

**Proposal to Establish a New Nursing Education Program
Texas Health School in Houston, Texas
Licensed Vocational Nurse to Associate Degree Nursing Education Program**

Summary of Request:

Consider the Texas Health School (THS) proposal to establish a Licensed Vocational Nurse (LVN) to Associate Degree Nursing (ADN) Education Program in Houston, Texas. The final proposal was provided electronically to members of the Texas Board of Nursing (Board).

Historical Perspective:

- THS, a privately owned and operated educational entity, was established in Houston in 2002 to provide specialized training programs needed to address the increasing demand for skilled allied health professionals. THS began classes in 2003 at 10565 Katy Freeway (in West Houston on the I-10 Corridor), moved to 11211 Katy Freeway during the summer of 2004, and in 2019, relocated to a larger, modern facility located at 11511 Katy Freeway.
- Initially, the school offered the Nurse Aide, Medical Assistant, and Physical Therapy Assistant programs. In 2004 the Medication Aide Program was added and approval for the Massage Therapy Program was granted.
- A Vocational Nursing (VN) Education Program, on the same campus in Houston, has been implemented since 2016, with demonstrated program success on the NCLEX-PN® in the table below:

Year	2017	2018	2019	2020	2021
Pass Rate	100%	93.55%	86.49%	92.50%	87.88%
Candidates	10/10	29/31	32/37	37/40	29/33

- THS was awarded national accreditation on February 15, 2005, by the Council on Occupational Education (COE), a national accrediting agency recognized by the United States Department of Education. The next accreditation visit is scheduled for October 2022.
- THS is licensed by the Texas Workforce Commission (TWC), Career Schools and Colleges. The TWC representative informed THS that the current Certificate of Approval is valid until the renewal application is finalized. The last communication with TWC was September 8, 2022.
- THS was issued a certificate of authorization to grant associate degrees from the Texas Higher Education Coordinating Board on May 23, 2022.

- The rationale for the program focuses on the projection for a significant shortfall in the supply of Registered Nurses (RNs) in the Houston area over the next decade due to the following:
 - increased healthcare demands related to chronic conditions of the baby boomer population;
 - emphasis on preventive health care;
 - new job opportunities for RNs in long-term care facilities, outpatient care centers, and home care;
 - trends in RN retirements and exit from the RN workforce of many currently employed RNs;
 - unfilled RN positions; and
 - limited seats in existing RN programs in the target geographic area.

- The LVN-to-ADN Program curriculum is the first professional nursing education program for THS. The proposal describes that, based on the VN programs history, the new ADN Program is designed for the same level of success that will benefit the graduates, the employers, and the community-at-large.

- The first draft of the proposal was received in the Board office on February 25, 2022 and reviewed by Board Staff. After a comprehensive evaluation of the final draft in August 2022, the proposal was deemed complete.

Summary of Proposal:

Overview of the Proposal:

- THS proposes to establish a new LVN-to-ADN Education Program in Houston, Texas, with an initial enrollment of 30 students in February 2023. The proposal describes that an enrollment is planned for 30 students each year for the first two cohorts (2023 – 2024 and 2024 – 2025). Assuming the first time NCLEX-RN® pass rate for the first two cohorts meets the 80% benchmark, the program plans to seek approval to admit two cohorts per year of 30 students beginning in 2025 – 2026.

- The LVN-to-ADN Program is 16 months in length consisting of eight sessions lasting eight weeks each for a total of 60 semester credit hours (SCH). There are 21 SCH of general education courses and 39 SCH of RN level courses. The program will accept general education (GE) transfer credits. Science courses cannot be more than five years old and other courses cannot be more than seven years old. GE courses will be delivered online except for science laboratories. Nursing courses will be delivered in-person.

- The mission of the THS LVN-to-ADN Program is to provide quality education to a diverse student population necessary to contribute to the nursing profession through development of competent, safe, and caring RNs. The curriculum of the LVN-to-ADN Program will expand students' competence as LVNs by emphasizing knowledge, skills, and aptitudes necessary to make appropriate clinical judgments consistent with the RN scope of practice in a variety of clinical settings. Graduates will be committed to life-long learning, using reflection and self-evaluation to continue their professional development.

Rationale and Need for the Program:

- The proposed LVN-to-ADN Program will be located at 11511 Katy Freeway, Suite 200, Houston, TX 77079. There are 12 LVN-to-ADN programs and two generic ADN programs in Harris County and adjacent counties. In the 2019-2020 academic year, these 14 programs rejected approximately 2,955 qualified applicants. Data for 2020-2021, RN program student admissions in the Houston area, indicates that over 4,000 qualified applicants were unable to continue their education toward licensure as an RN.
- The Houston-Woodlands Consolidated Metropolitan Statistical Area (CMSA) has a population of 7,195,656, making it the ninth largest urban area in the country and the second largest in Texas. Most of the Houston-Woodlands CMSA is located within Harris County which, along with surrounding counties, experienced a 16.36% growth rate since 2010.
- The ethnicity of RNs and LVNs licensed in Texas does not accurately reflect the population in the Houston-Woodlands CMSA, the area surrounding Texas Health School. Since THS recruits and admits a significant number of minority students, expanding the opportunities for career mobility for these students will help to address the limited diversity of RNs in the area.
- There has been severe burnout sensed by caregivers during COVID-19 resulting in many nurse resignations and retirements. It is uncertain how many nurses will continue to work or return after the pandemic has subsided, but data indicates an ongoing shortage for the foreseeable future. The THS LVN-to-ADN program can help to address this problem in Houston and beyond.
- THS surveyed potential employers to obtain information related to expected ADN-educated RN hirings in the next year and five years. The data indicates that an average of 22 new RN positions will be open in the next year and 170 ADN-educated RN open positions over the next five years. The data represents nine facilities that have historically supported the THS VN program.
- With the aging population, the increasing population within Harris County, and the complex, life threatening needs of patients, there is an increasing need for RNs within the area. The overview of the health care needs of the population in Houston, particularly in the Houston-Woodlands CMSA, illustrates the extent of the unmet needs in the area. These health needs will be integrated into the proposed LVN-to-ADN Program curriculum.
- Data were obtained through a survey of current THS VN students and past graduates as well as those who contacted the school to inquire about the VN program to determine the interest in an LVN-to-ADN Program. Seventy-nine percent of the respondents indicated that they were either an LVN or were currently attending a VN program and were interested in a THS LVN-to-ADN program.
- The THS proposal includes seven letters of support from members of the community and potential employers.

Administration and Organization:

- The proposal states that the main goals of the school are to:
 - provide an education that will prepare the student to become a productive member of the community, as well as increasing his/her employment potential;
 - offer quality instruction by employing instructors and administrators who are experienced in their specialized fields and provide facilities and resources that promote educational growth;
 - assist students in developing self-discipline, skills, and attitudes that will motivate the student to allow him/her to achieve full potential for success in their career; and
 - provide competent, responsible support staff needed to help meet the employment demands of the local business and industry job market.
- A letter from the THS President approved the establishment of the ADN Program in Houston, Texas, and is included in the proposal. The president is responsible for overseeing the campus business including provision and allocation of financial resources.
- The Campus Director manages day-to-day operations of the school. He collaborates with the Dean of Nursing and the program coordinators to assist with hiring qualified faculty, to provide oversight of faculty development, and to coordinate regulatory reports and activities required by accrediting and regulatory bodies.
- Tuition for the program is fixed so this income will sustain the program from the beginning. The proposal presents a detailed budget for the first two years of operation and includes funds allocated to director and faculty salaries, classroom and skills laboratory equipment, media and instructor resources, supplies, student library resources, etc. The proposal presents audited financials for THS fiscal year ending October 31, 2020.
- Pamela Keys, DNP, MSN, RN, the Dean of Nursing and proposed ADN Program Director, is an accomplished nurse educator, having served in a variety of nursing education and administrator roles. Dr. Keys has over 30 years of experience as a Registered Nurse with more than 23 of these years in nursing education.

Faculty:

- Two qualified full-time faculty, currently teaching in the VN program, have agreed to teach in the THS LVN-to-ADN program. Both faculty members are masters prepared in nursing education and have experience teaching in ADN programs. The faculty transition to the LVN-to-ADN will not impact the VN program as both faculty members would have taught their assigned courses in the VN program by the third quarter of 2022. Additional faculty have been hired to teach in the VN program.
- The proposal indicates that one qualified clinical adjunct faculty will be recruited and hired, prior to session four, to assist full-time faculty with teaching nursing skills laboratories, simulation, and hands-on clinical experiences. Three qualified instructors have agreed to serve as general education course faculty. Contracts will be procured once the LVN to ADN program is approved.

- A structured onboarding for new faculty is detailed in the Faculty Handbook as well as a description of individualized faculty development plans and faculty support/training. The proposal indicates that these will be helpful in preventing faculty turnover and enhance student learning experiences within the LVN-to-ADN Program.
- The THS Faculty Handbook includes all elements required in Board Rule 215.7, including:
 - policies and procedures of faculty organization;
 - job descriptions;
 - workload policies;
 - faculty evaluation tool; and
 - policies for part-time faculty and preceptors.
- The committee structure at THS has been designed so that all faculty are involved in committees including Curriculum, Student Affairs, Evaluation, and Faculty Affairs. These committees will address policies and procedures, student progression, probation, dismissal, curriculum review and revision, total plan of evaluation and other associated matters.

Students:

- The plan for recruitment of students includes media advertisements, contacting former and current students, and referrals from health care agencies. Marketing will be targeted to attract a larger, diverse, student population, which includes first time college students and non-traditional adult learner students. The potential student pool will be generated through the school's consumer database, entrance exam test-taker lists, institutional inquiry leads, and current students.
- The THS LVN-to-ADN proposal clearly outlines a rigorous student selection process for admissions. The school applicant ranking system for qualified candidates will be based on previous academic history, entrance examination scores, letters of recommendations, program readiness, and interview scores. The top-ranking applicants will be offered admission to the LVN-to-ADN program.
- The Student Handbook (SHB) contains all elements required in Board rules including:
 - clearly defined admission, progression, dismissal, withdrawal, readmission, and graduation policies;
 - the criminal background check requirement and process;
 - pre-entrance exams and required scores;
 - withdrawal, reinstatement, and dismissal policies;
 - processes for student mobility/ transfer/ articulation;
 - grading policies (passing standard of 75%) including remediation;
 - evaluation of teaching effectiveness;
 - financial aid information;
 - other policies, including non-discrimination, remediation, complaints, grievances, appeal process, attendance/absences policy, and holiday/vacation days;
 - Student input into development of academic policies and procedures and curriculum planning.
 - form for students to sign upon receipt of the SHB; and
 - a Board licensure eligibility form to review and sign.

Program of Study:

- The mission of the THS LVN-to-ADN Program builds upon the school's mission that is to deliver quality education to a diverse student population so they may contribute to professional nursing through competent, safe, and empathetic patient care. The curriculum will expand the LVN's competency by emphasizing knowledge, skills, and abilities that are essential to make appropriate clinical judgments consistent with the RN scope of practice in a variety of clinical settings. Graduates should be committed to life-long learning by utilizing reflection and self-evaluation for further professional development.
- The philosophy of THS flows from the mission of the school and supports the concepts of nursing care, patient centered care, health and wellness, environment, nursing process, clinical judgment, the teaching-learning process, professional values, and social justice.
- The THS LVN-to-ADN program faculty consider that the entry-level, associate degree RN, should use biological, physical, and technical sciences, as well as psychological, sociological, and spiritual factors to provide safe and effective care. The novice associate degree prepared RN provides direct patient care and/or coordinated care for patients in various health care settings with predictable and unpredictable needs .
- THS's four main nursing roles (Member of the Profession, Provider of Patient-Centered Care, Patient safety Advocate, and Member of the Health Care Team) are taken directly from the Board's Differentiated Essential Competencies (DECs) and are incorporated throughout the curriculum.
- The THS LVN-to-ADN program is a 16-month course of study, composed of eight sessions lasting eight weeks each for a total of 60 semester credit hours (SCH), 21 SCH of general education courses and 39 SCH of RN level courses. Nursing courses include all Board required content areas. Actions that allow students to use learned knowledge, skills, and abilities to make appropriate clinical judgments are threaded throughout the program. The nursing curriculum follows a linear progression making each session a prerequisite to the next.
- The THS faculty will bring clinical to the classroom through active learning opportunities in class, skills laboratory, and simulation laboratory. The program will offer a hybrid delivery model. The general education courses will be offered online and the nursing courses will be face-to-face with designated learning activities offered remotely.
- THS has established an Articulation Agreement with Grand Canyon University (GCU) in Phoenix, Arizona, that will allow the LVN-to-ADN to pursue a Bachelor of Science in Nursing (BSN) degree. Graduates will be able to transfer the 60 SCH earned at THS to the BSN program at GCU. The procurement of additional Articulation Agreements with two other universities are in progress.

Clinical Learning Experiences:

- The THS LVN-to-ADN Program has a system-wide clinical contract with the Memorial Hermann Health System. Additional clinical contracts include Kindred Hospital-Houston Northwest; Tuscan Village, Pearland; Huntsville Healthcare Center; East View Healthcare, Houston; Misty Willow Healthcare and Rehab Center, Houston; Cambridge Health & Rehab Center, Richmond; The Phoenix Post-Acute, Texas City; and Oceans Behavioral Hospital, Katy.

- THS plans to collaborate with area nursing programs to ensure a positive working relationship related to common clinical sites. Clinical days are procured for Wednesdays and Thursdays beginning October 2023 and beyond from Kindred Healthcare (Northwest) which does not interfere with other nursing program's clinical days. Further, clinical rotations will be coordinated with other clinical sites and schools to assure there is no conflict with other nursing programs.
- The Affiliation agreements are with facilities that will provide a wide variety of hands-on patient care experiences in acute care, rehabilitation, skilled nursing, long term care, long term acute care, mental health, and geriatrics. At least three clinical sites will be utilized at any given time which will allow the program to remain within the faculty to student ratio required by Board rule.
- The number of clinical contact hours is 384 which will allow students adequate time to apply didactic content to patient care situations as a novice RN. The faculty led post clinical conferences held at the end of each clinical day provide an opportunity for students to reflect on their use of effective clinical judgment as an RN.
- THS will not utilize preceptors for the LVN-to-ADN Program. Faculty will be on site at each clinical location to provide students with a variety of learning experiences that will allow students to meet the clinical learning objectives. The faculty are responsible for evaluating students in the clinical setting. Each student receives a formative and a summative clinical evaluation during each clinical course.
- The Dean of Nursing and faculty are responsible for selecting and evaluating the clinical settings. Students also evaluate the clinical experience and the clinical faculty after each clinical course.

Facilities, Resources, and Services:

- THS has ample classroom and lab space available in a modern office building. The school occupies approximately 12,000 sq. ft. on the second floor of the of building. There is additional space available for future expansion of the nursing programs.
- The facilities include two computer labs, one with 11 computers and one with 30 computers. The large computer laboratory is also used as a classroom as well as two classrooms with a capacity of 20 students each. There is an abundance of storage areas to accommodate supplies and records.
- Two nursing skills laboratories also serve as classrooms, one lab accommodating 15 students and one that holds at least 30 students. The large laboratory has three hospital beds and equipment, low fidelity manikins, table, chairs, sinks and ample storage for supplies and equipment. The smaller skills laboratory contains simulation equipment including mid and high fidelity, three hospital beds, medical equipment and resources for faculty and student utilization.
- The Dean of Nursing and the Program Coordinator/Lead Faculty have private offices in the administrative office suite area. There are five faculty workstations near the classrooms, with all necessary equipment and supplies, that are separated by partitions. A private conference room is available adjacent to the faculty area that may be used for confidential student counseling.

- The campus has an admissions/recruitment department, financial aid office, campus registrar, and career services/placement department. Faculty provide student counseling, remediation, and academic advising.
- The school has plans to develop an Academic Success Resource Center (ASRC). The ASRC will provide opportunities for students to enhance their critical thinking, communication, collaboration, and self-reflection skills.
- There is one full-time administrative assistant who provides support for the LVN-to-ADN and the VN programs and reports to the Dean of Nursing.
- THS will utilize a commercial grade learning management system, CANVAS, with professional hosting abilities, to offer the online component of the LVN-to-ADN Program. Students may use resources at the campus to support the online component of learning.
- The Dean of Nursing, in close partnership with the Campus Director, will be responsible for administering the delivery of the distance education component of the program. The Dean of Nursing works on-site and regularly interacts with students and faculty engaged in distance education and is responsible for the evaluation of the effectiveness of faculty in the distance education environment.
- The THS library offers both digital and print resources. Internet access is available throughout the school. The Houston Public Library (HPL) will provide additional library services and is currently used for the VN program. HPL has complete online databases with a vast collection of printed materials as well as audiovisual and microform formats. The library's digital catalog specific to nursing aligns with nursing/allied health resources, EBSCO host, Academic Search Premier, GALE/Health and Medicine, Medline, and Nursing Academic Edition.
- A Simulation Learning System for Nursing will also serve as a resource. The system provides additional clinical search engines so students may obtain clinical concepts, knowledge and nursing information while learning new skills, procedures and understanding research. Nursing and medical websites incorporated into this system are numerous for student support.
- Board Staff reviewed a video of the program site.

Records and Reports:

- THS has a written Policy on Records Retention & Destruction. THS has a locked storage room with locked file cabinets for storage of student records, financial aid files, administrative records, and faculty files. The school will maintain student records under lock and key in the office of the Registrar, in compliance with the Family Educational Rights and Privacy Act or FERPA. The policy is specific to student admission records and student academic records. Student admission records including transcripts are kept permanently

Total Program Evaluation Plan:

- The Total Program Evaluation (TPE) has been developed to periodically review the critical elements of the THS LVN-to-ADN nursing program as required by Board rule. The program evaluation is arranged to include criteria, data collection method, responsible person, frequency of data collection, indicator of achievement, findings, actions, and evaluation.
- The Dean of Nursing and the faculty will meet at least quarterly to review and discuss the TPE. The evaluation will be led by the Dean. Actions and rationales will be documented on the TPE as well as meeting minutes.

Rationale for Recommendation:

Pros:

- Pamela Keys, DNP, MSN, RN, the proposed LVN-to-ADN Program Director and Dean of Nursing, meets all requirements of Board Rule 215.6 to assume the leadership position. Dr. Keys is an accomplished professional nurse, nurse educator, and nursing education administrator.
- THS has a proven successful Vocational Nursing Education Program as well as other health care professions programs.
- Appropriate clinical learning experiences for ADN students have been secured.
- The administration has committed appropriate resources to the implementation of this new program.

Cons:

- THS is not experienced in providing professional level nursing education.

Staff Recommendation:

Move to grant initial approval to Texas Health School to establish a new LVN-to-ADN Education Program in Houston, Texas, and impose the conditions and requirements in the attached letter and Board Order (See Attachment #1).

DRAFT LETTER

October 20, 2022

Pamela Keys, DNP, MSN, RN
Dean of Nursing, LVN to ADN Program
Texas Health School
11511 Katy Freeway, Suite 200
Houston, Texas 77079

Dear Dr. Keys:

At the October 20, 2022, meeting, members of the Texas Board of Nursing discussed the Texas Health School Proposal to Establish a New Licensed Vocational Nurse to Associate Degree Nursing Education Program in Houston, Texas. The Board wishes to thank you and 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 Texas Health School to establish a new Licensed Vocational Nurse to Associate Degree Nursing Education Program in Houston, 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 beverly.skloss@bon.texas.gov or 512-318-3219.

Sincerely,

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

Copy: David Hawk, CEO & President, Texas Health School
Texas Workforce Commission
Texas Higher Education Coordinating Board
Council on Occupational Education

BEFORE THE TEXAS BOARD OF NURSING

ORDER OF THE BOARD

In the Matter of
Texas Health School
Licensed Vocational Nurse to Associate Degree Nursing Education Program
In Houston, Texas

A public meeting of the Texas Board of Nursing, hereinafter referred to as the Board, was held on October 20, 2022, 333 Guadalupe, Tower III, Room 100, Austin, Texas, to consider the Texas Health School proposal to establish a new Licensed Vocational Nurse to Associate Degree Nursing Education Program in Houston, Texas, based upon the review of the proposal, pursuant to Section 301.157, Texas Occupations Code and 22 Tex. Admin. Code Chapter 215.

After review and due consideration of the filed materials, as well as the presentation by the representatives from Texas Health School in Houston, Texas, and other interested parties, if any, the Board hereby grants INITIAL APPROVAL of the Texas Health School Licensed Vocational Nurse to Associate Degree Nursing Education Program in Houston, Texas, and imposes the following conditions and requirements:

1. The program shall not admit more than 30 students in the initial admission cohort in February 2023 and a second admission cohort of no more than 30 students in May 2024, until the program achieves the status of Full Approval.
2. Board Staff shall conduct a virtual survey visit when students are enrolled and classes are in session.

Entered this 20th day of October 2022

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