

**Consideration of Findings from Survey Visit
and Consideration of Change in Approval Status
from Full Approval to Full Approval with Warning
Bell Tech Career Institute in Houston, Texas
Vocational Nursing Education Program**

Summary of Request:

Consider the proposed change in approval status for the Bell Tech Career Institute (BTCI) Vocational Nursing (VN) Education Program from Full Approval to Full Approval with Warning based upon the 2019 NCLEX-PN® examination pass rate, findings in the 2019 Self-Study Report, and areas for improvement for alignment with Rule 214; and, the report of the March 4-5, 2020 unannounced focused survey visit to the Bell Tech Career Institute (BTCI) Vocational Nursing (VN) Education Program in Houston, Texas, due to NCLEX-PN® pass rates for 2018 and 2019 and the change in the program director.

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, seven 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. A qualified Program Director was hired and served from January 31, 2018 to December 23, 2019.
- According to Ms. Bello, the program has had difficulty finding and retaining qualified program director applicants. In January 2020, Ms. Bello requested to serve as the Interim Program Director.
- Ms. Bello was approved as Interim Program Director on January 9, 2020 and indicated the program will search for a program director.
- The last BTCI VN program survey visit was unannounced and conducted in April, 2018 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.
- The NCLEX-PN® examination pass rates since inception of the program are provided below:

NCLEX Examination Year	BON Approval Status	Pass Rates	Number of First Time Candidates (Passed/Total)
2019	Full w/Warning	68.15%	15/22
2018	Full	66.67%	10/15
2017	Full	81.82%	9/11
2016	Conditional	100%	13/13
2015	Initial w/Warning	20.83%	5/24
2014	Initial	58.82%	10/17
2013	Initial	27.92%	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 significantly below 80% in 2014 and 2015.
- 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 their outcomes 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.
- Due to the 2018 NCLEX-PN® examination pass rate of 66.67%, the program was required to submit another SSR to evaluate factors that may have contributed to the graduates' performance on the NCLEX-PN® examination and a description of corrective measures to be implemented.
- The program director requested a one-week extension to complete the SSR citing the high turnover in program leadership and faculty, and the unavailability of data due to the school moving and not keeping adequate records.
- The program identified the following corrective measures based on data available:
 - Revise the program admission criteria;
 - Implement a remediation program including tutoring three times per week;
 - Establish a community nursing advisory committee to obtain professional feedback on the program;
 - Implement faculty training for faculty to obtain certification as a nurse educator;
 - Establish faculty committees per Board of Nursing Rule 214;
 - Hire two full-time instructors because all but one is adjunct faculty;
 - Evaluate faculty on a quarterly basis to assure adequate performance;
 - Establish lesson plans and course outlines in the learning management system incorporating the Differentiated Essential Competencies into the curriculum;
 - Further develop standardized testing throughout the curriculum and at the exit of the program (Board staff advised the program director to review the Board's Education Guideline on Standardized Examinations found on the BON website);
 - Implement standardized policies and procedures for testing; and

- Secure a more robust information technology contract for maintenance of computers.
- These efforts for improvement have not been successful as evidenced by the 68.15% pass rate for 2019.
- The March 4-5, 2020 unannounced focused survey visit was conducted by Education Consultants Virginia Ayars, EdD, MS, RN, CNE and Beverly Skloss, MSN, RN in response to the below 80% pass rates for two consecutive years and the change in the program director.

Findings from survey visit for the VN Program:

See survey visit report in Attachment #1.

Positive Aspects of Survey Visit:

- Faculty members are accomplished clinicians, offer fresh approaches, function as a team and share a sincere interest in BTCL and the VN program.
- Students indicated faculty is always available, communicates effectively, and understands their needs.
- Clinical learning experiences are exceptional for VN students. One faculty member has a well-developed community network with area facilities and serves as the Clinical Liaison for the program.
- Student and Faculty records and faculty meeting minutes are well-organized.
- One adjunct faculty is doctorally prepared in Educational Leadership and is competent to provide professional development related to teaching.

Concerns of Survey Visit

- The Faculty Handbook (FHB) does not include information on faculty committees and duties and information on peer review as required by Board Rule 214.7.
- Decision-making is not evidenced in faculty meeting minutes or on the Total Program Evaluation document. Meeting minutes reflect sharing of information and announcements only.
- The clinical evaluation tools include formative and summative evaluations for clinical courses but do not correlate with level clinical objectives. All clinical evaluation tools are identical and do not indicate progression across the curriculum.
- New faculty orientation does not include the comprehensive checklist indicated in the FHB consists of only online modules related to school policies and observing another instructor teach.
- There are discrepancies between the FHB and the Student Handbook (SHB) regarding the score required on the program entrance exam and references to appendices in the SHB that are not present.
- According to the curriculum, VN-405 and VN-406 are the last two courses of the program. Both contain high stakes exams since each course grade is based solely upon achieving a predetermined score on a standardized exam. If a student fails either one of these courses at the end of the program, they do not graduate.

Staff Rationale for Requirement #1:

Rule 214.7(a)(2)(A) states, "Committees necessary to carry out the functions of the program shall be established with duties and membership of each committee clearly defined in writing." Rule 214.7(b)(3) states, "Written policies for nursing faculty shall also include...Nursing Peer Review,

as described in §217.9 (relating to Incident-Based Nursing Peer Review and Whistleblower Protections) and §217.20 (relating to Safe Harbor Nursing Peer Review and Whistleblower Protections) of this title.” The Faculty Handbook does not include information on faculty committees, duties and membership or information on Nursing Peer Review as required by Rule 214.7.

Requirement #1:

The program shall ensure that the Faculty Handbook contains policies/information on faculty committees and Nursing Peer Review required in Rule 214.7 and submit a copy of the revised FHB to Board staff no later than September 1, 2020.

Staff Rationale for Requirement #2:

Rule 214.7(a)(2)(B) states, “Minutes of faculty organization and meetings shall document the reasons for actions and the decisions of the faculty and shall be available for reference.” Minutes of meetings maintained do not reflect that faculty committee members are involved in planning and decision-making. Minutes indicate only the sharing of information and announcements.

Requirement #2:

The program shall ensure that faculty meeting minutes document the reasons for actions and the decisions of the faculty, and shall submit copies of meeting minutes beginning with April 2020 and ending with November 2020 to Board staff beginning with the April through July minutes no later than August 31, 2020, and the August through November minutes no later than December 31, 2020.

Staff Rationale for Requirement #3:

Rule 214.10(f) states, “Clinical evaluation tools shall be correlated with level and/or course objectives and shall include a minimum of a formative and summative evaluation for each clinical in the curriculum.” The clinical evaluation tools include formative and summative evaluations for clinical courses but do not correlate with level clinical objectives. All clinical evaluation tools are identical and do not indicate progression across the curriculum.

Requirement #3:

The program shall ensure that clinical evaluation tools correlate with level clinical objectives, indicate progression across the curriculum and reflect professional nursing competencies and shall submit copies of the revised clinical evaluation tools to Board Staff no later than September 1, 2020.

Staff Rationale for Recommendation #1:

Rule 214.7(b)(4) states, “Orientation of new nursing faculty members shall be initiated at the onset of employment.” New faculty orientation consists of online modules only related to school policies and observing another instructor teach. Board staff suggested using the comprehensive checklist contained in the Faculty Handbook policy for a structured and individualized orientation.

Recommendation #1:

It is recommended that administration and nursing faculty discuss new faculty orientation arrangements that will allow time for any new faculty to receive a comprehensive orientation as indicated in the Faculty Handbook. Please provide a response to Board Staff no later than September 1, 2020.

Staff Rationale for Recommendation #2:

Rule 214.7(b) states, "There shall be a Nursing Faculty Handbook that contains written policies for nursing faculty that are in keeping with accepted educational standards and are consistent with the policies of the governing entity." Rule 214.8(d) states, "The program shall have a Nursing Student Handbook with well-defined, written nursing student policies based upon statutory and Board requirements..." The Faculty Handbook indicates that a score of 80% is required on the program entrance exam for admission whereas the Student Handbook states that 75% is required.

Recommendation #2:

It is recommended that administration and nursing faculty update the Faculty Handbook and Student Handbook so consistent information is reflected in both documents. Please provide a response to Board Staff no later than September 1, 2020.

Staff Rationale for Recommendation #3:

Rule 214.9(h) states, "Faculty shall develop and implement evaluation methods....Board Education Guideline 3.7.4.a. Using Standardized Examinations outlines the effective use of standardized examinations as an evaluation of student progress." According to the curriculum outline, VN-405 and VN-406 are the last two courses of the program. Both contain high stakes exams since each course grade is based solely upon achieving a predetermined score on a standardized exam. If a student fails either one of these courses at the end of the program, the course syllabi and program policies indicate the student will do not graduate.

Recommendation #3:

It is recommended that administration and nursing faculty review Education Guideline 3.7.4.a. Using Standardized Examinations related to cautions for use of standardized examinations. Please provide a response to Board Staff no later than September 1, 2020.

Staff Recommendation:

Move to change the approval status for the Bell Tech Career Institute Vocational Nursing Education Program in Houston, Texas from Full Approval to Full Approval with Warning based upon the 2019 NCLEX-PN® examination pass rate, findings in the 2019 Self-Study Report, and areas for improvement for alignment with Rule 214; and

Move to accept the report of findings from the March 4-5, 2020 unannounced focused survey visit to the Bell Tech Career Institute Vocational Nursing Education Program in Houston, Texas due to the below 80% NCLEX-PN® pass rates for 2018 and 2019 and the change in the program director; and

Move to impose the requirements/recommendations in the attached letter and Board order. (see attachment #2).

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

Purpose of Survey Visit: An unannounced focused survey visit was conducted due to the pass rates for 2018 and 2019 and the change in the program director.

Date of Survey Visit: March 4-5, 2020

Board Staff Conducting Visit: Nursing Consultants for Education Beverly Skloss, MSN, RN, and Virginia Ayars, EdD, MS, RN, CNE.

Education Consultants met with:

- Administrators:
 - Raffy O. Bell, MBA, CEO
 - Kikelomo Bello, BSN, RN, Interim Director of Nursing Education
- VN Faculty
 - Dena Roberts, MSN, RN
 - Robert Watts, RN, BS, M.Ed., M.Div.
 - Linda Henderson, EdD, MPH, BSN, RN (adjunct)
- 23 VN students

Education Consultant reviewed:

- Curriculum plan and course descriptions;
- Faculty & Student Handbooks;
- Clinical evaluation tools and clinical affiliation agreements;
- Faculty and student files;
- Total Program Evaluation Plan (TPE) and data;
- Faculty meeting minutes; and
- 2019 and 2018 Nursing Education Program Information Surveys (NEPIS).

Education Consultants:

- held initial conference with administration;
- toured program facilities; and
- conducted an exit interview with administrators.

Summary of Findings:

Administration:

- Administration is supportive and actively involved in assuring the needs of the VN program are met.
- The BTCI owner, Rashidat Kikelomo Bello, RN, BSN, serves as Interim Program Director and was approved by the Board January 9, 2020. Ms. Bello has been a nurse for 35 years and has 17 year of vocational nursing education experience.
- Ms. Bello indicated she has the authority to direct the VN program in all phases. At the time of the survey visit, Ms. Bello, was not carrying a teaching load.

- Ms. Bello commended the faculty indicating all are actively engaged in curriculum development and care about the best interest of the students.

Faculty:

- The VN program instruction is carried out by two full-time and two part-time faculty. At the time of the survey visit, there were no vacant faculty positions.
- Faculty members offer a rich diversity in their education and experiential backgrounds. Faculty experience in nursing education varies with all faculty having been at BTCI less than one year.
- One faculty is the designated clinical liaison and has an established rapport with clinical facilities within the community.
- Qualified adjunct faculty that have a collegial working relationship with the program are readily available to teach on short notice.
- The Faculty Handbook (FHB) contains an orientation checklist that is comprehensive. New faculty orientation consists of only online modules related to school policies and observing another instructor teach. Board staff suggested using the checklist as indicated in the policy for a structured and individualized orientation.
- Faculty members are engaged in curriculum planning, implementation, and evaluation.
- Faculty meetings are held at least monthly. Minutes of meetings maintained do not reflect that faculty committee members are involved in planning and decision-making. Minutes indicate the sharing of information and announcements.
- Full-time faculty workload is 40 hours per week. 32 load hours include a combination of classroom and clinical teaching only per the FHB. Eight hours per week includes student tutoring/remediation, office hours, and committee/curriculum work. Faculty indicated the need for essential time to prepare for class and clinical.
- Faculty Development consists of online webinars and modules for nurse educators. Board staff discussed the importance of continued competency for faculty including the importance of networking with faculty from other schools. Faculty members expressed the desire to attend the Texas Association of Vocational Nurse Educators annual conference. Board staff suggested having Dr. Henderson, doctorally prepared in Educational Leadership, provide some professional development related to teaching.
- Faculty indicated some possibilities for improvement are training on the learning management system and organization/communication related to management of the program.
- The FHB does not include information on faculty committees, duties and membership or information on peer review as required by Board Rule 214.7.
- The FHB indicates that 80% is required on the entrance exam for admission whereas the Student Handbook states that 75% is required.

Students:

- At the time of the survey visit, there were 23 students enrolled in the BTCI VN Program. The current cohort began in January 27, 2020 and is scheduled to graduate in January 2021.
- The Student Handbook (SHB) contains all Board required content and is provided to all students during orientation. There are discrepancies between the FHB and the Student SHB regarding the score required on the program entrance exam and references to appendices in the SHB that are not present.
- Students have an active student governance, with two student representatives elected by their peers. The representatives are expected to provide information to faculty and/or the

Program Director regarding student policies and concerns, and report results to their peers.

- Students stated they enrolled in the VN program because of the proximity to home, the reputation among nurses who attended the program, referral by a parent, cost is reasonable, word of mouth in the community and an online search.
- Students cited challenges as the intensity of the program, working while attending school, and the requirement of passing a standardized exam to complete the program.
- Students have input into faculty evaluations by completing a faculty and course evaluation at the end of each course.

Program of Study:

- The VN program admits a new cohort every January, is a 12-month full-time training program consisting of four quarters, with a total of 1588 clock hours including 704 classroom hours, 277 laboratory hours and 607 clinical hours.
- Students completing the program are awarded a Certificate of Completion.
- The block curriculum for the VN program indicates leveling of nursing content, advancing in difficulty from simple to complex.
- The VN Program utilizes a face-to-face teaching-learning environment. Course content is delivered via lectures and presentations and through BTCI's Learning Management System (LMS).
- The *Differentiated Essential Competencies (DECS)(2010)* are incorporated into the curriculum as evidenced in the syllabi.
- Standardized testing is used throughout the program for progression, remediation, and graduation purposes.
- According to the curriculum outline, VN-405 and VN-406 are the last two courses of the program. Both contain high stakes exams since each course grade is based solely upon achieving a predetermined score on a standardized exam. If a student fails either one of these courses at the end of the program, the course syllabi and program policies indicate the student will do not graduate. Board staff discussed this with Ms. Bello and she indicated the exit exams were not going to keep a student from completing the program.
- Syllabi received prior to the survey visit contained outdated information related to current grading, current textbooks used for each course and current names of documents related to the Board of Nursing. During the visit, Ms. Bello indicated that all syllabi are being revised prior to being handed out to students. Updated syllabi for Quarter I courses were received by Board staff.

Clinical Learning Experiences

- BTCI has active clinical contracts with a variety of clinical agencies including long term acute care, long term care, a primary care clinic, adult daycare, rehabilitation centers, and a daycare center for disabled children in Houston and surrounding areas.
- Students participate in a variety of valuable direct patient care clinical learning experiences.
- Students practice in the skills lab and demonstrate basic competency prior to providing hands-on care in the clinical setting.
- Student assignments correlate to student learning needs identified in the course syllabi.
- Faculty provide supervision during all clinical learning experiences and BON required faculty-to-student ratios are maintained throughout the program. Preceptors are not utilized.

- The clinical evaluation tools include formative and summative evaluations for clinical courses but do not correlate with level clinical objectives. All clinical evaluation tools are identical and do not indicate progression across the curriculum.

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 spacious lounge where students with adequate tables and chairs where student may gather to eat, study, or take breaks. It is equipped with a refrigerator, beverage vending machine, two microwave ovens, and student lockers.
- Two classrooms are furnished with tables and chairs. The designated VN classroom capacity is 30 students and the small classroom capacity is 16. Multi-media projection and a PA system are available in each classroom as well as a computer for each student.
- There are four skills labs, one open lab with a conference table/chairs, white board, three bays with hospital beds/medical equipment divided by privacy curtains and two adult manikins; one lab with two beds, one low fidelity manikin, substantial supplies, equipment and storage space; one maternal/child lab with a manikin and intravenous equipment; and one nursery/pediatric lab with an examine table, bed, manikin and supplies/equipment. Hot and cold running water is available.
- The Program Director has a private, furnished office, while the faculty share one furnished office. There are areas for private student counseling.
- BTCI students have 24-hour access to library resources including national nursing databases such as CINAHL and MEDLINE, and services. Reference books are available in the nursing office.
- A full-time assistant serves as administrative and clerical support for the VN program.

Records and Reports:

- Student and faculty files are maintained with all required documents in a locked room in locked file cabinets. All files were compliant with Board Rule 214.12.
- Minutes of faculty meetings are maintained in the Interim Director's office.
- Clinical affiliation agreements are current.
- The Total Program Evaluation Plan (TPE) is in place. Decision-making is not evidenced in faculty meeting minutes or on the TPE document. Meeting minutes reflect sharing of information and announcements only.

DRAFT LETTER

July 23, 2020

Kikelomo Bello, BSN, RN, Interim Director
Bell Tech Career Institute Vocational Nursing
12000 Richmond, Suite 130
Houston, Texas 77082

Dear Ms. Bello:

At the July 23-24, 2020 meeting, the members of the Texas Board of Nursing (Board) considered the approval status for the Bell Tech Career Institute Vocational Nursing Education Program in Houston, Texas, based upon the NCLEX-PN® examination pass rate for 2019, findings in the 2019 Self-Study Report, and areas for improvement for alignment with Rule 214; and, the report of the unannounced focused survey visit to the Bell Tech Career Institute Vocational Nursing Education Program due to NCLEX-PN® pass rates for 2018 and 2019 and the change in the program director.

Based upon the discussion and review of information, it was the decision of the Board to change the approval status for the Bell Tech Vocational Nursing Education Program in Houston, Texas, from Full Approval to Full Approval with Warning; to accept the report of the survey visit conducted on March 4-5, 2020; and, to impose the conditions/recommendations/requirements 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 be of any assistance, please contact Board Staff at beverly.skloss@bon.texas.gov or 512-318-3219.

Sincerely,

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

Copy: 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 23, 2020, 333 Guadalupe, Tower II, Room 225, Austin, Texas to consider the approval status for the Bell Tech Vocational Nursing Education Program in Houston, Texas, pursuant to Section 301.157, Texas Occupations Code and 22 Tex. Admin. Code Chapter 214, based upon the NCLEX-PN® examination pass rate for 2019, findings in the 2019 Self-Study Report, and areas for improvement for alignment with Rule 214; and, to consider the report of the March 4-5, 2020 unannounced focused survey visit to Bell Tech Career Institute Vocational Nursing Education Program, pursuant to Section 301.157, Texas Occupations Code and 22 Tex. Admin. Code Chapter 214, due to NCLEX-PN® pass rates for 2018 and 2019 and the change in the program director.

After review and due consideration of the filed materials, and other interested parties, if any, the Board hereby CHANGES the approval status for Bell Tech Career Institute Vocational Nursing Education Program in Houston, Texas from FULL APPROVAL to FULL APPROVAL WITH WARNING; ACCEPTS the report of the survey visit to Bell Tech Career Institute Vocational Nursing Education Program in Houston, Texas; and, hereby imposes the following conditions/requirements/recommendations:

Condition:

1. An evaluation of the effectiveness of the corrective measures outlined in the 2019 Self-Study Report is to be submitted by the program to Board Staff no later than September 1, 2020, per Education Guideline 3.2.1.a.

Requirements:

1. The program shall ensure that the Faculty Handbook contains policies/information on faculty committees and Nursing Peer Review required in Rule 214.7 and submit a copy of the revised Faculty Handbook to Board staff no later than September 1, 2020
2. The program shall ensure that faculty meeting minutes document the reasons for actions and the decisions of the faculty, and shall submit copies of meeting minutes beginning with April 2020 and ending with November 2020 to Board staff beginning with the April through July minutes no later than August 31, 2020, and the August through November minutes no later than December 31, 2020.

3. The program shall ensure that clinical evaluation tools correlate with level clinical objectives, indicate progression across the curriculum and reflect professional nursing competencies and shall submit copies of the revised clinical evaluation tools to Board Staff no later than September 1, 2020.

Recommendations:

1. It is recommended that administration and nursing faculty discuss new faculty orientation arrangements that will allow time for any new faculty to receive a comprehensive orientation as indicated in the Faculty Handbook. Please provide a response to Board Staff no later than September 1, 2020.
2. It is recommended that administration and nursing faculty update the Faculty Handbook and Student Handbook so consistent information is reflected in both documents. Please provide a response to Board Staff no later than September 1, 2020.
3. It is recommended that administration and nursing faculty review Education Guideline 3.7.4.a. Using Standardized Examinations related to cautions for use of standardized examinations. Please provide a response to Board Staff no later than September 1, 2020.

Entered this 23rd day of July, 2020

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