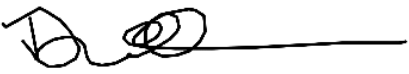**TO:** The Honorable the Members of the Board of Regents

FROM: John L. D'Agati

Douglas E. Lentivech

SUBJECT: St. Paul's School of Nursing: Application for Permanent Degree Authority to Confer Degrees

DATE: November 21, 2019

AUTHORIZATION(S):

SUMMARY

Issue for Decision (Consent Agenda)

Should the Board of Regents grant permanent degree authority or extend provisional degree conferring authority to St. Paul's School of Nursing (SPSoN) at its Queens and Staten Island campuses?

Reason(s) for Consideration

Required by State statute and regulation.

Proposed Handling

The question will come before the Full Board for consideration at its December 2019 meeting, where it will be voted on and action taken.

Procedural History

On December 16, 2008, the Board of Regents determined that Education Affiliates, Inc. (EA) satisfied the regulatory criteria for provisional authority to confer the Associate in Science (A.S.) degree as SPSoN upon final transfer of assets from St. Vincent's Catholic Medical Center for a five-year term. The transaction was completed on April 13, 2009 and SPSoN was established to provide academic programs and award degrees. The School operates under the administrative authority of a campus President.

At its December 2014 meeting, the Board of Regents voted to extend the School's provisional authority to confer degrees until December 31, 2016 based on the recommendation of the Deputy Commissioners. At its December 12, 2017 meeting, the Board of Regents extended provisional degree-granting authority of SPSoN until December 31, 2019.

Background Information

Pursuant to §224 of the Education Law, the consent of the Board of Regents is required for a for-profit institution to award degrees. Section 3.58 of the Rules of the Board of Regents authorizes the Board of Regents to determine whether to grant permanent authority, extend the provisional authority to confer degrees for an additional period of up to five years, or deny continuing degree-conferring authority past the term of the previously granted provisional authority. SPSoN submitted an application in December 2018 requesting permanent authority to confer degrees.

The School is owned by EA, a Delaware c-corporation engaging in the acquisition and operation of for-profit, postsecondary, career-oriented schools. In 2008, EA owned 20 postsecondary schools with 35 campuses located in 9 states. EA had expanded its holdings to operate 53 campuses in 17 states in 2013. In 2016, EA reported that it operates 48 campuses in 17 states. In 2018, EA reported it owned and operated 19 institutions in 17 states, including 43 campuses.

The mission of the School is to serve the needs of the community by offering education that exemplifies the "highest standards for nursing practice and healthcare education." Both campuses offer an Associate in Science (A.S.) degree program in Nursing (registered in June 2009) and an Associate in Occupational Science (A.O.S.) degree in Medical Assistant (MA) (registered in July 2010). The Staten Island campus also offers an A.O.S. program in Dental Assistant (DA) (registered in May 2010).

As part of the review process, on June 19 and 20, 2019, staff members from the New York State Education Department (the Department) coordinated two separate peer review site visits to each campus. Each team consisted of two Professional Education staff, including a Nursing Associate from the Office of the Professions and two peer reviewers. Peer reviewers to the Queens campus included a Dean of Nursing at a private, single purpose institution offering Nursing programs at the associate degree level and a Senior Vice President at an independent college that offers Nursing and allied healthcare programs. The Staten Island campus peer reviewers consisted of a retired director of a private, single purpose institution offering Nursing programs at the associate degree level and a former Dean at a single purpose nursing school.

The site visit team found that first-time candidates' pass rates on the National Council Licensure Examination (NCLEX-RN) have improved, and SPSoN has developed a system to recruit students with the backgrounds, aptitudes, and qualities necessary to complete the program and meet the benchmarks necessary for licensure and entry level employment. It has implemented multiple student advising strategies, including a "Rocks in the Road" questionnaire, to self-identify obstacles to program completion and the support system needed to overcome the obstacles; mid- and end-of-module student

assessments; timely advising beyond the advising points; and externship advising separate from externship orientation prior to the student beginning the externship. In addition, the Schools have implemented advising strategies for at-risk students (i.e., students who are placed on Satisfactory Academic Progress (SAP) warning, restarting students, and students whose attendance rates are below 80 percent). An improvement plan is developed for the individual student who falls into any of the above categories. The team notes concerns about the financial health of EA and identified areas for improvement in resources, faculty, curriculum and awards, administration, and student information. See attachment for more detailed information on the site visit team's findings.

Related Regents Items

December 2008 Item
(https://www.regents.nysed.gov/meetings/2008Meetings/December2008/1208hea4.htm)

December 2014 Item
(https://www.regents.nysed.gov/common/regents/files/meetings/Dec%202014/1214brca 9_0.pdf)

December 2017 Item
(https://www.regents.nysed.gov/common/regents/files/1217hea2.pdf)

December 2018 Item
https://www.regents.nysed.gov/common/regents/files/1218hed1.pdf)

Recommendation

VOTED, that the Board of Regents extend provisional degree-granting authority for St. Paul's School of Nursing for a period of three years ending December 31, 2022. Consideration of degree-granting authority beyond December 31, 2022 will be contingent upon EA demonstrating improvement in financial health and the School's compliance with pertinent State and federal laws, regulations, and rules. Application for permanent degree-granting authority must be received 12 months prior to the end of the provisional authority period.

Timetable for Implementation

The Regents action will take effect immediately.

St. Paul's School of Nursing
Report of Compliance with Rules of the Board of Regents Section 3.58

Rule §3.58 (b)(3)(i): *Need for each degree program that the institution seeks to offer in New York based upon demand by students and/or employers and/or need of society for such programs, in accordance with Section 137 of Chapter 82 of the Laws of 1995.*

Findings:

SPSoN has provided employment data for students who graduate from Registered Professional Nursing, Dental Assisting (DA), and Medical Assisting (MA) programs, as well as career outlook information for each profession. All programs offered at SPSoN's campuses, located in Staten Island and Queens, serve the community by providing educational training programs to underserved populations in the healthcare field.

Rule §3.58 (b)(3)(ii): *Institutional capacity to operate as an institution in compliance with the Education Law, the program registration standards set forth in Part 52 of this Title and other Federal and State statutes, regulations, and policies related to the operation of an institution.*

Findings:

Resources: The Queens and Staten Island campuses have adequate classrooms, computer labs, and offices to support the programs. Each program has its own dedicated and well-equipped lab with ample provision of supplies. The Staten Island facility contains labs and equipment necessary to support the Nursing, MA, and DA programs. At the Queens campus, the skills labs for the Nursing and MA students are modern, well-equipped, well-maintained, and inviting spaces. In addition to the skills labs, the campus supports a state-of-the-art simulation lab. MA students identified lack of extra practice hours in the lab as a concern. In response, the School provided evidence of making the facilities available for extra practice hours to accommodate the MA students.

Library facilities at both campuses support the mission, goals, and outcomes of the respective programs; the facilities are staffed by appropriately credentialed library professionals. The collections policy needs to be refined and implemented such that healthcare and science materials published more than five years ago, unless a seminal document, be removed from the collection.

Faculty: The minimal requirements established by both campuses meet the pertinent regulations and guidelines. All full- and part-time faculty have a minimum of a master's degree with many in the MA programs holding medical doctorates from foreign institutions. In the DA program at the Staten Island campus, full- and part-time faculty hold appropriate credentials, and, as necessary, foreign education equivalency. None of the DA program faculty are licensed in New York State for Dentistry.

In June 2019, at the Queens campus, there were 16 full-time faculty and 15 part-time faculty in the Nursing program and four full-time faculty and six part-time faculty in the MA program. At the Staten Island campus, there were seven full-time faculty and 30 part-time faculty in the Nursing program; two full-time faculty and three part-time faculty in the MA program, and two full-time faculty and three part-time faculty in the DA program. Three full-time general education faculty are also shared among the programs.

Of the full-time faculty at Queens campus, nine have less than or equal to one year of experience with the School, and ten have more than one year of experience with the School. Of the part-time faculty, seven have less than or equal to one year of experience with the School, and 16 have more than one year of experience with the School. At the Staten Island campus, all full-time faculty have two or more years with the School. Of the Staten Island part-time faculty, 13 have one year with the School. In response to concerns about faculty retention, the School revamped the faculty orientation program and developed a faculty mentoring program. In addition, policies were revised to include flexible work schedules and tuition reimbursement to encourage life-long learning and scholarship. The faculty mentoring program includes scheduling and workload policies that allow mentors to team teach with new faculty or with faculty who are taking on responsibility for teaching new courses. Thus, the School has made notable efforts toward faculty retention; however, they must continue such efforts in order to maintain the continuity and stability of the faculty and curriculum in the respective programs.

Preceptors are used in both the MA and DA programs; however, consistent guidelines regarding the role and performance expectations of the faculty advisor, student, and preceptor do not exist.

Curricula and Awards: Each campus offers a Nursing program leading to the Associate of Science degree and an MA program leading to the Associate of Occupational Studies degree. The Staten Island Campus also offers a DA program leading to the Associate of Occupational Studies degree.

The MA program consists of 97 quarter credits which equate to approximately 64 semester credits; the program can be completed in 72 weeks. The Nursing program is 69 semester credits with 38 credits in Nursing; the program can be completed in two academic years of full-time study. The DA program is 103 quarter credits which equate to approximately 68 semester hours; the program can be completed in 84 weeks. Programs meet the requirements to award academic credit.

Systematic review and evaluation occur as detailed in the Program Effectiveness Plans (PEPs). Although PEPs exist, they do not focus on course outcomes or program objectives. The School intends to integrate the respective PEPs into the overall Institutional Effectiveness Plan and develop a more systematic approach to measuring course and program outcomes.

Medical Assisting. Although the MA program meets the requirements to award academic credit, the direct contact hours allocated per credit were greater than necessary. A revision of hours, assigned credits, and supplemental assignments seems

necessary for the program. The School has acknowledged the need to revise the MA curriculum and anticipates submission of a curriculum change proposal to the Department for evaluation in the next nine to twelve months. The curricular revision will take into consideration relevant professional standards and guidelines, as well as scope of legal practice in New York State.

Nursing. Trended data demonstrates improvements in the first-time NCLEX-RN pass rates (see Tables 1 and 2) for graduates of the respective programs who tested during the past four years.

Table 1. First-Time Candidate Pass Rates on the NCLEX-RN: *Queens Campus*

Year	# of First-time Attempts	# Passed	% Passed	NYS Pass Rate
2015	154	86	55.8%	79.7%
2016	168	128	76.2%	82.0%
2017	179	143	79.9%	83.8%
2018	124	100	80.7%	86.3%

Table 2. First-Time Candidate Pass Rates on the NCLEX-RN: *Staten Island Campus*

Year	# of First-time Attempts	# Passed	% Passed	NYS Pass Rate
2015	192	103	53.7%	79.7%
2016	118	72	61.0%	82.0%
2017	104	81	77.9%	83.8%
2018	137	110	80.3%	86.3%

*NCLEX pass rates calculated for first time candidates as reported by National Councils of State Boards of Nursing (NCSBN) by the year in which the candidate tests.

Aggregate data on those candidates testing during the calendar years of 2016-2018, regardless of their date of graduation, indicate that the minimum quality indicator of a 75 percent first-time pass rate (used by the Department) was met for candidates from both campuses. Further analysis of the data, by graduating cohort, based on information supplied by the NCSBN, suggests that the first-time NCLEX-RN pass rates for candidates graduating in 2016 through 2018 (i.e., graduate cohort data) at the Queens campus increased from 77.5 percent to 84.2 percent, and for candidates from the Staten Island campus from 64.5 percent to 80.5 percent. While this is laudable, the national benchmark for first-time NCLEX-RN pass rates, established by professional nursing organizations, is for 80 percent of first-time test takers to be successful; thus, efforts to improve the NCLEX first-time pass rates need to continue. In addition, despite improvements on the NCLEX-RN, the Nursing programs would benefit from curricular refinements, the further development of evidence-based exam policies, and a systematic approach to measuring all course and program outcomes.

Dental Assisting. Syllabi for the Clinical I and II courses taken as part of the DA program at the Staten Island campus state, "students will be supervised by a licensed dentist and an office manager." This does not meet the requirement that the practice of certified dental assisting shall be under the direct personal supervision of a licensed dentist. The School's response clarified that each DA student is and always has been directly supervised by a licensed dentist. Since the time of the visit, evidence has been provided to the Department indicating that the wording in the course syllabi has been changed to remove any possible misunderstanding. The School also provided evidence of their use of the NYSED website to verify dentists' licenses. The School would meet the curricula and awards registration standard with the implemented changes they have now made.

General Education. The School and the respective programs would benefit from the further development of measurable, competency-based institutional general education goals. Evaluation of such outcomes should be periodically analyzed through an established system and used to inform curricular refinements. The School has acknowledged these recommendations and plans to review and revise its general education requirements within the next nine to twelve months.

A review of course syllabi for the general education courses and major cognates demonstrated a lack of some elements of required information.

Admissions: Student admissions for all programs at both campuses are based on established criteria that seek to identify candidates capable of meeting program outcomes. Both campuses have a clearly developed admissions process with published admissions criteria which are uniformly applied. Admission criteria include high school diploma or GED; age at the time of application (17 or older for the MA and DA programs; 18 or older for the Nursing programs); submission of a completed application; interview with an admission representative; and, scores on the Wonderlic Scholastic Examination. MA and DA students must obtain a score of 11 on the Wonderlic Scholastic Level Exam in order to be admitted. Candidates for the Nursing programs must obtain a Wonderlic score of 16 and achieve a minimum composite score of 80 on the Evolve Reach Admission Assessment Examination A2. Nursing program applicants must also complete certification requirements for administration of basic life support and meet the health, immunization, drug screening, and background check requirements.

Queens Campus Enrollment: In spring 2019, there were 479 enrolled students at the Queens campus (103 MA students and 376 nursing students). Among all students, 17 percent were male; 10 percent were Caucasian; 18 percent were Asian and Pacific Islander; 34 percent were Black or African American; 2 percent were American Indian or Alaska Native; 21 percent are Hispanic/Latino, and 15 percent did not identify their race/ethnicity. The School serves the needs of the nontraditional adult learner with the average age of the student body ranging from 25-44 years of age.

Staten Island Campus Enrollment: In spring 2019, there were 445 enrolled students at the Staten Island campus (99 MA students; 30 DA students; 205 full-time nursing students and 111 part-time nursing students). Of the primarily female student

population, 35 percent were Caucasian; 18 percent were African American; 7 percent were Hispanic, 4 percent were Asian/Pacific Islander, and 36 percent of the students did not identify their race/ethnicity.

The demographics of the student body served by the School are consistently diverse.

Administration: An EA operational team provides administrative support to the Schools. Members of the executive team across the corporate enterprise attend virtual meetings for three days each month. During the monthly meetings, each campus president is allotted time to discuss their opportunities and challenges. Meetings center around the organizational mission; goals and topics are closely tied to analytics (student, faculty, staff and financial performance).

At the Queens campus, the administrative team includes the President, Dean of Nursing, Dean of Liberal Arts and Sciences, the Directors of the MA Program, Student Services, Admissions, Financial Aid, and the Registrar. The President relies on the deans, academic managers, and other staff to collaborate in the budget preparation process. The Dean of Nursing, the Dean of Liberal Arts and Sciences, the MA Program Director, and department heads meet with the President on a weekly basis. Faculty within their respective unit or department also meet on a weekly basis to discuss pedagogical, curricular, student, program, and/or faculty concerns. Although some policies are written at the corporate level and others at the institutional level, responsibility for the administration of institutional policies and programs is the purview of the President, deans, and the program director for the MA program.

At the Staten Island campus, the administrative team includes the President, Dean of Nursing, Dean of Education, Director of Allied Health, Director of Career Services, Director of Admissions, Director of Financial Aid, and the Registrar. All members have a direct reporting line to the President. This reporting structure allows for autonomy and independent decision making for the day-to-day business of the School. Senior administrators are responsible for ensuring that the missions of EA and the campus are accomplished, and that both School and corporate policies are fair, appropriate and consistently applied. The senior administrators are also responsible for the quality of the program and for holding the faculty accountable for the outcomes of the teaching/learning process. The President reports to the Regional Manager, who is also the President of the Queens Campus.

The Faculty Handbook and the EA Employee Handbook set forth the general governing policies for faculty and staff. Faculty members report that some input is provided at the program level, with most policies being generated by the parent organization. There is a committee structure that provides opportunities for faculty to be involved in governance. Meeting minutes were insufficient to support the extent to which these committees meet and the scope and effectiveness of their function. Faculty and staff at both Schools were not fully engaged in the assessment of institutional effectiveness. The budgeting process is an activity of the Deans, Directors and School President. Material requests from the faculty are filtered by the Deans and submitted to the administrative team. A statement on academic freedom was provided with the self-

study document but did not appear in the Faculty Handbook. A policy on rank and promotion existed for the nursing faculty in EA; a similar policy for other faculties employed by the School did not exist. Since the time of the site visit, a similar policy has been developed and approved.

Support Services: Most student support services are coordinated through a position created relatively recently, the Director of Student Support Services (DSS). The DSS serves as the Title IX Coordinator and coordinates the provision of external social services support, tutoring services, orientation, retention efforts, and the tracking of returning students. Students requesting disability accommodations must make their needs known to the DSS or the Campus President. Academic Support Services are provided primarily through faculty intervention or by a student self-initiating assistance from a faculty member. Although the DSS can coordinate tutoring services, faculty members may also provide additional tutoring opportunities to those identified as struggling. Students can also contact the Admissions Office, Registrar, or Career Services for other applicable issues. The administration routinely surveys students about the adequacy of support services. Data from the last three semesters indicates a high degree of satisfaction with the available academic and general support services (88.14-91.16 percent).

Information for Students: The 2017-18 College Catalog for each of the respective campuses was provided as an exhibit to the self-study document; however, revised and updated versions of the catalogs for 2018-19, found on the institution's web site under the Consumer Information link, were used as the basis for the following comments.

Cost of attendance is not made publicly available to prospective students; however, information on the cost of attendance and financial assistance is available in the catalog and upon request to students seeking admission. The catalog further references information on loan repayment and counseling, terms and conditions of federal loan deferment, The Student Lending Code of Conduct, private education loans, EA institution loans, and the preferred private education loan lender. A list of lending organizations is found in the School's Consumer Information Guide, which is available online. Other available information included: other charges, tuition refunds, program descriptions, facilities, faculty, completion rates, and placement rates.

Absent from published materials were the pre- and co-requisites for the MA program, a clear progression plan for the MA program, an estimated number or percentage of adjunct faculty and teaching assistants used in the programs, and first-time NCLEX-RN pass rates. The School has already demonstrated compliance with these requirements.

Areas for Improvement:
Resources

1. A continued focus on improvements in the financial performance of EA, Inc. to allow greater re-investment into the teaching-learning enterprise, i.e., to allow improvements in IT integration, faculty research and creative projects, and so forth.

2. Refinement and implementation of the library collection policy; the policy should include regular and scheduled culling of healthcare and science materials that are older than five years.

3. Increased opportunities for skills acquisition for the MA students.

4. Increase physical facilities on the Staten Island campus to meet student needs.

5. Ensure all equipment is functioning for all programs.

6. Develop procedures to review and verify accuracy of student information on campus management student information system.

Faculty

1. A continued focus on faculty retention. While efforts to improve the salary and working conditions of the faculty were noted, in order to maintain the continuity and stability of the programs and prevent the phenomenon of "curricular drift", the same attention that has been given to student retention should be given to faculty retention. Curricular drift contributes to poor student learning and program outcomes. A comprehensive retention plan considers the teaching-learning environment holistically and includes the faculty.

2. Development and implementation of well-defined preceptor policies. The roles and performance expectations for preceptors with respect to teaching, supervision, and student evaluation need to be clearly defined and communicated to preceptors; the expectations should be congruent with expected student outcomes and relevant to professional standards and guidelines. The preceptor polices need to be periodically reviewed and refined as appropriate.

Curriculum and Awards

1. Identify measurable, competency-based general education goals for the institution; establish a system for periodic review of all general education outcomes and all general education courses.

2. Align course learning outcomes for general education courses with the general education goals.

3. Develop a standardized syllabus template across general education courses and cognates to ensure that all required information under the regulations is included in each course across the institution.

4. Revise the MA curriculum, building from a learning theory, and inclusive of relevant professional standards and guidelines. Sequence courses in the curriculum in a logically consistent manner, and map course learning outcomes to general education and program outcomes.

5. Establish a systematic approach to measure all course and program outcomes in the Nursing, DA and MA programs; establish more standardized and developmental rubrics for all assignments across the curriculum.

6. Establish evidence-based exam policies (administration, development, analysis, and grading) for use in the Nursing program; establish a test blueprint template that follows the NCLEX-RN categories to be used by all faculty engaged in test development.

7. Ensure that students in the MA program practice within the scope of legal practice during MA externships.

8. Ensure all Dental Assisting students are supervised by a New York State licensed dentist for all clinical courses.

Administration

1. Ensure faculty involvement in academic affairs and maintain documentation of faculty input.

2. Ensure the institution maintains a permanent, complete, accurate, and up to date transcript/file of student achievement for each student.

Student Information

1. List all pre- and co-requisites for the MA program in the catalog or course syllabi.

2. Publish clear progression plans for the MA program.

3. Make available to prospective students the estimated number or percentage of adjunct faculty and teaching assistants used in the programs.

4. Ensure transparent publication of all outcome data related to all three academic programs to include retention, graduation, job placement, certification exam (if any) and NCLEX pass rates.

5. Ensure correct HEGIS codes are listed for each program in all materials.

Rule §3.58 (b)(3)(iii): *Evidence of financial resources to ensure satisfactory conduct of proposed degree programs, achievement of its institutional mission, and proposed educational goals.*

Findings:

The School indicates in their application that they have adequate resources and financial commitment to support the programs at both campuses. The Office of Audit Services (OAS) reviewed the audited financial statements for the period ending June 30, 2018 for the School and noted the following:

• The Condensed Consolidating Balance Sheet indicated that the Queens campus had $16,000 in cash and cash equivalents. The average monthly expenses were $749,000 and average monthly revenue was $899,000 for the period. The Staten Island campus has $16,000 in cash and cash equivalents. The average monthly

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expenses were $703,000 and average monthly revenue was $821,000 for the period.

- The Queens campus has current assets of $10.29 million and current liabilities of $2.72 million, which means for every dollar of current liabilities, the Queens campus had $3.78 in current assets. The Staten Island campus had current assets of $22.96 million and current liabilities of $2.43 million, which means for every dollar of current liabilities, the Staten Island campus had $9.45 in current assets.
- The Queens campus earned net income of $1.8 million on $10.78 million in total revenue. This represents a new income ratio of 16.7 percent. The Staten Island campus earned new income of $1.42 million on $9.86 million in total revenue. This represents a new income ratio of 14.4 percent.

OAS also reviewed the audited financial statement for the period ending June 30, 2018, for the corporate owner, Education Affiliates Inc. and Subsidiaries (EA). Presented below is a summary of the review:

- The Consolidated Balance Sheet indicated that EA had $2.33 million in cash and cash equivalents. The average monthly expenses were $22.58 million and average monthly revenue was $21.74 million of the period.
- EA had current assets of $22.72 million and current liabilities of $60.69 million, which means for every dollar of current assets EA had $2.67 in current liabilities. In addition, EA had total assets of $47.78 million, total liabilities of $93.57 million, and owner's equity of negative $45.79 million.
- EA operated at a loss of $10.06 million on unrestricted revenue of $260.84 million. In other words, expenses exceeded revenue by 3.9 percent.

To support the request for permanent degree-granting authority, the OAS reviewed the audited financial statement for the period ending June 30, 2019, for the cooperate owner, EA. Presented below is a summary of the review:

- The Consolidated Balance Sheet indicated that EA has $4.09 million in cash and cash equivalents. Average monthly expenses of $21.95 million and average monthly revenue of $22.05 million were calculated for the period.
- EA had current assets of $31.99 million and current liabilities of $79.94 million, which means that for every dollar of current assets EA had $2.50 in current liabilities. In addition, EA had total assets of $53.72 million, total liabilities of $98.71 million, and owner's equity of negative $44.99 million.
- EA earned net income of $1.23 million on $264.65 million in total revenue. This represents a new income ratio of less than 1 percent.

EA's federal composite score was negative 1.0 (-1.0) for 2017, negative 0.8 (-0.08) for 2018, and negative 0.4 (-0.04) for 2019 which means that EA is *not* considered financially healthy for the period. Because of this, both Schools remain under heightened cash monitoring by the U.S. Department of Education.

The Composite Score for the Queen's campus was 3.0 for 2017, 2018 and 2019. The Composite Score for the Staten Island Campus was 2.5 for 2017 and 3.0 for 2018 and 2019. Both campuses *were* considered financially healthy for the period.

Areas for Improvement:

1. Continued efforts to stabilize and improve the financial health of the parent organization, Education Affiliates.

Rule §3.58 (b)(3)(iv): *Evidence that the performance outcomes demonstrate that the institution and/or programs it operates are effective, where applicable.*

Findings:

The Schools provided cohort data on how many students were admitted in each admissions cycle, those who dropped, completed on-time, and those that needed to decelerate. From this data, persistence data was calculated.

Table 3. Nursing-Queens Campus

Start Date	# Enrolled	# Drops	# Persisted	% Persisted	# Completed On Time	% Completed On Time	# Currently Enrolled
9/5/2017	42	11	31/42	73.8%	14/31	45%	17
5/8/2017	62	29	33/62	53.22%	27/33	81.8%	6
1/9/2017	105	37	68/105	64.7%	53/68	77.9%	15
9/6/2016	43	14	29/43	67.4%	28/29	96.5%	1
5/9/2016	56	17	39/56	69.6%	38/39	97.4%	1
1/11/2016	112	31	81/112	72.3%	78/81	96.29%	3
Total			281/420	66.7%	238/281	85%	

Table 4. Employment Rates of Licensed Nursing Graduates

Start Date	# Completed On Time	# passing NCLEX on 1st Attempt	# of Students Employed in the Field	% Employed in the Field
9/5/2017	14	N/A	N/A	
5/8/2017	27	10** (10/14)	3/10	30
1/9/2017	53	43* (43/46)	22/43	51.2
9/6/2016	28	24 (24/28)	19/24	79.2
5/9/2016	38	28 (28/38)	23/28	82.14
1/11/2016	78	66 (66/78)	54/66	81.8
Total		171/204	117/171	68.42%

* 7 students graduated and had not tested when data was provided.
** 13 students graduated and had not tested when data was provided.

The data in Table 3 shows that the overall persistence rate in the program is around 67 percent with a trend towards greater persistence; this may be due to a recent and greater focus on student retention. At the same time, changes in the progression policies have resulted in a significant decrease in the percent of students who complete the program on-time. However, courses in the curriculum are offered sequentially, thus, if a student needs to take a leave of absence, they are generally out of sequence for one to two semesters. As previously discussed (page 3), the NCLEX-RN first time pass rates have demonstrated modest improvements and currently exceed the established minimal quality benchmarks.

Employment data is universally difficult to track. In the Nursing program tracking such data is complicated by the fact that such data is often not available for months following graduation as graduates must successfully complete the licensure examination for the Registered Professional Nurse before seeking licensure and employment. However, the data that is available indicates that by one-year post-graduation, greater than 70 percent of licensed Nursing graduates were employed in the field. The program continues to explore better ways to collect employment data.

Table 5. Medical Assisting-Queens Campus

Start Date	# Enrolled	# Drops	% Persisted	# Completed On Time	% Completed On Time	# Employed in the Field	% Employed in the Field
10/16/17	15	3	80	8/12	67	2/8	25
9/5/17	21	5	76.19	14/16	87.5	3/16	18.75
7/24/17	13	1	92.3	10/12	83.3	3/12	25
6/5/17	9	3	66.7	5/6	83.3	5/5	100
4/20/17	5	1	80	4/4	100	3/4	75
3/9/2017	14	5	64.2	9/9	100	8/9	88.8
Total	77	18	76.6	50/59	84.7	24/50	

The persistence rates for the MA program have improved since the time the program was initially granted provisional degree granting status; and, of those who persist in the MA program, the percent who graduate on time, although it varies by cohort, is good (84.7 percent) for the 2017 period. The graduates of the MA program are not required to be certified; however, the program encourages it's graduates to seek certification. As a result, the program has no information on graduate performance on the certification examination, but the program administration has indicated that it will collect such data in the future as a part of program evaluation. Although the overall employment rate is 48 percent, employment rates in the period immediately following graduation are low, ranging from 18.75-25 percent; however, over time, the employment rate increases to 75-100 percent.

Table 6. Nursing- Staten Island Campus

Start Date	# Enrolled	# Drops	# Persisted	% Persisted	# Completed On Time	% Completed On Time
9/5/2017	82	25	57	69.5	27	47.3
5/8/2017	38	9	29	76.3	26	89.6
1/9/2017	78	18	60	76.9	58	96.6
9/6/2016	70	14	56	80	53	94.6
5/9/2016	52	22	30	57.6	27	90
1/11/2016	68	30	38	55.8	36	94.7
Total	388	118	270	69.5	227	84.0

Table 7. Employment Rates of Licensed Graduates-Staten Island Campus

Start Date	# Completed On Time	# of Graduates passing NCLEX on 1st Attempt	# of Students Employed in the Field	% of Graduates Employed in The Field
9/5/2017	27	N/A	N/A	
5/8/2017	26	19/26	1	5.2
1/9/2017	58	36	8	22
9/6/2016	53	36	15	41.66
5/9/2016	27	20	17	85
1/11/2016	36	11	22	61

According to the data (Table 6), the overall persistence rate in the Nursing program is around 69.5 percent with a trend towards greater persistence in the last three of four cohorts; of those students who persist, an average of 84 percent complete the program on time. As previously discussed, the NCLEX-RN first time pass rates for the program have demonstrated modest improvements and currently exceed the established minimal quality benchmarks. Further, as previously noted, the employment data for more recent graduates is an unreliable indicator of their employability in the field, although the longer a student has been out of the program, the easier it is to track licensure and employment data and the more likely it is that the graduate will be employed and those who were unsuccessful on a first attempt at the NCLEX-RN will retest. The program needs to increase its efforts to track program outcome data. Such data is important in making program improvements.

Table 8. Medical Assisting- Staten Island Campus

Start Date	# Enrolled	# Drops	% Persisting	# Completed on time	% Completed on time	# Employed in the Field	% Employed in the Field
12/5/2017	11	7	36.3	2/4	50%	0	0
10/23/2017	13	5	61.5	7/8	87.5%	1	14.2
9/11/2017	15	5	67	9/10	90%	4	44.4
7/27/2017	16	6	62.5	10/10	100%	6	60
6/8/2017	9	2	77.8	6/7	85.7%	2	33
4/26/2017	11	6	45.4	5/5	100%	2	40
Total	75	25	67	39/50	78%	15	38.4

The persistence rates for the MA program varies by cohort, however, it remains lower than the USDE recommendation of 70 percent for this reporting period. Among those students who persist, the percent who complete on time, apart from the most recent reporting period, has been high (>85 percent). As previously noted, the program has not routinely gathered data on graduate performance on the national certification examination but will do so in the future as a part of program evaluation. Employment rates in the period immediately following graduation are low ranging from 0-60 percent; with an overall employment rate of 38.4 percent for this reporting period. It is unclear if the low percentage of graduates who are employed in the field accurately reflects the employment prospects for graduates of the program, poor tracking of graduates, or a mix of factors. The program needs to increase its efforts to track program outcome data.

Table 9. Dental Assisting- Staten Island Campus

Start Date	# Enrolled	Drops	% Persisting	# Completed on time	% Completed on time	# Employed in the Field	% Employed In the Field
9/11/2017	5	0	100	3	60	1	33
7/27/2017	3	2	33	1	100	0	0
6/8/2017	5	2	60	2	67	2	100
4/26/2017	7	4	42.3	3	100	2	67
3/15/2017	8	2	75	6	100	2	33
1/31/2017	3	0	100	3	100	2	67
Total	31	10	67%	18	85.7	9	50%

The Dental Assisting program is the smallest of the three Staten Island programs with only 31 students enrolled over the 2017 calendar year. Of those 31 students, 21 persisted,

18 completed on time, and 9 students secured employment in the field. These findings suggest the need to examine program admission procedures and criteria. As well, the program needs to determine if the low employment figure is attributable to the methods of tracking graduates, the market for graduates, the need to improve career counseling, or a mix of factors. The overall employment figures do not meet USDE guidelines.

Areas for Improvement:

1. Improve the tracking methods used to determine employment rates in all programs; explore whether findings are due to the methods of tracking methods, market factors, career counseling, or a mix of factors.

2. Use internal and external outcome data to better evaluate each program being offered, set specific benchmarks for persistence, timely program completion, overall program completion, examination pass rates, and employment rates; use program outcome data to improve program outcomes.

Rule §3.58 (b)(3)(v): *Evidence that the individuals having ownership or control of the institution have a record free from evidence suggesting fraudulent and/or deceptive practices, including but not limited to misleading or misrepresentation in advertising.*

Findings:

EA attests to having a record free from any evidence suggesting fraudulent and/or deceptive practices, including but not limited to misrepresentation in advertising.

Areas for Improvement: None