

**Report of Focused Survey Visit  
ITT Technical Institute Breckinridge School of Nursing in Richardson, Texas  
Associate Degree Nursing Education Program**

**Summary of Request:**

Consider the report of the June 3, 2013 focused survey visit to ITT Technical Institute Associate Degree Nursing (ADN) Education Program in Richardson, Texas (See Attachment #1). The survey visit was conducted by Robin Caldwell, PhD, RN, CLNC, contract Program Evaluator employed by the Board of Nursing (BON).

**Historical Perspective:**

- The ADN Program at ITT Technical Institute was approved by the Board in January 2011 and began enrolling students in June 2011.
- ITT Technical Institute is accredited by the Accrediting Council for Independent Colleges and Schools (ACICS).
- The program is currently on initial approval and will have its first ADN graduates in September 2013.
- A group of nursing students from ITT Technical Institute submitted a lengthy letter of complaints to the Enforcement Department at the BON on March 14, 2013.
- The allegations prompted an unannounced survey visit on May 22, 2013.

**Summary of Findings from the Survey Visit:**

- Jane Allen, MS, RN, was instrumental in the development of the proposal and has been the program director since it began.
- Breckinridge School of Nursing at ITT Technical Institute in Richardson is a part of a larger organization that uses a standardized nursing curriculum and standard policies across the country. This makes it difficult for the local program director to have full authority over the program and to implement measures to ensure compliance with Rule 215.
- Students expressed strong concerns about the Anatomy & Physiology course because of the absence of an instructor for six (6) weeks and the fact that the current instruction is being provided by faculty who do not have expertise in the human sciences.
- Though the nursing curriculum is logically organized, it is expected to follow the national model for the corporation. There was not evidence that the *Differentiated Essential Competencies* are clearly emphasized or utilized in the program of study.
- There are inadequate faculty to effectively carry out the program of study. Though the current faculty are committed to the program and eager to provide good instruction, there is a need for faculty development, especially in areas of test construction and analysis, and high-fidelity simulation experiences. Faculty indicated that the common, core curriculum, standardized lesson plans and exams restrict creativity, innovation, and the ability to make changes to the program as needed.
- There is high faculty turnover and the program relies upon part-time faculty for clinical instruction. Salaries for part time faculty are not competitive, adding to the high turnover rates.
- Both students and faculty acknowledged that they have little input into the governance of the program.
- Students receive information about eligibility and declaratory orders, but signed receipts from the students validating that they receive this information were not included in all student files.
- Finding the clinical experiences to meet course objectives has been challenging because of the clinical competition for nursing programs in the Dallas area, but Ms. Allen continues to seek additional facilities for the learning experiences.

**Pros and Cons:**Pros:

- The program director and the current faculty members demonstrate commitment to the program.
- The learning environment in the building promotes a positive experience for the students.
- The director and college administration are willing to take measures for the program to be in full compliance with Rule 215.

Cons:

- The program director does not have full authority to direct the program in all its aspects.
- There are not adequate nursing faculty to meet the instructional needs for the number of enrolled students in the program.
- Salaries for part-time adjunct faculty do not encourage faculty to have a lasting commitment to the program.
- Faculty are restricted from using innovative teaching strategies or from making changes and improvements to the curriculum because of the larger organization.
- Faculty need professional development in areas of test construction and analysis, simulation instruction, and effective teaching in nursing.
- A qualified instructor with a background in human sciences to teach Anatomy & Physiology is not available.
- The program struggles to establish adequate clinical contracts.
- A signed receipt indicating that students received eligibility information for licensure was not included in all student files.
- Students and faculty do not have adequate input into program governance.
- There is not strong evidence that the DEC's are incorporated into the day-to-day implementation of the curriculum.

**Rationale for Recommendation:**

Though the program has many strong attributes and has an intention to provide excellent nursing instruction, the nature of the organization has not allowed the program director to fully direct the program and has not allowed the faculty to design, implement, and evaluate the program to be in compliance with Texas rules. Inadequate nursing faculty and the lack of a qualified science faculty member to teach Anatomy & Physiology limit the effectiveness of the program. Faculty development as well as faculty and student participation in the governance of the program will greatly facilitate the success of the program.

**Staff Recommendation:**

Move to accept the findings of the survey visit to ITT Technical Institute in Richardson, Texas and to impose the requirements in the attached Board Order (See Attachment #2).

### Summary of Survey Visit

<b>Name of Nursing Program:</b>	Breckinridge School of Nursing and Health Science at ITT Technical Institute Associate Degree Nursing (ADN) Education Program Richardson, Texas
<b>Nursing Program Director:</b>	Jane Allen, MS, RN
<b>Reason for Survey Visit:</b>	Focused survey visit related to student complaints.
<b>Date of Survey Visit:</b>	May 22, 2013
<b>Survey Visitors:</b>	Robin Caldwell, PhD, RN, CLNC, Contract Program Evaluator
<b>Texas Board of Nursing Approval Status:</b>	Initial
<b>Date of Last BON Survey Visit:</b>	December 10, 2010
<b>Name of Accrediting/Licensing Agencies:</b>	Accrediting Council for Independent Colleges and Schools (ACICS)

The survey was conducted on an unannounced basis due to the seriousness and complexity of the written student complaints provided to Board Staff beginning in March 2013. Though the Program Evaluator was not able to substantiate all of the allegations, students' complaints included the following:

- Students stated that they are not required to complete theory and clinical hours, and early dismissals are common practice.
- All clinical learning experiences take place only in long-term care and rehabilitation facilities.
- The skills lab faculty member is not evaluating students skills proficiency but is assigning students to check-off one another in return skills demonstrations.
- Students alleged that classroom instruction is ineffective in that nursing faculty member is unprofessional in behavior.
- Nursing faculty member does not have sufficient clinical experiences and is not qualified to teach in assigned areas of instruction.
- Peer evaluations of faculty instruction are not being conducted.
- Students expressed concern that reporting complaints would be met with retribution.

#### **Summary of the May 22, 2013 Survey Visit:**

##### During the visit, Program Evaluator:

- Conducted an initial meeting with Program Director, Jane Allen, MS, RN and Bruce Bundeali, Dean of Academic Affairs to explain the purpose of the visit;
- interviewed two ADN faculty members separately;
- interviewed fifty-three (53) ADN students
- viewed the facilities housing the nursing program;
- reviewed documents and files; and,
- conducted a summary conference with Ms. Allen, Mr. Bundeali, and Rose Galloway, Campus Director.

#### Finding Related to Administration:

- Jane Allen, MS, RN has been the director of the ADN program since the program began in 2011.
- Ms. Allen is fully qualified and has experience as faculty in ADN programs in Texas.
- ITT Technical Institute in Richardson is one of a network of co-educational, non-denominational private, post-secondary institutions owned and operated by ITT/ESI. All ITT campuses are governed by a corporate board of directors.
- Administration described the ITT corporate organizational structure, and the nursing program's place within the organization.
- Discussions with the director and administration indicated that the ADN director has not been given the authority to administer all aspects of the program. Subsequent interviews with faculty validated this finding.
- The director and administration acknowledged that ADN students currently enrolled in Anatomy and Physiology (A&P) had no instructor for the first six (6) weeks of the course. Currently, the course is being taught by ADN faculty.
- According to the director, the course was not cancelled due to corporate policy to enroll students despite lack of a qualified instructor. Administration reported that recruitment efforts have been ongoing and a qualified candidate has recently been hired.

#### Findings Related to the Program of Study:

- The program of study is based upon a core curriculum for twenty-two (22) ITT nursing programs across the nation.
- The twenty-seven (27) month ADN program is comprised of twelve (12) week quarters and includes thirty-six (36) quarter hours of general education courses and sixty-seven (67) quarter hours of nursing courses.
- General education courses are included as co-requisite courses in the curriculum. Nursing courses begin in the second quarter and clinical learning experiences begin in the fourth quarter of the program.
- The curriculum is sound, logically organized and includes all Texas Board of Nursing (Board or BON) required content.
- All instruction is carried out in a face-to-face format.
- Standardized testing is used for admission, progression, remediation, and graduation purposes.
- The Program Evaluator questioned Nursing Education Program Information Survey (NEPIS) data indicating 1937 didactic hours in the program. The director clarified there are 1937 contact hours in the program of study: 1037 didactic; 0 computer lab; 126 skills lab; and, 774 patient care clinical situations.
- Though NEPIS data indicated 0 simulation lab hours, the director and faculty reported that ten (10) to twenty (20) hours of high-fidelity simulation is utilized in lieu of direct patient care experiences, primarily in pediatrics. Administration stated that corporate policy allows no more than 10% simulation in all ITT programs.
- According to the director, the program has written articulation agreements with Kaplan University, Grand Canyon University, and the ITT RN-BSN program.
- The majority of tests reviewed were written at a lower cognitive level.
- The director acknowledged that the program does not use NCLEX blueprinting and faculty has not received training in test construction and analysis.
- It was unclear to the Program Evaluator that the common nursing curriculum allows for individualization to Texas law and rules.
- Documentation submitted with the ITT proposal for a new nursing program, and maintained in the director's, office provides evidences of mapping and leveling of the *Differentiated Essential Competencies of Graduates of Texas Nursing programs (DECs)(2010)* across the curriculum. However published program materials, program objectives, and syllabi do not clearly identify the four (4) roles of the nurse, and the knowledge, clinical judgments, and behaviors of graduates as defined in the DECs.
- The program director was not able to describe how the DECs are fully incorporated into the curriculum, and discussions with one ADN faculty member indicated unfamiliarity with the DECs.

#### Findings Related to Faculty:

- Interviews with the program director and faculty revealed that there is an insufficient number of faculty members to accommodate the number of enrolled students.
- At the time of the survey visit five (5) full-time and one (1) part-time faculty carried out the ADN instruction for the 124 students enrolled in the program.
- The program has experienced ongoing problems with high rates of faculty turnover. According to the director, there was one (1) full-time faculty resignation and five (5) part-time faculty resignations in 2012. There are currently five vacant (5) part-time faculty positions.
- The director and administration acknowledged that the program relies heavily upon adjunct faculty, and turnover rates among adjuncts are high.
- Though the director acknowledged a need for additional full-time faculty, the nursing program abides by a corporate policy for faculty hiring.
- Nursing faculty meet BON qualifications. Several faculty members have teaching experience.
- Two (2) full-time faculty members were available for interview.
- Faculty interviewed are well credentialed and offer a rich diversity in their educational and experiential backgrounds. Faculty possess the expertise to teach in areas assigned.
- The two faculty reported they have been employed in the program for one (1) year and two (2) years respectively.
- Faculty expressed a commitment to the students and the program.
- Faculty identified a need for further education to assist them develop in the educator role, including formal training in the use of high-fidelity simulation, test construction, and item writing. According to the director and faculty, requests for professional development have not been approved by corporate administration.
- Faculty indicated that the common, core curriculum, standardized lesson plans and exams restrict creativity, innovation, and the ability to make changes as needed. Adjustments to classroom instruction or testing must receive prior approval at the corporate level.
- Faculty confirmed that orientation occurs upon employment and reported they are evaluated by students, the program director, and administration.
- Faculty described ITT “faculty engagement” performance evaluations which are based upon students’ classroom attendance.
- Faculty files provide evidence that established policies are in place and followed, including evaluations of classroom instruction by the program director.
- Faculty stated that they meet monthly and communicate frequently. Minutes of meeting are maintained.
- Faculty comments regarding support received from the director and campus administration were positive.
- Faculty expressed concerns about the increased enrollment of students in the program and lack of sufficient faculty.

#### Findings Related to Students:

- According to the director and administration, there are currently 124 students in five (5) cohorts enrolled in the program. The program admits a new cohort of thirty (30) students each quarter.
- Admission and graduation dates for the five (5) cohorts are provided in the following table.

Cohort	Admission date	Graduation date
1	June 2011	September 2013
2	September 2011	December 2013
3	March 2012	June 2014
4	September 2012	December 2014
5	March 2013	June 2015

- Fifty-three (53) students representing cohorts 1, 2, 4, and 5 were available for interview.
- The majority of students reported they enrolled in the program because there was no waiting list and no prerequisite courses required for admission.
- None of the students indicated having received false or misleading information regarding transferability of course work completed at ITT. Students acknowledged that information regarding transfer of credits is available on the ITT website.
- Several students indicated a reluctance to speak candidly with the Program Evaluator. A few students made vague comments suggesting that opinions among students differed.
- Discussions with students indicated that their experiences in, and satisfaction with, the program has been adversely affected by inconsistencies in the effectiveness of instruction due to ongoing high rates of faculty turnover.
- However, students complimented the expertise, caring, commitment, and availability of ADN faculty currently teaching in the program.
- Students overwhelmingly expressed dissatisfaction with the A&P course and reported the following: the course has historically been taught by adjunct faculty and faculty turnover rates have been high; the quality of instruction has been poor; instructor-student relationships have been ineffective; students have not received timely feedback; and, instructors have not been available to students.
- Students currently enrolled in A&P confirmed having no instructor for the first six (6) weeks of the term, and reported they attended class with instructions to read their texts and follow the learning objectives. The course is currently being taught by ADN faculty. Students expressed grave concerns they have not received instruction in fundamental course content from a qualified instructor. Students indicated that no one has responded to their complaints about this matter.
- The majority of students indicated they have little input into program processes.
- Student policies are in place. Students receive required information in their handbook and verbally.
- Though students unanimously agreed they received declaratory order and eligibility information upon enrolling in the program, signed receipts were not included in all student files.

#### Findings Related to Clinical Learning Experiences:

- The program has active clinical affiliation agreements that provide a variety of clinical experiences for the curriculum, including the HCA Hospital system.
- The director reported that preceptors are used primarily for pediatrics and the capstone role transition course.
- The director reported recent difficulty in scheduling clinical rotations due to an increasing number of nursing education programs competing for clinical placements.
- According to the director and faculty, the program has recently lost a pediatric clinical site. The program currently utilizes five (5) HCA pediatric urgent care clinics, community settings, and high-fidelity simulation for pediatric clinical learning experiences. The director reported aggressively pursuing new pediatric clinical experiences for the program, and is in the process of signing an affiliation agreement with a large pediatric home health agency.
- Though several faculty members have experience with high-fidelity simulation, the director and faculty identified a need for further education.
- Students' comments about clinical learning experiences were positive.
- Students agreed that simulated clinical experiences are effective.
- Students confirmed that clinical faculty provides responsible supervision and they receive prompt feedback regarding clinical performances.
- Several students complained that scheduling of clinical experiences is unpredictable and inconsistent.
- Clinical evaluation tools demonstrate progression across the program and are used for formative and summative evaluation.

### Facilities, Resources and Services:

- The facilities housing the nursing program are spacious, modern, and offer a positive learning environment. There is ample parking and public transportation services are accessible.
- A full array of student services is offered on the ITT campus.
- Students have twenty-four (24) hour access to the online library and computer resources are available throughout the campus.
- Classrooms and skills/simulation labs are spacious and modernly equipped.
- Adequate student/faculty break areas and restrooms are available on the ITT campus.
- The ADN director has a private office and faculty is provided with office space, equipment and technology support.
- Locked files are maintained in secure area.
- The director indicated that clerical support and resources are adequate.

### Records:

- Faculty files contained all BON required documents.
- Signed receipts for declaratory order and eligibility information were not evident in all student files reviewed.

### Summary:

Though findings from the survey visit did not substantiate the allegations in the written complaints, the Program Evaluator identified a number of issues of concern as well as areas of non-compliance with rule 215. The director and administration were receptive to the Program Evaluator's findings and recommendations, and expressed a commitment to make corrective changes necessary to bring the program into compliance with Rule 215 and ensure the success of students' in the program.

### **PROS:**

- The program director is fully-qualified and an experienced educator.
- Current ADN faculty members are well-credentialed and offer a rich diversity in their educational and experiential backgrounds.
- Faculty indicated they receive support from the program director and campus administration.
- Faculty expressed a commitment to students and the program.
- Students complimented the caring, commitment, expertise, and availability of ADN faculty.
- The program has active clinical affiliation agreement that provide a variety of clinical learning experiences for the curriculum.
- Students expressed a high degree of satisfaction with clinical learning experiences.
- Facilities and resources are adequate to support the nursing program.
- The director and administration expressed a commitment to take corrective actions necessary to bring the program into compliance with Rule 215 and ensure the success of students' in the program.

### **CONS:**

- The program does not have sufficient faculty to accommodate the number of students in the program.
- The program director acknowledged increasing difficulty in obtaining adequate clinical learning experiences for the number of students enrolled in the program.
- The program continues to enroll thirty (30) students each quarter. This enrollment was approved by the Board at the time of program approval.
- The program lacks stability due to persistent high rates of faculty turnover.
- The program has relied heavily upon adjunct faculty, and turnover rates among adjunct faculty are high.
- Students' experiences in, and satisfaction with, the program has been adversely affected by inconsistencies in the effectiveness of instruction due to ongoing high rates of faculty turnover.

- Students currently enrolled in A&P have not received instruction in fundamental course content from a qualified instructor. Students had no instructor for the first six weeks of the term, and the course is currently being taught ADN faculty.
- The ADN program director has not been given the authority to direct all aspects of the program.
- ADN faculty has little input into program processes.
- Students have little input into the governance of the nursing program.
- It was not evident at the time of the survey visit that the national common curriculum allows for local control and for individualization to Texas laws and rules.
- Faculty indicated that the common, core curriculum, standardized lesson plans and exams restrict creativity and innovation, and the ability to make required adjustments.
- It was unclear that the program of study prepares graduates to demonstrate the knowledge, clinical judgments, and behaviors of graduates as defined in the DEC's.
- The program director and faculty were not able to describe how the DEC's are fully incorporated into the curriculum.
- Tests reviewed were written at a lower cognitive level.
- Faculty identified a need for professional development to assist them develop in the educator role. However, requests have not been approved by corporate administration.
- Signed receipts for declaratory order and eligibility information were not present in all student files reviewed.

DRAFT LETTER

July 22, 2013

Jane E. Allen, MS, RN, Director  
Breckinridge School of Nursing  
ITT Technical Institute  
2101 Waterview Parkway  
Richardson, TX 75080

Dear Ms. Allen:

At the July 18-19, 2013 meeting, the members of the Texas Board of Nursing discussed the report of the May 22, 2013 survey visit to the ITT Technical Institute Breckinridge School of Nursing Associate Degree Nursing Program in Richardson, Texas. The Board members wish to thank you and --- for being present to answer questions.

Based upon the discussion and review of the survey visit report, it was the decision of the Board to accept the findings of the survey visit and to issue the requirements in the attached Board Order. Board members also wish to stress the importance of the program director having the authority to function in the full role described in the rules and education guideline.

Requirements are mandatory criteria based upon program assessment directly related to the rules that must be addressed in the manner prescribed.

If you have questions or if Board Staff can assist in any way, please do not hesitate to contact [Janice.hooper@bon.texas.gov](mailto:Janice.hooper@bon.texas.gov) or (512-305-6814).

Sincerely,

Kathy Shipp, MSN, RN, FNP  
President of the Board

Janice I. Hooper, PhD, RN, FRE  
Lead Nursing Consultant for Education\

Copy: Bruce Bundeali, Dean of Academic Affairs  
Dean of Nursing  
ACICS

## BEFORE THE TEXAS BOARD OF NURSING

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### In the Matter of:

ITT Technical Institute  
Breckinridge School of Nursing  
Associate Degree Nursing Education Program  
in Richardson, Texas

### ORDER OF THE BOARD

A public meeting of the Texas Board of Nursing, hereinafter referred to as the Board, was held on July 18, 2013, 333 Guadalupe, Tower II, Room 225, Austin, Texas, to consider the report of the survey visit to ITT Technical Institute Breckinridge School of Nursing Associate Degree Nursing Education in Richardson, Texas, pursuant to Section 301.157, Texas Occupations Code and 22 Tex. Admin. Code Chapter 215.

Board members in attendance were: Kathy Shipp, MSN, RN, FNP; Nina Almasy, MSN, RN; Deborah Hughes Bell, CLU, ChFC; Patricia Clapp, BA; Tamara Cowen, MN, RN; Sheri Denise Crosby, JD, SPHR; Marilyn J. Davis, RN, BSN, MPA; Shelby Ellzey, BBA; Richard Robert Gibbs, LVN; Kathy Leader-Horn, LVN; Mary LeBeck, MSN, RN; Josefina Lujan, PhD, RN; and Beverly Jean Nutall, LVN.

After review and due consideration of the findings from the survey visit, as well as the presentation by representatives from ITT Technical Institute in Richardson, Texas, and comments from other interested parties, if any, the Board hereby accepts the survey visit report and imposes the following conditions/requirements:

1. The administration shall empower the program director with full authority to administer the program in all its aspects. The administration shall provide written evidence to Board Staff that the program director has the authority to make all decisions and to administer the program in compliance with Rule 215 no later than September 1, 2013.
2. The administration shall review the current nursing faculty organization structure and employ sufficient full-time faculty members with graduate preparation and expertise necessary to enable the students to meet the program goals. In addition, the administration shall review the adjunct faculty salaries and adjust them to promote faculty retention. A report of changes made to the faculty organization and salaries shall be provided to Board Staff no later than October 1, 2013.

3. The administration shall provide resources to provide faculty development workshops for all needed areas identified by faculty, including, but not limited to, test construction and analysis, high-fidelity simulation activities, and instructional strategies. The director shall provide a schedule of developmental activities to Board Staff no later than September 1, 2013.
4. The administration shall assure Board Staff that nursing faculty at the local campus have the authority to engage in curriculum development, revision, and evaluation, and to incorporate all requirements of Rule 215 into the program of study. Evidence of this assurance shall be provided to Board Staff no later than September 1, 2013.
5. The administration shall ensure that qualified instructors with expertise in human and biological sciences are employed to teach Anatomy & Physiology. The administration shall provide a curriculum vitae of the employed instructor(s) that will teach Anatomy & Physiology to Board Staff no later than September 1, 2013.
6. The faculty shall develop a plan to include student representation in the governance of the ADN program. The program shall submit the plan for student representation in the ADN program to Board Staff no later than January 1, 2014.
7. The program shall maintain evidence of student receipt of the Board's license eligibility information in all student files. The program shall develop a policy and submit it to Board Staff by September 1, 2013, that will ensure that the signed receipts are obtained and placed in all student files.

Failure to comply with these requirements may result in further consideration of the program's approval, including the imposition of additional restrictions, conditions, monitoring, or other negative change in the program's status, up to withdrawal of approval.

Entered this 18<sup>th</sup> day of July, 2013

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Kathy Shipp, MSN, RN, FNP  
President of the Board