

**Proposal to Establish a New Nursing Education Program
Oxford Academy in San Antonio, Texas
Vocational Nursing Education Program**

Summary of Request:

Consider the Oxford Academy (OA) proposal to establish a new Vocational Nursing (VN) Education Program in San Antonio, Texas. The final proposal was provided electronically to members of the Texas Board of Nursing (Board).

Historical Perspective:

- OA is a new career school to the San Antonio, Texas, area established in 2019. Their intent is to provide education for preparation in vocational nursing (VN), certified nursing assistant (CNA), and medical assistant (MA) programs.
- The joint owners of OA, Dr. Ejike Asiegbunam and Franklin Okigbo, individually and collaboratively, have operated CNA programs, nursing programs, and NCLEX review courses in Florida; Washington, DC; Virginia; and Maryland. Their most successful initiatives have been with NCLEX review programs with reports of a high percentage of students passing the NCLEX examination following the review.
- OA is a private institution owned and governed by a Board of Directors, and approved by the Texas Workforce Commission. OA is operated by Knowledge First Institute which also owns Jay College of Health Sciences in Palm Bay, Florida, offering an Associate Degree Nursing (ADN) program and a Baccalaureate Degree in Nursing (BSN) program. The NCLEX pass rate for the ADN program has reportedly been very low (30.36% for 2019) and it has been noted that there has been a delay in students taking the NCLEX examination right away after graduation. In addition, Jay College indicated there have been inaccuracies in the names of students on the NCLEX Summary Report. An email from the Florida Board of Nursing verified there have been errors in the report that have not been corrected. The proposal reported that there have been no graduates from the BSN program.
- A description of program history is provided in the first person in the Administration and Organization section of the proposal and offers a first-hand explanation.
- The first OA proposal draft was received in the Board office on August 15, 2020, and had been prepared by a proposed director with assistance from a nurse educator who works as a program consultant. The original identified director resigned the position (for personal reasons) and OA conducted a search for another qualified nurse educator to continue the process. Kimberly MacNaughton, RN, BSN accepted the position in January 2021 and proceeded to review the proposal and make revisions. Board Staff (education consultants) conducted a conference call with Ms. MacNaughton on February 10, 2021, and an updated proposal was received in the Board office in April 2021.
- Board Staff held another consultation conference call with Ms. MacNaughton on April 27, 2021, to finalize comments and discuss clarification of areas in the proposal.

Summary of Proposal:

Overview of the Proposal:

- The proposed VN program is designed to be delivered in three 16-week semesters using face-to-face instruction for a 47-semester credit hour curriculum. The Monday-through-Friday program will require 496 contact hours in didactic content and 672 contact hours in clinical learning experiences.
- Following program approvals by the regulating agencies and the accreditation agency, the enrollment plan is to admit 30 students annually for the first two years and increase the number to 35 students annually for the next three years. The expected start date is August 2021.
- The program has secured commitments for clinical learning experiences in six affiliating agencies which will provide a variety of clinical settings with diverse patients and families. The facilities are named in the section on Clinical Learning Experiences.
- The CNA program may already be in operation at the San Antonio site when the VN program begins.

Rationale and Need for the Program:

- The rationale for the program is based upon:
 - the rapid growth in the population in the San Antonio area;
 - the inability of the current VN programs in San Antonio to accept all of the qualified applicants to their programs;
 - projections by TWC of an increased workforce demand for licensed vocational nurses (LVNs); and
 - the opportunity the program will offer students in a community where 64% of the population is Hispanic and will open the way for more diversity in nursing.
- Four of six surveyed health care settings indicated support for another VN program in the San Antonio area. The six settings estimated that the need for more LVNs will increase by 365 employment opportunities for LVNs in the next few years.

Administration and Organization:

- Ms. MacNaughton has 18 years of experience in nursing, 10 of which are in vocational nursing education. She completed the VN program at Schreiner University in 1978 and graduated from the San Antonio College ADN program in 2002. She earned a BSN from American Sentinel University in 2019, and is enrolled in a Master's Degree in Nursing program, also at American Sentinel University, with an expected graduation date in December 2021. She taught a broad array of didactic courses in the VN program at Schreiner University and provided instruction in nursing skills laboratories and clinical learning experiences at Schreiner. She also has years of practice experience in clinical settings including hospitals and school nursing.
- The Program Director will report directly to the school president, Franklin Okigbo, and her supervisory responsibilities will include overseeing the VN faculty and an Administrative Assistant.
- A financial audit of OA is included in the proposal as well as a program budget for the first two years of operation. OA has invested in remodeling and furnishing the campus space at 2727 NW Loop 410 Suite 104 in San Antonio.
- A letter of financial support for the VN Program from Franklin Okigbo is included in the proposal.

- The mission of the OA 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.”
- The mission is based on the following beliefs and philosophy:
 - Vocational nursing is a service discipline with its foundation in biological, physical, social, behavioral and nursing sciences.
 - Vocational nursing values integrity, human dignity and autonomy, accountability, ethical practice, safety and lifelong learning.
 - All patients deserve compassionate care recognizing the uniqueness of the individual in body, mind and spirit, the right to self-determination, and respect for the person.
 - The educational environment provides a spirit of inquiry, respects diverse views, develops clinical decision-making, and supports scholarly discussion and thoughts.
 - Students are active, eager participants in the learning process and faculty facilitate learning through their knowledge, coaching, and modeling of professional character.
 - Competency in vocational nursing practice is a product of knowledge base and use of evidence-based interventions, application of the nursing process, collaboration within the health care team, accountability, and lifelong learning.

Faculty:

- Initially, the instruction will be provided by four VN faculty including the Director who will teach one course each semester. One potential faculty member who has teaching experience has reviewed the curriculum plan for content validity and soundness.
- The ratio of faculty to students in the clinical area will be one faculty to eight or nine students.
- Nine highly-qualified candidates for faculty are identified in the proposal with their teaching and experiential backgrounds. Many of the potential faculty hold MSN degrees. As enrollment increases, additional faculty will be employed. Faculty will also be recruited through advertising and contacting professional organizations.
- The Faculty Handbook contains all required policies and processes (faculty workload, job descriptions, orientation and faculty development, by-laws, faculty evaluation, and use of preceptors). The Faculty Handbook also includes guidelines for teaching that will promote consistency in instruction and management of the teaching responsibilities.
- Part-time faculty will follow the processes and policies described in the Faculty Handbook.
- Because the faculty group will be small, three faculty committees are named: curriculum, faculty development, and admission and progression. The curriculum committee will have oversight over curriculum and the total evaluation plan. The faculty development committee will focus on faculty development and evaluation. The admissions and progression committee will make recommendations about admission, progression, and graduation decisions and policies.
- Faculty workload includes time for preparation and grading, contact with students in the classroom and labs, tutoring, office hours, and faculty meeting time.
- Faculty are expected to project a professional development plan each year based upon their individual needs. The proposed director is a member of the Texas Association of

Vocational Nursing Faculty and will attend their regular meetings and continuing education.

Students:

- The OA owners plan to lead the marketing activities, but the final admission decisions will be made by the Program Director.
- Student recruitment will include high school career fairs in the area and from qualified CNAs and Medical Assistants.
- A survey of potential CNA students indicated a strong interest in the VN program.
- The admission criteria include the candidate scores on the Assessment Technologies Institute (ATI) Test of Essential Academic Skills (TEAS) with a minimum total score in the “proficiency” or higher range. The program goal for retention of students is 75%.
- The Student Handbook includes required information about eligibility to take the NCLEX examination; admission, progression, withdrawal, and dismissal policies; grievance and appeals processes; transfer and mobility policies; and professional behavior.
- Nursing faculty will provide tutoring and advisement for students.
- The Student Handbook also describes the process for student input into program governance. Each student cohort will elect two student representatives to attend the monthly faculty meetings and provide student feedback.

Program of Study:

- The mission and philosophy include a foundation in the *Differentiated Essential Competencies* (DECs). The program outcomes are based upon the DECs and are appropriate for VN education:
 - The graduate will assist in determining the health status and health needs of patients, assist in the formulation of goals and a plan of care in collaboration with the patient and health care team, implement structured teaching plans, assist in evaluating the patient’s response to interventions, provide direct care to assigned patients using the problem-solving approach.
 - The graduate will collaborate with the patient and health care team to provide direct care, participate in the identification of patient needs for referrals, and assist in the coordination of resources for the provision of care.
 - The graduate will participate as an advocate for the patient, demonstrate accountability for his/her own nursing practice, and demonstrate involvement in the development and practice of vocational nursing standards.
 - The graduate will demonstrate knowledge of the Texas Nursing Practice Act, as well as national safety standards while implementing measures to promote quality and a safe environment for patients, self, and others.
 - The graduate will accept and make assignments, and supervise care provided by others while taking into consideration patient safety, patient or unit need, and the knowledge, skill and ability of their self and others.
- The curriculum is developed on three levels (one level each semester). Level objectives indicate ongoing progression in the competencies and roles of the RN students.
- The general education courses support the development of the nursing roles of the LVN.
- All required courses are taught during the 12-month period. No pre-requisite courses are required.
- Some courses are eight weeks long but most are 16 weeks long. A Monday through Friday schedule is planned with clinical experiences across the three semesters.

- The proposal describes where required concepts in Rule 214.9 are included in the instruction. All required content areas listed in Rule 214.9 are included in the curriculum.
- The sequence of nursing courses is designed for progression of knowledge and skills from simple to complex throughout the program.
- The program uses a ratio of one hour of theory to three hours of associated clinical for most clinical courses.

Clinical Learning Experiences:

- There are six signed clinical contracts with two others in process. Ms. MacNaughton is constantly seeking new clinical experiences for the students.
- OA has notified the existing four VN programs of their intent to begin a VN program. No comments were received by OA.
- Clinical areas will include smaller general acute hospitals, long-term acute care hospitals, long-term care facilities (nursing homes), birthing centers, and daycare centers.
- Most hospital administrators contacted were positive about OA students carrying out clinical learning experiences in their facilities since it allows them to consider the students for future employment.
- Clinical agreements have been signed with Sunrise Nursing and Rehabilitation, Stone Oak Care Center, Pecan Valley Rehabilitation and Healthcare, Birth Center Stone Oak, and The Kids Garden Learning Center. Other possible agreements include Texas Center for Infectious Disease Hospital and Southwest General Hospital.
- A clinical placement schedule for students is included in the proposal.
- Following each semester, an evaluation of the clinical sites will be conducted to determine their suitability for students to meet clinical objectives.
- Policies have been developed for using clinical preceptors although the use of preceptors is not planned initially.
- Tables 10 and 11 list the location of required content related to clinical practice outlined in Rule 214.10.

Facilities, Resources, and Services:

- The VN program will be located in a commercial building located just off the inner loop of San Antonio with a dedicated space of 6,970 square feet. The areas designated for VN education will easily accommodate up to 40 students.
- Three private offices will be ready for three nursing faculty, and the Program Director will also have a private office.
- A conference room and break room are included. The classroom for students is complete with a computer for each student. The skills lab is furnished with six hospital beds with necessary equipment for student practice.
- A small study room with a selection of references will provide students with a resource space. Wi-fi connection and a separate student break room are available.
- Two restrooms are on site, and the building is ADA compliant.
- At the time of this writing, interviews are being conducted for an administrative assistant for the VN program.
- Photographs of the setting are provided in the proposal and indicate the facility and resources are appropriate for the program to begin.
- Staff will include a Marketing/Admissions Officer, a Finance Officer, and an Information Technology Officer.

Records and Reports:

- A plan for providing a secure area for student and faculty records, and other official documents is in place.

Total Program Evaluation Plan:

- A Total Program Evaluation Plan has been developed.

Rationale for Recommendation:

Pros:

- The proposed Program Director is a seasoned educator in VN education, is known to clinical affiliating agencies in the area, and is enrolled in a MSN program. (One of the quality indicators for successful VN programs is for the director to have a graduate degree.)
- Available faculty have BSN and MSN degrees. (Another quality indicator for successful VN programs is for the faculty to hold at least a BSN degree.)

Con:

- All new programs are vulnerable since the curriculum and processes are new.
- The past history of other nursing programs operated by the owners have indicated poor NCLEX pass rates.

Staff Recommendation:

Move to grant initial approval to Oxford Academy to establish a new Vocational Nursing Education Program in San Antonio, Texas, and impose the condition and requirement in the attached letter and Board Order (See Attachment #1).

DRAFT LETTER

July 22, 2021

Dear Ms.

At the July 22, 2021, meeting, members of the Texas Board of Nursing discussed the Oxford Academy Proposal to Establish a New Vocational Nursing Education Program in San Antonio, Texas. The Board wishes to thank you, XXXXXXX, 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 Oxford Academy to establish a new Vocational Nursing Education Program in San Antonio, Texas, and impose the conditions and requirements 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 virginia.ayars@bon.texas.gov or 512-305-7660.

Sincerely,

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

Copy: Franklin Okigbo
Texas Workforce Commission

BEFORE THE TEXAS BOARD OF NURSING

ORDER OF THE BOARD

In the Matter of
Oxford Academy
Vocational Nursing Education Program
In San Antonio, Texas

A public meeting of the Texas Board of Nursing, hereinafter referred to as the Board, was held virtually on July 22, 2021, to consider the Oxford Academy proposal to establish a new Vocational Nursing Education Program in San Antonio, Texas, based upon the review of the proposal, 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 Oxford Academy in San Antonio, Texas, and other interested parties, if any, the Board hereby grants INITIAL APPROVAL of the Oxford Academy Vocational Nursing Education Program in San Antonio, Texas, and imposes the following conditions and requirements:

1. The program shall not admit more than one (1) cohort of thirty (30) students annually, to begin September 2021, for the first two years of operation. Beginning year three, the program shall admit one (1) cohort of thirty-five (35) students each year through year five.
2. Board Staff shall conduct a virtual survey visit when students are enrolled and classes are in session.

Entered this 22nd day of July, 2021

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