

**Report of Survey Visit
Bell Tech Career Institute in Houston, Texas
Vocational Nursing Education Program**

Summary of Request:

Consider the report of the April 24, 2018 unannounced survey visit to the Bell Tech Career Institute (BTCI) Vocational Nursing (VN) Education Program in Houston, Texas due to the program's physical relocation without obtaining prior Board approval of the new facility, resources, and services.

Historical Perspective:

- The BTCI VN Education Program was approved at the October 2011 Board meeting to enroll the first cohort of 30 students. According to the 2012 Nursing Education Program Information Survey (NEPIS), the first cohort of 32 students was enrolled in January 2012.
- BTCI is licensed by the Texas Workforce Commission (TWC).
- In addition to the VN program, BTCI offers Patient Care Technician and Nurse Aide programs.
- Since the program began, six program directors have served in the leadership position. The BTCI owner, Rashidat Kikelomo Bello, RN, BSN was the designated contact person from July 14, 2017 to January 31, 2018, as no qualified program director was in place. Nikolaos Moraros, MSHSA, MSN, RN, PHN, the current Program Director, was approved on January 31, 2018.
- The NCLEX-PN® examination pass rates for the past five years are provided in the following table:

NCLEX Examination Year	BOARD Approval Status	NCLEX-PN® Examination Pass Rate	Number of First Time Candidates (Passed/Total)
2017	Full	81.82%	9/11
2016	Conditional	100%	13/13
2015	Initial with Warning	20.83%	5/24
2014	Initial	58.82%	10/17
2013	Initial	37.93%	11/29

- The program submitted a Self-Study Report (SSR) in 2014 due to the 2013 NCLEX-PN® pass rate. Although the program implemented measures to improve the performance of students, the NCLEX-PN® pass rate continued to be below 80% in 2014 and 2015.
- Major areas needing corrective measures were identified in the SSR. These included:
 - establishing a standardized testing policy and process;
 - establishing faculty development resources;
 - holding weekly faculty meetings to include a faculty committee structure;
 - implementing a remediation program for students;
 - implementing standardized assessment testing for applicants;
 - updating the student recruitment and orientation process;
 - establishing lesson plan binders to document teaching plans and course outlines;
 - conducting quarterly faculty evaluations;
 - upgrading clinical sites; and
 - implementing the Total Program Evaluation Plan.
- When a program is placed on conditional approval, as occurred in 2016, it is restricted from enrolling new students in order for the program to focus on improving the outcomes of the program including the NCLEX® pass rate before admitting additional students.
- The program achieved its first pass rate above 80% in 2016, after three years of falling below this benchmark. At the January 2017 Board meeting, the Board voted to change the program's approval status to Full Approval and imposed the following stated conditions and requirements:
 1. The program shall not enroll more than one cohort of 30 students until the program demonstrates a pass rate for first-time candidates of at least 80% on the 2017 NCLEX-PN® examination. The 2017 NCLEX-PN® year is January 1, 2017 through December 31, 2017; and
 2. The program must demonstrate full compliance with Rule 214.
- The April 24, 2018 survey visit was conducted by Education Consultants Beverly Skloss, MSN, RN and Susan Lee, PhD, RN, CNE in response to the program's relocation without prior Board approval of the new facility, resources, and services, as indicated in Board Rule 214.11. TWC representatives participated in the visit with Board Staff as TWC had received several complaints from students, thus warranting a joint visit.

Summary of Survey Findings (See Attachment #1):

- Findings from the survey visit are detailed in Attachment #1. The visit focused on students, faculty, facility, and resources.

Major Concerns:

- During the visit to the skills lab, Board Staff saw that multiple bottles, bubble packs, and tubes of actual prescription medications, most with full prescription labels (e.g., patient name, date of birth, physician name, prescription numbers) were available in unlocked medication cart drawers and an unlocked, lower cabinet in the nursing skills lab.
Note: The Program Coordinator revealed the presence of the prescription medications to Board Staff but the Program Director denied that he was aware that actual prescription medications were in the skills lab. Board Staff instructed the Program Director of the

impropriety and safety concerns associated with having unsecured medications, as well as the fact this represented a violation of the Health Insurance Portability and Accountability Act (HIPAA). Furthermore, Board Staff asked about program policies for discarding medications during skills lab practice and were told that medications were dropped into a sharps container.

Board Staff encouraged the Program Director to properly dispose of the medications as soon as possible. On April 25, 2018, Board Staff received an email communication from the Program Director with a list of medications and documentation of receipt of medications by a licensed pharmacy in Houston, Texas. Subsequent to the visit, Board Staff also received a copy of a sales order submitted to a vendor by the BTCI owner to purchase student demonstration faux medications.

- During the survey visit, the Program Director also discussed with Board Staff a previously submitted request to admit a second cohort of up to 30 students in 2018 and then two cohorts of up to 30 students in January and July of each following year. In addition, the owners and program director of BTCI have expressed an interest in developing an associate degree and a baccalaureate degree nursing education program.
Note: there is currently a lack of adequate lab space for students and the equipment in the lab is outdated with functional limitations. The equipment does not provide adequate student learning or skills practice for the current students and this must be considered prior to admitting additional students. Similar issues were addressed in the July 2017 Board Report of a previous survey visit conducted in June 2017. At that time, three of six skills lab beds were not operational and this time, the Program Coordinator was unable to demonstrate the raising and lowering of two of the three skills lab beds.
- A third concern identified during the survey visit involved the use of standardized examinations. One course, VN-406 NCLEX Preparation/Review Lab that is offered to students in the final semester of the VN program is a high-stakes course since the grade is based solely upon achieving a pre-determined score on standardized exams. The course syllabus indicates that 90% of the course grade is determined by achieving a minimum score on standardized exams purchased from two different vendors. The Student Catalog does state that the program completion requirements include passing these two standardized examinations in course VN-405 Transition into Nursing.

The following concerns were identified during the survey visit that warrant immediate attention:

- Safety of students and lab personnel related to unsecured prescription medications in the lab;
- Confidentiality of patient data not protected (actual prescription medications in the lab);
- Need for adequate educational facilities and resources, with functional skills lab equipment for current students as well as future growth;
- Requests to increase enrollment with additional cohorts; and
- Appropriate utilization of standardized examinations.

Board Staff provide the following rationales for three requirements:

Staff Rationale for Requirement #1

Rule 217.11(1)(A) states: All vocational nurses, registered nurses and registered nurses with advanced practice authorization shall: Know and conform to the Texas Nursing Practice Act and the Board's rules and regulations as well as all federal, state, or local laws, rules or regulations affecting the nurse's current area of nursing practice.

Rule 217.11(E) states: All nurses shall respect the client's right to privacy by protecting confidential information unless required or allowed by law to disclose the information.

During the survey visit, the Education Consultants discovered multiple bottles, bubble packs, and tubes of prescription medications, most with full prescription labels (e.g., patient name, date of birth, physician name, prescription number) in unlocked medication cart drawers and an unlocked, lower cabinet in the nursing skills lab. Patient identifiers were clearly visible, therefore not in alignment with HIPAA, a federal mandate providing data privacy and security provisions for patient confidentiality.

Requirement #1:

The program shall develop policies and curriculum content stressing adherence to HIPAA and promoting safety standards and submit evidence to Board Staff by August 1, 2018.

Staff Rationale for Requirement #2:

Rule 214.11(d) states: The physical facilities shall be adequate to meet the needs of the program in relation to the size of the faculty and the student body.

Rule 214.11(d)(5) & (6) state: Classrooms, laboratories, and conference rooms shall be conducive to learning and adequate in number, size, and type for the number of students and the educational purposes for which the rooms are used and teaching aids shall be provided to meet the objectives/outcomes of the program.

During the survey visit, the Education Consultants observed and were told by the Program Coordinator that there is not adequate space in the skills lab to accommodate the current student enrollment and that some of the equipment is not functional.

Requirement #2:

The program shall submit documentation (e.g., floor plans, invoices, work orders) that adequate classroom space, lab space, and properly functioning skills lab equipment are available to accommodate the current enrollment to Board Staff no later than October 31, 2018.

Staff Rationale for Requirement #3:

Rule 214.8(b) requires that a program must seek Board approval prior to an increase in enrollment by 25% or greater in one academic year.

During the survey visit, the Program Director discussed the desire of the program to add a second cohort of up to 30 students in 2018 and then to add two cohorts of up to 30 students each in January and July of each year thereafter. One of the considerations for increasing enrollment is evidence of adequate educational resources (space and equipment). Board Staff observed crowding in the skills lab for the current students and this was substantiated by the Program Coordinator. In addition, some of the lab equipment is outdated or non-functional.

Requirement #3:

The program shall submit evidence that adequate space and equipment will be available for any growth in enrollment. A floor plan, equipment purchase plan, and adequate qualified faculty list shall be submitted to Board Staff no later than October 31, 2018.

Staff Rationale for Recommendation #1:

Education Guideline 3.7.4.a. The Use of Standardized Examinations in Nursing Education Programs sets forth Board Staff recommendations when utilizing standardized examinations in pre-licensure nursing programs. The guideline cautions against the use of standardized exams in a high stakes manner which may prevent a student from progressing or graduating.

During the survey visit, Education Consultants were provided information that the course grade in VN-406 NCLEX Preparation/Review Lab is based solely upon earning a designated score on standardized exams.

Recommendation #1:

The program shall evaluate the use of high stakes standardized examinations based on Education Guideline 3.7.4.a. and develop a plan to eliminate the utilization of the examination outcomes in a high stakes manner and submit to Board Staff syllabi of any and all courses where high-stakes standardized exams are utilized no later than October 31, 2018.

Staff Recommendation:

Move to accept the report of findings of the unannounced survey visit to the Bell Tech Career Institute Vocational Nursing Education Program in Houston, Texas, and impose the requirements/recommendation indicated in the attached letter and Board Order (See Attachment #2).

**Summary of Survey Visit
Bell Tech Career Institute, Houston, Texas
Vocational Nursing Education Program**

Purpose of Survey visit: An unannounced joint survey visit was conducted due to the program's physical relocation in 2018 without obtaining prior Board approval of the new facility, resources, and services. The visit was made in collaboration with Texas Work Force Commission (TWC) Staff due to TWC's receipt of multiple student complaints.

Date of Visit: April 24, 2018

Board Staff Conducting Visit: Education Consultants Beverly Skloss, MSN, RN and Susan Lee, PhD, RN, CNE

TWC Staff Participating in Joint Visit: Le'Cresha Davenport, Integrated Service Area Assistant Manager - Region 5

Education Consultants met with:

Nikolaos Moraros, MSHSA, MSN, RN, PHN, Vocational Nursing (VN) Program Director
Titilayo Salami, MSN, RN, VN Program Coordinator and Faculty

Education Consultants:

- Held initial interview with Program Director;
- Interviewed 23 first-semester VN students;
- Toured facility;
- Reviewed student and faculty files; and
- Conducted exit interview with Program Director.

Summary of Findings:

Administration:

- The Board-approved Program Director, Nikolaos Moraros, MSHSA, MSN, RN, PHN, has been with BTCL since January 2018. Mr. Moraros indicated his sole responsibility is the VN Education Program.
- The Program Director indicated he has administrative authority for the program; however, he stated he must speak with the campus director/owner for approval prior to taking action or making changes.
- The Program Director does not carry a teaching load, though he does cover classes during instructor absences.

Faculty:

- There were five nursing faculty employed at the time of the survey visit, one full-time and four part-time. Two faculty have taught at BTCI for more than three years, two were hired in 2017, and one was hired in January 2018. Two faculty are doctorally-prepared and two faculty are masters-prepared. All faculty have experience in nursing education.
- Faculty development webinars from an outside vendor have been provided for faculty use.

Students:

- Twenty-seven students were enrolled in January 2018 with 24 students in the program at the time of the survey visit.
- Fourteen students were enrolled in 2017. Board Staff were given three different enrollment dates of January, March, and April 2017. When Board Staff asked for clarification, the Program Director did not provide a response. Ten of these students graduated on April 20, 2018.
- Twenty-three students were interviewed, given an explanation of the Board role along with Board Staff contact information. No complaints were voiced.
- Students indicated they know to contact their instructors and the Program Director with any concerns.
- Students indicated they were given a copy of the student handbook at the beginning of the program and signed a receipt.
- Students indicated they are satisfied with the clinical learning experiences.

Program of Study:

- The one-year program is divided into four quarters.
- At the end of the program, the course grade in VN-406 NCLEX Preparation/Review Lab, is based solely upon the achievement of an identified score on the standardized exams. The course syllabus indicates 90% of the course grade is determined by achieving a minimum score on two different standardized exams obtained from two vendors. Of note, the Student Catalog indicates program completion requirements include passing these standardized examinations in course VN-405 Transition into Nursing. Students who do not earn the required minimum score are removed from the program.
- The Program Director indicated that after graduation, there is a mandatory seven-week review/remediation that must be successfully completed prior to the Program Director submitting Affidavits of Graduation, which verify eligibility of graduates to take the NCLEX-PN® exam.

Clinical Learning Experiences:

- According to the Program Director and Program Coordinator, faculty provide supervision during all clinical learning experiences.
- Board Staff interviewed the Program Coordinator regarding skills lab activities and hands-on clinical rotations. She indicated faculty to student ratios are 1:8, which is in compliance with Rule 214.
- The Program Coordinator indicated that faculty meet with students before skills lab is conducted and explain the plan for the day. Each faculty is assigned eight students for the

lab experience. The Program Coordinator added that skills lab space is limited and too crowded for teaching eight students at one time in each lab.

- Hands-on clinical learning experiences are conducted in facilities, such as long-term care, post-acute care, and rehabilitation.

Facilities, Resources, and Services:

- BTCI is located on the first floor of a multi-story professional office building. Ample parking is available.
- There is a lounge where students can gather to eat, study, or take breaks. It is equipped with a refrigerator and two microwave ovens.
- Classrooms are furnished with tables and chairs, with space in one classroom for up to 33 students and space in the second classroom for up to 21 students. Media equipment is available, including computers for students.
- There are two small skills labs, one with two hospital beds and one with one bed, three low fidelity mannequins, eight infants, and one toddler mannequin. A third skills lab is available for student use with an examination table and skeletal model. The Program Coordinator was unable to demonstrate the raising and lowering of two patient beds. In the June 2017 survey visit, the Program Evaluator found that three of the six skills labs beds were not operational. This is an on-going issue.
- The Program Director has a private, furnished office, while the faculty share one furnished office. There are areas for private student counseling.
- Multiple bottles, bubble packs, and tubes of prescription medications, most with full prescription labels (e.g., patient name, date of birth, physician name, prescription number) were found in unlocked medication cart drawers and an unlocked lower cabinet in the nursing skills lab. The Program Director and Program Coordinator said these were not actual medications, adding they were demo drugs purchased from a supply company that came with prescription labels containing patient information.
- The Program Director stated that he was unaware of actual medications being used in the skills lab, but offered to query the BTCI owner and the Program Coordinator to determine how and why actual medications, rather than demo medications were used by students in the nursing skills lab.
- The Program Director reported to Board Staff that the BTCI owner stated the medications were brought from her home health agency and acknowledged she “accidentally forgot to black out patient names with a marker”.

Records and Reports:

- Faculty and student records contained all documents as required by Board rule.

July 19, 2018

Nikolaos Moraros, MSHSA, MSN, RN, PHN
Director, Vocational Nursing Education Program
Bell Tech Career Institute
12000 Richmond Ave., Suite 130
Houston, Texas 77082

Dear Mr. Moraros:

At the July 19, 2018 meeting, members of the Texas Board (Board) of Nursing considered the report of the April 24, 2018 survey visit to the Bell Tech Career Institute Vocational Nursing Education Program in Houston, Texas. It was the decision of the Board to accept the report of the survey visit and impose the recommendation and requirements as indicated in the attached Board Order.

A Requirement is a mandatory criteria based upon program assessment directly related to the rules that must be addressed in the manner prescribed.

A Recommendation is a suggestion based upon program assessment indirectly related to the rules to which a program must respond but in a method of their choosing.

If you have any questions or if we may offer assistance, please contact Board Staff at 512-318-3219 or Beverly.Skloss@bon.texas.gov.

Sincerely,

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

Copy: Kikelomo Bello, BSN, RN, Campus President
Texas Workforce Commission

BEFORE THE TEXAS BOARD

ORDER OF THE BOARD

In the Matter of
Bell Tech Career Institute
Vocational Nursing Education Program
In Houston, Texas

A public meeting of the Texas Board of Nursing, hereinafter referred to as the Board, was held on July 19-20, 2018, 333 Guadalupe, Tower II, Room 225, Austin, Texas to consider the report of the April 24, 2018 survey visit to Bell Tech Career Institute Vocational Nursing Education Program in Houston, Texas, pursuant to Section 301.157, Texas Occupations Code and 22 Tex. Admin. Code Chapter 214, based upon compliance with Rule 214.

After review and due consideration of the filed materials, and other interested parties, if any, the Board hereby ACCEPTS the report of the survey visit to the Bell Tech Career Institute Vocational Nursing Education Program in Houston, Texas, and hereby imposes the following requirements and recommendation:

Requirements:

1. The program shall develop policies and curriculum content stressing adherence to HIPAA and promoting safety standards and submit evidence to Board Staff by August 1, 2018.
2. The program shall submit documentation (e.g., floor plans, invoices, work orders) that adequate classroom space, lab space, and properly functioning skills lab equipment are available to accommodate the current enrollment to Board Staff no later than October 31, 2018.
3. The program shall submit evidence that adequate space and equipment will be available for any growth in enrollment. A floor plan, equipment purchase plan, and adequate qualified faculty list shall be submitted to Board Staff no later than October 31, 2018.

Recommendation:

1. The program shall evaluate the use of high stakes standardized examinations based on Education Guideline 3.7.4.a. and develop a plan to eliminate the utilization of the examination outcomes in a high stakes manner and submit to Board Staff syllabi of any and all courses where high-stakes standardized exams are utilized no later than October 31, 2018.

Entered this 19th day of July, 2018

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