

**Report of Survey Visit to a Nursing Education Program  
Concorde Career Institute in Arlington, Texas  
Vocational Nursing Education Program**

**Summary of Request:**

Consider the report of the focused survey visit (Attachment #1) on February 13, 2014, to Concorde Career Institute Vocational Nursing Education Program in Arlington, Texas, related to a complaint received by Board Staff about irregularities in the clinical learning experiences at Concorde.

**Historical Perspective:**

- Concorde Career Institute has been in operation since 1996.
- At the time of the survey visit, there were three hundred one (301) students enrolled in the program.
- There have been five (5) changes in the program director position since 2013.
- The program director at the time of the visit was Lisa Hawthorne, PhD, RN who was hired September 3, 2013. Dr. Hawthorne submitted her resignation on March 7, 2014.
- The NCLEX-PN® examination pass rates for the past six (6) years are provided in the table below:

<b>Year</b>	<b>BON Approval Status</b>	<b>NCLEX-PN® Pass Rate</b>	<b>Number of First-Time Candidates (Passed/Total)</b>
2013	Full	83.57%	178/213 (Survey Visit)
2012	Full	76.35%	184/241 (Self-Study Required)
2011	Full	87.17%	197/226
2010	Full with Warning	78.28%	209/267
2009	Full	79.55%	210/264 (Self-Study Required)
2008	Full	81.67%	196/240

- The program has a day program (that can be completed in twelve [12] months) and an evening program (that can be completed in fifteen [15] months). An assistant director provides management for the evening program, but there has been recent turnover in this role.
- At the time of the visit, the nursing faculty consisted of two (2) assistant directors (Day/Evening), and seventeen (17) full-time, twenty-three (23) part-time, and fifteen (15) substitute/ per diem faculty.
- Based on a complaint received in Board office on January 19, 2014, about clinical irregularities, Board Staff conducted an unannounced focused visit to the program on February 13, 2014. This was a joint visit with Texas Workforce Commission staff.
- The complainant reported that some students were not required to complete the assigned hands-on practice hours in the clinical setting. The purpose of the visit was to gather facts related to the complaint to determine if there were students who were not completing the clinical hours requirement for the program and who would not be eligible to apply to take the NCLEX-PN examination.

**Survey Visit Findings:**

- Interviews with administration and faculty validated that eight (8) students had not been cleared to enter the clinical settings due to eligibility issues and had been assigned to campus for onsite activities.
- Program policy does not allow students with eligibility issues to progress in the program.

- The director indicated that she had questioned administration's decision to retain the students in the program since it would be against program policy, but the decision to retain was upheld at the corporate level.
- Two (2) faculty were assigned to the eight (8) students on campus to supervise the students in case studies and skills/simulation lab practice. These students were not evaluated for meeting clinical objectives.
- Their classmates were carrying out faculty-supervised hands-on patient care in various clinical affiliating agencies. The students in the clinical settings were practicing with actual patients to fulfill clinical objectives and were evaluated by the clinical faculty to ensure their fulfilling clinical competencies.
- At the time of the survey visit, the eight (8) students had been cleared to enter the clinical settings and Board Staff were unable to interview them on campus. Board Staff has since spoken to the students.
- Students stated they were not aware there was a possibility they would need to make-up clinical hours when they were assigned to the activities on campus.
- This assignment continued for four (4) to five (5) weeks of a nine (9) week clinical rotation. Each of the eight (8) students had missed between sixty-eight (68) and eighty-four (84) hours of clinical practice of the one hundred ninety-six (196) hours required in the course. (Attachment #3)

**Pros and Cons:**

Pros:

- The program's 2013 NCLEX-PN® examination pass rate was 83.57%.

Cons:

- Program policies were not followed for student progression through the curriculum;
- Program director did not have the authority to make decisions about student progression;
- Program director unexpectedly resigned; and
- Students were allowed to fulfill clinical hours by on campus activities that did not meet clinical objectives and did not allow for evaluation of clinical competencies.

**Rationale for Recommendation:**

These practices were in violation of the program policies and Board Rule 214.

**Staff Recommendation:**

Move to accept the Survey Visit Report and issue the requirements outlined in the attached Board Order (Attachment #2).

**Survey Visit – February 13, 2013  
Summary Report**

**Name of Nursing Program:**

Concorde Career Institute – Arlington Vocational Nursing Program in Arlington, Texas

**Nursing Program Director:**

Lisa Hawthorne, PhD, RN, Director

**Reason for Survey Visit:**

Based on a complaint of clinical irregularities received in Board offices on January 19, 2014, Board Staff conducted a focused survey visit to the program on February 13, 2014. The purpose of the visit was to gather facts related to the complaint. According to the complaint, some students in Level II who had not been cleared by the BON because of eligibility issues were being allowed to continue in the program and receive clinical hours for time spent on campus instead of time spent in an assigned clinical facility.

**Date(s) of Survey Visit:**

February 13, 2014

**Survey Visitor(s):** Gayle Varnell, PhD, RN, Nursing Consultant for Education

NOTE: This was a joint visit with Texas Workforce Commission (TWC):

L. Earl Woolbright, Integrated Service Area Manager  
Jill Werner, Assistant Integrated Service Area Manager  
Jane Goodenough, Assistant Integrated Service Area Manager

**Texas Board of Nursing (BON) Approval Status:**

Full

**Date of Last BON Survey Visit:**

August 15, 2013

**Names(s) of Accrediting Agencies:**

Licensed by the Texas Workforce Commission (TWC)  
Accrediting Bureau of Health Education Schools (ABHES)  
Accrediting Commission of Career Schools and Colleges (ACCSC)

**Activities During Survey Visit:**

Board staff and TWC staff:

- met with the Lisa Hawthorne, PhD, RN, Director and Marilyn Drew-Long, Campus President;
- met with faculty conducting on-site clinicals: Gary Force, BSN, RN and Selenza Mitchell, LVN;
- reviewed files of students attending on-site clinicals, master student lists, student rosters, course syllabus, and sample of on-site learning activities.

Prior to the survey visit, Board staff reviewed in-house file documents including the August 2013 Survey Report, the 2013 NEPIS, and the 2013 CANEP.

## Survey Visit Findings:

### Findings from the meetings, interviews, and review of files and documents:

- At the time of the visit, three hundred one (301) students were enrolled in the program. The curriculum is arranged in five levels described as Terms. Students enrolled in the “Day” program complete the program in twelve (12) months; the “Evening” students, in fifteen (15) months.
- The site visit was focused on the Term II class which had an enrollment of forty-four (44) students.
- During the focused visit, Dr. Hawthorne, Director indicated that she had questioned whether the program should retain the eight (8) students in the program in Term II who had eligibility issues.
- Program policies state that students will not be allowed to continue in the program if they are not cleared (based upon eligibility issues) to engage in clinical learning experiences. Administration made the decision to override program policies in order to allow students to progress in the program.
- This practice resulted in a situation where students enrolled in Term II were not all given the same educational opportunities as outlined in the course syllabus.
  - Instead of all forty-four (44) students beginning their facility-based clinicals on January 9, 2014, as outlined on the course calendar, eight (8) students who did not have the necessary clearance to attend clinicals were assigned to campus until they were eligible to attend clinicals.
  - This continued for four (4) to five (5) weeks of a nine (9) week clinical rotation.
  - These eight (8) students missed from sixty-eight (68) to eighty-four (84) hours of clinical in a course that had one hundred ninety-six (196) hours of clinical.
  - The eight (8) students had campus-based learning activities that were intended to satisfy clinical requirements. These learning activities took place in either a classroom or skills lab depending on room availability. Two (2) faculty were assigned to provide learning opportunities for these students. Formal lesson plans were minimal with no planned objectives, and no performance evaluations.
  - An attendance roster for all of the dates that the students had campus-based learning activities was unavailable during the site visit. Attendance policies for the program do not distinguish between didactic, skills, simulation, or clinical activities.
  - On course rosters, the eight (8) students attendance records were identical to the other students in the course.
  - The actual dates that students started their clinical was determined by asking the students and the director separately.
- Seven (7) of the eight (8) students were interviewed by telephone and all stated that they were never told that these dates might have to be made up.
- One (1) of the eight (8) students is no longer enrolled in the program and was not interviewed.
- The program director has provided a list of students enumerating the date that they began their actual clinical rotation and the number of hours that was spent in on-campus activities.
- Following the survey visit, the program was advised that the students must complete all required faculty-supervised hands-on clinical practice before their applications to take the NCLEX-PN examination would be processed by Board Staff.
- On March 4th Dr. Hawthorne submitted a plan for students to make up the clinical hours and asked that these students make up sixty (60) hours of clinical time and the remaining eight (8) to twenty-four (24) hours be forgiven. Board staff advised that all hours must be completed in fairness to the other students in the class (see attachment #3).

**DRAFT LETTER**

April 18, 2014

Debbie Venbertloh, MSN, Interim Director  
Concorde Career Institute  
3015 Interstate 20  
Grand Prairie, TX 75052

Dear Ms. Venbertloh:

At the April 16-17, 2014 meeting, members of the Texas Board of Nursing discussed the report of the February 13, 2014 survey visit conducted by Board staff to Concorde Career Institute – Arlington Vocational Nursing Education Program. The Board wishes to thank you, Marilyn Long, Campus President, and Constance Woulard, RN, MSN, Regional Nurse Specialist for being present at the meeting to answer questions. Based upon the discussion and review of documents, it was the decision of the Board to accept the Survey Visit report and issue the requirements in the attached Board Order.

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

If you have any questions or if we may be of assistance, please contact Board staff at 512-621-5179 or [gayle.varnell@bon.texas.gov](mailto:gayle.varnell@bon.texas.gov).

Sincerely,

Katherine Thomas, MN, RN, FAAN  
Executive Director

copy: Texas Workforce Commission (TWC)  
Marilyn Drew-Long, Concorde Career Institute Campus President  
Accrediting Bureau of Health Education Schools (ABHES)  
Accrediting Commission of Career Schools and Colleges (ACCSC)

**BEFORE THE TEXAS BOARD OF NURSING**

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**ORDER OF THE BOARD**

**In the Matter of:**

Concorde Career Institute  
Vocational Nursing Education Program  
In Arlington, Texas

A public meeting of the Texas Board of Nursing, hereinafter referred to as the Board, was held on April 16, 2014, 333 Guadalupe, Tower II, Room 225, Austin, Texas, to consider the report of the survey visit to Concorde Career Institute Vocational Nursing Education Program in Arlington, Texas, pursuant to Section 301.157, Texas Occupations Code and 22 Texas Administrative Code, Chapter 214.

After review and due consideration of the findings from the survey visit, as well as the presentation by representatives from Concorde Career Institute in Arlington, Texas, and other interested parties, if any, the Board hereby ACCEPTS the survey visit report and imposes the following conditions/requirements:

1. The program shall submit to the Board no later than June 1, 2014, a plan for the eight (8) students to fulfill the course-required number of faculty-supervised hands-on clinical practice hours that were required of all students in the course.
2. The administration shall provide evidence to Board Staff no later than June 1, 2014, that the program director has the authority to direct the program in all its phases including the authority to enforce program policies.

Entered this 16<sup>th</sup> day of April, 2014

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Katherine Thomas, MN, RN, FAAN  
Executive Director

**Actual Patient Care Clinical Make-Up Hours  
Submitted by Lisa Hawthone**

Below is a summary of each student's hours missed in actual patient care clinical setting that they attended in nursing skills and computer laboratories:

<b>Student Name</b>	<b>Actual Patient Care Clinical Hours Missed</b>	<b>Date Returned to Actual Patient Care Clinical</b>
1	68	1/30/2014
2	68	1/30/2014
3	68	1/30/2014
4	84	2/5/2014
5	68	1/30/2014
6	84	2/5/2014
7	84	2/5/2014

Students will be making-up the hours on the following dates:

- March 12, 2014 10 hours
- March 13, 2014 10 hours
- March 17, 2014 8 hours
- March 18, 2014 8 hours
- March 19, 2014 8 hours
- March 20, 2014 8 hours
- March 21, 2014 8 hours

While this does not total the full hours of actual patient care clinical hours missed, it does provide the students the interaction with additional patients to enhance their learning experience. The students will not exceed 40 hours in a week.

Additionally, I would like to request that the other hours of nursing skills and computer laboratory experiences be considered to meet their requirements by definition of the Texas Board of Nursing Chapter 214.2 (10) definition for Clinical Learning Experiences:

*Faculty-planned and guided learning activities designed to assist students to meet the stated program and course outcomes and to safely apply knowledge and skills when providing nursing care to clients across the life span as appropriate to the role expectations of the graduates. These experiences occur in actual patient care clinical learning situations and in associated clinical conferences; in nursing skills and computer laboratories; and in simulated clinical settings, including high-fidelity, where the activities involve using planned objectives in a realistic patient scenario guided by trained faculty and followed by a debriefing and evaluation of student performance.*