’s offices which are more readily available.

• The clinical areas will provide patient care experiences that allow students to apply their theoretical knowledge and hands-on skills to elderly, adult, women (including antepartum and postpartum women), and children. These sites provide experiences with patients who are acutely ill, and those that are managing chronic disorders. Additionally, these types of clinical agencies and offices allow the student to have real-life experiences in settings where they may find future employment.

• Clinical affiliations include: Cambridge Health and Rehabilitation Centre, Windsor Quail Valley Post-Acute Healthcare, Legend Oaks Healthcare and Rehabilitation of Northwest Houston, Wilcrest Medical Center, Wilcrest Children’s Clinic, Just 4 Kids Pediatrics, Kindred Hospital Sugar Land, and Fort Bend Women’s Center.

• In addition, the final execution of affiliations was in process at the time of proposal submission with the following clinical sites: Encompass Inpatient Rehabilitation Hospital, Harris Health System Community-Based Care for Mother and Baby, and Legacy Health Outpatient Clinics.
Facilities, Resources, and Services:

- EHI has approximately 5,900 square feet of space that includes a private office for the Program Director, classrooms, and conference rooms, as well as office space to accommodate faculty and staff. Ample parking is available directly in front of the school.

- The 1,200 square-foot classroom designated for the nursing program can accommodate 30 students and has 15 rectangular desks that seat two students to a desk.

- The 700 square-foot nursing skills laboratory provides ample space for instruction with five hospital beds along two walls with curtains between beds to create a more realistic patient room setting.

- The library is a small room with six fixed desk-top computer stations with access to online databases, such as the Cumulative Index to Nursing and Allied Health Literature (CINAHL) Plus with Full-Text, and a small collection of nursing reference books.

- The students have a break area near the classroom providing vending for cold drinks and snacks with tables, chairs, and a microwave oven.

- EHI will maintain its physical student records and files under locked access in fireproof filing cabinets to prevent loss and destruction. All electronic student records will be maintained in the software system that is backed up daily and kept off-site in the event of a catastrophic event.

Total Program Evaluation Plan:

- The Total Program Evaluation (TPE) has been developed to periodically review the critical elements of the nursing curriculum, policy, procedure, and other aspects of program operation. The plan encompasses the first five elements required by Board rules: evaluative criteria; frequency of evaluation; assignment of responsibility; methodology; and indicators of program effectiveness. The sixth element, the action plan for addressing findings, will be considered when the school begins operation and the timeline for evaluation begins.

- The TPE components are intended to be clear, concise, and measurable. The assignment of responsibility is made by the Program Director with input from the faculty. Indicators or benchmarks of program and instructional effectiveness are included in the evaluative process. All required elements of Board Rule 214.13 are fully addressed.

Rationale for Recommendation:

Pros:

- Valerie Berger, MSN, RN, the proposed Program Director, meets all requirements of Board Rule 214.6 to assume the leadership position. Ms. Berger is an accomplished professional nurse, nurse educator, and nurse administrator.
• EHI has identified and established clinical affiliations with multiple and diverse clinical sites. The Program Director is working proactively to ensure cooperation with other nursing education programs that may utilize the contracted clinical sites.

• The administration has committed the resources to the implementation of this new program.

Cons:
• EHI is not experienced in providing a VN Education Program and the curriculum is not proven.

Staff Recommendation:
Move to grant initial approval to Edwin’s Healthcare Institute to establish a new Vocational Nursing Education Program in Stafford, Texas, and impose the condition and requirement in the attached Board Order (See Attachment #2).
TASBOR
SURVEY VISIT PROGRAM REPORT
Vocational Nursing Education Program

NAME OF NURSING PROGRAM: Edwin’s Healthcare Institute

PROPOSED DIRECTOR: Valerie Berger, MSN, RN

REASON FOR SURVEY: New Proposal

DATE: June 12, 2019

SURVEY VISITOR: Beverly Skloss, MSN, RN

In this report the nursing program met standards and criteria unless otherwise indicated by narrative. Narrative in the Evidence column documents findings of pertinent data, outstanding performance, or deficiencies. Narrative in the Comments column includes recommendations or requirements to be met based on analysis of the survey visit.

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<td>§214.11 Facilities, Resources, and Services</td>
<td>Edwin’s Healthcare Institute (EHI) Programs, including the proposed Vocational Nursing (VN) Program, are housed in an office suite at 435 Murphy Rd. in Stafford, Texas. The approximately 5900 square feet of space includes a private office for the Program Director, classrooms, and conference rooms, as well as office space to accommodate faculty and staff. The suite is modern, spacious, and conducive to learning. The office suite contains a 1,200 square-foot classroom designated for the VN Program that can accommodate 30 students. The classroom contains 15 rectangular desks that seat two students to a desk with outlets for each student’s laptop computer that is included as part of the</td>
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| (b) An appropriately equipped skills laboratory shall be provided to accommodate the maximum number of students allowed for the program.  
(1) The laboratory shall be equipped with hot and cold running water.  
(2) The laboratory shall have adequate storage | The 700 square-foot skills lab has five electric hospital type patient beds along two walls with privacy curtains between beds to create a nursing ward environment. The lab has five low-fidelity adult manikins and six low-fidelity infant manikins. Each bed has a bedside table with a lamp, a sharps container, gloves, and hand sanitizers. There are five IV poles and IV pumps, six IV arms for student practice, a pacing pump as well as all necessary equipment. | Criteria: Met |
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<td>for equipment and supplies.</td>
<td>equipment and supplies for the teaching/learning process. The lab contains two sinks along one wall with ample counter space and three storage cabinets. Both sinks have hot and cold running water. An adjacent storage room with shelving is adequate for storage of supplies and equipment. An oxygen machines with regulators and a portable suction machine have been ordered. Medication carts will be obtained upon approval of the program. The skills lab is dedicated solely for the VN Program and provides ample space, equipment, and supplies for the projected number of students.</td>
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<td>(c) The dean/director and faculty shall have adequate secretarial and clerical assistance to meet the needs of the program.</td>
<td>There is one full-time administrative assistant that will be shared by the VN Program and the EHI NCLEX Review Program. This person will provide adequate secretarial/clerical assistance to meet the needs of the new VN Program.</td>
<td>Criteria: Met</td>
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<td>(d) The physical facilities shall be adequate to meet the needs of the program in relation to the size of the faculty and the student body. (1) The dean/director shall have a private office. (2) Faculty offices shall be conveniently located and adequate in number and size to provide faculty with privacy for conferences with students and uninterrupted work. (3) Space for clerical staff, records, files, and equipment shall be adequate.</td>
<td>The Program Director has a private, moderate in size office with two file cabinets in the EHI suite. The full-time faculty office is private and moderate in size. An adjunct faculty office is available with two desks and file cabinets and is conducive for faculty to work uninterrupted. A separate private conference room is available with a table and six chairs for any faculty to visit privately with students. The Program Director and faculty offices are conveniently located and adequate in number and size. EHI will keep student records and reports in the Program Director's office. The records will be securely maintained in locked file cabinets within the room and protected against damage or loss. All electronic student records will be maintained in the software system that is backed up daily and kept off-site in case of a catastrophic event.</td>
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<td>(4) There shall be mechanisms which provide for the security of sensitive materials, such as examinations and health records. (5) Classrooms, laboratories, and conference rooms shall be conducive to learning and adequate in number, size, and type for the number of students and the educational purposes for which the rooms are used. (6) Teaching aids shall be provided to meet the objectives/outcomes of the program. (7) Adequate restrooms and lounges shall be provided convenient to the classroom.</td>
<td>The classroom at EHI has the latest technology tools, including computers, internet, projectors, and whiteboards. The classroom and lab are modern, spacious, adequate in size, well-lit, and conducive to learning. One moderate size faculty/staff conference room and one staff breakroom is available and conveniently located. One moderate size student break room is available near the classroom and equipped with tables and chairs, a refrigerator, and a microwave oven available for use. Vending machines for cold drinks and snacks will be added prior to students beginning the VN Program. Adequate teaching aids are provided to meet the program objectives. Appropriate medical equipment and supplies are on hand. There is one set of men’s and women’s restrooms conveniently located in the building. All restrooms meet ADA standards. The building is ADA compliant with adequate handicapped parking spaces for visitors, faculty, and prospective student use.</td>
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<td>(e) The learning resources, library, and departmental holdings shall be current, use contemporary technology appropriate for the level of the curriculum, and be sufficient for the size of the student body and the needs of the faculty. (1) Provisions shall be made for accessibility, availability, and timely delivery of information resources. (2) Facilities and policies shall promote</td>
<td>EHI has Wi-Fi throughout the building. Each student will have their own laptop. The EHI library is a small room with six fixed desktop computers, a printer, access to the internet, and a small collection of nursing reference books. Library resources are available to all students through the Cumulative Index to Nursing and Allied Health Literature (CINAHL) Plus with Full-Text, Elsevier, and other nursing databases that will be accessible 24 hours a day regardless of location. The learning resources, library, and departmental holdings are appropriate and sufficient in size for</td>
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<td>effective use, i.e. environment, accessibility, and hours of operation.</td>
<td>the student body and faculty.</td>
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**Pros and Cons from Survey Visit:**

**Pros:**
- Facilities, resources, and services are adequate to meet the needs of the proposed VN Program.

**Cons:**
- None identified.
July 25, 2019

Valerie Berger, MSN, RN, Director
Vocational Nursing Education Program
Edwin’s Healthcare Institute
435 Murphy Road, Suite P
Box 285
Stafford, TX 77477

Dear Ms. Berger:

At the July 25-26, 2019 meeting, members of the Texas Board of Nursing discussed the Edwin’s Healthcare Institute Proposal to Establish a New Vocational Nursing Education Program in Stafford, Texas, and the report of the June 12, 2019, survey visit. The Board wishes to thank you and XXX for being present to answer questions. Based upon the discussion and review of documents, it was the decision of the Board to grant initial approval to Edwin’s Healthcare Institute to establish a new Vocational Nursing Education Program in Stafford, Texas, and impose the condition and requirement in the attached Board Order.

We wish you success with the program. If you have questions, or if we may be of assistance, please contact Board Staff at 512-305-7660.

Sincerely,

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

Copy: Aleyamma Daniel, RN, BSN, Owner, Edwin’s Healthcare Institute
Texas Workforce Commission
BEFORE THE TEXAS BOARD OF NURSING
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ORDER OF THE BOARD

In the Matter of
Edwin’s Healthcare Institute
Vocational Nursing Education Program
Stafford, Texas

A public meeting of the Texas Board of Nursing, hereinafter referred to as the Board, was held on July 25, 2019, 333 Guadalupe, Tower II, Room 225, Austin, Texas, to consider the Edwin’s Healthcare Institute proposal to establish a new Vocational Nursing Education Program in Stafford, Texas, based upon the review of the proposal and survey visit report, pursuant to Section 301.157, Texas Occupations Code and 22 Tex. Admin. Code Chapter 214.

After review and due consideration of the filed materials, as well as the presentation by the representatives from Edwin’s Healthcare Institute in Stafford, Texas, and other interested parties, if any, the Board hereby grants INITIAL APPROVAL of the Edwin’s Healthcare Institute Vocational Nursing Education Program in Stafford, Texas, and imposes the following condition and requirement:

1. The program shall not admit more than one (1) cohort of thirty (30) students in Summer 2019 and one (1) annual cohort of thirty (30) students in subsequent years until the program achieves Full Approval from the Board.

Entered this 25th day of July, 2019

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