

**Report of Survey Visit
Concorde Career College in Dallas, Texas
Associate Degree Nursing Education Program**

Summary of Request:

Consider the report of the June 22, 2017 unannounced joint survey visit to the Concorde Career College (CCC) Associate Degree Nursing (ADN) Education Program in Dallas, Texas, pursuant to the January 2017 Board Order and numerous complaints.

Historical Perspective:

- CCC of Dallas was established in spring 2010 as a branch of the Aurora, Colorado campus.
- The ADN Education Program was approved by the Board at the April 2013 meeting with their first cohort graduating class in 2014.
- Besides the ADN program, CCC of Dallas currently offers the following programs: Dental Assistant, Dental Hygiene, Medical Assistant, Medical Office Administration, Physical Therapist Assistant, Respiratory Therapy, Surgical Technology, and Vocational Nursing.
- CCC was accredited by the Accrediting Commission of Career Schools and Colleges (ACCSC) in 2010.
- The program has had three directors:
 - Sherry Akins, MSN, RN, served as the ADN Program Director from October 2014 to May 2017.
 - Susan Gray, MSN, RN, became the Interim Program Director in May 2017.
 - Louise Outlaw, MSN, RN became the Program Director in August 2017. The current Director is new to the role.
 - The NCLEX-RN® pass rates for the past two (2) years are provided in the table below:

NCLEX Examination Year	BON Approval Status	NCLEX-RN® Examination Pass Rate	Number of First Time Candidates (Passed/Total)
2016	Initial with Warning (January 2017)	47.06%	16/34
2015	Initial	31.58%	6/19

- The program submitted a Self-Study Report (SSR) in 2016 for the 2015 NCLEX-RN® pass rate in which they identified the following areas for correction:
 - increase admission criteria to include TEAS V exam and implement this requirement for new and re-entry students;
 - improve faculty orientation, development, and retention;
 - consistently implement standardized proctored exams throughout the program
 - develop course exams using the NCLEX blueprint categories; and
 - revise clinical evaluation tools and skills checkoffs to better match course objectives.
- The program evaluated the effects of corrective measures in 2017 and submitted an evaluation indicating the following activities:

- transitioned to using a different standardized exam with a minimum score of 75;
 - increased number of qualified faculty through the temporary use of an outside agency;
 - conducted director-led weekly meetings with new faculty;
 - carried out regular classroom and clinical evaluations;
 - assigned specialty exams, online adaptive quizzing, and case studies to applicable courses with higher passing score;
 - required remediation following failures in exams; and
 - ensured that clinical evaluation tools are congruent with course objectives.
- The program's approval status was changed to Initial with Warning in January 2017.
 - The June 22, 2017 survey visit was conducted by BON and Texas Workforce Commission (TWC) Staff in response to program complaints centered on inadequate clinical learning experiences and inconsistencies in adhering to program policies.

Summary of Survey Findings (See Attachment #1):

- Findings from the survey visit are detailed in Attachment #1 with the visit focused on identifying major areas for improvement and exploring the complaints. Representatives from TWC examined clinical rotation schedules, course grades, and student policies, and interviewed students.

Major Concerns:

- Students were engaged in improper use of clinical time.
- Student and faculty policies were not readily available and there was inconsistency in following grading and progression policies. Students expressed concern about rapid changes in policies.
- Faculty turnover has resulted in numerous new faculty and the use of agency nurses as faculty.

Staff Rationale:

Board Staff has provided rationale for the requirements in the Board Order.

Staff Rationale for Requirement #1:

Rule 215.7(a) lists numerous faculty policies that must be available in a written form (commonly in a Faculty Handbook). The lack of available policies and processes limits consistency and best practices in program function.

Requirement #1:

The program shall develop and submit to Board Staff no later than January 1, 2018 written faculty policies required in Rule 215.7 including policies for workload, qualifications and responsibilities, performance evaluation criteria, faculty orientation, faculty development, faculty organization, and other policies to promote a positive work environment and program success. In addition, the Program Director and Administration should agree on policies that will encourage faculty retention no later than January 1, 2018.

Staff Rationale for Requirement #2:

Rule 215.8(c) states, "The program of study shall have well-defined, written nursing student policies based upon statutory and Board requirements, including nursing student admission,

dismissal, progression, and graduation policies that shall be developed, implemented, and enforced.”

It was found during the survey visit that the policies for student grading, progression, and graduation are unclear and not easily located. Processes currently in place are not consistently followed and students indicated policies are changing rapidly without notification.

Requirement #2:

The program shall develop and submit to Board Staff no later than January 1, 2018 written student policies outlined in Rule 215.8 including nursing student admission, dismissal, progression, and graduation policies in accordance with the requirements of all applicable federal and state agencies. Policies should be included describing how students will have input into the development of academic policies and procedures, curriculum planning, and evaluation of teaching effectiveness.

Staff Rationale for Recommendation #1:

Rule 215.10(a) requires faculty to be responsible and accountable for managing clinical learning and observation experiences of students.

A complaint was received in the Board Office that students were unable to engage in scheduled clinical experiences due to missing, requested student health documents at the clinical setting. The program had not provided this information.

Recommendation #1:

The program shall submit to Board Staff their plans to ensure that mechanisms are in place for the program to meet its responsibilities to clinical agencies to allow students to participate in all clinical experiences no later than December 1, 2017.

Staff Recommendation:

Move to accept the report of findings of the survey visit to the Concorde Career College Associate Degree Nursing Education Program in Dallas, Texas, and impose the requirements/conditions indicated in the attached letter and Board Order (See Attachment #2).

**Summary of Survey Visit
Concorde Career College in Dallas, Texas
Associate Degree Nursing Education Program**

Purpose of Survey visit: A follow-up survey visit was conducted pursuant to the January 2017 program status change. The visit was made in collaboration with Texas Work Force Commission (TWC) staff related to multiple complaints.

Date of Visit: June 22, 2017 (unannounced)

Board Staff and TWC staff arrived at 9:00 am. Ms. Erin Henry, Campus President, Susan Gray, MSN, RN, Interim Director, were on site, as well as the ADN students in cohort six who will graduate in December 2017.

Board Staff Conducting Visit: Education Consultants Gayle Varnell, PhD, APRN, CPNP-PC

TWC Staff Participating in Joint Visit:

L. Earl Woolbright, Region 2 Area Manager
Jill Werner, Assistant
Crystal Sanders, Assistant

Education Consultant met with:

Susan Gray, MSN, RN, Interim Director
Erin Henry, Campus President

Education Consultant:

- Interviewed 26 ADN students;
- Toured facility;
- Reviewed records, and documents including student and faculty files, clinical and course rotations, course catalog, course syllabi, college catalog; and
- Conducted exit interview with Interim Director, and President.

Summary of Findings:

Administration:

- Board staff met with the Interim Director and Campus President to discuss the ADN Program at Concorde College and the complaints received. An exit meeting was held at the end of the day with closing remarks.
- Administration stated they had been working with the Interim Program Director to address deficiencies identified in the SSR and student issues.

- In addition to the ADN Program, CCC offers the following programs: Vocational Nursing, Dental Assistant, Dental Hygiene, Medical Assistant, Medical Office Administration, Physical Therapist Assistant, Respiratory Therapy, and Surgical Technology.

Program of Study:

- The program is 18 months in length and consists of six terms.

- There are 690 didactic hours, 225 skills lab hours, and 743 clinical practice hours in the program of study.
- Course syllabi were sent electronically to Board Staff following the visit. Syllabi did not include accurate dates nor a class schedule with assignments and test dates. This information may be available, but was not available to the survey visitor.
- Students do not receive authorization from the program director to apply to take the NCLEX® examination until satisfactory performance on an exit examination (standardized exam) has been met.

Faculty:

- There were nine faculty at the time of the survey visit, five of which were hired in 2017. There has been frequent faculty turnover and agency nurses have been hired to help fill vacancies at various times.
- Required faculty policies were not available. There is not a formal orientation for new faculty.

Students:

- There are 67 students currently enrolled in the ADN Program.
- One of the complaints received before the visit related to the program's failure to provide student health data to clinical facilities resulting in students being barred from the clinical setting and assigned to campus for the clinical time. Board Staff requested the names of students and a list of missed clinical days and scheduled make-up days.
- Another complaint related to the program's failure to follow grading and progress policies allowing students who failed to continue in the program.
- Forty-six students were interviewed and voiced the following concerns:
 - lack of structure in the program;
 - policies that are constantly changing;
 - minimal time spent in lecture and student questions in the classroom;
 - use of lecture and skills lab time for testing rather than content and skills;
 - apathy on the part of the program toward student concerns; and
 - program approval status (Initial Approval with Warning).
- Student policies in the Concorde Career College catalog are not easily accessible. Specific nursing student policies were not available.

Clinical Learning Experiences:

- The clinical evaluation tool currently is a single document that tracks the students' progress throughout the program.
- According to the Interim Director, faculty provide direct supervision during all clinical learning experiences.
- Faculty-to-student ratios required by Board rules are maintained in the clinical areas.

Facilities, Resources, and Services:

- The facilities housing the ADN Program are spacious and equipped with numerous audio-visual equipped classrooms, student study areas, and a computer lab.
- The Interim Program Director has a fully equipped private office.
- The nursing faculty have private cubicles that are fully furnished. There are ample private offices to meet with students in private.
- The program has full-time clerical and secretarial support.

Records and Reports:

- Concorde utilizes a paperless system and faculty and student records are maintained online.
- The Total Program Evaluation (TPE) Plan, copies of the Nursing Education Program Information Surveys, Compliance Audits for Nursing Education Programs, and faculty minutes are kept in the Program Director's office in a locked cabinet.

October 27, 2017

Louise Outlaw, MSN, RN
Director, Associate Degree Nursing Education Program
Concorde Career College
12606 Greenville Ave., Suite 130
Dallas, TX 75243

Dear Ms. Outlaw:

At the October 26-27, 2017 meeting, members of the Texas Board of Nursing (Board) considered the report of the survey visit to the Concorde Career College Associate Degree Nursing Education Program in Dallas, Texas. It was the decision of the Board to accept the report of the survey visit and impose the requirements/conditions as indicated in the attached Board Order.

If you have any questions or if we may offer assistance, please contact Board Staff at 512-621-5179 or gayle.varnell@bon.texas.gov.

Sincerely,

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

Copy: Erin Henry, Campus President
Ferquita Stokes, MSN-ED, RN, Regional Dean of Nursing
Texas Workforce Commission

BEFORE THE TEXAS BOARD OF NURSING

ORDER OF THE BOARD

In the Matter of:

Concorde Career College
Associate Degree Nursing Education Program
In Dallas, Texas

A public meeting of the Texas Board of Nursing, hereinafter referred to as the Board, was held on October 26-27, 2017, 333 Guadalupe, Tower II, Room 225, Austin, Texas to consider the survey visit to the Concorde Career College Associate Degree Nursing Education Program in Dallas, Texas, based upon Board action at the January 2017 meeting pursuant to Section 301.157, Texas Occupations Code and 22 Tex. Admin. Code Chapter 215, and based upon findings from the June 22, 2017 survey visit.

After review and due consideration of the filed materials, as well as the presentation by representatives from Concorde Career College Associate Degree Nursing Education Program in Dallas, Texas, and other interested parties, if any, the Board hereby ACCEPTS the report of the survey visit to the Concorde Career College Associate Degree Nursing Education Program in Dallas, Texas, and hereby imposes the following requirements/conditions:

Requirements:

1. The program shall develop and submit to Board Staff no later than January 1, 2018 written faculty policies required in Rule 215.7 including policies for workload, qualifications and responsibilities, performance evaluation criteria, faculty orientation, faculty development, faculty organization, and other policies to promote a positive work environment and program success. In addition, the Program Director and Administration should agree on policies that will encourage faculty retention no later than January 1, 2018.
2. The program shall develop and submit to Board Staff no later than January 1, 2018 written student policies outlined in Rule 215.8 including nursing student admission, dismissal, progression, and graduation policies in accordance with the requirements of all applicable federal and state agencies. Policies should be included describing how students will have input into the development of academic policies and procedures, curriculum planning, and evaluation of teaching effectiveness.

Recommendation:

1. The program shall submit to Board Staff their plans to ensure that mechanisms are in place for the program to meet its responsibilities to clinical agencies to allow students to participate in all clinical experiences no later than December 1, 2017.

Entered this 26th day of October, 2017

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