Proposal to
Establish a New Nursing Education Program
American Medical Institute in Houston, Texas
Vocational Nursing Education Program

Summary of Request:
Consider the American Medical Institute (AMI) proposal to establish a new Vocational Nursing (VN) Education Program in Houston, Texas and the survey visit report (See Attachment #1). The final proposal document was provided electronically to members of the Texas Board of Nursing (Board) after some reformatting by Board Staff was required for accessibility.

Historical Perspective:
- A VN program at AMI was approved by the Board in July 2007 following their seeking Board approval on several attempts dating back to 2001.
- AMI elected to close the previous VN program effective April 16, 2014, based on four consecutive years of NCLEX-PN® examination pass rates below 80% and other areas of noncompliance. Ify Emenaha, RN, Pharm D, served as Program Director from 2007 to 2014.
- The NCLEX-PN® examination pass rates from 2010 (first cohort) to 2014 are provided in the following table:

<table>
<thead>
<tr>
<th>Examination Year Pass Rate</th>
<th>BON Approval Status</th>
<th>NCLEX-PN® Pass Rate</th>
<th>Number of First Time Candidates (Passed/Total)</th>
</tr>
</thead>
<tbody>
<tr>
<td>2014</td>
<td>Closed</td>
<td>25.00%</td>
<td>1/4</td>
</tr>
<tr>
<td>2013</td>
<td>Conditional</td>
<td>38.57%</td>
<td>27/70</td>
</tr>
<tr>
<td>2012</td>
<td>Full with Warning</td>
<td>69.70%</td>
<td>23/33</td>
</tr>
<tr>
<td>2011</td>
<td>Full</td>
<td>50.00%</td>
<td>21/42</td>
</tr>
<tr>
<td>2010</td>
<td>Full – Self Study Report</td>
<td>79.41%</td>
<td>27/34</td>
</tr>
<tr>
<td>2009</td>
<td>Initial</td>
<td>88.89%</td>
<td>8/9</td>
</tr>
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</table>

- A new proposal was received in the Board office in December 2015. Board Staff acknowledged receipt of the proposal and conducted a cursory overview. AMI was notified of major deficits in the proposal. A revised proposal was received in Board office in December 2016. This proposal was denied approval at the April 2017 Board meeting.
- Another new proposal was received in the Board office in April 2018. Since the application fee was not received until May 17, 2018, the official date for receipt of the proposal was documented as May 17, 2018. Two consultants reviewed the first draft of the proposal
and submitted extensive review notes of the proposal to AMI in June 2018. Two consultants reviewed the second draft of the proposal and once again submitted extensive review notes to AMI in March 2019. A consultation visit was held in the Board office on April 1, 2019, by invitation of Board Staff to hopefully discuss what had been identified as inadequacies in the program proposal. AMI representatives departed from the consultation visit before all comments were discussed by the consultants. A final revision of the proposal was received in Board office on May 24, 2019.

- A site visit was conducted by Beverly Skloss, MSN, RN on June 12, 2019, to determine the adequacy of the facility (See Attachment #1).

Summary of the Proposal:

Overview of the Proposal:
AMI is proposing to establish a 12-month VN education program to admit 10 students each April. They seek to enroll students from various cultural and ethnic groups and socioeconomic backgrounds to fulfill their commitment to diversity. As will be outlined in more detail later in this report, Board Staff did not find the proposal was sufficient to recommend approval.

Rationale and Need for the Program:
The need for the program is based upon the growing population in the Houston area, especially among the geriatric citizens. AMI contacts with health care facilities indicate that jobs are available for licensed vocational nurses in the area.

Four letters of support for the program from health care agencies included ones from Cantex Continuing Care Network, Spanish Meadows of Katy, West Houston Rehabilitation Healthcare Center, and Houston Methodist Sugar Land (undated).

Administration and Organization:
AMI is a non-profit 501c3 tax exempt organization that is self-governed. It was established in 1996 and offers successful programs for Certified Nursing Assistants and for Medication Aides. AMI has also been TWC-approved to offer a Patient Care Technician Program. They serve as a testing center for standardized examinations (e.g. GED and medication certification) and offer workshops and continuing education classes in phlebotomy, EKG, Assisted Living Managers Training, Certified Nurse Aide 24-hour Updates, Certified Medication Aide Updates, Basic Life Support Training, and Advanced Cardiac Life Support.

A current Certificate of Approval from the Texas Workforce Commission (TWC) is included that was issued on May 6, 2019. AMI recently received accreditation from the Commission of the Council on Occupational Education (COE) for three years effective on February 17, 2019.

AMI states that a new VN program would pose no negative or unforeseen impact on other programs in the community. Financial backing would be supported by profits from their other programs and tuitions.

Ify Emenaha, RN, Pharm D is the proposed Program Director. She completed her nursing education at the University of Nigeria Teaching Hospital in Enugu, Nigeria, in 1976. She also
holds a Bachelor of Science Degree and a Doctorate in Pharmacy (1996) from Texas Southern University in Houston, Texas.

**Faculty:**
The number of faculty planned for 10 students is one full time, one part-time, and one substitute faculty. Curriculum vitae for faculty are included in the proposal.

The Faculty Handbook provided is mostly an employee manual and does not include the required faculty policies in Rule 214.7 nor does it include plans for a faculty organization.

**Students:**
The proposal indicates an enrollment plan for ten students each year for five years. The program plans to recruit students from the five local high schools and from health care facilities that hire non-licensed personnel. A VN program would also add another option for AMI students enrolled in other programs who wish to further their education.

The Student Handbook includes admission, progression, and graduation criteria; policies related to professional behaviors; clinical performance and dismissal guidelines; and grading policies. Instructors are responsible for completing a request for counseling form when they recognize students who need academic or social counseling, but there are no details about the process for providing counseling services. Information about eligibility and filing a declaratory order are provided in the Student Handbook, but the information is not current with rule changes effective in February 2018. No form for student signature verifying their receipt of this information is included in the Student Handbook.

**Program of Study:**
The conceptual framework is built on the nursing process and is developed on concepts of knowledge, skills, values and goals, cultural factors, participation, communication, attitudes, and environment. The curriculum has been developed in four levels (12 weeks each) from simple to complex content. Didactic, lab, and clinical experiences have been planned to be conducted Monday through Thursday, with Friday reserved for faculty meetings.

Course objectives include competencies in the *Differentiated Essential Competencies (DECs)*. For each of the four levels, the 25 DECs for vocational nurses are listed before the syllabi but there is no explanation of how they relate to other objectives included in each course or how they are evaluated through examinations or in clinical performance.

Board Staff elected to provide details about each syllabus. The length of each course is noted since they vary in length.

**Level 1**
VN 111 Introduction to Vocational Nursing: The pages in the proposal seem to be out of order. Details about each class in the course are not provided in the unit outline. The four course
objectives do not relate to the content listed in the course schedule. The course grade is based solely upon four exams. This is a 12 week course.

VN 112 Medical Terminology: Course content for each class session is based mostly on body systems. Many course objectives are not reflected in the listed course content. Fifteen percent of the grade relies on homework and group activities but no descriptions of these activities are included in the syllabus. This is a 12 week course.

VN 113 Fundamentals (or Foundations) of Nursing: Details about topics presented in the course are not provided. The grade is based solely upon four exams but details about the exams are not provided. This is a 12 week course.

VN 1101 Fundamentals of Nursing Skills Lab: There is no information about how skills will be evaluated. Grading criteria are not provided. This course is a six week lab course.

VN 1102 Fundamentals of Nursing Clinicals: There are seven clinical objectives provided with sub-objectives for the course. The relationship of these objectives to the DECs or to other courses in the level is not clear. Sub-objectives appear to be at a higher level than what is expected at this course level. Grading criteria or grading rubrics are not included. This is a six week clinical course as described in the program of study but the syllabus states that the clinical rotation is twelve weeks in length.

Level 2
VN 211 Anatomy & Physiology: The outline and content provided do not seem to relate to content usually associated with anatomy and physiology. This is a 12 week course.

VN 212 Gerontology Theory: There is no mention of “nursing” in the course objectives. This is a 12 week course.

VN 2101 Gerontology Skills Lab: Details regarding skills to be performed in the course and how they will be graded are not provided. This is a three week lab course.

VN 2102 Gerontology Clinical: This clinical course also has a set of similar clinical objectives that seem to be independent from the content but similar to the objectives noted in VN 1102, but with some additions. There is no explanation of how these objectives are to be used and whether an evaluation will be carried out for these objectives. Grading criteria is not provided. This is a nine week clinical course as described in the program of study but the syllabus states the clinical rotation is twelve weeks in length.

Level 3
VN 311 Pharmacology: There are reading assignments for DeWit (text) but it is not included in the list of texts in the syllabus. Course objectives do not relate to list of unit content. Course grade is determined by exams and a drug math test. There is no information about the drug math test in the syllabus. This is a 12 week course.
VN 312 Medical Surgical Nursing: Course objectives are provided but there is not a list of course content to be covered. The course grade is based solely upon exams. Unit and final exams add up to 120% for the course grade. This is a 12 week course.

VN 3101 Medical Surgical Nursing Lab: There is no explanation about how skills will be graded, or their relationship to course objectives. Five percent of the grade will be based on homework and 5% on laboratory assignments, but no descriptions are provided about the homework or assignments. This is a four week lab course.

VN 3102 Medical Surgical Clinical: There are similar clinical objectives for this course as for the other clinical courses, but no explanation of how they will be used and evaluated. Grading criteria is not provided. The clinical rotation is 144 hours as described in the program of study, however, the syllabus states the clinical rotation is 161 hours. This is an eight week clinical course.

Level 4
VN 411 Maternal Child Nursing: This course includes six weeks for maternal/child (obstetric and well baby care) content. Course objectives for maternity do not mention “nursing”. There is some focus in the course description about care of the child but pediatrics is not included in the list of content. This is a six-week course as described in the program of study, however, the syllabus indicates a four-week topical outline.

VN 4101 Maternity Child Lab and VN 4102 Maternity Child Clinical: These courses are each three weeks long as a lab class and a clinical experience. This course includes pediatric content. There is no mention about the pediatric clinical experiences.

VN 412 Mental Health Nursing: From the objectives, this course includes content related to personality theory, mental illness, stress, therapeutic communications, anxiety disorders, mood disorders, schizophrenia, dementia, violence and abuse, and disorders of childhood and adolescents. This is a four week course. The course grade is based solely on examinations.

VN 4112 Mental Health Nursing Clinical: This is a four week clinical course. Grading criteria are not included.

VN 413 Leadership: This four week course covers content related to leadership and management. Details about topics presented in the course are not provided.

VN 4103 Leadership Clinical: This four week clinical course accompanies VN 413.

There is a set of rubrics (pp. 416-440) based upon the DECs for eight weeks and for twelve weeks, but there are no headings or explanations of their use. The rubrics do not provide information about how grades are calculated.
Clinical Learning Experiences:
There is no detailed description of clinical instruction for the program but the following contracts or letters for clinical placement are included: (Board Staff phoned these agencies to verify the agreements and their availability.)

- Spanish Meadows Nursing and Rehab. - signed 9/29/2015 Representative agreed to offer clinical learning experiences to AMI students (file is corrupt on USP).
- Larry Learning Academy Memorandum of Understanding to accept students – date added 3/15/2019 – unsigned – Representative agreed to offer clinical experiences to AMI students.
- Crescent Sugarland Nursing Center – date added 3/15/2019 – unsigned – Representative agreed to offer clinical experiences to AMI students. However, representative stated facility has had no recent communication with AMI regarding acceptance of VN students for clinical experiences.
- Iba Sina Foundation Community Medical Centre – Per representative, AMI has not communicated with facility regarding acceptance of VN students for clinical learning experiences. Facility stated they cannot accept VN students – date added 3/15/2019
- Houston Methodist Sugar Land – VN clinical experiences will require an affiliation agreement, which has not been done – date added 3/15/2019 – Contact person stated there has been no communication with AMI in over two years.
- Cibi-Care Family Health Centers – Representative stated that adult and pediatric outpatient experiences would be observational only – date added 3/15/2019.

All letters of agreement were not signed and the date “March 15, 2019” on some of the letters did not match the original font. The letters of agreement in this proposal are the exact same letters as ones from earlier proposals.

This section of the proposal also includes a letter of support from Arlene M. DeLaCruz.

Syllabi for clinical courses include definitions of satisfactory, unsatisfactory, and unsafe clinical performance, but grading rubrics are not included in the proposal. Clinical syllabi also include a set of learning outcomes and competencies that are obviously clinically-oriented, but there is no explanation of whether or how these will be evaluated and graded (pp. 407-432).

Each level also includes a set of learning objectives based on the DECs, but it is uncertain how these will be used in student evaluation or grades. The calendar for classes and clinical does not indicate clinical areas or number of students at each site. Weeks for clinical rotation do not align with information stated on the course syllabi.

Facilities, Resources and Services:
This section includes information about faculty and photos of the school.

Records and Reports:
The office manager will be responsible for maintaining records.
Total Program Evaluation:

An outline of an evaluation plan is included with goals for each criteria. The plan focuses more on how the program complies with Rule 214 rather than determining the effectiveness of aspects of the program.

Rationale for Staff Recommendation:

- AMI staff have made efforts to improve the organization and formatting of the last revision of the proposal. However, the proposal and curriculum plan remain very similar to the one received in 2016.
- The Faculty Handbook does not include faculty policies for the nursing faculty organization, faculty workload, faculty orientation, resources for professional development, and faculty evaluation. A course evaluation form is included in the Student Handbook but there is no information about its use.
- The Student Handbook does not provide current information after rule changes in 2018 about eligibility for licensure and the filing of a declaratory order. A student receipt form providing evidence that students received eligibility information is not included in the Student Handbook. The Student Handbook does not include information about students' participation in the governance of the program.
- The program of study is based upon a set of concepts (pp. 272-274) but these concepts are not included in the descriptions of the levels (pp. 276-277). A sample schedule for classes for nine weeks (beginning third week through twelfth week) is for the first level.
- The proposal does not provide a description of how learning experiences provide for progressive development of values, judgment, and technical skills. It does not provide a narrative of how the learning opportunities will assist students to develop basic communication and interpersonal relationship skills.
- The section of the proposal on the Program of Study does not adequately describe how the curriculum will provide a progressive learning experience for the students nor does it provide details about the delivery of the program. Syllabi do not include specifics about course content, class and clinical scheduling, assignments, and grading criteria.
- A rationale is not provided for the ratio of clinical hours, or for the balance of nursing and non-nursing courses.

Staff Recommendation:

Due to the following inadequacies in the proposal, Board Staff recommend DENIAL of the proposal as indicated in the attached letter and Board Order (See Attachment #2):

- lack of clarity and consistency between course objectives and the conceptual framework;
- variation of information in syllabi about the length of courses;
- inconsistencies between course descriptions and content identified in syllabi;
- lack of information about assignments and grading criteria;
- lack of consistency in clinical objectives in clinical courses;
- lack of information related to the process for evaluating students in the clinical area;
- missing information required by Board rules in the handbooks;
• verification of contractual agreements indicated all are not valid contracts; and
• less than optimal learning environment due to inadequate lighting and air conditioning in classroom, handicapped restroom not readily accessible, lack of handicapped parking, limited hours for student access to media room, and lack of evidence that library resources are available.
NAME OF NURSING PROGRAM: American Medical Institute, Houston

PROPOSED DIRECTOR: Ify Imenaha, RN, Pharm D

REASON FOR SURVEY: New Program 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.

<table>
<thead>
<tr>
<th>STANDARD/Criteria</th>
<th>EVIDENCE</th>
<th>COMMENTS</th>
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<tbody>
<tr>
<td>§214.11 Facilities, Resources, and Services</td>
<td>The American Medical Institute (AMI) Programs, including the proposed VN Program, are housed in a free standing building at 6902 Cook Rd., in Houston. The building is approximately 8600 square feet and spacious. The environment is not optimal for positive learning (dimly lit rooms, worn carpet in classrooms and lobby). The proposed VN Program building contains two large classrooms that can hold 35 to 40 students. Other areas/rooms include a front lobby with two chairs, secretarial/receptionist/clerical private office adjacent to the lobby, a large multi-purpose room, a large skills laboratory (lab), a private office for the program director, a shared faculty office, a media room with computers, and storage closets. The AMI campus has appropriate classroom space; however, lighting in the proposed VN program designated classroom is dim with multiple light fixtures that are not working. This is not viewed as a conducive learning environment.</td>
<td>Criteria: Not Met</td>
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<td>STANDARD/CRITERIA</td>
<td>EVIDENCE</td>
<td>COMMENTS</td>
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<td><strong>The program director and faculty are responsible for student academic advising, tutoring and remediation. Staff stated that a faith-based center, which provides counseling, is directly behind the program building for student referrals related to personal issues when needed.</strong></td>
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<td><strong>There is one spacious skills lab that will be shared with the Nursing Assistant (NA) and Medical Assistant (MA) programs. The lab will be scheduled for the VN program according to the program schedule, Monday through Friday.</strong></td>
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<td><strong>The school is in an easily accessible location. The facility has adequate space for the projected number of students. Standard parking spaces for visitors, faculty, and prospective students are adequate.</strong></td>
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<td><strong>There were no marked handicapped parking spaces in the parking lot adjacent to the building.</strong></td>
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<td><strong>There were multiple water-like stains on the ceiling tiles throughout the building.</strong></td>
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<td><strong>The administration of AMI have supported the development of the new program.</strong></td>
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<td>(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 for equipment and supplies.</td>
<td><strong>The large skills lab has 10 various hospital type patient beds along two walls with eight low fidelity adult manikins and one pediatric manikin. There are two portable partitions that may be utilized to simulate privacy, otherwise the laboratory can be described as an open ward-type setting. Two overbed tables are available that can be moved from bed to bed. An eye wash station is available along one wall. There is one oxygen and suction set-up, two IV poles, and one IV pump for student practice. Several sharps containers, gloves, and hand sanitizers, as well as some necessary supplies, are readily available. Staff indicated more supplies will be ordered for the VN program. A small desk and chair are available for faculty use at the front of the lab. There are two sinks at the front of the lab with hot and cold running water. A single bathroom is available to the left of the sinks - lighting was not working. Medication carts were not available.</strong></td>
<td><strong>Criteria: Met</strong></td>
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<td>STANDARD/CRITERIA</td>
<td>EVIDENCE</td>
<td>COMMENTS</td>
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<td>There are plastic storage bins utilized for supply storage and a small, separate storage room with shelves which provides adequate space for small equipment and supplies. Larger equipment is stored in the open lab.</td>
<td>The skills lab is shared with the NA and MA programs and provides adequate space and minimal equipment 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 secretary/receptionist that will be shared by all AMI programs. This should meet the needs of the proposed VN Program.</td>
<td>Criteria: Met</td>
</tr>
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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. (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</td>
<td>The Program Director and faculty offices are conveniently located and adequate in number and size for the projected number of students. The Program Director has a private office in close proximity to the secretarial/receptionist/clerical office. The shared faculty office is medium in size, has availability for two faculty, is furnished with one large desk, one small table, and file drawers; the office is conducive for faculty to work uninterrupted and for faculty to visit privately with students when needed. The office for secretarial/clerical/receptionist staff space is located near the front lobby of the building. AMI student records and reports will be stored in a small, under the desk, locked and fireproof file safe in this office and per AMI staff, “in the cloud.” Another 4 drawer locked file cabinet is available in the same office but is not fireproof. The main VN program classroom is not conducive to a positive learning environment. The room was warm and dimly lit; numerous overhead lights were not working. When questioned, AMI staff indicated the light bulbs were burned out and the air-conditioner was not set for a cool temperature. This classroom contains 28 individual student desks and chairs, ceiling fans, a projector and screen for presentations, a large monitor on the wall that staff</td>
<td>Criteria Met: Not Met</td>
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<td>STANDARD/Criteria</td>
<td>Evidence</td>
<td>Comments</td>
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<td>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>indicated was not utilized, and a faculty desk and chair. Two sinks are located at the front of the classroom with a room to the side that has two separate bathrooms - one was in working order and the other was not. The second classroom, utilized by AMI's other programs, may be scheduled for the VN program if needed. This classroom is large, has desks, a whiteboard partition, and a restroom. One large multi-purpose room is available and conveniently located for a student breakroom. It contains a table with 10 chairs, refrigerator, microwave, sink, student lockers, a single restroom, storage room and cabinets, and two desks. There is an area adjacent to the table that is set-up with chairs for a lecture type setting. AMI staff indicated this is utilized for CPR and First Aid classes.</td>
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<td>One large media room is on-site that can be accessed by students Monday through Saturday from 1:00 p.m. to 4:30 p.m. Students will need to make arrangements with AMI staff to use the room at other times. This media room has 20 desktop computers, chairs, desks, sinks, a restroom, storage room, and a commercial printer. AMI staff indicated this room is also used for vendor NCLEX practice testing and pre-entrance testing. AMI staff indicated that Wi-Fi is available throughout the building for student use. Adequate teaching aids are available to meet the program objectives. Medical equipment and minimal supplies are on hand.</td>
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<td>There are two single toilet rooms available in each classroom. These rooms are accessed through a door at the front of the classroom. After entering this door, there is a small area and two doors on the right that open to the toilets. One toilet was not working at the time of the survey visit. There are no handwashing options until an individual re-enters the classroom where sinks are available at the front of the room. These toilet rooms are not conveniently located for students. The toilet rooms in the skills lab, the student breakroom/multi-purpose room and the media room are</td>
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<td>STANDARD/CRITERIA</td>
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<td>set-up the same as the classrooms. The skills lab restroom lighting was not working.</td>
<td>The only handicapped accessible restroom in the building is adjacent to the lobby that must be accessed through a door marked with a sign “Employees Only.” To access this restroom, a person enters through this door and walks through a storage room to the restroom door. Staff indicated that any student who needs an accessible restroom may use this one. This restroom is not conveniently located and wheelchair accessibility through the storage room is questionable.</td>
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(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 effective use, i.e. environment, accessibility, and hours of operation.

When Board staff asked about access to online learning resources and library holdings, AMI staff stated they would contact the Director, who was not present. Per staff statement after contacting the proposed Director, the students will have access 24 hours a day to the Texas Medical Center online library and vendor resources that will be utilized by the school. No hard copy library resources were available. The hours of operation for the media room are not optimal if students do not have their own computer at home or accessibility elsewhere. | Criteria Not met |

Summary from Survey Visit:

Negative findings:

- Inadequate lighting and air conditioning in classroom and restroom.
- Handicapped bathroom not conveniently located for students and marked “Employees Only”
- No marked handicapped parking
- Media room hours are limited
- Uncertainty of library resources
AMI Building & Parking Lot
Hallway from lobby
Program Director office
CNA Classroom (can be used for VN students if needed)
Skills Lab Storage Closet
Designated VN Classroom
Breakroom/Multi-Purpose Room
Media Room
The door opens into the small room where the toilet room doors are located.
Handicap Bathroom
July 29, 2019

Ify Emenaha, RN, Pharm D
American Medical Institute
6902 Cook Rd., Building 2
Houston, Texas 77072

Dear Dr. Emenaha:

At the July 25-26, 2019 meeting, members of the Texas Board of Nursing discussed the American Medical Institute Proposal to Establish a Vocational Nursing Education Program in Houston, 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 DENY APPROVAL of the American Medical Institute Proposal to Establish a Vocational Nursing Education Program in Houston, Texas, and impose the conditions in the attached Board Order.

If you have further questions, please contact Board Staff at 512-305-6814 or 512-463-4631.

Sincerely,

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

Copy: Texas Workforce Commission
Commission of the Council on Occupational Education
BEFORE THE TEXAS BOARD OF NURSING

ORDER OF THE BOARD

In the Matter of
American Medical Institute
Vocational Nursing Education Program
In Houston, Texas

A public meeting of the Texas Board of Nursing, hereinafter referred to as the Board, was held on July 25, 2019, 333 Guadalupe Street, Tower II, Room 225, Austin, Texas, to consider the American Medical Institute Proposal to Establish a Vocational Nursing Education Program in Houston, Texas, based upon the review of the proposal and survey report, pursuant to Section 301.157, Texas Occupations Code and Tex. Admin. Code Chapter 214.

After review and due consideration of the filed materials, as well as the presentation by the representatives from American Medical Institute in Houston, Texas, and other interested parties, if any, the Board issues a DENIAL of the American Medical Institute Proposal to Establish a Vocational Nursing Education Program in Houston, Texas based upon the following findings:

- lack of clarity and consistency between course objectives and the conceptual framework;
- variation of information in syllabi about the length of courses;
- inconsistencies between course descriptions and content identified in syllabi;
- lack of information about assignments and grading criteria;
- lack of consistency in clinical objectives in clinical courses;
- lack of information related to the process for evaluating students in the clinical area;
- missing information required by Board rules in the handbooks;
- verification of contractual agreements indicated all are not valid contracts; and
- less than optimal learning environment due to inadequate lighting and air conditioning in classroom, handicapped restroom not readily accessible, lack of handicapped parking, limited hours for student access to media room, and lack of evidence that library resources are available.

The Board further imposes the following condition:

1. American Medical Institute in Houston, Texas, may not submit a new proposal to the Board until at least twelve (12) calendar months have elapsed from the date of denial.

Entered this 25th day of July, 2019

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