



May 23, 2022

Arkansas Higher Education Coordinating Board
ATTN: Dr. Maria Markham
423 Main Street, Ste 400
Little Rock, AR 72201

RE: LETTER OF APPEAL

Dear Dr. Markham and Members of the Coordinating Board:

Per ADHE's policy as communicated to us by the Attorney General's office, institutions may appeal a decision of the board within 30 days of the vote. National Park College wishes to appeal the AHECB decision made on April 29, 2022 regarding the role and scope change. We ask your reconsideration based on the following points:

1. The board received information, in the form of an 'FAQ' sheet, from department staff that NPC did not see until after the meeting. NPC did not have the opportunity to address these questions because we did not know they were presented to the Board. NPC respectfully requests the opportunity to respond to the document and provide correct information. We have provided a written response to the FAQ sheet, attached.
2. NPC is confused over whether ADHE staff did, or did not, recommend the proposal. Per the ADHE Role and Scope Process, Item 4 of the described review process states "After the role and scope review is completed, ADHE staff will notify the institution of its recommendation to the AHECB." NPC should have been notified if the proposal was not recommended. The policy also states that if the proposal is not recommended, the proposing institution would receive clarification and explanation. NPC presumed that the staff recommended the proposal, and now we are uncertain. Per ADHE's policy, it places only recommended items on the agenda.
3. The community presenters were not provided ample time to convey their support. Given the opportunity, some of the information on the need for a local BSN program might have been more evident. This would have been especially significant on the issue of BSN demand, a concern raised in the 'FAQ' document.

4. The circumstances of the meeting were extraordinary. The entire board was not present. Four members logged out before hearing NPC's presentations. Many of the 'no' votes expressed their reluctance. A decision of this magnitude warrants a review and conversation with the entire board.

I personally appreciate your dedication to higher education in Arkansas. Prior to submitting our proposal, I met with many of the university staff to attempt to assuage their concerns. NPC very respectfully asked that the BSN program be evaluated on its merits alone. I humbly request that you re-review our materials and re-consider these circumstances. The information provided to the board without our knowledge prevented a fair hearing.

Best regards,

A handwritten signature in black ink that reads "John D. Hogan". The signature is written in a cursive, flowing style.

John Hogan, PhD
President

Enclosure

NPC Counterresponse to ADHE's "FAQ" document

1. The number of graduates in RN and BSN programs.

a. NPC Response –

Total Graduates in BSN Program

<i>Institution</i>	<i>2019</i>
<i>HSU</i>	<i>25</i>
<i>UALR</i>	<i>185</i>
<i>UAMS</i>	<i>132</i>
<i>Total</i>	<i>342</i>

ADHE Response -

(ADHE inserted several tables with enrollee and graduate information for RN and BSN programs from 2- and 4-year institutions in Arkansas)

NPC Counterresponse:

From these data, one cannot derive the capacity of any of the programs. This shows several charts depicting students and graduates in BSN programs in Arkansas.

NPC's program has enrolled a full cohort of students every year and will in the fall of 2022. NPC's program expanded in 2016 with the goal of gradually doubling the students we accept. This was part of an ill-fated partnership with HSU to provide BSN on the NPC campus. However, NPC continued to increase enrollment until the pandemic.

From Janice Ivers, Dean of Nursing at NPC:

"Registered Nursing enrollment numbers have gradually increased over the years. The following are admissions numbers since 2014, when we began our push to help alleviate the shortage of nurses here in Garland County. We have not turned away any qualified students to our RN program for the past several years. We increased our number of admissions from 40 to 85 qualified applicants in 2018. COVID-19 influenced admission numbers in 2020 and 2021. In 2021, admission letters were sent to 85 qualified students; however, some students chose to decline enrollment due to the pandemic. The applicant pool for 2022 is robust and a full cohort of 85 -90 students is expected."

The second chart in the FAQ document indicates total graduates in the BSN program. It's possible that ADHE's staff is suggesting that the number enrolled less the number of graduates is the capacity. This simply is not the case. The capacity would be the number of slots available compared to the number of students enrolled.

Again, **NPC has enrolled a full class of ASN students every year for the past eight years** and has grown the number it accepts in that time. Thanks to a generous grant from CHI-St. Vincent Hot Springs, NPC was able to expand its simulation capacity to serve additional students.

2. Number of colleges with a BSN program

a. NPC response – 3 in region (HSU, UALR, UAMS)

b. ADHE response – 11 in state (ASUJ, ATU, HSU, SAUM, UAF, UAFS, UALR, UAM, UAMS, UAPB, UCA)

NPC Counterresponse:

The nature of this question when posed to us came from ADHE's role and scope template, which asked us to identify other programs serving students in our region. The standard, according to that template, is a 50-mile radius. HSU is the only institution offering BSN within that radius, so NPC identified two beyond our radius to be even clearer. In the FAQ sheet, all the programs in the state were listed. NPC's program is a hybrid program, and therefore different from the other programs in the state which are online/remote. NPC wishes to clarify this distinction. The 50-mile radius is ADHE's guideline. The data provided ignored this guideline, as they invited members of the coordinating board to consider programs beyond the stated radius. To change the standard, not inform NPC of the change in the standard, and to not apply the standard equally warrants reconsideration.

3. Number of additional years needed for BSN over RN.

a. NPC response – 33 extra credit hours over the RN degree

b. ADHE response – It is not clear in the proposal where the additional hours required to meet the 120 bachelor's level would come from. Currently we see 66 hours from the RN program and an additional 33 hours for the BSN that comes to 99 hours.

NPC Counterresponse:

ADHE's staff reviewed both the Role and Scope and BSN proposals. NPC academic leaders and ADHE's staff held a separate meeting on January 25, 2022 to identify/clarify any errors in either document. In that meeting, ADHE staff lauded the program proposal—one staffer called it the most thorough proposal she had ever reviewed. The BSN completion is 33 hours above the 90 hours students earn when they receive their ASN. Students would complete 120 hours much as they do now with an online completion program. This program would absolutely fulfill the needed 120-hour requirement. The specific hours of the degree are provided in detail in the degree proposal, which the ADHE Director assured us had been made available to the Board. Again, by ADHE's policy document, the staff should have either recommended the proposal or provided NPC with the reasons they did not recommend it. We received no communication about the concern for a shortage of credit hours. There is no shortage of credit hours. The staff knew this, so it was not correct to state otherwise in the FAQ document.

Also, if the proposal was not going to be recommended after this review, it should not have been placed on the agenda per ADHE's policy.

4. What distinguishes a BSN over an RN?

a. ADHE response –

i. *Hours needed to complete.*

ii. *From indeed.com – "Someone with a BSN might have opportunities for advancement compared to candidates with just an associate degree or certificate, and they may attend graduate school to pursue a Master of Science in nursing (MSN) program or a doctorate in nursing, depending on how much schooling a nursing candidate may desire. People with BSNs qualify for leadership roles, such as a director of nursing or a health care manager."*

iii. *From indeed.com – "While RNs are often qualified to work in health care settings, a BSN is more likely to hold a management or supervisory role. BSN graduates often have developed skills as leaders and in communication, problem-solving and critical thinking and often explore the fields of medical theory and research."*

iv. *From indeed.com – "Both RNs and BSNs pass the NCLEX-RN, which is a nationwide exam for the licensing of nurses. Nurses with a BSN might have more opportunities to pursue specialized certifications, such as for nursing management or specialized medical units, that require a bachelor's degree or higher. An RN still may be eligible for certification in some specialties, such as pediatric care or geriatric nursing."*

NPC Counterresponse:

The description of the difference between a BSN and an RN is much more detailed than the responses provided. The way BSNs are deployed varies widely by employer type. Our hospital leaders attempted to clarify why the BSN was an important credential for them, but since they were limited to two minutes that did not occur. They attempted to clarify why it was important to their business model and to patient care. We assert that our local health care providers are a more credible source for information than Indeed.com.

In October 2010, the Institute of Medicine released its landmark report on *The Future of Nursing: Leading Change, Advancing Health*, initiated by the Robert Wood Johnson Foundation, which called for increasing the number of baccalaureate-prepared nurses in the workforce to 80% by 2020. This increase would further perpetuate improved patient outcomes. According to Arkansas Center for Nursing data resources based on 2021 Arkansas State Board information, there are 48.7% BSN or higher prepared nurses in the state. This percentage is quite different from the national recommendation.

Locally, CHI St. Vincent Hot Springs holds Magnet Hospital Recognition in Magnet-designated hospitals, those in higher-tier nursing positions, such as nurse managers and leaders, are required to hold BSN degrees. BSN programs prepare nurses for leadership and offer courses specific to leadership and management roles.

5. Pay scale for RN vs. BSN.

a. NPC response – In January 2021, there were 3420 unique job postings for registered nurses with a median salary of \$91,000. (from EMSI report run using job posting information for a service area defined as Clark County, Garland County, Pulaski County, Saline County, Yell County)

b. ADHE response – Numbers pulled from Statewide Longitudinal Data System (SLDS) looking at actual salaries reported to the SLDS system using service area defined by NPC as Clark County, Garland County, Pulaski County, Saline County, Yell County

Full Time Average Earnings

Wage Year	RN	BSN
2015	\$43,341.00	\$52,088.00
2016	\$48,007.00	\$55,654.00
2017	\$52,000.00	\$60,041.00
2018	\$56,467.00	\$62,737.00
2019	\$62,293.00	\$68,205.00
2020	\$66,245.00	\$74,088.00

NPC Counterresponse:

It appears that ADHE used the SLDS system to identify the salary difference. NPC used EMSI data which was current through 2021. We cannot fully explain this discrepancy. However, we suspect that SLDS data for 2020 is based on the pre-pandemic 2018 calendar year. NPC asserts that the EMSI data, which intersected with the timing of the pandemic, are more credible. At the very least, ADHE staff should have informed NPC that it disputed the data provided and informed us that they were using a different source for information. According to ADHE's policy, this is what they are required to do if there is a discrepancy.

6. Are RNs meeting the state need and where are the nursing shortages?

a. ADHE response – The data below is for the Supply/Demand gap and is provided from Statewide Longitudinal Data System (SLDS) for the 2018-2020 year. The highlighted rows show the counties that NPC was using from their EMSI report. This shows the number of new job openings and the number of students completing that could meet that need. This does not take into account the fact that the BSN students proposed here will mostly come from the pool of students that have already received an associate degree from NPC in nursing per their proposal. **Students enrolling in the proposed BSN program already have their RN licensure so this program will not create more nurses for Arkansas medical facilities.**

NPC Counterresponse:

NPC vehemently disputes the assertion that this program will not produce additional RNs, and we are both shocked and disappointed by this misleading assertion by the ADHE staff. This program will increase the number of ASN students in addition to increasing BSN attainment in our county. Our interviews with students, prospective students, and graduates indicate it will

increase the pipeline to our ASN program. The boldface type used to state that this will not create additional RNs implies a certainty. To suggest, without evidence, that our program would not expand undermines our goal to produce nurses in our service area. What research did ADHE conduct to reach such a definite conclusion?

NPC used a 50-mile radius and pandemic-era figures to determine that the demand for BSNs in the region was over 3300 and growing. Our hospitals draw employees from a radius not necessarily defined by county boundaries. Moreover, even these pre-pandemic figures show that there was an annual gap of 82 in Pulaski and Saline counties, both counties NPC serves. Dr. Doug Ross, President of CHI St. Vincent, said:

"The notion that there is a surplus of nurses in our hospitals in Southwest Arkansas is just untrue. Throughout the pandemic, hospitals in Southwest Arkansas had nursing vacancy rates of anywhere from 30-50% on some of the hospital units. The only way we could meet the needs of the community with those types of vacancy rates was to turn to traveler nursing programs at a premium cost to staff those units. These increased costs have threatened the sustainability of the healthcare system as we know it today. Additionally, with our continual desire to improve the quality of care we provide, we are turning to BSN trained nurses more and more to serve in our facilities. Recently, CHI St. Vincent Hot Springs was named as a Magnet hospital by the American Nursing Association. Magnet is the highest honor a hospital can receive in nursing excellence. Magnet hospitals are actually required to fill numerous positions in the hospital with only BSN trained nurses because of the more advanced training and care they provide."

This information was also included in NPC's role and scope change request.

7. Additional cost for NPC.

a. NPC response – "The cost associated with this degree would be minimal for NPC and would include the need to hire two full-time faculty to offset some of the additional instructional hours. This would cost the college approximately \$125,000 in salary and benefits and \$2500 in added M&O annually. In addition, there would be one-time costs associated with office furniture and supplies for the new faculty."

NPC will sustain the program without adding state funds. The tuition and fee rate will be lower than every other nursing completion program in Arkansas. A partnering program will have to hire additional faculty—NPC can get economies of scale by using existing faculty and adding only what is needed by demand. This is a much more efficient method of producing BSNs than any other way. It stands to reason that this will have a positive impact on the dearth of qualified nurses. It will be less expensive for Arkansas students and taxpayers.

8. Where are most BSNs employed?

a. ADHE response – We are not able to get that information at this time.

NPC Counterresponse:

Most BSNs are employed by CHI St. Vincent in Hot Springs. The current positions, anticipated needs, and vacancies are all required as part of the degree proposal submission. You can find that information in Appendix A of the degree proposal. We are happy to clarify further.

9. Institutional Letters attached below.

(14 letters attached to FAQ document)

NPC Counterresponse:

There are letters from institutions attached to the FAQ document. But ADHE did not provide all the letters of support in the FAQ document. We presume the board did not have time to review both proposals, which were about 100 pages each in length. ADHE should have provided *ALL* the letters of support since it provided *ALL* the letters of concern as many of the board's questions would have been answered in those materials.

NPC was prepared to address these concerns. However, we did not have the opportunity to set the record straight in any of these areas.

In addition, there is no evidence to support the assertion that NPC aspires to be 'a university.' We do not know how to disprove a negative. This item is not part of the criteria in ADHE's rules.

By ADHE's rules, if the merits of the proposal did not warrant a recommendation, NPC would have been notified after the review of the proposal.

There is also no evidence to support the assertion that NPC's change in role and scope will pave the way for other schools. According to the Community College Baccalaureate Association, only two of the 24 states which allow these degrees to be offered includes all their colleges. It is a leap in logic to suggest that all Arkansas colleges would attempt to offer the degree. NPC's proposal should not have been judged on conjecture or speculation