

**Proposal to Establish a New Nursing Education Program  
Institute of Allied Healthcare in San Antonio, Texas  
Vocational Nursing Education Program**

**Summary of Request:**

Consider The Institute of Allied Healthcare (IOAH) 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:**

- IOAH, a privately owned and operated educational entity, was established in 2016. All IOAH programs are approved by the Texas Workforce Commission, Career Schools and Colleges Sections (TWC) through February 4, 2023. The school has been nationally accredited by the Council on Occupational Education (COE) since 2020; the COE accreditation expires June 30, 2026. IOAH currently offers Certified Nursing Assistant (CNA) and Medical Assistant (MA) Programs.
- The proposal explains that, based on expressed interest from graduates of IOAH's CNA and MA Programs recent survey outcomes, and increased local hiring needs for Licensed Vocational Nurses (LVNs), IOAH's administration determined the launch of a new VN Program would meet multiple needs in the San Antonio community.
- IOAH first submitted a proposal to establish a VN Education Program to the Board in November 2020. Multiple communications between Board Staff and the proposal author occurred to discuss findings of Board Staff's review of the second and third versions. Resultantly, the proposal was withdrawn on October 15, 2021.
- At this point, there was a change in direction with a new Program Director assigned and the program submitted a new proposal and application fee received in the Board office on April 4, 2022. After a comprehensive evaluation of the revised proposal by Board Staff, the proposal was deemed complete in Fall 2022. The program carried out an extensive build-out project to ready the physical facilities.

**Summary of Proposal:**

Overview of the Proposal:

- IOAH proposes to establish a new VN Education Program in San Antonio, Texas, with an initial enrollment of 30 students for the first year. The plan is to continue to enroll 30 students in one cohort annually for the first four years of operation and increase to 30 students per cohort in two cohorts annually for year five.
- The need for the program is based primarily upon the population growth in the San Antonio area and a projected need for more local nurses in the future.

- The curriculum has a total of 560 clock hours for didactic instruction, 190 hours for lab instruction, and 480 hours for clinical learning experiences to equal a total of 1230 clock hours. The 12-month program of study is delivered in four 12-14-week terms, with a one week break after each term.
- The one-year program is designed to be delivered through face-to-face courses. Nursing skills laboratory instruction, as well as faculty supervised clinical learning experiences in a variety of health care settings, will be offered.
- Clinical learning experiences will be offered in healthcare facilities in the San Antonio area. Clinical affiliations include: Super Hero Kids Home Health, Generous HCM, Memory Care of Westover Hills, TruCare Living Center, Medina Valley Health & Rehab Center, San Pedro Manor, Wellmed Medical Group, Stone Oak Care Center, and Catholic Charities Archdiocese of San Antonio.

#### Rationale and Need for the Program:

- The proposed VN Program will be an expansion of the IOAH Programs located in San Antonio, Texas. IOAH currently operates CNA and MA Programs at the main campus, 7614 Louis Pasteur, Suite 402, San Antonio, Texas.
- The IOAH VN Program will be housed at the main campus located in the South Texas Medical Center (STMC). The center is a 900-acre campus comprised of 75 medically related institutions, more than 45 clinics, 12 major hospitals, one higher education institution, and countless small practices, offices, and non-medical businesses.
- The proposal states that an increasing number of older citizens, the development of additional medical facilities, and the increased demand for LVNs provide the perfect opportunity for an additional VN Program within the STMC community. The center has an established plan for expansion of the total 900 acres, in that 280 undeveloped acres and several existing areas are slated for reconfiguration.
- Letters of support from community leaders in the San Antonio area are provided in the proposal and document local support for the proposed VN Program.
- The proposal sets forth that the following five VN Programs are located within a 30-mile geographic area of the IOAH campus: U.S. Army Practical Nurse Program, Baptist Health System School of Health Professions, Galen College of Nursing, Lamson Institute, and St. Philip's College. The proposal describes a high number of annual enrollments for a majority of the nursing programs, but the data also reveal the number of graduates is almost less than half of the program enrollments. The goal of the IOAH VN Program is to offer a program of study to fully support students throughout the educational process and to ensure student retention and graduation.
- The IOAH VN Program conducted surveys online as well as by telephone to determine potential employment opportunities for graduates. Nineteen online surveys were completed and results indicated all of the health care facilities have a need for VN Program graduates. In addition, 14 respondents stated they would be willing to serve as clinical sites for IOAH VN students. Since the survey was distributed early during the COVID-19

global pandemic, follow-up communications demonstrated there is more clinical availability for students than initially indicated.

- Data obtained through an IOAH online and hard copy survey of 275 current and former students from the IOAH CNA and MA Programs revealed the respondents' high levels of interest in attending an IOAH VN Program.

#### Administration and Organization:

- IOAH was founded in October 2015 in San Antonio, Texas, by siblings Nestor and Leah Lopez. Mr. Nestor Lopez, IOAH CEO and School Director, began his career as a pre-med student at The University of Texas at San Antonio. Ms. Leah Lopez, LVN, has served as a CNA and worked in long-term care facilities, pediatric nursing settings, and as a Clinical Instructor. Mrs. Lopez is also an American Heart Association Basic Life Support Certified Instructor.
- Mr. Nestor Lopez and Ms. Leah Lopez decided to establish IOAH to offer the community an affordable educational route that would lead to fulfilling the community's need for more CNAs in local healthcare settings. The main objective has been to provide career-focused education in allied healthcare fields. In November 2015, the CNA Program was approved by the Department of Aging and Disability Services (DADS) and became the first program offered at IOAH. After recognizing the need for additional MAs in the community, the MA Program was founded, and was approved by TWC in October 2016. IOAH's location in the STMC provides convenient access to a wide variety of clinical learning experiences for prospective VN Program students.
- The proposal states the mission of IOAH is "to offer students quality instructional opportunities in career orientated programs and to successfully prepare students for post-secondary education in preparation for their future careers". This aligns with the IOAH VN Program mission statement: "to prepare caring, innovative nurses who are leaders in addressing the evolving healthcare needs of all people and in advancing the profession of nursing". Further, IOAH has established a community advisory board specifically to offer guidance for the VN Program.
- The proposal provides a detailed budget for the first two years of operation. Identified items are the Program Director's salary, faculty salaries, the administrative assistant's salary, library resources, technical and laboratory equipment, durable and non-durable equipment, computer and office holdings, and nursing skills lab and simulation lab holdings.
- IOAH has the full approval of the school administration to establish a VN Program, as the owner provided 100% of the financial support and resources needed to establish the proposed VN Program. An initial budget of \$100,000 was approved to purchase equipment and supplies for the program and nursing lab. To date, \$100,000 has been spent in support of the proposed program. Funds were utilized to update internet access to high speed as well as to purchase additional Personal Protective Equipment (PPE) and supplies to assist in requirements for the COVID-19 pandemic guidelines.

- The IOAH Organizational Chart indicates the school is overseen by the Chief Executive Officer/School Director. The daily operation and management of the VN Program is the responsibility of the VN Program Director. Faculty and the Clinical Coordinator/Lab Assistant report directly to the Program Director.
- Barbara Scanlon, MSN, RN, the proposed IOAH VN Program Director, is an accomplished nurse educator, with more than 40 years of professional nursing experience, including 31 years dedicated to nursing education. Ms. Scanlon served as an Assistant Professor in a New Jersey Nurse Midwifery Program from 1991 through 2003. In addition, Ms. Scanlon directed two Texas nursing education programs that offered both Associate Degree and Vocational Nursing Programs.

#### Faculty:

- Faculty will be onboarded as the academic start date nears, pending the approval by the Board. The number of clinical and didactic faculty will be dependent on the number of enrollments of the first class. The number of clinical sites will also factor in the determination of additional faculty needed as the 1:10 ratio in the clinical setting is required for operation. When the first year of program operation is completed the number of faculty will be revisited.
- Five prospective faculty members are identified in the proposal. They are veteran nurse educators with teaching experiences ranging from eight to 15 years. The proposed faculty members' nursing practice experience in one or more nursing specialty areas will determine their teaching assignments.
- The initial faculty candidate interview will be conducted by the Program Director and will be followed by a group interview with the Program Director, faculty members, and the School Director. An official offer of employment will be extended after completion of the screening and verification process. Following a probationary period of six weeks, an evaluation of the faculty member's performance will be provided. Thereafter, the performance appraisal will be conducted annually.
- The VN Program Faculty Handbook describes that the nursing faculty believe nursing is a practice profession with a dedicated body of knowledge and outcomes. Nursing practice is embraced through education as holistic, caring in nature, incorporating and supporting lifelong learning.
- Full-time nursing faculty will be expected to maintain 40 contact hours per week plus any additional time as necessary to accomplish the basic function/purpose. Faculty are to develop, implement, and evaluate the nursing program on an ongoing basis. Faculty will: participate in the selection of students, advise students, select textbooks, teach in the classroom and clinical settings, evaluate student achievement, and perform other duties as assigned.
- Nursing faculty will serve as members of the Curriculum Committee, participate in the Nursing Program Faculty Committee, and serve as members of the Nursing Program Advisory Committee.

- The Faculty Handbook provides the Orientation Plan for new faculty as well as extensive information about Peer Review: Incident-Based or Safe Harbor.
- The IOAH VN Program offers faculty the following professional development activities: Master Teacher Development Series through Elsevier, Texas Association of Vocational Nurse Educators or TAVNE membership, and NurseTim. In addition, full-time faculty will be able to attend one conference per year, funded by IOAH. Monthly faculty development activities will be offered to all full-time and adjunct faculty.

#### Students:

- It is anticipated that the initial cohort will be primarily comprised of graduates of the IOAH CNA and MA Program who have work experience in the healthcare field. These graduates have expressed interest in completing the IOAH VN Program.
- The initial cohort will be comprised of 30 students. The plan to enroll 30 students per year will continue through the fourth year of operation. Beginning year five, two cohorts of 30 students each cohort per year will be enrolled.
- The VN Program Director's student recruitment plans include: collaboration within the community, knowledgeable on-site program advisors, media advertising, and marketing with former alumni.
- Admission criteria requires that applicants be high school graduates or have obtained a General Educational Development or GED certificate; achieved a score of 70% on the Test of Essential Academic Skills or TEAS proficiency examination; and successfully completed a pre-admission interview and the Board's Criminal Background Check.
- Applicants must provide a Blue Card prior to admission to the VN Program for the first two years of program operation. After the second year, applicants with a Board-issued Operations Outcome Letter will be evaluated for admission on an individual basis. For the initial cohort, applicants requiring a Declaratory Letter will not be admitted.
- The IOAH VN Program will instruct students about and operate in alignment with Board Rule 213.27-217.30 Good Professional Character.
- The IOAH VN Program Student Handbook contains all the required elements of Board Rule 214.8 Students. A signed receipt form for the Board's Declaratory Order information to document students were provided information about the Board's eligibility for licensure process is provided.

#### Program of Study:

- The mission of the IOAH VN Program is to prepare caring, innovative, vocational nurses who are leaders in addressing the evolving healthcare needs of all people and in advancing the profession of nursing. The vision is to produce the next generation of nursing leaders empowered and focused on innovative responses to address the challenges of a rapidly changing and culturally diverse healthcare environment.

- Core values to be implemented throughout the program of study include: empathy and caring, psychomotor skills, applied therapeutics, communication, ethical and legal considerations, critical thinking, professionalism, and teaching.
- The VN Program will utilize a systematic approach to teach clinical decision-making in the nursing process in order to develop nursing competency, a complex integration of knowledge including professional judgment, skills, values, and attitudes. This is to prepare graduates for their careers as practicing nurses who must apply their acquired knowledge, skills, and abilities to each situation and to be able to adapt the knowledge and skills in dynamic circumstances.
- Instructional strategies include interactive educational methods: lectures, small group work, virtual simulation, flipped classroom, presentations, and writing/research assignments. These formats should provide an environment in which the learner is an active participant and learners will be able to refine their evidence-based practice knowledge and skills.
- Curriculum content areas include Medical/Surgical Nursing that incorporates Geriatric Nursing, Maternal/Child Nursing, Pediatric Nursing, and Mental Health. The curriculum includes the professional values of ethics, safety, diversity, confidentiality, standards for nursing practice, and the Differentiated Essential Competencies or DEC's. In addition, the following concepts of nursing practice are incorporated: promotion, prevention, rehabilitation, maintenance, restoration of health, palliative and end-of-life care, and care for individuals of all ages across the life span.
- Assessment Technologies Institute (ATI) products, an assessment-driven review program, will be used by the IOAH VN Program to lower program attrition and increase student pass rates on the NCLEX. The ATI Comprehensive Program will be utilized throughout the students' enrollment in the IOAH VN Program; however, the ATI Comprehensive Program will not be used as high stakes testing. Students will not fail a class nor be denied progression based solely on an ATI test score.
- The proposal presents a detailed calendar for the initial class to be admitted in January 2023 and scheduled to graduate in January 2024.
- The nursing courses are sequential, and the successful completion of each course is a prerequisite for admission to the next level or successive course. Nursing courses may be repeated once.
- The IOAH VN Program utilizes formative assessments as well as summative assessments in didactic and clinical courses. Formative assessments include the use of online quizzes, concept maps, and student feedback. Formative assessments are used in the clinical setting to help promote students' clinical reasoning skills. The summative assessments are comprised of unit exams, projects, and term papers. Clinical assessment tools include a self-evaluation for students as well as the instructor's evaluation.
- Assessment of student learning is clearly articulated in each course syllabus. Didactic courses utilize quizzes, exams, ATI Practice Assessment and Proctored Assessments, papers, and/or projects (individual and/or group). The skills classes are evaluated through

lab performance utilizing knowledge learned in didactic class and the associated skills through simulation to promote critical thinking and clinical judgement. Each didactic exam has NCLEX style questions that are comprised of equal numbers of questions that are categorized as follows: knowledge-based, application, analysis, and evaluation.

- As a part of the clinical experience, pre and post conferences will be utilized. A preconference consists of group discussions and planning sessions prior to a clinical learning experience. Assignments given to the students allow them an opportunity to prepare in advance through reading and critical thinking. The student can come to the clinical with a nursing care plan ready to adapt to the assigned patient that the student will provide care for that day. They can then discuss their plans with the instructor and the instructor can assist them in the application of knowledge to real life situations. After the discussion portion of the preconference the student can review the patient's chart to obtain additional information.
- The post conference experience is used for students to share their experiences and knowledge they gained during the clinical learning assignment. The clinical instructors guide the discussion, encourage critical thinking, and assist students in developing problem-solving skills.
- Labs, simulation, computer, and hands-on patient care experiences are included in the instructional strategies. The IOAH VN Program includes the following interactive educational methods: lectures, small group work, virtual simulation, flipped classroom, presentations, and writing/research assignments.
- The curriculum has a total of 560 clock hours for didactic instruction, 190 hours for lab instruction, and 480 hours for clinical learning experiences to equal a total of 1230 clock hours. The 12-month program of study is delivered in four 12-14-week terms, with a one week break after each term.
- The first term contains five courses; the second term contains five courses; the third term is made up of four courses; the fourth term includes three courses to total 17 VN Program courses. The passing standard is identified as a "C" (75% minimum). No rounding of percentages will occur.

#### Clinical Learning Experiences:

- The proposed IOAH VN Program is located in a heavily populated area in San Antonio. The VN Program will be prudent in that the program does not plan to exceed an enrollment of one cohort of 30 students annually. This enrollment plan was developed in an effort to not stress the availability of clinical learning experiences.
- Prior to placing students in a clinical learning setting, an assessment of the appropriateness of the clinical site will be conducted. Primarily, the appropriateness of the site needs to be evaluated. The following questions must be considered:
  - How will the learning objectives be achieved during the clinical learning experiences?

- Will the experiences be supervised by nursing faculty or will they be overseen by a preceptor?
- What is the faculty member's experience/competency in this clinical setting?
- Clinical experiences for VN students will be designed according to the legal scope of practice of the LVN. Prior to engaging in hands-on clinical learning experiences, students will practice nursing skills with direct instruction/supervision through the use of technically designed scenarios with simulation models in the IOAH nursing skills/simulation laboratory.
- The proposal explains that VN Program faculty have responsibilities to the students, colleagues, the community, and the nursing profession. These include facilitating the intellectual and emotional growth of students and striving to maintain a climate of mutual respect in a safe learning environment.
- Each term, the clinical settings are varied and correspond to the curriculum content area for the term. In supervised clinical learning experiences, nursing students can practice their skills with real patients but under the supervision of faculty/preceptors. Therefore, students are provided an opportunity to develop mastery of nursing skills while ensuring safe patient outcomes.
- The IOAH VN Program plans to utilize preceptors as a method of clinical supervision whereby the student would work side-by-side with the preceptor on a daily basis. Well-developed Preceptor Guidelines are in place. Preceptors will not replace faculty but will work closely with faculty members in facilitating student learning. Nursing faculty maintain the responsibility for final student evaluation.
- As clinical evaluation tools are critical for patient safety and important to build student confidence as clinicians, comprehensive clinical evaluations will be conducted. The proposal sets forth that providing fair and reasonable clinical evaluation is one of the most important and challenging faculty roles. As stated, faculty must decide whether students can think critically within the clinical setting, maintain a professional demeanor, interact appropriately with patients, prioritize problems, demonstrate basic knowledge of clinical procedures, and provide nursing care in a safe and competent manner.
- Further, the proposal sets forth that the clinical evaluation process provides information to the student about performance and provides data that may be used for individual student development, assigning grades, and making decisions about the curriculum. Students have the right to a reliable and valid evaluation that assesses achievement of required competencies.
- IOAH utilizes clinical evaluation tools for each level of progression across the curriculum and provides measurements for cognitive, affective, and psychomotor achievement in the clinical setting. Detailed Clinical Evaluation Tools specific to the four terms of the VN Program and based on the DEC's are provided in the proposal.

- Contracts have been secured with the following clinical affiliates: SuperHero Kids Home Health, Generous HCM, Memory Care of Westover Hills, TruCare Living Center, Medina Valley Health & Rehab Center, San Pedro Manor, Wellmed Medical Group, Stone Oak Care Center, and Catholic Charities Archdiocese of San Antonio.

#### Facilities, Resources, and Services:

- The IOAH VN Program's physical space is comprised of offices, classrooms, and labs within 9,492 square feet that occupies part of the fourth floor of the building at 7614 Louis Pasteur, San Antonio, Texas. Initially, one didactic classroom and one skills laboratory will be dedicated to the VN Program. The Program Director has a private office with three instructor offices available for the nursing faculty. The Executive Administrative Assistant will also be provided a private office.
  - The program has the option to acquire additional space on the fourth floor, as well as space on the second floor of the building. The campus offers well-lit parking for students while reserved parking spaces are provided for faculty and staff.
  - The facility has adequate restrooms and lounges that meet the Americans with Disabilities Act (ADA) accessibility and compliance requirements that are available to all students, faculty members, and staff. ADA parking, elevators, and handicapped doors are available.
  - Tutoring is available to all students and is offered by the faculty members. Tutoring will be provided to students during faculty's posted hours or by appointment. Students will be expected to attend tutoring sessions prepared with questions, concerns, and/or issues related to class content, studying, and/or exams/quizzes.
  - The main campus of IOAH has established areas for an admissions department, financial aid, and student facility services. The extended site is specific to the IOAH VN Program and will provide additional offices, classrooms, and skills labs within the 9,492 square feet.
  - Two laboratory areas are available, including a Basic Skills Lab with three patient beds, two mannequins, and supplies; and a Clinical Lab with a nurses' station, three beds, one basic adult manikin, two high-fidelity manikins (one Noelle for labor and delivery), one exam table, one pediatric metal crib, one basic pediatric manikin, two infant manikins, as well as other equipment and supplies. Ample locked storage space is provided. The Skills Lab ratio will be one nursing instructor to every 10 nursing students.
  - A computer lab containing 30 Chromebooks, desktop computers, and printers is currently available. Tests are online in Orbund; students will utilize the computer lab for all testing. Additionally, laptops can be used at school and checked out to take home for practice NCLEX-style testing, homework completion, research, and participation in virtual scenarios.
  - The facility is currently ready for the VN Program. No remodeling is needed.
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### Records and Reports:

- IOAH has established a written plan for the storage and retention of program related records including long-term access for student files and transcripts. All paper copies are kept in locked fireproof cabinets located in the business office, financial aid, and the file located in the VN Program Director's office. Backup digital copies are uploaded into *Orbund*, the school's secure online system.
- These plans are in alignment with Board Rule 214.12 and the Family Educational Rights and Privacy Act or FERPA. Students may request copies of their academic records or transcripts by completing the Student/Graduate Request Form provided in the proposal.

### Total Program Evaluation Plan:

- IOAH developed a Total Program Evaluation (TPE) Plan addressing all the Board Rule 214.13 required elements. The proposal includes a table that contains all criteria/components to be evaluated, data collection methods, personnel responsible, frequency of data collection, and determination of achievement. The components are intended to be clear, concise, and measureable.
- The evaluation process will be led by the VN Program Director who will gather data from assigned faculty members; the TPE will be conducted at least annually.

### **Rationale for Recommendation:**

#### Pros:

- Barbara Scanlon, MSN, RN, the proposed Program Director, meets all requirements of Board Rule 214.6 to assume the leadership position. Ms. Scanlon is an accomplished professional nurse, nurse educator, and nursing program administrator.
- Appropriate clinical learning experiences for VN students have been secured.
- The administration has committed appropriate resources to the implementation of this new program.

#### Cons:

- IOAH is not experienced in providing a VN Education Program and the curriculum is not proven.

### **Staff Recommendation:**

Move to grant initial approval to The Institute of Allied Healthcare 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**

October 20, 2022

Barbara Lee Scanlon, MSN, RN  
Program Director  
Vocational Nursing Education Program  
The Institute of Allied Healthcare  
7614 Louis Pasteur Drive, Suite 402  
San Antonio, Texas 78229

Dear Ms. Scanlon:

At the October 20, 2022, meeting, members of the Texas Board of Nursing discussed The Institute of Allied Healthcare Proposal to Establish a New Vocational Nursing Education Program in San Antonio, Texas. The Board wishes to thank Mr. Nestor Lopez and you 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 The Institute of Allied Healthcare to establish a new Vocational Nursing Education Program in San Antonio, 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 [virginia.ayars@bon.texas.gov](mailto:virginia.ayars@bon.texas.gov) or 512-305-7660.

Sincerely,

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

Copy: Nestor Lopez, The Institute of Allied Healthcare, CEO and School Director  
Texas Workforce Commission  
Council on Occupational Education

**BEFORE THE TEXAS BOARD OF NURSING**

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**ORDER OF THE BOARD**

In the Matter of  
The Institute of Allied Healthcare  
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 on October 20, 2022, 333 Guadalupe, Tower II, Room 100, Austin, Texas, to consider The Institute of Allied Healthcare 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 The Institute of Allied Healthcare in San Antonio, Texas, and other interested parties, if any, the Board hereby grants INITIAL APPROVAL of The Institute of Allied Healthcare Vocational Nursing Education Program in San Antonio, Texas, and imposes the following condition and requirement:

1. The program shall not admit more than a total of thirty (30) students in one (1) cohort in 2023. After the initial year of operation, The Institute of Allied Healthcare may enroll one (1) cohort of thirty (30) students each year through year four, then increase to thirty (30) students per cohort in two (2) cohorts annually for year five.

Entered this 20<sup>th</sup> day of October, 2022

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