

**Consideration for Change of Approval Status from Full with Warning to Conditional  
 Universal Health Services School of Vocational Education in Fort Worth, Texas  
 Vocational Nursing Education Program**

**Summary of Request:**

Consider a proposed change in the program approval status of Universal Health Services School of Vocational Education Vocational Nursing Education Program in Fort Worth, Texas, based upon review of the 2012 NCLEX-PN® examination pass rate, the 2012 Nursing Education Program Information Survey, and the program’s compliance with Board Rule 214.

**Historical Perspective:**

- The Universal Health Services School of Vocational Education (UHS) Vocational Nursing (VN) Education Program has been in operation since Fall 2008.
- The program’s first cohort of nine (9) students graduated in September 2009; eight (8) of the nine (9) candidates who tested in 2009 passed the NCLEX-PN® examination. The program’s overall pass rate for the 2009 testing period is 88.89%. The program’s status was changed from Initial approval to Full approval at the January 2010 Board meeting.
- In April 2011, the program was required to submit a Self-Study Report due to the 2010 NCLEX-PN® pass rate of 60.87%. The program identified the following areas for correction: needs of English as a Second Language (ESL) students; lack of rigor in admission criteria; inadequate tutoring and remediation services; ineffective teaching methods; and failure to follow policies.
- Although the program implemented a number of corrective measures to improve candidate success, the 2011 NCLEX-PN® pass rate is 61.54%.
- At the April 2012 Board meeting, the program approval status was changed from Full to Full with Warning based upon an NCLEX-PN® pass rate below 80% for two (2) consecutive years.
- The 2012 NCLEX-PN® pass rate is 62.50% with 15 of 24 first-time test-takers successfully completing the licensure examination.
- The NCLEX-PN® examination pass rates for the past four (4) years are presented in the following table:

<b>Year</b>	<b>BON Approval Status</b>	<b>NCLEX-PN® Pass Rate</b>	<b>Number of First Time Candidates (Passed/Total)</b>
2012	Full with Warning (April 2012 Board meeting)	62.50%	15/24
2011	Full	61.54%	24/39
2010	Full (January 2010 Board meeting)	60.87%	14/23
2009	Initial	88.89%	8/9

- The current VN Program Director, Ana Naccarato, BSN, RN, approved for appointment in September 2012, meets all qualifications set forth by Board Rule 214.6. Administration and Organization.
- A survey visit to UHS was conducted on October 31, 2012 by Robin Caldwell, PhD, RN, CLNC, Contract Program Evaluator (See Attachment #1). Dr. Caldwell identified several areas of concern during the visit.

**Pros and Cons:**

Pros:

- The director and administration have identified areas for correction, have planned strategies to strengthen the program, and are in the process of implementing an extensive plan for program improvement.
- The school is exploring the possibility of initiating a day program in an effort to facilitate student success.
- The program director, administration, and faculty verbalized willingness to adopt new educational strategies and make all necessary changes to the program of study in order to promote learner success.
- The program has a cohesive, supportive faculty, and faculty turnover rates are low.
- Established policies pertaining to admission, progression, and dismissal of students are now consistently followed.
- Students praised the commitment and availability of faculty members and administration.
- Facilities and resources are adequate to support the program.
- The program has engaged the services of an experienced vocational nursing education consultant.

Cons:

- The program's 2012 NCLEX-PN® pass rate is 62.50%.
- Students in the program are not assigned two (2) consecutive days off each week.
- The accelerated eleven (11) month evening/weekend program is not conducive to the success of students, the majority of whom work full-time and have English as a second language.
- The program primarily utilizes one (1) basic nursing text book throughout the curriculum. The text incorporates fundamentals, geriatric, adult, pediatrics, maternity, and mental-health content.
- Tests are not constructed in a manner to be sufficiently aligned with the NCLEX. The national licensing examination questions are written at an application or higher level of cognitive ability, whereas the tests in the VN program are written at the knowledge and comprehension level.

**Staff Recommendation:**

Based upon review of the 2012 NCLEX-PN® examination pass rate, the 2012 Nursing Education Program Information Survey, and program compliance with Board Rule 214, move to change the approval status of Universal Health Services School of Vocational Education Vocational Nursing Education Program in Fort Worth, Texas from Full with Warning to Conditional Approval status. Further, move to impose the requirements as indicated in the attached order. (See Attachment #2).

**Summary of Survey Visit and Findings  
Universal Health Services School of Vocational Education in Fort Worth, Texas  
Vocational Nursing Education Program**

Purpose of Survey Visit: Focus visit related to approval status

Date of Visit: October 31, 2012

Board Representative Conducting Visit: Robin Caldwell, PhD, RN, CLNC

Activities Carried out by Board Representative During the Survey Visit:

- Conducted an initial meeting with administration:
  - Ana Naccarato, BSN, RN, VN Program Director
  - Monica Casarez-Flores, RN, Program Coordinator
  - Kathy Walls, EdD. MBA, RN, CHPN, President/CEO of UHS School of Vocational Education
  - Robbin Wilson, MSN, RN, UHS VN Program Consultant was present during the survey visit.
- Interviewed three (3) VN program faculty:
  - Chris Connelly, RN, AD, CHPN
  - Les Harp, RN, AD
  - Ron Palmer, BSN, RN, CHPN
- Interviewed two (2) Level III VN program students
- Toured the facilities
- Reviewed program documents and records
- Conducted a summary conference with the director and administration

General Findings:

- The director and administration expressed a commitment to implement corrective actions necessary to ensure learners' success and bring the program into compliance with Board Rule 214. The VN instruction is carried out by experienced RN faculty members with a wide variety of educational and clinical backgrounds. Students expressed a high degree of satisfaction with the program and confidence that the director, faculty, and administration are committed to their success. The program has active clinical contracts with a number of affiliating agencies which provide a variety of appropriate clinical learning experiences for the curriculum. However, the program recently lost two (2) pediatric clinical sites.
- Dr. Caldwell validated that corrective measures related to admission, progression, and dismissal policies, tutoring and remediation strategies, English as a Second Language (ESL) training for faculty, and classroom instruction are in progress.
- However, Dr. Caldwell identified the following areas of concern:
  - a. Students in the program are not assigned two (2) consecutive days off each week.
  - b. The accelerated eleven (11) month, evening/weekend program is not advantageous for student success, the majority of whom work full-time and/or are ESL students.
  - c. The program primarily uses one (1) basic nursing textbook throughout the curriculum.
  - d. The majority of tests are constructed at a lower cognitive level.
  - e. The program has experienced an ongoing problem with graduates who delay in taking the licensure examination.

Findings Related to Administration:

- Ana Naccarato, BSN, RN served as a faculty member in the program prior to her appointment as director in September 2012.
- Monica Casarez-Flores, RN has been with the program since it began in 2008, serving as faculty member until her appointment as coordinator in September 2012.
- Kathy Walls, EdD, MBA, RN, CHPN, President/CEO expressed a commitment to implement changes to ensure the success of the program.

- Both the program director and coordinator voiced appreciation for the strong support they receive from Dr. Walls.
- The program has recently employed the services of a vocational nursing education consultant, Robbin Wilson, MSN, RN.

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

- Nursing Education Program Information Survey (NEPIS) data indicate a total of 1,520 contact hours in the program of study: 568 didactic hours; 117 computer lab hours; 232 skills lab hours; and 608 patient care clinical hours. All instruction is carried out in a face-to-face format.
- The school admits three (3) cohorts per year: January, May, and September.
- The program of study is comprised of three (3) levels; with sixteen (16) weeks in Level I, seventeen (17) weeks in Level Two II, and eleven (11) weeks in Level III.
- The organization of the curriculum is based upon sequential learning with the first level providing the foundation for the program. Skills are front-loaded in Level I.
- The accelerated program is designed to be completed in eleven (11) months, with evening classes from 6 pm - 11pm during the week. Clinical learning experiences are scheduled on Saturday and Sunday and include eight (8) twelve (12) hour shifts.
- In an effort to increase academic rigor, the school has initiated standardized testing throughout the program for admission, progression, remediation, and exit examination purposes.
- The director and administration are exploring the feasibility of initiating a day program in an effort to facilitate successful student outcomes.
- Students are not assigned two (2) consecutive days off each week as required in Rule 214.9(c)(6). Classes are conducted on Tuesday, Wednesday, and Thursday evenings and clinical learning experiences are scheduled on Saturday and Sunday.
- One (1) basic nursing text book is primarily utilized throughout the curriculum. The text incorporates fundamentals, geriatrics, adult, pediatrics, maternity, and mental-health content.
- Strategies to improve testing and classroom instruction have been initiated, including utilizing a test bank as well as a variety of teaching aides available from the text book publisher. Additionally, faculty development pertaining to test construction and item-writing have been ongoing.
- Despite improvements, examinations reviewed were not in alignment with the NCLEX testing blueprint as they were constructed at a knowledge or comprehension cognitive level rather than an application or higher level.
- The *Differentiated Essential Competencies (DECs) (2010)* are fully incorporated into the curriculum.

#### Findings Related to Faculty:

- The VN instruction is carried out by experienced RN faculty members.
- One (1) full-time and eleven (11) part-time faculty teach in the program.
- All faculty are currently engaged in clinical practice and are assigned teaching responsibilities based upon their areas of clinical expertise.
- Several faculty are continuing their education for advanced degrees.
- Faculty report morale is high and they receive strong support from the director, administration, and one another.
- Faculty turnover rates are low. The current faculty have been employed since 2008 when the program began.
- Faculty stated they meet as a group once a month and communicate frequently (either face-to-face or via e-mail).
- New faculty are oriented immediately upon employment. The orientation process includes assigned mentoring and observation of classroom and clinical instruction.
- Faculty expressed satisfaction with professional development opportunities offered by the school, and cited recent in-services in test construction, teaching methods, and ESL training. A DECs workshop and additional ESL training are planned for the future.
- Faculty hypothesized that inadequate admission criteria and failure to follow established policies had significantly contributed to the low NCLEX pass rates in the program.

#### Findings Related to Students:

- According to the director, thirty-one (31) students are currently enrolled in the three (3) cohorts.
- The enrollment and graduation dates for the three (3) cohorts currently enrolled in the program are as follows:
  - January 3, 2012 - November 17, 2012      10 students
  - May 8, 2012 - March 28, 2013              11 students
  - September 4, 2012 - July 27, 2013        10 students
- Administration reported that the majority of students enrolled in the program have family commitments, full-time jobs, and English as a second language.
- The program has experienced ongoing problems with graduates delaying for one (1) year or more in taking the licensure examination and this has had a negative impact on the program's NCLEX pass rates.
- Test anxiety and lack of confidence were cited as major reasons many graduates do not take the NCLEX-PN® as soon as they are eligible to do so.
- Two (2) Level III students were available for interview.
- Students cited clinical learning experiences, along with the VN program director, faculty and administration as being the highlights of the program.
- Students agreed that the program of study has prepared them well for clinical practice.
- Students reported that they have input into the program of study and stated that the faculty, director, and administration are responsive to their feedback.
- Students indicated that they received Declaratory Order and Eligibility information upon entering the program.
- Students stated they planned to seek further education to become registered nurses.

#### Findings Related to Clinical Learning Experiences:

- The program currently has six (6) active clinical affiliation agreements.
- Faculty supervised, hands-on, direct patient care clinical learning experiences are provided in the following facilities:
  - Kindred Hospital (long-term, acute care)
  - HealthSouth (in-patient rehabilitation)
  - Global (in-patient rehabilitation)
  - Universal Health Services (in-patient hospice)
  - Gladney Center for Adoption (maternal/newborn)
  - Millwood Hospital (acute in-patient psychiatric)
- According to the director and faculty, the program has recently lost two (2) pediatric clinical sites. The school is aggressively pursuing new pediatric clinical experiences for the program and is in the process of signing an affiliation agreement with Cook Children's Hospital out-patient pediatric clinics. In the interim, the program is utilizing simulated clinical experiences taught by VN faculty who are experienced pediatric nurses and advanced practice nurses. Additionally, pediatric assessments are conducted with student and faculty children on a voluntary basis.
- Students reported the simulated pediatric clinical experiences were effective.
- The clinical evaluation tools demonstrate leveling and progression of knowledge.

#### Findings related to Facilities, Resources, and Services:

- The building housing the VN program is spacious, aesthetically pleasing, and offers a positive learning environment.
- The classrooms and skills lab are large, comfortable, and modernly equipped.
- The VN program has full-time dedicated secretarial support.
- Locked program files are located in the director's and president's office.
- The VN program director and coordinator have private offices and faculty are provided with office space, equipment, and technology support.
- Adequate faculty/student lounges, break areas, and restrooms are available.
- There is a small physical library which is regularly used by students. The VN students have 24-hour access to an online library and ample computer resources are available on the UHS campus.
- In an effort to facilitate learner success, UHS is now offering an NCLEX-PN® review course and has strengthened one-on-one tutoring and remediation services available to students.

#### Findings Related to Records and Reports:

- The program has an effective Total Program Evaluation (TPE) Plan in that numerical benchmarks are provided in all categories. The plan is actively used in decision-making.
- Student and faculty files contained all documents required by Board Rule 214.

**DRAFT LETTER**

April 22, 2013

Ana Naccarato, BSN, RN, Director  
Vocational Nursing Education Program  
Universal Health Services School of Vocational Education  
1208 Country Club Lane  
Fort Worth, Texas 76112

Dear Ms. Naccarato:

At the April 18-19, 2013 meeting, the members of the Texas Board of Nursing discussed the approval status of the Universal Health Services School of Vocational Education Vocational Nursing Education Program based upon the 2012 NCLEX-PN® examination pass rate, review of the 2012 Nursing Education Program Information Survey, and Board Rule 214. Members of the Board wish to thank Dr. Kathy Walls and you 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 change the approval status of the Universal Health Services School of Vocational Education Vocational Nursing Education Program from Full with Warning to Conditional Approval status, and issue the requirements provided in the attached Board Order.

A requirement is a mandatory criterion 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 provide assistance, please contact Board staff at 512-305-7660.

Sincerely,

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

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

copy: Texas Workforce Commission  
Kathy Walls, EdD, MBA, RN, CHPN, President

## BEFORE THE TEXAS BOARD OF NURSING

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**In the Matter of:**  
Universal Health Services  
School of Vocational Education  
in Fort Worth, Texas

### ORDER OF THE BOARD

A public meeting of the Texas Board of Nursing, hereinafter referred to as the Board, was held on April 18, 2013, 333 Guadalupe, Tower II, Room 225, Austin, Texas, to consider the approval status of the Universal Health Services School of Vocational Education Vocational Nursing Education Program in Fort Worth, Texas, based upon the NCLEX-PN® examination pass rate for 2012, review of the 2012 Nursing Education Program Information Survey, and compliance with Rule 214 pursuant to Section 301.157, Texas Occupations Code and 22 Tex. Admin. Code Chapter 214.

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

After review and due consideration of the filed materials, as well as presentation by representatives from Universal Health Services School of Vocational Education Vocational Nursing Education Program in Fort Worth, Texas, and other interested parties, if any, the Board hereby CHANGES the approval status of the Universal Health Services School of Vocational Education Vocational Nursing Education Program from FULL WITH WARNING to CONDITIONAL and hereby issues the following requirements:

1. The program may not enroll students while on conditional approval status.
2. The program will remain on conditional approval status until the program demonstrates a pass rate for first-time candidates of at least 80% on the 2013 NCLEX-PN® examination. The NCLEX-PN® examination year is January 1, 2013 through December 31, 2013.
3. The program must demonstrate full compliance with Board Rule 214 prior to consideration of a change in approval status.

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

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