

**Follow-up Report of Findings  
American Medical Institute in Houston, Texas  
Vocational Nursing Education Program**

**Summary of Request:**

Consider the status of American Medical Institute Texas Board of Nursing (Board) resultant to actions at the July 19-20, 2012 meeting (Attachment #1).

**Historical Perspective:**

Year	Approval Status	NCLEX-PN® Pass Rate	Number of First-Time Candidates Who Tested (Passed/Total)
2012	Full with Warning (Changed at April 2012 Board Meeting)		
2011	Full	50%	21/42
2010	Full	79.41%	27/34
2009	Initial	88.89%	8/9

- At the April 19-20, 2012 meeting, the members of the Board voted to change the approval status of the American Medical Institute (AMI) in Houston, Texas Vocational Nursing Education Program from Full to Full with Warning based upon the review of the 2011 NCLEX-PN® pass rate, the 2010 Nursing Education Program Information Survey (NEPIS), and Board Rule 214.
- Also at the April 19-20, 2012 meeting, Board members voted to restrict the program from enrolling new students until a report of the April 17, 2012 survey visit could be considered at the July 2012 Board meeting.
- At the July 19-20, 2012 meeting, the members of the Board considered the report of the April 17, 2012 survey visit and voted to continue to restrict the enrollment of new students until a decision is reached by Texas Workforce Commission (TWC) concerning renewal of the AMI Certificate of Approval and Board Staff have an opportunity to reevaluate the program's compliance with Board rules.

**Rationale for Board Staff Recommendation:**

- Board Staff have worked collaboratively with TWC representatives and conducted a joint, unannounced survey visit to AMI on April 17, 2012. A number of infractions of Board Rule 214 Vocational Nursing Education were substantiated during the survey visit (See Attachment #1).

- Board Staff were notified in May 2012 that TWC was withholding renewal of the Certificate of Approval for AMI that expired on May 11, 2012, due to multiple deficiencies identified during the survey visit. The certificate may be denied if the deficiencies are not addressed in a timely manner. TWC approval is required for AMI to operate as an educational entity in the State of Texas.
- In August 2012, Dr. William Currey was hired as the AMI Campus President. Dr. Currey, a non-nurse, has communicated frequently with Board Staff in an effort to implement corrective measures. According to Dr. Currey, the school will move to a larger campus that can accommodate the number of enrolled students with a projected move-in date of October 15, 2012. In addition, Dr. Currey is interviewing prospective faculty members in order to expand the nursing faculty that is presently comprised of five registered nurses and one licensed vocational nurse. Candidates must possess a baccalaureate degree in nursing and have teaching experience to be considered for a faculty position.
- A September 13, 2012 TWC Hearing was scheduled to consider issues surrounding the renewal of the AMI Certificate of Approval; however, the hearing was postponed.
- As of October 1, 2012, TWC had not reached a determination regarding the approval status of AMI.
- Board Staff continue to receive complex, serious complaints from former and current students as well as former vocational nursing program instructors.

**Staff Recommendation:**

Move to continue to restrict the enrollment of new students in the American Medical Institute in Houston, Texas Vocational Nursing Education Program until a decision is reached by TWC and Board Staff have an opportunity to reevaluate the program's compliance with Board rules (See Attachment #2).

### **Survey Visit Summary Report**

**Name of Nursing Program:** American Medical Institute Vocational Nursing Education Program  
Houston, Texas

**Nursing Program Director:** Ify Emenaha, PharmD, RN

**Reason for Survey Visit:** Unannounced Survey Visit with Texas Workforce Commission (TWC) staff due to receipt of multiple student complaints, beginning in January 2012, with the seriousness and complexity of the students' complaints continuing to escalate from January 2012 to April 2012

**Date of Survey Visit:** April 17, 2012

**Survey Visitors:** Mary Beth Thomas, PhD, RN  
Virginia D. Ayars, EdD, MS, RN  
Sharon Thomas, TWC Representative  
Ramona Malone, TWC Representative

**Texas Board of Nursing Approval Status:** Full with Warning

**Date of Last BON Survey Visit:** February 2009

**Name of Accrediting/Licensing Agencies:** Texas Workforce Commission

#### **Rationale for Unannounced Survey Visit:**

**The following issues were described in written, signed student complaints provided to Board Staff from the time period of January 2012 through April 2012. Though Board Staff were not able to substantiate the following allegations, students submitted that:**

- No nursing faculty members were on staff from August 2011 through November 2011 when one registered nurse (RN) faculty member was hired.
- Two foreign medical graduates (FMGs) were teaching the following nursing courses: Maternity Nursing, Pediatric Nursing, Adult Medical/Surgical Nursing, and Mental Health Nursing. Students stated that the FMGs were unable to answer fundamental course content questions and were not experienced educators. In addition, students alleged that non-professional faculty/student relationships had developed.
- Program Director Emenaha's son and daughter, both non-nurses, were teaching several classes, as well as monitoring the students during examinations.
- The physical facilities were inadequate in that Bishop Leo Emenaha's church, located in a strip shopping center next to AMI, was utilized for classroom instruction and activities. However, at 12 noon every day, the students were directed to leave the church so that religious services could be held.

- The Nursing Skills Laboratory lacked appropriate resources and equipment. Rather than receiving instruction concerning how to perform clinical nursing tasks in the Skills Lab, the students were directed to watch nursing videos.
- Changes in grading policies occurred. Ten students, admitted in the March 2011 cohort, who completed all classroom and clinical requirements for graduation as described in the Student Handbook at the time of their admission to the program of study, were not approved to graduate. Program Director Emenaha required the students to retake all examinations in courses in which the students achieved a single examination score of less than 75%. A cumulative final course grade of 75% or greater was not acceptable if one test score was less than 75%. The change in policy and procedure was announced to the students one week before the anticipated graduation date of March 25, 2012.
- Program Director Emenaha was repeatedly informed of the students' concerns and implemented no corrective actions, but rather appeared dismissive and characterized the group as "unwilling learners".

### **Summary of April 17, 2012 Survey Visit:**

#### Prior to visit, Board staff:

Met with TWC staff members Ms. Sharon Thomas and Ms. Ramona Malone at the Workforce Solutions Office, Houston, Texas, to conduct a pre-survey conference and review documents in preparation for the joint Board/TWC unannounced survey visit.

#### During the visit, Board staff:

- met with Program Director Emenaha to explain the purpose of the visit;
- interviewed faculty members, one RN and two FMGs, as a group;
- interviewed faculty members individually;
- interviewed two cohorts of students;
- toured the classrooms, skills laboratory, and nursing offices;
- reviewed documents and files; and
- conducted a summary conference with Program Director Emenaha.

#### Pertinent Survey Findings:

##### Enrollment on April 17, 2012 included the following three cohorts:

- Level 1 - 40 students to graduate April 2013
- Level 2 - 26 students to graduate November 2012
- Level 3 - 18 students to graduate August 2012

##### Interview with Group of Faculty Members:

- The interview with the group of faculty members revealed an insufficient number of faculty members to accommodate the number of enrolled students. The one RN lacked experience as a nurse educator. Neither FMG was qualified to teach nursing courses as directed by Board Rule 214.7(c).

##### Facilities, Resources and Services:

- Physical facilities were crowded and not adequate for the number of enrolled students. The church sanctuary is connected via an internal passageway to the school and students were observed in the church sanctuary upon Board staff arrival in the school reception area.
- The Nursing Skills Laboratory was not sanitary, organized, or well-maintained. No paper towels were present at the sink area, nor was a paper towel holder visible. No hot running water was available. Bed linens were unclean. Supplies and equipment were inadequate for a vocational nursing education

program. The skills training equipment was insufficient to meet the needs of the number of enrolled students.

Records:

- A review of documents revealed an apparent alteration of the dates of the clinical affiliation contract with Mission Care Center, Houston, Texas.
- Student files did not contain documentation of a high school diploma issued by an accredited secondary school or equivalent educational credentials as established by the General Education Development Equivalency Test (GED).
- Signed student acknowledgments of the Board Petition for Declaratory Order of Eligibility process were not present in all student files.
- No central clinical scheduling calendar was apparent. When asked to identify the names of the clinical agencies where the clinical groups were conducting clinical learning experiences on the day of the survey visit, the Program Director was unable to do so.
- No documentation of an active Advisory Committee was present.
- Documentation of Faculty Meeting Minutes was not complete.
- Previously issued Board requirements regarding well-defined written nursing student policies related to unprofessional conduct, dismissal from the program, and readmission to the program had not been addressed.
- Documentation of TWC approval of individual faculty members was not present.

Conclusion:

- A number of infractions of Board Rule 214 Vocational Nursing Education were substantiated. Board Staff are waiting to be informed of the outcome of the TWC investigation and the renewal or denial of the TWC Certificate of Approval.

Updated Information:

- Board Staff continue to receive multiple serious complaints from students about the ongoing issues at AMI.

<<DRAFT LETTER>>

October 22, 2012

Ify Emenaha, PharmD, RN, Director  
Vocational Nursing Education Program  
American Medical Institute  
10849 Kinghurst Drive, Suite 120  
Houston, TX 77099

Dear Dr. Emenaha:

At the October 18-19, 2012 meeting, members of the Texas Board of Nursing (Board) considered the report of the American Medical Institute in Houston, Texas Vocational Nursing Education Program. The Board wishes to thank you and <<.....>> for being present to answer questions.

Based upon the report, it was the decision of the Board to continue to restrict the enrollment of new students at American Medical Institute in Houston, Texas Vocational Nursing Education Program, until a decision is reached by the Texas Workforce Commission regarding renewal of the school's Certificate of Approval and Board Staff have an opportunity to reevaluate the program's compliance with Board rules.

If you have any questions, or if we may be of any assistance, please contact Board Staff at [virginia.ayars@bon.texas.gov](mailto:virginia.ayars@bon.texas.gov) or via telephone at 512-305-7660.

Sincerely,

Kristin K. Benton, MSN, RN  
Board President

Virginia D. Ayars, EdD, MS, RN  
Nursing Consultant for Education

copy: Texas Workforce Commission