

# FINAL ANALYSIS AND RECOMMENDATION FOR MOSBN

## Meeting Date: 02/27/2024

Type of Submission:  
Renewal Petition

### Criteria: 1.

#### Description of Criteria

1. Is statewide in the scope of its operations and is legally authorized to accredit schools of nursing.

Narrative:

1. Is statewide in the scope of its operations and is legally authorized to accredit schools of nursing.

The Missouri State Board of Nursing is statewide in the scope of its operations and is legally authorized to approve programs of nursing through Section 335.036., RSMo 1999 which lists the duties of the Board. The pertinent citations are:

- 335.036.1. (3) Prescribe minimum standards for educational programs preparing persons for licensure pursuant to the provisions of sections 335.011 to 335.096.
- 335.036.1. (4) Provide for surveys of such programs every five years and in addition at such times as it may deem necessary.
- 335.036.1. (5) Designate as “approved” such programs as meet the requirements of sections 335.011 to 335.096 and the rules and regulations enacted pursuant to such sections; and the board shall annually publish a list of such programs.
- 335.036.1. (6) Deny or withdraw approval from educational programs for failure to meet prescribed minimum standards.

Among the 1999 revisions of the Nursing Practice Act was a change in wording authorizing the Board of Nursing to approve rather than accredit programs of nursing. This is consistent with wording utilized by the National Council of State Boards of Nursing. Thus, throughout this report, the word(s) approve/approved as opposed to accredit/accredited are used.

The statutes and regulations for the Missouri State Board of Nursing (Missouri Nursing Practice Act) are included with this petition as Exhibit 1 – Minimum Standards (rules) for Programs of Professional (beginning page 46) and Practical Nursing (beginning page 63) are included. The Missouri State Board of Nursing (Board) approves practical nursing, associate degree, diploma, baccalaureate, and entry-level master’s degree nursing programs with physical presence in the State of

Missouri that prepare individuals for initial nursing licensure as a practical or professional nurse. The Board does not have authority to approve programs for licensed professional nurses pursuing post-licensure baccalaureate or advanced nursing degrees or instructional processes that originate outside of the State of Missouri.

Distance learning entities overseen by the Missouri State Board of Nursing are limited to resources utilized by nursing programs to communicate with their students on remote basis/at different program sites and locations. Prompted by constraints of the COVID-19 pandemic the Board issued a guidance statement to nursing education programs related to temporary conversion of theory and clinical instruction to a more distance education model. Due to urgency to implement instructional models that would minimize exposure, the requirement for the Board's approval to implement distance learning modalities was temporarily waived and nursing programs were allotted freedom to initiate changes as necessary. The guidance statement clearly states the requirement for the Board's approval should such changes be implemented on permanent basis. The guidance statement is accessible on the Board's website at <https://pr.mo.gov/boards/nursing/COVID.pdf> and is also included as Exhibit 2.

Minimum Standards for Programs of Nursing indicate rules for distance education for programs that offer courses/programs of study through utilization of distance education as evidenced in Exhibit 1; Chapters 2 – 20 CSR 2200-2.100 (page 58) and 3 – 20 CSR 2200-3.100 (page 75). This petition therefore includes the request for inclusion of distance education in this Board's recognition.

Currently there are thirty-three (33) practical, twenty-seven (27) associate degree, one (1) diploma, and twenty-nine (29) baccalaureate degree nursing (BSN) programs approved by the Missouri State Board of Nursing (Board). A proposal for establishment of a pre-licensure option to obtain a master's degree in nursing within a currently approved baccalaureate nursing program was approved by the Board in March 2010. This entry-level master's degree option remains the only program option of this kind approved by this Board. A trend identified in 2016 indicating transition of associate degree in nursing programs to pre-licensure baccalaureate degree in nursing education is not as prevalent at this time. A current trend for establishment of additional pre-licensure associate and baccalaureate degree in nursing (BSN) programs is identified. Currently there are three (3) newly established baccalaureate degree in nursing and one (1) new associate degree in nursing program that are on initial approval by this Board. Two (2) additional proposals for establishment of new BSN programs were approved by the Board in 2021. Rules as shown in Exhibit 1 -- Chapter 2 – 20 CSR 2200-2.010 (page 48) require that each new proposal is heard by members designated by the Board that then make recommendations prior to presentation of the proposal to the Board. As an example Exhibit 3 shows the hearing notice and agenda for the Board's Education Committee meeting in February 2021. Hearing of two (2) new proposals (the new associate degree in nursing program and a new BSN program) is reflected. Hearing of these proposals by the full Board is reflected in the full Board meeting notice and agenda included as Exhibit 4. The Board's decision regarding these proposals is reflected in Exhibit 5. Exhibit 9 shows



hearing of the proposal for establishment of another new BSN program by the Board's Education Committee in November 2021. Hearing of this proposal by the full Board is reflected in the meeting notice and agenda for the December 2021 Board meeting (Exhibit 9). The Board's approval for new programs is granted contingent on a successful site visit. New nursing programs are not shown on the Table of Schools until the initial site visit has been completed and initial program approval has been confirmed. An initial site visit for the new associate degree in nursing program was conducted in August 2021 prior to program start in September 2021; the site visit report is included as Exhibit 27. Start of the new BSN programs reflected in Exhibits 4, 5 and 9 is projected for 2022.

Trend data indicate overall reduction in the number of Board approved associate degree in nursing and practical nursing programs. This is due to merging of same-level programs operating under the same sponsoring institution under one (1) program code; therefore then considered as one nursing program with satellite location(s). Merging of like programs under one program code is often more efficient for the schools when working with regional and national accreditors. A listing of the approved nursing education programs (Table of Schools) is included as Exhibit 6. Satellite locations are indicated and identified with the same program code as the main campus. Although the Board is responsible for all Missouri nursing programs leading to initial nurse licensure, it is recognized that the oversight authorized by the U. S. Department of Education applies only to the professional nursing programs of which there are a total of fifty-seven (57). New programs will be added as initial approval is confirmed.

**Document(s) for this Section**

<b>Exhibit Title</b>	<b>File Name</b>	<b>Analyst Comments</b>	<b>Agency's Exhibit Comments</b>
Exhibit 1	Exhibit 1 - Missouri Nurse Practice Act.pdf	-	-
Exhibit 2	Exhibit 2 -- COVID Guidance for Nursing Progr	-	-
Exhibit 27	Exhibit 27 -- SLCHC ADN Program -- Initial Ap	-	-
Exhibit 3	Exhibit 3 -- February 2021 Education Committe	-	-
Exhibit 4	Exhibit 4 -- March 2021 Board Meeting Notice	-	-
Exhibit 5	Exhibit 5 -- Initial Approval Board Decision	-	-
Exhibit 6	Exhibit 6 --Table of Schools.pdf	-	-

Exhibit Title	File Name	Analyst Comments	Agency's Exhibit Comments
Exhibit 9	Exhibit 9 -- Education Call Meeting Notice-Ag	-	-

Analyst Worksheet- Narrative

**Analyst Review Status:**

Meets the requirements of this section

**Analyst Remarks to Narrative:**

The agency is legally authorized to accredit schools of nursing in the State of Missouri pursuant to Section 335.036 of the Nurse Practice Act (1999) (Exhibit 1), which lists the duties of the Board in pertinent part as: prescribe Minimum Standards for educational nursing programs [335.036.1. (3)]; provide for surveys of such programs every five years and in addition at such times as it may deem necessary [335.036.1. (4)]; approve such programs that meet State requirements, rules and regulations [335.036.1. (5)] and deny or withdraw approval from those educational programs that fail to meet the State requirements, rules and regulations [335.036.1. (6)] The agency notes that the 1999 Nursing Practice Act changed the wording authorizing the Board of Nursing to approve rather than accredit nursing programs, which is consistent with the practice of the National Council of State Boards of Nursing. Accordingly, this analysis uses the term “approve” throughout. Exhibit 1 is entitled “State of Missouri Division of Professional Registration State Board of Nursing Statutes and Rules” and includes sections on statutes and rules: Collaborative Practice Statute; The Nurse Practice Act; and Mandatory Reporting. The rules are also referred to by the agency as “Minimum Standards.” As such, exhibit 1 is referred to throughout this analysis under different names including: Nursing Practice Act, Minimum Standards, and State of Missouri Division of Professional Registration State Board of Nursing Statutes and Rules.

The agency attests that the Board approves 33 practical nursing, 27 associate degree, 1 diploma, and 29 baccalaureate programs. This information is congruent with the list of Missouri State Board of Nursing program approvals found on the agency’s website and submitted with its petition [Exhibit 6], demonstrating it has statewide authority to approve nursing programs. The agency notes it does not have authority to approve post-licensure baccalaureate or advanced nursing degrees or programs offered outside of the State of Missouri. The agency submitted several exhibits demonstrating its review and approval of nursing programs in the State of Missouri [Exhibits 3-9; 27]. The exhibits include site visits, board agenda’s, meeting minutes, and approval letters.



Lastly, the agency attests it approves nursing programs in the State of Missouri delivered solely or in part through distance learning technologies. The standards for these programs are found in Exhibit 1, Chapters 2-20 CSR 2200.2.100 (page 58) and 3 – 20 CSR 2200-3.100 (page 75). The agency also notes the guidance issued in response to the COVID-19 pandemic [Exhibit 2]. The guidance temporarily waives the approval requirements for distance learning so that nursing programs could implement distance learning modalities for theory and clinical instruction to minimize exposure. In its petition, the agency requests distance education be included in the Board’s recognition; however, state agencies for the approval of nursing programs do not have a scope of recognition. Nonetheless, the agency submitted a routine site survey [Exhibit 27] and the Board’s review [Exhibit 9] for a program offered in part through distance education. A review of these exhibits by Department staff demonstrates the agency reviewed and approved the hybrid distance program according to its standards.

**List of Document(s) Uploaded by Analyst - Narrative**

No files uploaded

**Analyst Worksheet - Response**

**Analyst Review Status:**

Not Reviewed

**Criteria: 2.**

Description of Criteria

2. Makes publicly available:

- a. Current information covering its criteria or standards for accreditation;
- b. Reports of its operations;
- c. Lists of schools of nursing which it has accredited.

Narrative:

2. Makes publicly available:

- a. Current information covering its criteria or standards for accreditation;

The Minimum Standards for programs of nursing are included in the Missouri Nursing Practice Act (Exhibit 1). The chapters specific to the nursing programs are 20

CSR 2200-Chapter 2 Minimum Standards for Approved Programs of Professional Nursing and 20 CSR 2200-Chapter 3 Minimum Standards for Approved Programs of Practical Nursing (Exhibit 1). While it is noted that recognition by the U.S. Department of Education pertains to professional nursing programs only, for clarification it is to be noted that as of 2017 Minimum Standards – Chapter 8 offers rules for establishment of Veteran’s Bridge programs designed to pave the way from military medical personnel to LPN. Missouri currently does not have any nursing programs approved under this category. The Nurse Practice Act in whole or part is sent to an individual or agency upon request at a cost of \$5.00 per paper copy. The statutes and rules can be accessed via the Missouri State Board of Nursing website at <http://pr.mo.gov/nursing.asp> under the rules and statutes tab.

Every five (5) years or at the Missouri State Board of Nursing (Board)’s discretion, a Minimum Standards Task Force is convened. Each Task Force is comprised of member(s) of the Board serving on the Board’s Nursing Education Committee and representatives from all levels of pre-licensure nursing education. Each Task Force works collaboratively to propose recommendations for revision of Minimum Standards to the Board of Nursing. Upon initial review of Task Force recommendations by the Board, the Board then seeks feedback from nurse educators. The Board then reviews comments and makes final decisions for approval of recommended revisions. This procedure allows nurse educators/stakeholders to collaboratively design, review and finalize recommendations for revision and to offer input before the official rulemaking process is initiated. Current Minimum Standards (Exhibit 1) were revised in 2015/2016; revised rules became effective as of August 30, 2018.

Most currently the Board convened a Task Force to begin review of Minimum Standards in January 2020; Task Force members completed their work in July 2021. Meeting minutes for the final Minimum Standards Task Force meeting (July 13, 2021) are included as Exhibit 8. Meeting minutes offer insight into composition of the 2020/2021 Task Force. Upon the Board’s initial review, nurse educators/programs of nursing were then offered the opportunity to provide feedback to the Board. The Board then reviews responses and necessary adjustments are made. Once the Board renders final decisions of revisions to be made the rule making process is initiated. Review of current recommendations for revisions by the Board is reflected in the full Board meeting notice and agenda for the December 2021 Board meeting included in Exhibit 9. Additional public comment periods are offered as part of the official rule making process. Once the rule making process is complete and revised rules become effective, nursing programs are kept informed of the changes via public announcements, conferences, webinars and meetings with various nursing education groups.

To assist nursing program administrators/coordinators and faculty in becoming more knowledgeable about their role(s), the Minimum Standards and the interactions between nursing programs and the Board of Nursing, New Program Administrator and Faculty Orientation sessions are conducted at regular intervals; usually at minimum twice each year. The most recent session was held on October 28, 2021 per



virtual format. The agenda for this informational session is attached as Exhibit 7. In addition to orientation sessions, revisions to Minimum Standards are communicated in various meetings, to include the Midwest Leadership Institute for Nurse Educators sponsored by the Missouri League for Nursing, Missouri Chapter of the American Association of Collegiate Nursing (MACN) and Missouri Organization of Associate Degree in Nursing schools (MOADN) and various Deans and Directors' meetings across the state. Presentations and discussions are usually led by Ingeborg D. "Bibi" Schultz, Director of Education; Sarah Barickman, the Board's Education Specialist also participates in these meetings.

The Director of Education and/or Education Specialist attend statewide meetings of nursing education groups on a regular basis. Communication of activities of the Missouri State Board of Nursing (Board) and facilitation of dialog as well as addressing of mutual concerns and current issues are at the forefront of discussions. Meetings of the following groups are regularly attended: Missouri Association of Colleges of Nursing (MACN), directors/deans of pre-licensure baccalaureate nursing programs, Missouri Organization for Associate Degree Nursing (MOADN), directors of associate degree nursing programs/nursing faculty, Missouri Council of Practical Nurse Educators (MCPNE), administrators/coordinators/faculty of practical nursing programs and the Southwest Consortium, made up of nurse educators from the southwest region of the state as well as Deans and Director Meetings across the state. This Board offers a climate of open communication and collaboration with nurse educators from all levels of nursing education and other stakeholders.

**b. Reports of its Operations;**

The Missouri State Board of Nursing (Board) is mandated to provide an Annual Report to the Governor. This report is available to the public free of charge upon request. The current 2020 annual report is accessible at

<https://pr.mo.gov/boards/nursing/publications/annual/2020-Annual%20Report.pdf> and is also included in Exhibit 10. All meeting notices and agendas of the Board are public information and are posted fourteen (14) days but no later than twenty-four (24) hours prior to each meeting. Such notices are posted in a public viewing area at the Division of Professional Registration building reception area and on websites of the Missouri Board of Nursing and the Office of Administration. The Board's Education Committee meeting notice and agenda is included in Exhibit 3. A copy of the meeting notice and agenda for a full Board meeting is included in Exhibit 4. Committee and Board meeting minutes for meetings are public information and are available upon request.

A quarterly Missouri State Board of Nursing (Board) Newsletter is published. Mailing of Newsletters in hard copy format was discontinued. The Newsletter is available in electronic format at <https://pr.mo.gov/boards/nursing/publications/newsletters/2021-07-01.pdf>. The Board is responsible for the informational content of the Newsletter. The current Newsletter is also included as Exhibit 10.

The Missouri State Auditor's Office (SAO) conducts audits of state agencies and departments, boards and commissions, statewide elected officials, the legislature,

specific programs or issues, the state's financial statements, and federal awards expended by the state in addition to county audits, petition audits, court audits, and local audits in addition to other duties. The SAO goal is to help improve the performance and accountability of state and local government by assessing fiscal and management controls, efficiency and effectiveness, and legal compliance. This information helps ensure the reliability of management and financial systems within the state. Their work is conducted in accordance with applicable professional standards. There is no published calendar of timing of any of the audits. The Missouri State Board of Nursing (Board) submits annual financial reports addressing policies and procedures in relation to its financial management to the State Auditor. The Board's last audit was through the period of June 30, 2000.

The Missouri State Board of Nursing (Board) developed and printed a brochure in March 2002, describing its membership, responsibilities, committee structure, and services. This brochure is no longer in print. The Board utilizes National Council of State Boards of Nursing (NCSBN) communications to reiterate processes/available resources. An example is accessible through the NCSBN website at <https://www.ncsbn.org/member-boards.htm>.

c. Lists of schools of nursing, which it has accredited.

The Missouri State Board of Nursing (Board) maintains a list of all approved nursing education programs, this includes each program's name, address, telephone number, name and e-mail address of the program administrator and coordinators. Upon program request contact information for support staff may be added (Exhibit 6). This listing is available free of charge upon request to any individual and is made available at informational booths at meetings and seminars. The listing can be accessed via the Board's website at <https://pr.mo.gov/boards/nursing/schoolsofnursing.pdf>

First-time tester NCLEX® licensure exam pass rates for the past five (5) years for each approved nursing program are available on the Board's website. Beginning in 2008 the official pass rate reporting period changed to the calendar year. Official pass rates are reported from January 1st through December 31st of each respective year. The number of candidates testing from each program for the most recent calendar year is given. Program pass rate performance below the required 80% is color-coded according to program outcomes. Program closures are color marked (not applicable at this time) and current Board approval status for each program is indicated. In addition to licensure exam pass rates, the number of classes admitted per year and student admissions per class as approved by the Board for each nursing program are listed. Pass rates and enrollment approval for approved nursing programs are considered by the Board to be public information. Having this information available on the website provides prospective students with useful information in selecting

**Document(s) for this Section**



Exhibit Title	File Name	Analyst Comments	Agency's Exhibit Comments
Exhibit 10	Exhibit 10 -- July 2021 Newsletter and 2020 A	-	-
Exhibit 11	Exhibit 11 -- NCLEX Pass RateTable for Websit	-	-
Exhibit 12	Exhibit 12 -- Site Survey Table -- Revised De	-	-
Exhibit 7	Exhibit 7 -- Agenda -- October 28 2021.pdf	-	-
Exhibit 8	Exhibit 8 -- Minimum Standards Revision Task	-	-
2021 and 2022 Annual Reports for the Missouri State Board of Nursing	2022-Annual-Report.pdf	-	-
2021 and 2022 Annual Reports for the Missouri State Board of Nursing	2021-Annual-Report.pdf	-	-

#### Analyst Worksheet- Narrative

#### **Analyst Review Status:**

Substantially Compliant

#### **Staff Determination:**

The agency must provide its 2021 and 2022 audited financial reports, if available, in its response to the draft staff analysis.

#### **Analyst Remarks to Narrative:**

#### Standards for Accreditation

The Minimum Standards for programs of nursing are included in the State of Missouri Division of Professional Registration State Board of Nursing Statutes and Rules [Exhibit 1]. The standards are made available on the agency's website free of charge. Individuals may request a paper copy for \$5.00. The agency provides training on the Minimum Standards and the interactions between nursing programs and the Board of Nursing through New Program Administrator and Faculty Orientation sessions at least twice each year. The agency provided the agenda for a recent

orientation held October 28, 2021 [Exhibit 7], which covered the topics: mission of the Board; licensure information; nurse licensure compact and nursys.com information; annual report; faculty approval process; Missouri Nurse Practice Act; site surveys – preparation and process; MSBN Minimum Standards for approved programs of nursing; and opportunities for participation in education processes.

The agency convenes a Minimum Standards Task Force every five years or at the agency's discretion. This Task Force is comprised of member(s) of the Board of Nursing's Education Committee and representatives from all levels of nursing education, including nursing programs and other stakeholders, whose purpose is to propose recommendations for revision of the Minimum Standards to the Board of Nursing. Recommendations approved by the Board go through a collaborative rule making process that includes design and review by nurse educators and other stakeholders. When the revised rules become effective, nursing programs are kept informed of the changes via public announcements, conferences, webinars and meetings with various nursing education groups. The Minimum Standards were most recently revised in 2015/2016 with effective date August 30, 2018 for the current Minimum Standards [Exhibit 1]. A current task force was convened in January 2020 and concluded its work July 2021. The agency provided an example of meeting minutes from a task force meeting, which includes a list task force members [Exhibit 8]. The agency also provided documentation demonstrating review of revisions by the Board in December 2021 Board meeting minutes [Exhibit 9]. The agency notes there will be additional public comment periods offered as part of the official rule making process and once the rule making process is complete and revised rules become effective, nursing programs are kept informed of the changes via public announcements, conferences, webinars and meetings with various nursing education groups.

The agency also described additional public outreach through its presentations and discussions at state conferences and meetings.

### Reports of its Operations

The agency is mandated to provide an annual report to the Governor and submitted its most recent fiscal year 2020 report [Exhibit 10] as evidence it meets this criterion. This report, which is available on the agency's website free of charge includes: Board members and staff; highlights in the area of workforce, education, compliance investigations, legal, licensure, operations, leadership and practice; education statistics; NCLEX examination results, licensure statistics; average age of nurses; disciplinary action and financial information.



The agency states that all meeting notices and agendas of the Board are made publicly available on its website between fourteen days and twenty-four hours prior to each meeting as well as physically posted in a publicly available viewing area at the Division of Professional Registration building. To support its narrative the agency submitted the Board's "Education Committee Conference Calls Meeting Notice and Agenda" [Exhibit 4] and a copy of the meeting notice and agenda for a full Board meeting [Exhibit 3]. The agency attests meeting minutes are available to the public upon request. Department staff observed the open session of the Board's Education Committee Conference Call held on August 10, 2022.

The agency also publishes a quarterly newsletter [Exhibit 10, pages 27-43], which is made electronically available on the agency's website. The newsletter contains a message from the President; Executive Director Report; industry articles; and disciplinary actions taken by the Board.

The Missouri State Auditor's Office (SAO) conducts statewide audits, according to applicable professional standards, of various areas including boards and commissions such as the Missouri State Board of Nursing. The SAO goal is to help improve the performance and accountability of state and local government by assessing fiscal and management controls, efficiency and effectiveness, and legal compliance. The agency states there is no published calendar of timing of audits and restates that the last audit conducted of the agency was for the period through June 30, 2000.

Although the last audit conducted of the agency was in the year 2000, the agency attests it submits annual financial reports to the state auditor [Exhibit 10 pages 22-24]. This financial information notes the agency operates solely on fees received from licensees the agency regulates and covers the expenses for FY 2020. The financial information shows total operating expenses of \$(b)(6) for FY 2020 and an ending fund balance of \$(b)(6). Based on this information it appears the agency has sufficient funds for its operations. Department staff recognizes that due to the two year cycle of review for agencies the financial information submitted by the agency may be current at the time of submission but could be out of date by the time of the agency's NACIQI appearance; therefore, Department staff requests the agency submits its most recent financial information in response to the draft analysis.

Furthermore, the criteria for recognizing state agencies for the approval of nurse education is pursuant to the January 16, 1969 Federal Register, which continues to be the most recent criteria in effect. The criteria relative to this section requires agencies to make available reports of its operations and does not specify that an agency must submit audited financial reports; therefore, Department staff find the agency compliant with this criterion.



## List of Accredited Schools

The agency makes available to the public free of charge a list of all Board approved nursing education programs. This listing can be found on its website and is available as a printed copy at the agency's informational booth at meetings and seminars. It is also included in the agency's fiscal year annual reports. The online list includes: the name of each school; and contact information. The agency included licensure pass rates (NCLEX) for its approved nursing programs [Exhibit 11], which is also available on its website.

### List of Document(s) Uploaded by Analyst - Narrative

No files uploaded

Response:

Thank you for the opportunity to provide this response. There are no current audited fiscal reports. The Missouri State Board of Nursing has not had a recent audit. The 2021 and 2022 Annual Reports for the Missouri State Board of Nursing are included.

### Analyst Worksheet - Response

#### Analyst Review Status:

Meets the requirements of this section

#### Analyst Remarks to Response

In response to the draft analysis, the agency submitted its two most recent annual reports for fiscal years 2021 and 2022 [Exhibits 1 and 2]. The financial information shows total operating expenses of \$(b)(6) for FY 2021 and an ending fund balance of \$(b)(6). For FY 2022, the report shows total operating expenses of \$(b)(6) and an ending balance of \$(b)(6). Based on this information it appears the agency continues to have sufficient funds for its operations.

Department staff needs to clarify a statement made in the draft analysis regarding the agency's compliance with this criterion in the draft analysis. Department staff made the following statement in the draft analysis "The criteria relative to this section requires agencies to make available reports of its operations and does not specify that an agency must submit audited financial reports; therefore, Department staff find the agency compliant with this criterion." However, Department staff selected Substantially Compliant as the agency's status in the draft analysis and required the agency to provide its most recent financial information. As noted, the agency provided its most current financial information and is compliant with this criterion.



**List of Document(s) Uploaded by Analyst - Response**

No file uploaded

**Criteria: 3.**

Description of Criteria

3. Has an adequate organization and effective procedures, administered by a qualified board and staff, to maintain its operation on a professional basis. Among the factors to be considered in this connection are that the agency:

Narrative:

3. Has an adequate organization and effective procedures, administered by a qualified board and staff, to maintain its operation on a professional basis. Among the factors to be considered in this connection are, that the agency:

An official organizational chart indicating the Missouri State Board of Nursing (Board)'s position within the Department of Commerce and Insurance, Division of Professional Registration is included as Exhibit 13. The name change from the former Department of Insurance, Financial Institutions and Professional Registration to the current Department of Commerce and Insurance, Division of Professional Registration occurred in 2019; this name change did not bring about any operational changes for the Missouri State Board of Nursing.

The Missouri State Board of Nursing (Board) is comprised of nine (9) Board member positions of which eight (8) are currently filled. Board members are appointed by the Governor of Missouri and serve at the pleasure of state government. Exhibit 14 shows the current members of the Board, their credentials and current Board positions. Four (4) current Board members serve on the Board's Education Committee, a committee charged with the task to make recommendations to the full Board regarding education items. Exhibit 15 indicates the four (4) Board members currently serving as the Education Committee in yellow highlight. Exhibit 16 indicates resumes/CVs for all current members of the Board. It is important to note that the Chair of the Education Committee as well as all other members serving on the Board's Education Committee have doctoral preparation and are actively employed in nurse educator positions. Exhibit 17 indicates organizational structure within the Board of Nursing's staff. The Board of Nursing currently has twenty-eight (28) staff positions to efficiently manage Board office processes on a day to day basis; of those eight (8) staff members are classified as professional staff. The Executive Director, Lori Scheidt, holds a master's degree in business administration & health care management and is not a licensed nurse. The position of Director of Operations (formerly titled as Executive Assistant) supports the Executive Director and is considered a professional position as well. Elizabeth Willard serves the Board in this capacity. Elizabeth Willard takes part in

Executive, Publication and Education Committee meetings in the capacity of Board support staff. Professional staff holds the positions of Director of Education (Ingeborg “Bibi” Schultz), Director of Discipline (Janet Wolken), Director of Practice (Debra Funk), Director of Enforcement (Quinn Lewis), Director of Licensure (Angie Morice), and General Counsel (Kevin Hall). Three of the professional staff members, to include the Director of Education, are licensed professional nurses and hold a minimum of a bachelor’s or master’s degree in nursing, nursing education, or business. Resumes for professional Board staff are provided as Exhibit 18. Position descriptions for each professional staff member are included as Exhibit 19. To maintain consistency within the Department of Commerce & Insurance, these descriptions are titled Job Requirements. Two (2) vacant attorney positions have been filled. While Kevin Hall and the two (2) attorneys in his section work closely with the Board to address legal issues, the Board also utilizes two (2) local law firms as well as the Attorney General’s office to carry out legal functions. While legal staff assists with operations of the Board, attorneys are not directly involved in nursing program approval processes.

**Document(s) for this Section**

Exhibit Title	File Name	Analyst Comments	Agency's Exhibit Comments
Exhibit 13	Exhibit 13 - Department of Commerce and Insur	-	-
Exhibit 14	Exhibit 14 -- BOARD MEMBER LIST_Redacted.pdf	-	-
Exhibit 15	Exhibit 15 -- BOARD MEMBER LIST_Redacted -- E	-	-
Exhibit 16	Exhibit 16 -- Board Member CVs_Redacted.pdf	-	-
Exhibit 17	Exhibit 17 -- BON Organization Chart.pdf	-	-
Exhibit 18	Exhibit 18 - Professional Staff Resumes_Redac	-	-
Exhibit 19	Exhibit 19 - Professional Staff Job Descripti	-	-

Analyst Worksheet- Narrative

**Analyst Review Status:**

Meets the requirements of this section

**Analyst Remarks to Narrative:**

The agency provided an official organizational chart that shows Missouri State Board



of Nursing (Board)'s position within Department of Commerce and Insurance, Division of Professional Registration [Exhibit 13]. The agency states that the Board is comprised of nine members appointed by the Governor and serve at the pleasure of state government. Exhibit 14 shows seven of the nine Board member positions are filled as of January 2022. The agency also provided the resumes for current Board members demonstrating their qualifications [Exhibit 16]. The agency states and the documentation supports that four of the Board members are active on the Board's Education Committee and all four members hold doctoral level degrees and are actively employed in the nursing profession.

The agency also provided an organization chart showing the Board of Nursing's staff, which includes a total of 28 staff positions, including 8 professional staff [Exhibit 17]. The agency provided resumes [Exhibit 18] and job descriptions [Exhibit 19] for the eight professional staff and attests that three of the eight professional staff are licensed professional nurses holding a minimum of bachelor's or master's degree in nursing, nursing education, or business. A review of staff resumes shows the following three professional staff positions are currently held by persons with a nursing background: Director of Education; Director of Practice; and Director of Compliance. The agency describes in its narrative for criterion 3a that the Director of Education has the responsibility for oversight of the nursing program approval process and manages with support from the Education Specialist (formerly the Education Compliance Officer).

It should be noted that the Department staff has not received a complaint regarding the agency's ability to conduct accreditation/approval activities indicating staffing levels and qualifications are adequate.

**List of Document(s) Uploaded by Analyst - Narrative**

No files uploaded

**Analyst Worksheet - Response**

**Analyst Review Status:**

Not Reviewed

**Criteria: 3a.**

**Description of Criteria**

a. Uses experienced and qualified examiners to visit schools of nursing to examine educational objectives, programs, administrative practices, services and facilities and to prepare written reports and recommendations for the use of the reviewing body -



and causes such examinations to be conducted under conditions that assure an impartial and objective judgment;

Narrative:

a. Uses experienced and qualified examiners to visit schools of nursing to examine educational objectives, programs, administrative practices, services and facilities and to prepare written reports and recommendations for the use of the reviewing body and causes such examinations to be conducted under conditions that assure an impartial and objective judgment;

The Director of Education has the responsibility for oversight of the nursing program approval process. The Director of Education manages nursing education program approval processes on a full-time basis. The former Education Compliance Officer position was reclassified as the Education Specialist position in July 2019. This position is a full-time position and is currently filled by Sarah Barickman. Sarah's resume is included in Exhibit 20. Performance expectations (job requirements) for Sarah's position are included as Exhibit 21. The Education Specialist answers directly to the Director of Education. The former clerical office manager position was reclassified in October 2019 as a Research Analyst position. Through restructuring of state positions, this full-time Research Analyst position has now shared responsibilities and is dedicated to education on a part-time basis (as of December 2019). This position is currently filled by Kristi Gilpin (indicated on the organizational chart as Paralegal & Data Integrity Specialist). Resume and Job Requirements for Kristi Gilpin are included as Exhibit 22.

Surveys (visits) to nursing programs are conducted by the Director of Education in collaboration with the Education Specialist (Sarah Barickman) and professional Board staff (Debra Funk). A group of highly qualified adjunct surveyors are available and remain under contract with the state. Since onset of the COVID-19 pandemic qualified Board staff have been utilized to conduct site visits per virtual and blended format. A WebEx-based platform is utilized to support virtual portions of each visit. The Director of Education continues to lead site visit processes, as indicated in the current (2017 through 2021) survey completion schedule (Exhibit 23).

Since 2008 at least twenty-eight (28) adjunct surveyors as well as seven (7) Board staff have attended formal orientation sessions to prepare for program survey process. The Director of Education and Education Specialist work together to conduct these sessions. The agenda and list of attendees for the most recent adjunct surveyor orientation is included as Exhibit 24. This session was conducted on September 4, 2019. Due to constraints of the COVID-19 pandemic no further orientation sessions have been conducted. Fifteen (15) adjunct surveyors are currently contracted with the State of Missouri to assist with program reviews. Adjunct surveyors are provided with an honorarium of \$(b)(1) per hour for their services as well as reimbursement for travel and lodging, as applicable. Majority of adjunct surveyors have worked with this Board for more than a decade. The current list of active adjunct program surveyors, to include their credentials and qualifications (CVs and resumes) is included as Exhibit 25. Under normal conditions each survey team is comprised of the Director of



Education and one (1) or two (2) adjunct surveyors. The Education Specialist actively participates in site visit/survey processes. As part of pandemic precautions utilization of adjunct surveyors has been minimized to avoid undue exposure. Due to constraints of the COVID-19 pandemic the Director of Education, professional Board staff (Debra Funk) and the Education Specialist (Sarah Barickman) have completed the majority of site visits. As previously noted, the completion schedule indicates site visits completed under the direction of the Director of Education as well as the former Education Compliance Officer (this position was reclassified in 2019). Board staff and adjunct surveyors utilized for each site visit are indicated in the survey completion schedule (Exhibit 23).

As the pandemic continues, site surveys are conducted per virtual and/or blended format. Education guidelines and procedures are in place to guide site visit/survey processes per direction by the Board (Exhibit 26). Throughout the pandemic site surveys related to program relocations, expansions and resource issues have included onsite portions. Going forward (initiated in 2021), site surveys are conducted per blended format. Exhibit 26 includes a staff proposal to the Board that was approved in March 2021. A site survey report reflecting the blended site visit format is included as Exhibit 27. The blended site survey format includes virtual interviews and an onsite portion to tour program facilities, to review instructional resources and to personally touch base with program administration and faculty. This is shown in the in the agenda for the site visit reflected in Exhibit 27.

Survey tools comprised of the Minimum Standards for Programs of Practical and Professional Nursing (Exhibit 1) provide a referenced approach as well as a standardized format. The Missouri State Board of Nursing (Board) strives to ensure impartial and objective judgment in conducting surveys and making subsequent recommendations to the Board. The self-study tool for assessment of Professional Programs of Nursing is included as Exhibit 48. Each nursing program receives the respective survey tool in the form of a self-study guide at least three (3) months prior to the survey date. A detailed instruction sheet is included (Exhibit 49). During the survey planning phase, the nursing program is notified of Board staff/adjunct surveyor(s) selected. The nursing program has the option to request selection of different adjunct surveyor(s), as applicable. Adjunct surveyor(s) are required to complete confidentiality as well as objectivity reports in preparation for surveys. Complete objectivity of each survey team is of utmost importance. Examples of confidentiality and objectivity report templates and reports are included as Exhibit 50. As accustomed, site visits are scheduled and Board staff/adjunct surveyor selections are made early each year to allow ample time for planning and review. 2022 site survey planning is reflected in the 2022 completion schedule included as Exhibit 28. While professional Board staff will continue to work with the Director of Education and the Education Specialist to conduct site visits, adjunct surveyor services will be utilized to assess new program readiness to start and to address major program issues as they may arise.

Each nursing program up for review is required to complete a self-study guide that is to be submitted by the deadline set by Board staff; usually no later than six (6) weeks

prior to the site survey (visit) date(s). The blended survey format requires scheduling of two (2) dates to complete each survey. The completed program self-study is submitted electronically; each nursing program has the option to submit exhibits in electronic and/or hard-copy format. Review of required documentation prior to the actual site visit facilitates the survey process. With the onset of the COVID-19 pandemic a process coined Double Document Review was initiated, which begins with review of submitted documentation. Once documentation has been reviewed the nursing program is contacted and additional documentation is requested as necessary. Documentation that may have been reviewed while onsite during the pre-COVID times is now included in the document review upfront. Missouri State Board of Nursing (Board) program records for each program are also reviewed. This review includes the last routine (five-year) survey report, reports for additional site visits that may have been conducted, annual reports, curriculum changes, faculty and program administrator approval records, current publications including websites, catalogs, handbooks, and pertinent correspondence. The Director of Education then utilizes each completed self-study to comprise a preliminary report. This report is communicated to Board staff/adjunct surveyor(s) selected for the respective visit and is utilized by the survey team as a guide to conduct virtual and onsite portions of the site visit.

Since the virtual survey process tends to limit opportunities to speak with students, the Student Feedback Survey process was initiated in April 2020. This process is designed to provide opportunities for students to provide feedback about their nursing program/educational experiences. A survey tool designed to gain input from students is utilized. An individual link to the survey tool is sent to each nursing program with the request to send out to the student body. Anonymous student participation in the survey process is ensured. The template for the 2021 Student Feedback Survey is included as Exhibit 29. This process has shown to provide substantial student feedback and proven invaluable to assessment of program processes, quality and integrity. The option for students to participate in the virtual interview process and/or contact Board staff individually remains open. An example of the Student Feedback Survey completed for a 2021 virtual visit is included as Exhibit 30.

As part of survey processes, examination of policies, procedures, and services provided by the sponsoring institution and/or the nursing program are reviewed prior to the visit. Interviews with the nursing program administrator, school administration, faculty, students (if available), and other support staff representatives such as recruiters, academic and financial aid advisors, counselors and librarians may be conducted in person and/or virtually. Tours of the physical facilities are part of the onsite portion and include classrooms, faculty offices, clinical skills and simulation laboratories, educational resource centers, computer labs/resources, and the library. Instructional resources are included in the onsite review. While the option to review additional

**Document(s) for this Section**



<b>Exhibit Title</b>	<b>File Name</b>	<b>Analyst Comments</b>	<b>Agency's Exhibit Comments</b>
Exhibit 20	Exhibit 20 - Education Specialist Resume_Redacted	-	-
Exhibit 21	Exhibit 21 - Education Specialist Job Descrip	-	-
Exhibit 22	Exhibit 22 - Research Analyst Resume and Job	-	-
Exhibit 23	Exhibit 23 -- Completion Schedule 2017-2021.p	-	-
Exhibit 24	Exhibit 24 - Adjunct Surveyor Orientation.pdf	-	-
Exhibit 25	Exhibit 25 - Adjunct Surveyor Resumes_Redacted	-	-
Exhibit 26	Exhibit 26 -- Education Guidelines -- Virtual	-	-
Exhibit 28	Exhibit 28 -- Completion Schedule -- 2022.pdf	-	-
Exhibit 29	Exhibit 29 -- Student Feedback Survey templat	-	-
Exhibit 30	Exhibit 30 -- Student Feedback Survey Results	-	-
Exhibit 31	Exhibit 31 -- Evaluation of Virtual Site Surv	-	-
Exhibit 32	Exhibit 32 -- Education Committee Meeting --	-	-
Exhibit 33	Exhibit 33 -- Columbia College -- ASN Program	-	-
Exhibit 34	Exhibit 34 -- Columbia College US17401200 --	-	-
Exhibit 48	Exhibit 48 -- Routine Self-Study -- Professio	-	-
Exhibit 49	Exhibit 49 -- MSBN Guidelines for Routine Nur	-	-
Exhibit 50	Exhibit 50 - Completed Objectivity Forms.pdf	-	-

Analyst Worksheet- Narrative

**Analyst Review Status:**

Meets the requirements of this section

**Analyst Remarks to Narrative:**

The Director of Education with support from an Education Specialist has full time responsibility for oversight of the nursing program approval process. Under normal circumstances, the Director of Education in conjunction with adjunct surveyor(s) conduct nursing program site visits for the agency. The agency currently contracts with fifteen adjunct site visitors of who one or two accompany the Director of Education on each site visit. The agency provided resumes of the Director of Education [Exhibit 17], Education Specialist [Exhibit 20], and site surveyors [Exhibit 25] demonstrating the use of experienced and qualified examiners.

Since the COVID-19 pandemic, the Director of Education, Education Specialist and professional Board staff have conducted the majority of site visits using a blended model that includes virtual and in-person site visits. The agency states the purpose of this change was to limit undue exposure of individuals to the virus. The agency submitted a list of all site visits conducted during the period 2017-2022 [Exhibit 23]. As the pandemic continues, the agency continues to use a blended site visit process that consists of virtual interviews and an onsite portion to tour program facilities, to review instructional resources and to personally touch base with program administration and faculty. The guidelines and procedures for this process were proposed to and approved by the Board [Exhibit 26]. The agency also included supporting documentation demonstrating the application of this process as Exhibit 27. The agency states that the virtual survey process tends to limit opportunities to speak with students. Therefore, the agency developed a Student Feedback Survey. This process is designed to provide opportunities for students to provide feedback about their nursing program/educational experiences. The agency provided a template of the survey as Exhibit 29 and a completed survey as Exhibit 30. Anonymous student participation in the survey process is ensured. The agency notes this process has shown to provide substantial student feedback and proven invaluable to assessment of program processes, quality and integrity.

Site surveyors receive training by the agency on their responsibilities. The agency provided two examples site surveyor orientations held September 4, 2019 [Exhibit 24]. Topics covered included: preparation of preliminary reports and initial review of documents; database for review of documents; objectivity and confidentiality; site visit expectations and processes; site visit checklist and exit interview guidelines; consistency/reliability measurement; current evaluation tools/practices; on-site program documentation; report completion; and Board presentation. The agency notes that due to the pandemic it has not held a site surveyor orientation since 2019; however, as previously noted, the agency has relied on experienced professional staff to conduct site visitors since that time. In addition, the agency notes that most site surveyors have over 10 years' experience with the Board and therefore have



previously received training.

The agency provides a nursing program with a self-study guide at least three months prior to the survey date, which is due back to the agency at least six weeks prior to the survey date. The survey is accompanied by detailed instructions [Exhibit 49]. During the survey planning phase, the nursing program is notified of Board staff/adjunct surveyor(s) selected. The nursing program has the option to request selection of different adjunct surveyor(s), as applicable. The survey is electronically submitted to the agency and each nursing program may submit additional exhibits in electronic or hard-copy format. The survey and accompanying exhibits are reviewed prior to the site visit. The review includes: the last routine (five-year) survey report; reports for additional site visits that may have been conducted; annual reports; curriculum changes; faculty and program administrator approval records; current publications including websites; catalogs; handbooks; and pertinent correspondence. The Director of Education completes a preliminary report, which is communicated to the selected adjunct surveyor(s) and Board staff and utilized as a guide for conducting the site survey. Once on site, the agency examines educational objectives, programs, administrative practices, services and facilities.

After the site visit, the agency includes notes and observations on the self-study and renames it a site survey report. The nursing program has an opportunity to respond to the report before it is finalized and submitted to the Board's Education Committee. The Education Committee reviews the final report and makes a recommendation to the full Board. The Education Committee's meetings are open to the public and Department staff observed the open portion of the Committee's August 10, 2022 meeting.

The full Board is the decision-making body and it may accept, reject, or postpone the Education Committee's recommendations. The agency provided a full cycle of review as described above as Exhibits 32-34 demonstrating it followed its processes and procedures.

Adjunct surveyor(s) are required to complete confidentiality as well as objectivity reports in preparation for surveys and submitted samples of signed confidentiality and objectivity reports to demonstrate site surveys are conducted under conditions that assure an impartial and objective judgment [Exhibit 50].

The agency provided additional information and documentation that demonstrates it meets the requirements of this criterion for the virtual file review conducted by Department staff during January 2023. Specifically, the agency provided an updated roster of site surveyors utilized during 2022-2023 along with their credentials and resumes/CVs. The documentation indicates the site surveyors have relevant experience and qualifications. The agency also provided the names, resumes and

proof of orientation for professional board staff who served as adjunct site surveyors during the review period. Lastly, the agency provided an additional example of a confidentiality and objectivity form signed by an adjunct surveyor prior to a site visit as evidence she will conduct the site visit in a confidential, impartial and objective manner.

**List of Document(s) Uploaded by Analyst - Narrative**

No files uploaded

**Analyst Worksheet - Response**

**Analyst Review Status:**

Not Reviewed

**Criteria: 3b.**

**Description of Criteria**

b. Secures sufficient and pertinent data concerning the qualitative aspects of the school's educational program;

Narrative:

b. Secures sufficient and pertinent data concerning the qualitative aspects of the school's educational program;

The Minimum Standards for Approved Professional and Practical Nursing Programs (Exhibit 1) are the instruments used to guide the examiners in the collection of pertinent data and also utilized to develop areas of data collection for criteria referenced by the U. S. Department of Education, Office of Post-Secondary Education. The areas of data collection are reflected in the Annual Report as well as site survey information/reports. Program admission, retention and graduation as well as job placement rates are reported and tracked on an annual basis.

Every effort is made to collect data which would document qualitative aspects of each nursing education program. For example, the faculty approval process requires verification of each program administrator/faculty's qualifications for teaching, completion of additional coursework or degree(s), experience in a specialty area, and teaching responsibilities, both classroom and clinical. Faculty approval processes require submission of academic transcripts indicating the completion of required degrees. Faculty approvals are verified on continuous basis. Each program is required to submit a list of current nursing faculty with each Annual Report. Faculty qualifications and approvals for each program are also verified during site visits. The Missouri State Board of Nursing (Board) currently does not have a rule regarding licensee's continued education requirements; however, professional development



activities for nursing faculty are reviewed during site visits; recommendations regarding competency of individual faculty/overall opportunities for professional development may be made. Missouri rules require that faculty orientation and mentoring documentation is maintained; such documentation is reviewed during site visits as well.

The Missouri State Board of Nursing (Board) requires that all substantive changes in a nursing education program have Board approval and are monitored by the Board for compliance with the Minimum Standards. Program changes requiring Board approval, notification or both include: Change in sponsorship of the program, substantive changes in the curriculum/program length, number of student admissions, pilot program/projects, relocation of the program or any of its components, and appointment of new faculty or program administrator. (Exhibit 1).

**Document(s) for this Section**

No files uploaded

Analyst Worksheet- Narrative

**Analyst Review Status:**

Meets the requirements of this section

**Analyst Remarks to Narrative:**

The agency attests it utilizes the following to secure sufficient and pertinent data concerning the qualitative aspects of the school's educational program: The Minimum Standards for Approved Professional and Practical Nursing Programs [Exhibit 1]; U.S. Department of Education criteria; annual reports; and site surveys. Program admission, retention and graduation as well as job placement rates are reported and tracked on an annual basis.

The agency did not reference documents for this section but did attach a completed annual report [Exhibit 42] and site survey reports to the petition [Exhibits 27 and 33], which are referenced in other sections of the petition. The annual report was reviewed against a checklist and signed and approved by agency staff. Data reported and collected for the site survey report inform Board staff recommendations. Together these documents collect data on admissions; retention rates; National Council Licensure Examination (NCLEX-RN®) results; job placement rates; program satisfaction data and faculty qualifications.

It should be noted that the completed site survey submitted as Exhibit 27 was for an initial applicant and therefore much of the qualitative data was not yet available.

The agency also requires that all substantive changes in a nursing program obtain Board approval or notification prior to implementation and the changes are monitored by the Board for compliance with the Minimum Standards. Program changes

requiring Board approval and/or notification include: change in sponsorship of the program; substantive changes in the curriculum/program length; number of student admissions; pilot program/projects; relocation of the program or any of its components; and appointment of new faculty or program administrator [Exhibit 1].

**List of Document(s) Uploaded by Analyst - Narrative**

No files uploaded

**Analyst Worksheet - Response**

**Analyst Review Status:**

Not Reviewed

**Criteria: 3c.**

**Description of Criteria**

c. Requires each school of nursing accredited to follow clearly defined refund policies governing all fees and tuition paid by students;

Narrative:

c. Requires each school of nursing accredited to follow clearly defined refund policies governing all fees and tuition paid by students;

While the Missouri State Board of Nursing (Board) is not designated as a Title IV gatekeeper (Board's jurisdiction for approval of nursing education is programmatic not institutional), rules require that each nursing program have a sponsoring institution that is accredited by an entity recognized by the U.S Department of Education. Minimum Standards require that program costs, refund policies, and financial assistance information be provided in writing to applicants prior to admission (Exhibit 1).

All nursing programs are required to provide a copy of their application packets, school/college catalog and student handbook(s) with their Annual and routine (5-year) survey reports. The Missouri State Board of Nursing (Board) requires that all nursing program publications are current, dated, and congruent. When evaluating each Annual Report and/or site visit report, the Board specifically looks for information regarding refund policies governing all fees and tuition paid by students, program costs as well as availability of financial assistance.

**Document(s) for this Section**

No files uploaded

Analyst Worksheet- Narrative



**Analyst Review Status:**

Meets the requirements of this section

**Analyst Remarks to Narrative:**

Chapters 2 and 3 of the Minimum Standards of the Missouri Nursing Practice Act [Exhibit 1] require nursing programs provide to prospective students, in writing, prior to admission: program costs; refund policies; and financial assistance information. The agency enforces this standard through the monitoring of annual reports and site surveys.

The agency did not attach an annual report or self-study to this criterion. However, a completed annual report [Exhibit 42] and a completed site visit report [Exhibit 33] was included in the petition as supporting documentation and referenced in other areas. The completed site survey report contains the nursing program's self-study.

A review of the completed annual report and completed site survey report demonstrates the agency meets this criterion. Specifically, page 22 of the annual report asks, in part, for the program to list the name of the publication and beginning page number where program costs and financial aid/refund policies can be located. This information is reviewed and approved by agency staff as demonstrated by the Board staff annual report review checklist. Likewise, the nursing program describes its refund policy, tuition and fee and financial aid information in the completed site survey. The completed site survey shows the agency reviewed and analyzed the information provided by the program and determined it met the agency's standards.

**List of Document(s) Uploaded by Analyst - Narrative**

No files uploaded

**Analyst Worksheet - Response**

**Analyst Review Status:**

Not Reviewed

**Criteria: 3d.**

**Description of Criteria**

d. Enforces a well defined set of standards regarding a school's ethical practices, including recruitment and advertising;

Narrative:

d. Enforces a well-defined set of standards regarding the school's ethical practices, including recruitment and advertising;

All nursing programs are to uphold established ethical practices and standards in relation to recruitment and advertising as well as other program operations. Minimum Standards mandate that required information is to be made available in writing to applicants prior to admission and to students upon entry to the program, as indicated below. Rules require that each nursing program carefully assesses applicant potential to complete the nursing curriculum and eligibility for nurse licensure prior to acceptance as a student. Program publications are to include a nondiscrimination policy specific to the nursing program (Exhibit 1).

Prior to admission, the nursing program must provide the following information in writing to prospective students/applicants:

- Approval status as granted by the Board;
- Admission criteria;
- Section 335.066 of the Missouri Nursing Practice Act with an explanation that completion of the program does not guarantee eligibility to take the licensure exam;
- Advanced placement policies;
- Student services;
- Curriculum plan;
- Program costs;
- Refund policy; and,
- Financial assistance.

The following information must be given to the student, in writing, upon entry:

- Philosophy;
- Graduate competencies;
- Grading, promotion, and graduation policies;
- Faculty roster with qualifications;
- School calendar;
- Student policies;
- Student's rights and responsibilities; and,
- Due process and grievance policies and procedures.

The Missouri State Board of Nursing (Board) requires the nursing program to provide this information with each Annual Report as well as each self-study completed in preparation for site visits/surveys.

While practices to evaluate ethical standards in nursing programs approved by the Missouri State Board of Nursing (Board) have been in place for many years, the Board felt it was essential to better define such processes and to provide official direction to Board staff and representatives of the Board qualified to conduct nursing program approval processes to evaluate ethical practices on consistent basis. The Missouri State Board of Nursing (Board) approved the Education Policy related to Assessment of Ethical Practices in Nursing programs Approved by the Board on February 8th, 2017:  
Missouri State Board of Nursing



## Education Policy – Assessment of Ethical Practices in Nursing Programs Approved by the Board

This policy provides direction to Missouri State Board of Nursing (Board) staff and representative of the Board qualified to conduct nursing program approval processes to include site visits to evaluate ethical practices of nursing programs approved by the Board on consistent basis:

Evaluation of ethical practices shall include review of nursing program policies and processes regarding:

1. Advertising for the nursing program to the public
2. Recruitment of students
3. Admission standards for acceptance to the nursing program -- policies and processes related to assessment of potential to complete the nursing program and ability to meet standards to apply for licensure
4. Progression standards while in the nursing program – policies and processes related to grading standards and requirements for progression
5. Graduation standards – policies and processes related to requirements to be met to complete the nursing program

Evaluation of ethical practices related to advertising, recruitment of students, admission, progression and graduation standards shall be clearly reflected in reports submitted to the Board in regard to approval processes for nursing programs approved by the Board. The Board's Education Policy, as reflected above, is also attached as Exhibit 35.

As indicated in the Board's evaluation processes, documentation and actions, active evaluation of ethical practices in all areas identified in the Education Policy has been and continues to be a major focus of approval processes across all levels of nursing educational programs approved by the Board. The Board's actions reflect exceptional regulatory responsiveness to program issues. Measures taken by the Board within recent years include actions leading to closure of three (3) underperforming pre-licensure Associate Degree in Nursing (ADN) professional nursing programs. The three (3) pre-licensure ADN programs include the ITT- Technical Institute –Breckenridge School of Nursing ADN program located in Earth City (MO), the Brown Mackie College ADN program located in Fenton (MO) and the Concorde Career College – ADN program in Kansas City (MO).

Concorde Career College – ADN Program – Final Closure Date: June 30, 2016

ITT Technical Institute – ADN Program – Final Closure Date: September 6, 2016

Brown Mackie College – ADN Program – Final Closure Date: July 1, 2017

As indicated in site survey reports submitted to the Board, evaluation of ethical program practices has significantly contributed to the Board's actions. Excerpts of site survey reports as well as official Board decision letters communicating the Board's decisions and actions to respective nursing programs are included as Exhibit 36.

Please note that documentation provided for review depicts excerpts from respective site visit reports. Full site survey report documentation on any of these visits is available and ready for submission to your office, if necessary. It is also to be noted that select documentation provided within Exhibit 36 indicates the title of Ingeborg D.

“Bibi” Schultz as the Education Administrator rather than Director of Education. This represents a change in titles; no change in duties or responsibilities occurred.

Exhibit 37 (site visit report) indicates evaluation of ethical standards throughout the report, with special emphasis on:

Faculty qualifications and responsibilities – 20 CSR 2200-2.060; beginning on page 12.

Student recruitment, admission, readmission and progression – 20 CSR 2200-2.090; beginning on page 35.

Educational/instructional quality and integrity – 20 CSR 2200-2.100; beginning on page 39

Student record management – 20 CSR 2200-2.110; beginning on page 55.

Program publications available to applicants prior to admission to the nursing program as well as publications provided to students as they enter the nursing program – 20 CSR 2200-2.120 – beginning page 56. As indicated above, the Board decision regarding this site visit report is included in Exhibit 37. A Follow-up site visit report for the same program in 2020 is included to reflect continuity of program review processes and follow-up (Exhibit 38). The Board’s decision regarding this site visit report is included in Exhibit 38.

In addition the Board’s multiple actions related to change of program approval status to conditional approval as well as actions to halt admissions to nursing programs that are found out of compliance with Minimum Standards are clear. Exhibit 39 indicates site survey reports reflecting such actions by the Board. Reports reflect the Board’s authority to impose (2020) and later lift the moratorium on student admissions (2021) as deficiencies are sufficiently addressed. Board decision letters for respective site visit reports are included as Exhibit 40.

**Document(s) for this Section**

<b>Exhibit Title</b>	<b>File Name</b>	<b>Analyst Comments</b>	<b>Agency's Exhibit Comments</b>
Exhibit 35	Exhibit 35 -- Missouri State Board of Nursing	-	-
Exhibit 36	Exhibit 36 - Excerpts from Site Visit Reports	-	-
Exhibit 37	Exhibit 37 - Routine Initial Site Survey Repo	-	-
Exhibit 38	Exhibit 38 -- Mercy College of Nursing and He	-	-
Exhibit 39	Exhibit 39 -- Missouri Southern State Univers	-	-
Exhibit 40	Exhibit 40 -- Missouri Southern - BSN -- Boar	-	-



## Analyst Worksheet- Narrative

### **Analyst Review Status:**

Meets the requirements of this section

### **Analyst Remarks to Narrative:**

The agency's standards regarding a school's ethical practices, including recruitment and advertising are found in chapters 2 and 3 of the Minimum Standards [Exhibit 1]. In addition, the Board approved and implemented a policy, the "Education Policy related to Assessment of Ethical Practices in Nursing Programs" [Exhibit 35]. The policy requires nursing program policies and processes be evaluated on the following categories: advertising for the nursing program to the public; recruitment of students; admission standards; progression standards and graduation standards. The policy requires the evaluation of ethical practices related to these areas be reflected in reports to the Board.

The Board also requires nursing programs to provide information related to the above categories be included with each annual report and self-study. Prior to admission, the nursing program must provide, in writing, information to applicants to include: approval status as granted by the Board; admission criteria; an explanation that completion of the program does not guarantee eligibility to take the licensure exam; advanced placement policies; student services; curriculum plan; program costs; refund policy; and financial assistance. Nursing programs are also required to include the following written information to students upon entry to the program: philosophy; graduate competencies; grading, promotion, and graduation policies; faculty roster with qualifications; school calendar; student policies; student's rights and responsibilities; and due process and grievance policies and procedures. The agency states in its narrative that its enforcement of standards regarding ethical practices led, in part, to the closures of three programs between 2015-2017 and provided the site visit reports and Board decision letters as Exhibit 36. Department staff notes that these examples fall outside the current recognition period. Nevertheless, the agency provided additional examples of site visits, reports, and Board decision letters demonstrating enforcement of its standards related to this criterion [Exhibits 37-40]. A review of the completed site survey reports demonstrates that the program reported on the above categories under the relevant section and the information was reviewed and commented on by the agency and acted upon by the Board, as applicable.

Although not included in this criterion, the agency included a sample annual report that demonstrates it collects the information described above. Department staff reviewed the completed annual report and determined the above areas and were completed by the program as evidenced by the inclusion of the names of the relevant publications and the links where the information is disclosed on the program's

website. The completed annual report contains an agency checklist showing the annual report was reviewed and approved by agency staff, including a review of program publications to include college catalog, nursing student handbook, application packets and program brochures [Exhibit 42].

Lastly, the agency provided additional documentation for the virtual file review conducted by Department staff during January 2023 that demonstrates it meets the requirements of this criterion. Specifically, the agency provided two additional site visit reports for programs selected by Department staff: Three Rivers College - ADN program and Missouri State University - BSN program. A review of the documentation submitted for the virtual file review demonstrates that the agency enforces a well defined set of standards regarding a school's ethical practices, including recruitment and advertising consistent with the site visit reports submitted as part of the petition and discussed above.

**List of Document(s) Uploaded by Analyst - Narrative**

No files uploaded

**Analyst Worksheet - Response**

**Analyst Review Status:**

Not Reviewed

**Criteria: 3e.**

**Description of Criteria**

e. Requires each school of nursing accredited to submit a comprehensive annual report, including current data on:

- (1) Progress toward achievement of its stated objectives in nursing education:
- (2) Qualifications and major responsibilities of the dean or director and of each faculty member:
- (3) Policies used for selection, promotion, and graduation of students:
- (4) Practices followed in safeguarding the health and well-being of students:
- (5) Current enrollment by class and student-teacher ratios:



- (6) Number of admission to school per year for past 5 years:
- (7) Number of graduations from school per year for past 5 years:
- (8) Performance of students on State board examinations for past 5 years:
- (9) Curriculum plan:
- (10) Brief course description:
- (11) Descriptions of resources and facilities, clinical areas and contractual arrangements which reflect upon the academic program.

Narrative:

e. Requires each school of nursing accredited to submit a comprehensive annual report, including current data on:

Minimum Standards (Exhibit 1) require that all nursing programs submit an Annual Report. The format for this report has been modified several times and continues to include data as to the number of admissions to the program, number of graduations from the program as well as applicant pool data for the past five (5) years. Current enrollment by cohort and student to teacher ratios are included. Program retention rates are indicated. Annual reporting requires a listing/progress toward achievement of the program's objectives in nursing education. Documentation required for submission with each Annual Report includes:

- Sample transcript
- Listing of all currently utilized clinical sites
- Sample contractual agreement with a clinical site
- List of current nursing faculty to include clinical adjunct faculty
- The current audited fiscal report and program budget
- Position descriptions for the program administrator, nursing faculty and staff
- Program publications, to include the College Catalog, Student Handbooks, Application Packets and Program Brochures, as referenced within the Nursing Program Annual Report.

The Annual Report template is sent to nursing programs in electronic format. The electronic Annual Report format/process has been utilized since 2009. As of 2010 nursing programs receive and complete Annual Report data on a calendar year basis, rather than by fiscal or academic year.

Throughout the year, Board staff updates program files as additional information is submitted, to include changes in program administrator and faculty. Each nursing program is required to submit a comprehensive Annual Report for each year the program is in operation. Upon receipt of the Annual Report and accompanying materials, submitted documentation is compiled for each program. The Director of Education and/or designee then review all information submitted to determine

program compliance with Minimum Standards. A report summarizing the Annual Reports for various level nursing programs with recommendations, as necessary, is prepared and submitted for the Board's approval.

Beginning with Annual Reporting for calendar year 2020 the Missouri State Board of Nursing engaged in data collection at the national level. A revised survey tool has been created that incorporates questions designed by the National Council of State Boards of Nursing (NCSBN) and also includes questions that address Missouri rule requirements and collection of documentation/data required by the U.S Department of Education. The 2020 Annual Reporting tool along with instructions, indicating supporting documentation required to accompany each Annual Report, is provided as Exhibit 41. Missouri pre-licensure nursing programs continue to submit their Annual Report documentation per electronic format and an individual report for each reporting program is compiled. Review of each Annual Report and supporting documents continues to be the responsibility of each participating Board.

Comprehensive reports are compiled at the national level and available to each Board. The Board continues to make individual decisions in regard to each Annual Report submitted.

A completed 2020 Annual Report with supporting documentation is included as Exhibit 42. Tracking documents are utilized to ensure that all required documentation has been received and reviewed. Tracking documents indicate deficiencies identified (as applicable) and show Board staff recommendations. An example of a 2020 Annual Report tracking document is included as Exhibit 43. The Board's decision letter regarding the Annual Report reflected in Exhibit 42 is included as Exhibit 44.

(1) Progress toward achievement of its stated objectives in nursing education:

The Annual Reporting process requires nursing programs to indicate program objectives in nursing education in the form of graduate competencies and/or program outcomes. Each program is required to provide a brief description on current progress toward achievement of its objectives, as evidenced in Exhibits 41 & 42.

(2) Qualifications and major responsibilities of the dean or director and of each faculty member:

Annual Reporting requires separate submission of position descriptions for the program administrator, nursing faculty and support staff. Position descriptions are to depict major responsibilities for each position. A section requiring the nursing program to state minimum qualifications for program administrator and faculty positions is part of each Annual Report. Submission of a list of current program faculty is required with submission of each Annual Report. Credentials and academic qualifications for each faculty are maintained as part of faculty approval records (Exhibit 41 & 42).

(3) Policies used for selection, promotion, and graduation of students:

Annual Reporting requires separate submission of program publications. Pursuant to 20 CSR 2200-2.120 and 20 CSR 2200-3.120 Minimum Standards for Professional as well as Practical Nursing Programs (Exhibit 1) require that policies for selection of students are addressed within publications available to the applicant prior to program admission. Submission of program application packets is required as well. Policies



related to promotion and graduation of students are addressed within program publications available to the student upon entry into the nursing program. Board staff review of Annual Reporting data includes review of submitted program publications to ensure compliance to these rules (Exhibits 41, 42 & 43).

(4) Practices followed in safeguarding the health and well-being of students:

Annual reporting requires separate submission of program publications, as indicated above. Minimum Standards for Professional as well as Practical Nursing (Exhibit 1) require programs to address available student services, student policies, student's rights and responsibilities within respective program publications. Board staff review of annual reporting data includes review of submitted program publications to ensure compliance to these rules (Exhibits 41, 42 & 43).

(5) Current enrollment by class and student-teacher ratios:

The Annual Reporting tool was revised to include current enrollment by class/cohort and student-teacher ratios for theory and clinical course work. The Board approved these changes in April 2020. By August 2020 the Board approved participation in the Annual Report processes on the national level and the current Annual Reporting tool (Exhibit 41) was approved during the August 2020 full Board meeting. Meeting minutes for the August 2020 full Board meeting are included as Exhibit 45.

(6) Number of admissions to school per year for past 5 years:

(7) Number of graduations from school per year for past 5 years:

Annual Reporting requires submission of this data, as indicated in the template and completed Annual Reporting tool provided as Exhibits 41 & 42.

(8) Performance of students on State board examinations for past 5 years:

Tracking of student performance on the State Board examinations is currently completed through utilization of quarterly NCLEX reports and is the responsibility of the nursing program in collaboration with Board staff. Nursing programs submit their pass rates as part of Annual Reports and in self-studies completed in preparation for site visits, as reflected in Exhibits 39, 41 & 42. The current official NCLEX pass rate report is available on the Board's website at

<https://pr.mo.gov/boards/nursing/passrates.pdf> and is included as Exhibit 11.

(9) Curriculum plan:

(10) Brief course description:

Annual Reporting requires submission of current program publications, to include the College Catalog and Nursing Student Handbook(s). Annual reporting requires the nursing program to provide page number and document or internet link where the curriculum plan as well as course descriptions are listed, as indicated within the Annual Report documentation provided within Exhibits 41 & 42. Board staff review of submitted program publications ensures that curriculum plan and course descriptions follow philosophy and mission statements of the nursing program. Verification of data per review of the nursing program's website, if applicable, is completed as well.

(11) Descriptions of resources and facilities, clinical areas and contractual arrangements which reflect upon the academic program.

The Annual Report indicates data related to adequacy of physical office, classroom

and skills lab space/instructional resources. Currently utilized clinical areas are reported in form of a list of clinical sites. Contractual agreements are verified within each Annual Report (Exhibits 41 & 42). Nursing programs are required to verify adequacy of physical program facilities. Actual inspections of physical program facilities and instructional resources are completed during respective site surveys. The 2020 Annual Reporting tool (Exhibit 41) reflects questions related to physical facilities/instructional resources available to the program. A description of program facilities is required.

The Board's approval of enrollments for each nursing program is directly gaged by sufficient space and instructional resources to support instruction. Expansion site visits are conducted to ensure physical program space and instructional resources are sufficient to meet student needs. An example of the Board's approval of a program expansion with evidence of the Board's decision for approval contingent on a successful site visit and the actual expansion site survey report is included as Exhibit 46. The Board's decision regarding the site survey report is included in Exhibit 47. As Annual Report submissions are reviewed by the Director of Education and/or the Education Specialist, Annual Report findings are reported to the Board. Concerns related to nursing program operation/compliance to rule

**Document(s) for this Section**

<b>Exhibit Title</b>	<b>File Name</b>	<b>Analyst Comments</b>	<b>Agency's Exhibit Comments</b>
Exhibit 41	Exhibit 41 -- Missouri Annual Report Survey T	-	-
Exhibit 42	Exhibit 42 -- 2020 Annual Report - Crowder Co	-	-
Exhibit 43	Exhibit 43 -- Annual Report Tracking 2020.pdf	-	-
Exhibit 44	Exhibit 44 -- Crowder College - Cassville ASN	-	-
Exhibit 45	Exhibit 45 -- August 2020 Board Meeting Notic	-	-
Exhibit 46	Exhibit 46 -- St. Louis CC -- Flo Valley and	-	-
Exhibit 47	Exhibit 47 -- Board Decision letter.pdf	-	-
Exhibit 51	Exhibit 51 - Education Complaint Procedure.p	-	-
Exhibit 52	Exhibit 52 -- Student Complaint Form.pdf	-	-



## Analyst Worksheet- Narrative

### Analyst Review Status:

Meets the requirements of this section

### Analyst Remarks to Narrative:

The agency's narrative was not fully entered into the system when the petition was submitted January 27, 2022. The missing narrative should read: "As Annual Report submissions are reviewed by the Director of Education and/or the Education Specialist, Annual Report findings are reported to the Board. Concerns related to nursing program operation/compliance to rules set forth in the Minimum Standards for Approved Professional as well as Practical Nursing Programs (**Exhibit 1**) are addressed.

Nursing programs may be required to submit additional information/provide an explanation/progress report related to submission of data that may have been omitted/is unclear or issues identified during site visits. With revision of the Annual Report template, utilization of instruction sheets and ongoing efforts to provide orientation sessions for new program administrators and nursing faculty (significant segment of each orientation session is designated to Annual Reporting) Annual Reporting is very much on target, as evidenced by the Annual Reporting tracking tool shown as **Exhibit 43**.

There certainly remain situations where nursing programs are required to submit additional information to the Board. Submission of additional information is often linked to program compliance issues. Complaints against a nursing program may also generate the need for submission of additional information/explanations. The education section complaint procedure is included as **Exhibit 51**. The current complaint procedure has been in place since 2012 and therefore lists the Director of Education designation as formerly titled as the Education Administrator. A student complaint form is provided to facilitate submission of concerns and is accessible on the Board's website at <https://pr.mo.gov/boards/nursing/studentcomplaintform.pdf>

The form is also included as **Exhibit 52.**" Department staff reached out to and received the missing narrative on August 30, 2022 and uploaded it as Exhibit AA.

Chapters 2 and 3 of the agency's Minimum Standards [Exhibit 1] require all nursing programs to submit an annual report. The format of the report includes: admissions data; graduation data; data on the applicant pool for the past five years; current enrollment by cohort; student to teacher ratios, program retention rates; and progress toward achievement of the program's objectives in nursing education. The agency also requires the following documentation as part of the annual report: sample transcript; listing of all currently utilized clinical sites; sample contractual agreement

with a clinical site; list of current nursing faculty to include clinical adjunct faculty; current audited fiscal report and program budget; position descriptions for the program administrator, nursing faculty and staff; and program publications to include college catalog, student handbooks, application packets and program brochures. The agency's Director of Education and/or Education Specialist reviews the information and determines program compliance with the Minimum Standards. The agency prepares a report summarizing the annual report with recommendations, as necessary for Board approval. The agency submitted an annual report instruction letter and template [Exhibit 41] and completed annual report [Exhibit 42] that included a completed agency checklist as evidence it meets this criterion. In addition, the agency provided its internal tracking tool used by staff to track receipt, acceptance and recommendations based on its review of annual reports for all MOSBN approved schools [Exhibit 43].

The agency responded to the outlined criteria as follows:

(1) Progress toward achievement of its stated objectives in nursing education: The annual reporting process requires nursing programs to describe program objectives in nursing education in the form of graduate competencies and/or program outcomes and a brief description on current progress toward achievement of its objectives, as evidenced in Exhibit 42 beginning on page 18.

(2) Qualifications and major responsibilities of the dean or director and of each faculty member: The annual reporting process requires separate submission of position descriptions for the program administrator, nursing faculty and support staff to include: position descriptions; minimum qualifications for program administrator and faculty positions; a list of current program faculty and their credentials and academic qualifications. Exhibit 42 contains information related to this section on pages 33-52.

(3) Policies used for selection, promotion, and graduation of students: The annual reporting process requires separate submission of program publications, which must include that policies for selection of students are addressed within publications available to the applicant prior to program admission; program application packets; and that policies related to promotion and graduation of students are addressed within program publications available to the student upon entry into the nursing program. Board staff review of annual reporting data includes review of submitted program publications to ensure compliance with these rules [Exhibit 42]. The completed annual report contains the school catalog, which includes policies related to the selection, promotion, and graduation of students.

(4) Practices followed in safeguarding the health and well-being of students: The annual reporting process requires separate submission of program publications to



include available student services; student policies; and student's rights and responsibilities within respective program publications. Board staff review of annual reporting data includes review of submitted program publications to ensure compliance with these rules [Exhibits 42 and 43]. Exhibit 42 contains questions that address the health and well-being of students. The questions ask where the information can be found in the program's publications, which is indicated in the response by direct links to the relevant information.

(5) The annual report [Exhibit 42] provides current enrollment by class and student-teacher ratios on pages 8-11. The annual report also includes (6) number of admissions to program per year for past 5 years and (7) number of graduations from program per year for past 5 years on page 17.

The agency attests that the annual reporting process requires the submission of (8) performance of students on State board examinations for past 5 years as indicated in completed annual reporting tools provided as Exhibits 41 and 42. Specifically, the agency utilizes quarterly NCLEX reports to collect this data. Pass rates are submitted as part of the annual report and in self-studies and site visit reports [Exhibit 39]. Lastly, the agency publishes a NCLEX pass rate report on the Board's website and included an example as Exhibit 11. Department staff notes that the NCLEX pass rate report submitted as Exhibit 11 contains the pass rates for each approved nursing program for the past five years.

(9) Curriculum plan and (10) brief course descriptions are identified in the course catalog submitted with the annual report beginning on page 110 [Exhibit 42].

(11) Descriptions of resources and facilities, clinical areas and contractual arrangements which reflect upon the academic program: The annual report asks questions related to adequacy of office, classroom and skills lab space and resources beginning on page 12. Specifically, question 107 asks the agency to describe the program's physical facilities and clinical areas. Nursing programs are required to provide a list of active clinical sites [Exhibit 42, page 32] and contractual agreements [Exhibit 42, page 40], which are reviewed and verified by agency staff. The agency further states the Board's approval of enrollments for each nursing program is contingent on sufficient space and resources. The agency conducts an expansion site visit to confirm resources and facilities and makes a recommendation to the Board. The agency included an example of an expansion site visit report and the Board's decision as Exhibits 46 and 47.

The agency included its complaint procedure (Exhibit 51) and complaint form [Exhibit 52]. Complaints against individual nurses are handled by the Board's investigation section and complaints against nursing programs are handled by the education section of the Board, which includes review by the Director of Education

and/or Education Compliance Officer.

Lastly, the agency provided additional documentation for the virtual file review conducted by Department staff during January 2023 that demonstrates it meets the requirements of this criterion. Specifically, the agency provided two additional annual reports for programs selected by Department staff: Three Rivers College - ADN program and Missouri State University - BSN program. A review of the documentation submitted for the virtual file review demonstrates that the agency requires each school of nursing accredited to submit a comprehensive annual report that contains the elements listed in 3e(1-11), consistent with the annual report submitted as part of the petition and discussed above.

**List of Document(s) Uploaded by Analyst - Narrative**

<b>Exhibit Title</b>	<b>File Name</b>
Exhibit AA	Missouri State Board of Nursing -- Petition for Continued Recognition -- Feb 2022 submission.pdf

**Analyst Worksheet - Response**

**Analyst Review Status:**

Not Reviewed

**Criteria: 3f.**

**Description of Criteria**

f. Regularly, but at least every 2 years, obtains from each accredited school of nursing:

- (1) A copy of its audited fiscal report, including a statement of income and expenditures:
- (2) A current catalog.

**Narrative:**

f. Regularly, but at least every 2 years, obtains from each accredited school of nursing:

(1) A copy of its audited fiscal report, including a statement of income and expenditures:

A copy of a current audited fiscal report and current budgets showing income and expenditures are to be submitted with Annual Reports. Submission of audited fiscal reports is required on annual basis. Each program is required to have an annual



budget and the program administrator is to manage the budget with input from the faculty (Exhibit 1). Program budget management responsibilities are assessed and indicated within each Annual Report (Exhibits 41 & 42).

(2) A current catalog.

Each nursing program is required to submit copies of current program publications, to include its current catalog with each Annual Report. Nursing programs often provide URL addresses to access program publications electronically/per the school's website. The current Annual Reporting tool and instructions include a list of required supporting documents to be submitted with each Annual Report, and a completed Annual Report with supporting documentation is provided within Exhibits 41 & 42.

**Document(s) for this Section**

No files uploaded

Analyst Worksheet- Narrative

**Analyst Review Status:**

Meets the requirements of this section

**Analyst Remarks to Narrative:**

The agency requires audited fiscal reports to be submitted as part of each program's annual report. As evidence, the agency submitted its instruction letter sent to Program Administrators reminding them their nursing program's annual report is due December 22, 2020 [Exhibit 41]. This letter includes a section listing all items that must be submitted with the annual report, including the most recent audited fiscal report. The agency submitted an example of an annual report [Exhibit 42 in section 3e], which includes the program's most recent audited fiscal report, including a statement of income and expenditures.

Each nursing program must submit copies of its current catalog with each annual report. This requirement is spelled out in the instruction letter sent to Program Administrators discussed above and checked by agency staff during its review and approval of each program's annual report. The annual report submitted by the agency as evidence in section 3e includes a course catalog publication, which was verified by agency staff [Exhibit 42].

Lastly, the agency provided additional documentation for the virtual file review conducted by Department staff during January 2023 that demonstrates it meets the requirements of this criterion. Specifically, the agency provided two additional annual reports for programs selected by Department staff: Three Rivers College - ADN program and Missouri State University - BSN program. A review of the documentation submitted for the virtual file review demonstrates that the agency obtains from each accredited school of nursing a copy of its audited fiscal report, including a statement of income and expenditures and a current catalog. This is

consistent with the example submitted as part of the petition and discussed above.

**List of Document(s) Uploaded by Analyst - Narrative**

No files uploaded

**Analyst Worksheet - Response**

**Analyst Review Status:**

Not Reviewed

**Criteria: 3g.**

**Description of Criteria**

g. Makes initial and periodic on-site inspections of each school of nursing accredited.  
Narrative:

g. Makes initial and periodic on-site inspections of each school of nursing accredited. The Missouri State Board of Nursing (Board) makes initial and periodic on-site visits to approved nursing programs (Exhibit 1). Each nursing program is surveyed at a minimum of every five (5) years. The Board has the authority to conduct additional site surveys (visits) as deemed necessary. A program may also request additional visits. The Board may schedule site surveys to coincide with that of a nationally recognized nursing education accrediting body, such as Accreditation Commission for Education in Nursing (ACEN), Commission for Nursing Education Accreditation (CNEA) or the Commission on Collegiate Nursing Education (CCNE), in an attempt to prevent duplication. The 2017 through 2021 survey completion schedule is included as Exhibit 23. Exhibits 27, 36, 37, 38, 39, 46 and 47 show site survey reports and Board decision letters to reflect periodic onsite inspection of nursing programs.

**Document(s) for this Section**

No files uploaded

**Analyst Worksheet- Narrative**

**Analyst Review Status:**

Meets the requirements of this section

**Analyst Remarks to Narrative:**

The Minimum Standards set forth in the Nursing Practice Act [Exhibit 1] require the agency to make initial and periodic on-site inspections of each approved school of



nursing. Specifically, chapters 2 and 3 of the standards require a representative of the board to make an on-site survey to verify compliance with the rules. Nursing programs are surveyed at a minimum every five years or more frequently as deemed necessary by the Board. The agency provided completed site survey reports and decision letters [Exhibits 27, 36, 37, 38, 39, 46 and 47] as well as a list of site surveys completed 2017-2021 [Exhibit 23] demonstrating it makes initial and periodic on-site inspections of each school of nursing it accredits.

Department Staff observed the agency conduct a site survey for a routine/expansion site visit during November, 2022 in Kansas City, MO. The site visit took place on two dates. On November 9th, 2022 the agency conducted a virtual site visit, which consisted of interviews with institutional and program staff, including faculty and administrators. The second part of the visit took place on-site at the university on November 16, 2022. Department staff observed both parts of the visit and observed that the agency was thorough in verifying the program met the State of Missouri's Minimum Standards.

Lastly, the agency provided additional documentation for the virtual file review conducted by Department staff during January 2023 that demonstrates it meets the requirements of this criterion. Specifically, the agency provided two additional site visit reports and student feedback surveys for programs selected by Department staff: Three Rivers College - ADN program and Missouri State University - BSN program. The site visits were conducted by the agency for both programs during September 2022. A review of the documentation submitted for the virtual file review demonstrates that the agency makes initial and periodic on-site inspections of each school of nursing accredited consistent with the examples submitted as part of the petition and discussed above.

**List of Document(s) Uploaded by Analyst - Narrative**

No files uploaded

**Analyst Worksheet - Response**

**Analyst Review Status:**

Not Reviewed

**Criteria: 4.**

**Description of Criteria**

4. Has clear, written procedures for

- (a) the accreditation of a school of nursing or institution,
- (b) placing it on a probationary status,
- (c) revoking the accreditation, and
- (d) reinstating accreditation.

Narrative:

4. Has clear, written procedures for (a) the accreditation of a school of nursing or institution, (b) placing it on a probationary status, (c) revoking the accreditation, and (d) reinstating accreditation.

The Minimum Standards describe established procedures for granting initial approval and full approval. If a program fails to meet or maintain the requirements as set forth by the Missouri State Board of Nursing (Board), the status of the program may be changed to conditional approval. The Board has authority to impose a moratorium on student admissions, as deemed necessary (Exhibit 1). Once the program conforms to the requirements, the program status may be reinstated to full approval. A moratorium on student admissions may be lifted by the Board with evidence that program deficiencies have been sufficiently addressed and resolved. The Board may withdraw approval should a program fail to correct identified deficiencies within a reasonable period of time. The program is afforded the opportunity for a hearing process before being removed from the Board's listing of approved programs (Exhibit 1). Current approval status of each nursing program approved by the Missouri State Board of Nursing is indicated on the Table of Schools (Exhibit 6) and the Approval Table (Exhibit 12). As indicated, five (5) nursing programs are currently on conditional approval by this Board.

As indicated under criterion 3.d above, site survey reports are included that show evaluation of nursing programs on ongoing basis. Board staff recommendations to move programs to conditional approval, impose a moratorium on admissions as well as to lift the moratorium on admissions with reduced enrollment are reflected (Exhibits 36 through 40). Board decision letters are included.

Once the Board's approval is withdrawn or a program has voluntarily closed, pursuant to 20 CSR 2200-2.020 (2) the procedure for reopening a nursing program is the same as that for initial approval (Exhibit 1). Furthermore 20 CSR 2200-2.020 (2) requires that should nursing approval be lost due to deficiencies identified by the Board, the sponsoring institution may not petition the Board for approval of a new nursing program for a minimum of one (1) year from the actual date of program closure. Exhibit 36 provides evidence of program approval processes that ended in program closures.

The Missouri State Board of Nursing (Board) maintains a cooperative relationship with both the Department of Elementary and Secondary Education (DESE) and the Coordinating Board of Higher Education (CBHE) of the State of Missouri to address



mutual concerns regarding program performance. Representatives from such government agencies work collaboratively with the Board/staff on current issues/future planning related to nursing education, attend meetings, and provide valued input related to task force charges/strategic planning initiatives.

Survey completion schedules through 2021 indicate program survey activities, as indicated in Exhibit 23. Survey activities are also reflected in Education Quarterly reports, submitted to the Board of Nursing prior to each full Board meeting. The Missouri State Board of Nursing (Board) meets four (4) times each year. A copy of one of the most recent Quarterly reports (December 2021) is included as Exhibit 53. Quarterly reports are submitted to the Board in preparation for each Board meeting to keep the Board abreast on current status of site visit processes and timely completion of reports; review of reports by program administrators as well as submission/review by the Board reflected in the Completion Schedule (Exhibit 23) and reiterated in each Quarterly Report.

**Document(s) for this Section**

<b>Exhibit Title</b>	<b>File Name</b>	<b>Analyst Comments</b>	<b>Agency's Exhibit Comments</b>
Exhibit 53	Exhibit 53 -- Quarterly Report -- December 20	-	-

Analyst Worksheet- Narrative

**Analyst Review Status:**

Meets the requirements of this section

**Analyst Remarks to Narrative:**

The agency has clear, written procedures for approving nursing programs, placing programs on probation, revoking program approval and reinstating accreditation (approval). The procedures are described in the State Board of Nursing Statutes and Rules [Exhibit 1], which has three classifications of approval: initial, full and conditional.

Chapters 2 and 3 of the Rules sets forth the procedures an accredited institution of higher education must follow to gain initial approval of its nursing program, which includes a petition to the Board; a site survey visit from Board representatives followed by the Board's decision. The Board's decision to grant initial approval is contingent upon evidence from the site survey that the program is compliant with state rules. Initial program approval contingent on the site survey can only be for one calendar year prior to program start.



Once initial approval has been granted by the Board, the program must submit an annual report. After graduation of the program's first class and receipt of the results of the first official National Council Licensure Examination for Registered Nurses (NCLEX-RC®) pass rate the Board will review the program for compliance with the Minimum Standards. After its review, the Board will decide to continue initial approval for a period not more than one calendar year, withdraw approval, or grant full approval.

During its period of approval, a program must submit an annual report, annual registration and an annual registration fee. Further, a program is subject to on-site surveys on a scheduled basis, at the direction of the Board, or upon request of the nursing program, typically at five-year intervals.

A program may be placed on conditional approval status if it has failed to meet or maintain the rules/regulations or requirements, or both as set by the Board. The Board notifies the program administrator of concerns regarding the program and the administrator may respond to those concerns. Programs placed on conditional status remain on that status until any deficiencies are corrected to the satisfaction of the Board. The agency submitted a table of approved schools [Exhibits 6 and 12], which shows that five programs currently have conditional approval.

A program's approval may be withdrawn pursuant to section 335.071.3 of the rules for noncompliance with the Minimum Standards. A program which fails to correct identified deficiencies to the satisfaction of the Board shall, after notice and hearing, be removed from the Board's listing of approved programs. Pursuant to 20 CSR 2200-2.020 (2), after the Board withdraws approval of a program or a program has voluntarily closed, the procedure for reopening a nursing program is the same as that for initial approval. Furthermore, 20 CSR 2200-2.020 (2) requires that if a nursing program loses approval due to deficiencies identified by the Board, the institution may not petition the Board for approval of a new nursing program for a minimum of one year from the actual date of program closure. Lastly the agency provided evidence of program approval processes that ended in a program closure [Exhibit 36].

To illustrate the procedures described above, the agency submitted its Surveyor Completion Schedule for 2017-2021 [Exhibit 23], which records the name of the nursing program, survey and program review dates, the lead and adjunct surveyors, program contact, Board review date, Board action and the current status of each program. Lastly, the agency submitted a Quarterly Education Report submitted to the Board December 2021 [Exhibit 53]. Quarterly reports are submitted prior to each Board meeting to inform the board on agency and program activities to include site visits, program completion reports, as well as submissions reviewed by the Board.



No files uploaded

### **Analyst Worksheet - Response**

#### **Analyst Review Status:**

Not Reviewed

### **3rd Party Written Comments**

<b>Document Title</b>	<b>File Name</b>	<b>Pro/Con</b>
-	-	CON

#### **Staff Analysis of 3rd Party Written Comments**

The Department received one written comment regarding Missouri State Board of Nursing, but most of it is unrelated to the agency's compliance with the recognition regulations. The comment stated that the Department's solicitation of written third-party comments occurred without access to the agency's petition or related materials. The Department's solicitation of written third-party comments sought comment on the agency's compliance with the regulation(s) in question pursuant to 34 C.F.R. §§ 602.32(c) and (l), not on the agency's petition or related materials. The purpose of the call for written third-party comment is to allow anyone who has any knowledge of an agency undergoing a recognition review by the Department and the agency's compliance or non-compliance with Departmental regulations to provide that information and/or documentation so that Department staff can utilize it in the comprehensive analysis of the agency. The comment also stated that complaint processes used by accrediting agencies should be more accessible to complainants. The Department's recognition review process assesses whether or not an agency meets the Secretary's Criteria for Recognition of State Agencies for Approval of Nurse Education (Criteria), which were published in the January 16, 1969, Federal Register. There is no specific requirement included in the Criteria to review complaints. However, Department staff use information and documentation it receives to ensure that a State agency acts in accordance with both its own policies and procedures and with the Criteria. The agency may still wish to respond to the comment in its response to the draft staff analysis. The comment noted the Sweet v. Cardona case and settlement and stated that NACIQI should review accrediting agencies and their actions related to individual institutions included in the case. There is no specific requirement included in the Criteria to review a program's compliance with any title IV, HEA program responsibilities. Recognition of State agencies for nurse education do not enable approved programs to establish eligibility to participate in Title IV programs.

#### **Response to 3rd Party Comments**

This comment is not directly related to operation of the Missouri State Board of Nursing (Board). The student complaint form is available on the Board's website.

#### **Document(s) Uploaded in response to 3rd Party Comments**

<b>Exhibit Title</b>	<b>File Name</b>
Student Complaint Form	-

### **3rd Party Request for Oral Presentation**

There are no oral comments uploaded for this Agency.

