Florida Statewide Course Numbering System

The course numbers that appear in this catalog and on transcripts are part of the Florida Statewide Course Numbering System (SCNS) of prefixes and numbers developed for use by all public postsecondary and participating private institutions in Florida to provide a "seamless system of articulation" which enable easy transfer of credits among member institutions by identifying courses which are equivalent. This system has been developed and instituted by The Florida Department of Education to assure transferability of courses between participating institutions. The SCNS website is http://scns.fldoe.org/. From this page, please find information on course numbers, course offerings, and descriptions of various disciplines throughout the state of Florida.

Acceptance of Equal Courses Authority by Receiving Institution

1007.24(7) Florida Statute States: "Any student who transfers among postsecondary institutions that are fully accredited by a regional or national accrediting agency recognized by the United States Department of Education and that participate in the statewide course numbering system shall be awarded credit by the receiving institution for courses satisfactorily completed by the student at the previous institutions. Credit shall be awarded if the courses are judged by the appropriate statewide course numbering system faculty committees representing school districts, public postsecondary educational institutions, and participating nonpublic postsecondary educational institutions to be academically equivalent to courses offered at the receiving institution. The [Florida] Department of Education shall ensure that credits to be accepted by a receiving institution are generated in courses for which the faculty possesses credentials that are comparable to those required by the accrediting association of the receiving institution. The award of credit may be limited to courses that are entered in the statewide course numbering system for the statewide course numbering system. Credits awarded pursuant to this subsection shall satisfy institutional requirements on the same basis as credits awarded to native students."

Appeal Procedures

A formal appeal will be entertained in instances in which there is evidence of discrimination or factual error on the part of the faculty/staff member. Mere disagreement with a faculty/staff member's professional judgment is not sufficient grounds for an appeal. <u>Any appeal</u> made by students concerning a decision, grade, or evaluative comment <u>shall be initiated within one week of the day the decision, grade, or evaluative comment was given.</u>

The initial step is for the student to consult the faculty/staff member who issued the decision, grade or evaluative comment for reconsideration. If, after consultation with the faculty/staff member, the student wishes to pursue the issue, the student should submit in writing an appeal to the Dean of Academic Affairs. The Dean of Academic Affairs and the Program Director, conducting the investigation should consult the parties involved, gather all pertinent information, and review the relevant facts. *At the conclusion of the investigation*, the Program Director and the Dean of Academics shall either convene the Appeals committee or issue a finding in writing, that will decide the matter.

Attendance Policy

The administration and faculty of HCI College recognize that proper attendance is essential to achieve the required knowledge, skills, and competencies in each student's educational pursuits. Cultivation of positive habits is as important as the acquisition of knowledge and the development of skills needed later in life. Consistent attendance is required to complete each program as scheduled. If a student is suspended, must repeat a course due to lack of academic progress, or withdraws and re-enters, HCI College is unable to ensure completion of the student's program in the prescribed amount of time. In this event, the Director of the relevant program will work with the student to

determine what is required to complete the program and the student will be scheduled to complete any remaining courses at the earliest availability of the course, in accordance with the normal schedule and on a space-available basis.

The school must be able to ensure potential employers that a student will be a reliable employee. Therefore, punctual attendance is required at all classes, training sessions, and externships. On time attendance is a crucial part of the training program and a requirement for graduation. Attendance is taken by instructors at every class (lecture, lab, externship, and/or clinical) *for the entire duration of the instruction period*. Students will not be excused from part of a class to attend to personal business. <u>The only excused absences are for illness and or emergency, at the discretion of HCI College's leadership</u>. HCI College recognizes that there are times when a student cannot attend class or arrives late because of unusual circumstances. The attendance policies have been formulated to allow for those circumstances, while at the same time ensuring that each student attends class a sufficient amount of time to master the subject matter and meet the minimum criteria for National Education Standards. **Makeup work is given at the discretion of the Instructor**.

Attendance Didactic

Absences are based on programmatic requirements that provide for the withdrawal and dismissal of students whose absences exceed a set rate. Each program contains a specific absence policy – please see student handbooks.

- Any student that does not attend the full class time will be marked as Tardy or Left Early. Continued excessive tardiness or missed class time could lead to disciplinary action up to and including program or course dismissal.
- A tardy may be defined as 10-15 minutes past the documented class start time.
- Students are responsible for the material covered in ALL scheduled classes: lectures, reading assignments, practical sessions and testing sessions. This work must be made up and cannot be skipped.
- Subject material cannot always be written as notes during classes; therefore; it is important to attend each session.
- <u>No more than two consecutive absences</u> are allowed in the EMT Program. On the third absence or 14 consecutive days from the last day of attendance, the student will be withdrawn for excessive absences within the term.
- <u>No more than two consecutive absences</u> per semester are allowed in the Paramedic Program. All clock hours missed must be completed in order to graduate.
- On the third absence or 14 consecutive days from the last day of attendance, the student will be withdrawn for excessive absences within the term; the date of the student's withdrawal is the date of the last attendance.
- <u>No more than two consecutive absences</u> per semester are allowed in the Nursing Program. On the third
 absence or 14 consecutive days from the last day of attendance, the student will be withdrawn for excessive
 absences within the term; the date of the student's withdrawal is the date of the last attendance.
- If a student is absent in excess of the program requirements, the student will be automatically withdrawn.

Online Course Attendance Policy

Regular online attendance is vital to student academic success and is required for all students. Attendance is tracked on a weekly basis. Attendance is recorded by completing academic activities. Each day a student submits an academic activity, they will be marked as present (in attendance). The date of the last academic activity will serve as the official Last Day of Attendance (LDA). Students are required to complete a minimum of one academic activity each week to be marked in attendance. Attendance is recorded on the day of the submission regardless of the assignment due date. Students who fail to submit at least one academic activity per week will be marked absent for the respective week. A student who fails to complete at least one academic activity for 14 consecutive days within the term will be dropped from the course. An academic week starts on day one (1) of the course and runs in a seven (7) day cycle. The following items are considered academic activities:

- Participating in a faculty led Threaded Discussion, or Blog.
- Participating in a course group within the online classroom.
- Submission of an assignment and/or posting comments to a drop box in the online classroom.
- Submission to the online classroom of an assessment, quiz, exam, pre-unit test, post-unit test, or practice exam.

Note: Emailing your course faculty member does not count as an academic activity.

Meeting the attendance requirements does not indicate that the student has completed all the required coursework for the week and attendance is not the same thing as participation. The faculty determines participation requirements and how they relate to a student's grade.

Attendance - Clinical/Lab/and Externships

Clinical externships are critical to academic success. The Absence Policy in the clinical or externship setting is based on programmatic requirements that provide for the withdrawal and dismissal of students whose absences exceed a set rate. Each program contains a specific absence policy.

- Only under <u>extenuating circumstances</u> is any student permitted to miss a clinical or field hours. In this instance a student is allowed only one clinical or field absence per semester. A second absence may result in failing the clinical portion of the course and academic withdrawal from the program, at the discretion of HCI Leadership.
- Other attendance requirements for externships are explained in detail within the program requirements.
- See Programmatic student handbooks for more information.

Family Educational Rights and Privacy Act (FERPA)

PRIVACY OF STUDENT RECORDS

Policies and procedures concerning the privacy of student records maintained by HCI College and its faculty and staff are governed by the Family Educational Rights and Privacy Act of 1974 (Public Law 93-380). Student records are maintained by campus Registrar's Office (academic records) and Financial Services Department (financial aid records).

Student records are maintained by the College in permanent files. Under Section 438 of the General Provision Act (Title IV of Public Law 90-247), students age 18 or over have access to their personal record files kept by the College. The Registrar maintains a log with dates the records were checked out and used by other departments.

All authorized College personnel have access to student records for official purposes. A student (or in some cases eligible parents) is given access to his/her record within a reasonable time after submitting a written request to the custodian in possession of that record (Registrar and Financial Services). If the content of any record is believed to be in error, inaccurate, discriminatory, misleading or in violation of student rights or otherwise inappropriate, it may be challenged, and a written explanation included in the record. A student's right to due process allows for a hearing, which may be held at a reasonable time and place at which time evidence may be presented to support the challenge. Student information is released to persons, agencies or legal authorities as required by subpoena/legal process or by consent of a student (or eligible parent). Information is released on a consent basis in cases where a student or eligible parent has provided a written consent, signed, dated and specifying the information to be released and name (s) of persons to whom the information is to be released.

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The Family Educational Rights and Privacy Act (FERPA) requires that the College, with certain exceptions, obtain your written consent prior to the disclosure of personally identifiable information from your education records. Directory information is considered public and may be released without written consent unless specifically prohibited by the student concerned. Data defined as directory information includes: student name, major field of study, student participation in officially recognized activities, dates of attendance, enrollment status (full-time, half-time, part-time; undergraduate or graduate), degrees and awards received, and the most recent educational agency or institution the student has attended. Students wishing to opt out must provide a formal written request to the registrar at their campus.

If a student is attending a postsecondary institution – at any age – the rights under FERPA have transferred to the student. However, in a situation where a student is enrolled in both a high school and a postsecondary institution, the two schools may exchange information on that student. If the student is under 18, the parent/guardian still retains the rights under FERPA at the high school and may inspect and review any records sent by the postsecondary institution to the high school.

FERPA DISCLOSURE

Directory information is considered public and may be released without written consent unless specifically prohibited by the student concerned. Students wishing to opt out must provide a formal written request to the Dean of Academic Affairs. Data defined as directory information includes: student name, address, telephone number, email address, major field of study, student participation in officially recognized activities, dates of attendance, enrollment status (full, half-, part-time; undergraduate or graduate), degrees and awards received, and the most recent educational agency or institution the student has attended.

If a student wishes to file a complaint, please contact the Department of Education: Family Policy Compliance Office, U.S. Department of Education: 400 Maryland Avenue SW, Washington, DC 20202-5901.

ACCESS, REVIEW, AND CHALLENGE OF RECORDS

Student account records are maintained by the College in permanent files. As a result of section 438 of the General Provision Act (Title IV of Public Law 90-247), students aged 18 or over have access to their personal records kept by the College. One transcript of the student's grades is provided free of charge after graduation. Additional transcripts will be supplied per written request. Appropriate fees will apply.

All authorized college and/or school officials and third-parties who meet the definition of a school official may be granted access to student records for official purposes only. A student (or in some cases eligible parents) may have access to the student's record within a reasonable time after submitting a written request to the custodian in possession of that record. If the content of any record is believed to be in error, inaccurate, discriminatory, misleading, in violation of student rights, or otherwise inappropriate, it may be challenged and a written explanation included in the record. The student's right to due process allows for a hearing, which may be held at a reasonable time and place, at which time evidence may be presented to support the challenge. (Please see Student Grievance/Complaint Policy). Student information will only be released to any person, agency or legal authority as required by subpoena/ legal process or by consent of the student (or eligible parent). Information will only be released on a consent basis where

process or by consent of the student (or eligible parent). Information will only be released on a consent basis where the student or eligible parent has provided written consent, signed, dated and specifying the information to be released, the reason for release and name(s) of persons to whom the information is to be released.

Satisfactory Academic Progress Policy

In order to demonstrate SAP toward completion of the Nursing Program, a student must maintain a specific course grade point average (see Required Grades) and must progress through the program at a specific minimum pace to

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ensure that the student does not exceed 150% of the published length of the Nursing Program ("Maximum Timeframe"). Maximum Time Frame for the Nursing Program is exceeded when a student attempts more than 108 semester credits. SAP is evaluated at the end of every semester in order to reestablish a student's eligibility to continue receiving federal financial aid funds for the next semester. The following abbreviations are used throughout this policy:

- (SAP) Satisfactory Academic Progress
- (CGPA) Communitive Grade Point average
- (AFAW) Academic Financial Aid Warning
- (AFAP) Academic Financial Aid Probation

There are two standards that must be met:

The **qualitative standard** for each program requires that a student achieve a minimum **CGPA** of 2.00 or better for the first semester in the program. When evaluated at the end of each semester, a student must achieve the **CGPA** listed on in Diagram 1 within this document at the end of the corresponding semester. At completion of the program, every nursing student must have a **CGPA** of at least 2.48 in order to graduate from the Nursing Program.

The **quantitative standard** requires students to complete the Nursing Program within the Maximum Timeframe of the program. Transfer credits that are accepted by HCI College for credit toward the Nursing Program are included in the calculation of the Maximum Time Frame.

The required minimum pace of completion percentage (Completion Rate) is derived by dividing the number of earned credits by the number of credits attempted. In this calculation, transfer credits are counted as both attempted and earned credits.

Students must successfully maintain a Completion Rate of at least 67% by the end of the first Semester and maintain a 67% minimum Completion Rate in all following semesters. The courses withdrawn during the add/drop period are not included in the Completion Rate as either attempted or completed credits. However, if a student withdraws from a course after the add/drop period has expired, the credits for that course will be included as credits attempted in the Completion Rate.

Treatment of incompletes, course completers, withdrawals, repetitions, transfer credit, audited courses, leaves of absence, and official grade changes.

- <u>Course Incomplete grades</u>: Grades of Incomplete are included in the minimum pace of completion percentage as credits attempted but are not included in GPA or **CGPA** until the official grade is posted.
- <u>Completers (non-graduates)</u>: A student who completes the academic requirements for a program but does not yet have the degree or certificate is not eligible for further additional federal student aid funds for that program.
- <u>Withdrawals</u>: Courses withdrawn during the add/drop period are not included as attempted credits in the minimum pace of completion percentage or in the student's GPA/**CGPA**. Courses withdrawn after add/drop period are included as attempted but not completed for the Completion Rate. They are not included in GPA or **CGPA**.
- <u>Repeated Courses</u>: Students may use federal student aid funds for which they are entitled to retake any course they previously completed with a grade of F. Students may also use federal student aid funds to retake a course they previously completed with a passing grade one time to improve their grade. For financial aid purposes each time a course is taken it counts as an attempted course for the Completion Rate. The higher

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grade will count towards the cumulative grade point average.

- <u>Transfer credits</u>: Transfer credits are considered as both attempted and completed for the Completion Rate. They are not included in the calculation of GPA or **CGPA**.
- <u>Audited Courses</u>: Courses taken as audits are not taken for credit and are not included in SAP calculations for the Completion Rate, GPA or **CGPA**.
- <u>Leaves of Absence (LOA)</u>: HCI does not grant LOAs during a term. Any complete term during which a student is on an authorized LOA will not be included in the Completion Rate calculation.
- <u>Grade Changes</u>: In the event a grade for a prior term is officially changed by HCI College after SAP has been evaluated for that term, SAP will be reevaluated using the new grade at the next SAP evaluation point, however, the College may elect to reevaluate SAP for the student immediately following the official grade change.

Financial Aid Warning

If a student does not achieve the required minimum **CGPA** of 2.0 at the end of the first semester or the required **CGPA** at the end of any following semester as set forth on Diagram 1 (semester 2, 3,4, 5, etc.), or if the student fails to achieve a 67% minimum pace of completion percentage after any semester, the student will be placed on **AFAW** for the next semester. Students on **AFAW** status remain eligible to receive federal financial aid for the semester on which they are on **AFAW**. Students may not be on **AFAW** for more than one consecutive semester.

- If a student successfully obtains the required minimum CGPA or achieves a minimum pace of completion percentage of 67% or better at the conclusion of the semester on AFAW, the student will be removed from AFAW.
- A student who is not meeting SAP requirements at the end of the semester on **AFAW** will lose eligibility to continue receiving federal financial aid, but the student may appeal the student's SAP status in order to preserve his/her financial aid eligibility. (Please see the section below "**SAP Appeal Process**" for information on how an SAP Appeal may be filed).
- If a student files an SAP appeal that is denied, they will be dismissed from the program and HCI College.
- Following a successful SAP appeal, the student will be placed on AFAP. Students on AFAP must meet with their academic advisor to develop an academic plan if the student is expected to need more than one semester to resume meeting SAP requirements. Students expected to need only one semester to resume meeting SAP requirements may also receive an academic plan at the discretion of HCI College and will be informed of the College's decision with the decision on the student's SAP appeal. All academic plans will be developed according to the judgement of the academic advising staff. Academic plans will contain a roadmap for the student to resume meeting SAP requirements by a specific point in time and may contain and benchmarks that the student needs to achieve in order to eventually resume meeting SAP requirements.
- At the conclusion of the student's semester on **AFAP** status, the student's progress shall be evaluated to determine if the student has resumed meeting SAP requirements or if the student is meeting the requirements established in the student's Academic Plan.
- If a student is on **AFAP** completes 67% or more of credit hours attempted by the next SAP review period and meets the applicable CGPA requirement stated on Diagram 1, the student will be removed from **AFAP** status and returned to good standing for academic/SAP purposes.
- If a student on **AFAP** has an academic plan that provides a pathway for the student to resume meeting SAP

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requirements within more than one semester and the student fails to meet requirements established in the academic plan, the student will be ineligible for federal financial aid and will be dismissed from HCI College.

• If the student on **AFAP** has an academic plan that provides a pathway for the student to resume meeting SAP requirements within more than one semester and the student is meeting the requirements established in the academic plan, the student will continue to be eligible to receive federal financial aid as outlined in the academic plan.

SAP Appeal Process

HCI College may only approve an appeal by a student if it is determined the student will meet SAP requirements based on the qualitative and/or quantitative standards in the next SAP review period or if the academic plan that the college proposes for the student demonstrates that a reasonable pathway exists to enable the student to resume meeting SAP requirements.

To appeal the loss of federal student aid eligibility due to SAP, the student must submit a written request to the Dean of Academic Affairs, or any such person designated by the Campus President. The reason for the appeal must be the result of mitigating circumstances, and documentation supporting a claim of mitigating circumstances must be provided in addition to the student's plan for improvement. As part of the appeal, the student must document in writing why they did not meet SAP, and what in the student's situation has changed that will allow them to meet SAP going forward. Typical student life issues and making the transition to college are not considered mitigating circumstances under this policy. Examples of mitigating circumstances that may impact Academic Progress include the following:

- Death of an immediate family member
- Student illness requiring hospitalization (this includes mental health issues)
- Illness of an immediate family member where the student is a primary caretaker
- Illness of an immediate family member where the family member is the primary financial support
- Abusive relationships
- Divorce proceedings
- Previously undocumented disability
- Natural disaster
- Family emergency
- Financial hardship such as foreclosure or eviction
- Other special circumstances

The Dean of Academic Affairs and/or designee will determine the appropriateness of the mitigating circumstance regarding severity, timeliness, and the student's ability to avoid the circumstance in the future. Upon receipt of the request for appeal and the supporting documentation, the Dean of Academic Affairs or designee will notify the student of the College's determination in writing of receiving the student's complete appeal submission.

Readmission to HCI College Following Dismissal for Failure to Meet SAP

If a student files an unsuccessful SAP appeal, which is denied, the student will be dismissed pursuant to HCI College policy but may apply to be readmitted after the end of the semester for which the SAP appeal was denied. Sitting out one term does not automatically reinstate a student's federal student aid eligibility.

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A student who seeks to be readmitted after remaining out of school for one full semester will be subject to HCI College's evaluation of the student's academic records to determine if it is possible for the student to resume meeting SAP requirements.

If HCI College determines that the student may be able to resume meeting SAP requirements, the student may be readmitted but is not eligible for federal student aid funds until the student successfully meets SAP requirements.

Diagram 1

Total Credits Attempted	GPA Requirement
Semester One	2.00
Semester Two	2.12
Semester Three	2.21
Semester Four	2.33
Semester Five	2.48

Note:

The Veterans Administration is notified of unsatisfactory progress of a veteran student who remains on academic probation beyond two consecutive semesters/pay periods. At that point, veterans' benefits can be terminated. A student terminated from veterans' benefits due to unsatisfactory progress maybe recertified for benefits when the student meets the **CGPA** requirement or meets the minimum 67% Completion Rate requirement for progression.

Academic Financial Aid Grievance Process

HCI College may only approve an appeal by a student if it is determined the student will meet Satisfactory Academic Progress based on the qualitative and/or quantitative standards in the next SAP review period.

To request the opportunity to appeal a dismissal, the student must submit a written request to the *Dean of Academic Affairs* or designee. The *reason for the appeal must be the result of mitigating circumstances, and documentation supporting a claim of mitigating circumstances must be provided* in addition to the student's plan for improvement. As part of the appeal, the student must document in writing why they did not meet SAP, and what in the student's situation has changed that will allow them to meet SAP.

Student life issues and making the transition to college are not considered mitigating circumstances under this policy. **Examples of mitigating Circumstances that may impact Academic Progress include the following** (not all inclusive):

- Death of an immediate family member
- Student illness requiring hospitalization (this includes mental health issues)
- Illness of an immediate family member where the student is a primary caretaker
- Illness of an immediate family member where the family member is the primary financial support
- Abusive relationships
- Divorce proceedings
- Previously undocumented disability
- Work-related transfer during the term

- Change in work schedule during the term
- Natural disaster
- Family emergency
- Financial hardship such as foreclosure or eviction
- Loss of transportation where there are no alternative means of transportation

The Dean of Academic Affairs or designee will determine the appropriateness of the mitigating circumstance regarding severity, timeliness, and the student's ability to avoid the circumstance in the future. Upon receipt of the request for appeal and the supporting documentation, the Dean of Academic Affairs or designee will notify the student within twenty-four hours of the determination of the Academic Financial Aid Grievance.

If the student's appeal is granted, they will be placed on Academic Financial Aid Probation at the start of the following semester. As part of Academic Financial Aid Probation, the student must create, agree with, and sign a written Academic Action Plan for Improvement, which documents that they will be required to attain a 2.0 CGPA and/or complete their program within 150% of the maximum timeframe by the next evaluation period. The student is eligible to receive Title IV funding while on AFAP.

If a student appeals and is denied the appeal, they must remain out of school for one semester/pay period after the SAP review period in which the appeal was denied.

A student who has been dismissed may reapply to HCI College after remaining out of school for one full semester/pay period. At that time, a student's academic records are evaluated to determine if it is possible for a 2.0 cumulative grade point average to be achieved, and if the program can be completed within the maximum 150% timeframe.

If both standards can be achieved, a student may be readmitted but is not eligible for Title IV funds until the student achieves satisfactory academic progress both quantitatively and qualitatively.

Required Grades

A grade of (80%) or higher is required for all Paramedic Exams

A grade of (80%) or higher is required for all Emergency Medical Technician Exams and Emergency Medical Services A grade of (70%) or higher is required for all General Education Courses

A grade of (80%) or higher is required for all Nursing Core and (70%) or higher for General Education Courses

A 95% predictability score on the Comprehensive predictor is required to pass course, NUR2943L. It is a test that offers assessment of the student's comprehension and mastery of nursing content and integration of NCLEX Client Need categories similar to the percentage of items on the NCLEX-RN. Any student who receives anomaly warnings must retake the Predictor on campus and achieve a minimum of 95%. Any student who receives anomaly warnings from ATI during enrollment in Virtual ATI (VATI) may be required to repeat additional remediation and exams online or on campus. as recommended by the Coach or Director of Nursing prior to release of the students name to the Florida Board of Nursing. If student is deemed to be 100% complete by their ATI Coach, but the Coach is unable to award Greenlight based on anomaly warnings, the student will be required to repeat, retest, or remediate as determined by the Director of Nursing and or the ATI Coach.

Dosage Calculation Test

Successful completion of basic mathematics and metric conversions are required to accurately calculate medication dosages, IV flow rates, IV medication titrations, and routes for drug administration. A dosage calculation test is required at certain points during the nursing program. Students are required to pass the dosage calculation tests with a minimum score of 90%. **If the student does not pass the dosage calculation test** with a minimum score of 90% **after**

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two attempts, they will not be able to continue to the next semester, and therefore cannot continue in the **program.** The student may consult with the Nursing Program Director to discuss their options.

Nursing Exit Exam Policy

In the final semester, students are required to achieve a minimum score of 95% on the Predicted Probability of Passing NCLEX-RN Proctored Exam. Students who score below a 95% on the Proctored Exam will be permitted one re-take upon completing the two-week remediation program. Failure to achieve a score of 95% for the second time will result in repeating the Nursing Capstone (NUR2943L). If a student fails to meet the required score at the end of the second attempt of the course, the student will be dismissed.

Leave of Absence Policy and Procedure

HCI College recognizes there may be times during a student's enrollment where unforeseen circumstances may prevent a student from continuously attending classes. In the event of such extenuating circumstances, a student may apply for a Leave of Absence (LOA). Examples of acceptable reasons for an LOA are jury duty, military duty, or circumstances such as those covered under the Family Medical Leave Act of 1993 (FMLA). To be eligible to apply for a leave of absence, a student must have completed one full semester at the school and be in good academic standing.

Procedure

Students must apply for a LOA with the Dean of Academic Affairs using the HCI College Leave of Absence Request form and submit all required supporting documentation. The student must provide the reason for requesting the LOA and indicate the expected date of return, which must be at the beginning of a semester.

Students need to be current in any financial obligations to the school and must continue to make their tuition payments while on a Leave of Absence. Student must complete their current semester in order to be eligible for an approved Leave of Absence. If the student is a recipient of Federal Financial Aid, the student is required to meet with the Financial Aid office prior to HCI College granting the LOA. The Financial Aid office will advise the student of the effects of an LOA, including the student's failure to return on the approved date and their loan repayment terms. The Leave of Absence does not begin until the student has received written approval back from HCI College granting permission for the approved time frame. Students taking an approved LOA do not incur any additional charges for the period of the approved leave.

Approval

A Leave of Absence is granted at the discretion of HCI College if it is able to establish a reasonable expectation of the date of the student's return from the LOA. A Leave of Absence may be granted for a period not to exceed 180 days. However, a second LOA may be granted as long as the total number of days does not exceed 180 days in any twelve-month period. Students must request an extension to their Leave of Absence in writing and wait for approval.

In the event, the Leave of Absence is not granted, the student is required to register for and attend classes or withdraw from the school.

Return from Leave of Absence

Upon the student's return from the LOA by the approved return date, they will be permitted to continue the coursework they began prior to the Leave of Absence. Refer to the LOA Policy for more information.

If a student does not resume attendance on the date set forth in the official LOA form, they will be withdrawn from the school. The student's date of determination for withdrawal will be the date the student began the Leave of Absence. Tuition: charges and refund calculations will be determined based on that date and will be applied to the student's account. A student who has received Federal student loans will have their grace period calculated

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using the LOA beginning date, which may cause the student loan to enter repayment immediately if the grace period has been exhausted.

Repeat Course Policy

A course in which a letter grade of "D" or "F" ("C" for the ADN nursing core courses) has been earned may be repeated for grade average purposes. Only the higher grade is used in computation of a cumulative grade point average (CGPA) at HCI College. Students may only receive federal financial aid funding for one repetition of a previously passed course.

All repeated courses, including withdrawals from repeated courses, affect financial aid satisfactory academic progress calculations. A repeated course along with the original attempt must be counted as attempted credits.

Regardless if a student is eligible or not eligible for Federal Financial Aid funding, no course may be repeated more than once. If a student fails the same course two times, they will be dismissed from the institution. The student may request the opportunity to appeal a dismissal; the student must submit a written request to the Dean of Academics and/or Campus Director or designee.

Students who repeat a course for which they have received a letter grade of "D", "F", or "C" for nursing core classes must notify the Registrar's Office for recalculation of their cumulative GPA. A course in which a satisfactory letter grade (e.g., "A", "B", "C") has been earned may not be repeated for grade average purposes. Courses may not be repeated for grade average purposes after graduation.

NOTE: Veterans' Administration benefits and some Title IV funds may not cover the cost of repeating courses assigned a "C" or "D" grade. Students should speak with the Financial Aid Department for further details.

Graduation Requirements

To be eligible for graduation and receive a diploma and, or a degree as appropriate, the student must have:

- Completed the required clock and credit hours for the program in which they were enrolled.
- Repeated and successfully completed any failed courses, with the understanding that the maximum time frame shall not exceed 1.5 times the normal duration or number of clock hours required to complete the program.
- Completed at least 25% of the course requirements of the program at HCI College.
- Met all financial obligations to the school.
- Satisfactorily met all program-specific requirements.

Notice of Non-Discrimination and Harassment

HCI College does not tolerate any form of employee or student harassment, either verbal or physical, be it based on race, color, religion, gender, national origin, age, physical handicap, medical condition, marital status, sexual orientation, or any other classification protected by law. Further, the school will not discriminate in policy or action based on the above. Questions concerning policies and procedures for filing grievances should be directed to the Office of the President.

School's Right to Change Catalog Requirements

This catalog and its contents are subject to change, as the school deems necessary and appropriate. Students will normally follow the requirements in effect at the time of their admission. However, students and the Institution are bound by the agreement signed at the time of the student's enrollment unless the student signs a new agreement.

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Furthermore, requirements of other regulatory bodies may influence a student's program requirements. Possible changes include, but are not limited to, graduation requirements, admissions requirements, tuition, fees, curricula, and course content. The school *will* provide adequate notice of any change. **Students are responsible for making themselves aware of any changes**.

The Americans with Disabilities Act of 1990 - The Rehabilitation Act of 1973, Section 504

HCI College recognizes and accepts its obligations under The Americans with Disabilities Act (ADA) of 1990 and The Rehabilitation Act of 1973 prohibiting discrimination on the basis of a disability and requiring that reasonable accommodations be provided to qualified disabled students in all programs and activities within the control of the Institution, provided such accommodation would not impose an unreasonable burden on the school or other students. Determination of reasonable accommodations and compliance with the ADA and Rehabilitation Act for students are managed by the Office of the President. No student shall be retaliated against for seeking accommodation under this policy or for participating in good faith and in a reasonable manner in any review procedures concerning HCI College for its alleged noncompliance with The Americans with Disabilities Act of 1990.

The following individual is HCI College's Section 504 Coordinator: Dr. Arlette Petersson, Vice President of Academic and Regulatory Affairs, HCI College, 1764 N. Congress Avenue, West Palm Beach, FL 33409; Telephone (561) 586-0121; Fax (561) 471-4010; Email: apetersson@hci.edu.

Title IX Compliance

Title IX of the Education Amendments of 1972 protects individuals from discrimination based on sexual orientation in education programs or activities which receive Federal financial assistance. HCI College not only complies with the letter of Title IX's requirements but also endorses the law's intent and spirit. The College is committed to compliance in all areas addressed by Title IX.

All College students are responsible to make certain that sexual discrimination, sexual violence or sexual harassment does not occur. If you feel that you have experienced or witnessed sexual harassment or sexual violence, you should notify the Title IX Coordinator designated below. HCI College forbids retaliation against anyone for reporting harassment, assisting in making a harassment complaint, or cooperating in a harassment investigation; it is also a violation of Federal law. Additional details on this policy can be found at the Colleges website at <u>www.HCl.edu</u> under the following heading "Title IX Policies and Procedures."

Title IX Coordinator: Dr. Arlette Petersson, Vice President of Academic and Regulatory Affairs, 1764 North Congress Avenue, Suite, West Palm Beach, Florida 33409.

Sexual Harassment

HCI College strives to provide a work environment free of sexual harassment. Harassment on the basis of sex is a violation of Section 703 of Title VII of The Civil Rights Act of 1964. It is also a violation of The APA Code of Conduct. It is the policy of HCI College that sexual harassment of employees or students is regarded as unprofessional and demonstrative of improper conduct. Sexual harassment is defined as unwelcome sexual advances, request for sexual favors, and other verbal or physical conduct of a sexual or otherwise offensive nature. Conduct of this nature is improper whether 1) submission to the conduct is either an explicit or implicit term or condition of employment or student status; 2) submission to or rejection of the conduct is used as a basis of employment or student standing; 3) the conduct has the effect of substantially interfering with an individual's work or academic performance; or 4) the sexually suggestive conduct or language has the effect of causing uncomfortable living or working conditions. All

employees and students of HCI College are expected to avoid any behavior or conduct toward any other employee or student that could be interpreted as sexual harassment.

Reporting Discrimination or Harassment

Students who believe they have been the victim of sexual or other harassment or discrimination should immediately report the matter to the Title IX Coordinator. Any faculty member or administrator who has received a complaint from an employee or student alleging harassment should immediately notify the Title IX Coordinator or follow and follow policy and procedures set forth by the College. Similarly, any administrator, faculty member, or supervisor who becomes aware of a situation involving potential harassment of an employee or student should contact the Title IX Coordinator. All complaints of harassment will be investigated promptly and will be kept confidential to all extents possible. Appropriate disciplinary action up to and including termination from academic study or employment will be taken against any student or employee found to have engaged in harassment.

Reporting Health or Safety Hazards

Students should immediately report health or safety hazards to the nearest available school representative and then to the President. Any accident or injury, no matter how slight, must also be reported immediately.

Campus Security Report

HCI College is a safe campus. Students and employees should report any theft, vandalism or any crime no matter how minor to the college President. A campus security report is published annually by HCI College to the Commission of Independent Education on the following website: <u>https://www.hci.edu/programs/campus-security-policy</u>. All students and employees should take reasonable precautions, such as not leaving personal possessions unattended and seek an escort to one's vehicle after dark.

Drugs and Alcohol Policy

The unlawful manufacture, distribution, dispensing, possession, or use of a controlled substance is prohibited in all locations on the property of, or as part of any of the activities of HCI College. We recognize the dangers of drug and alcohol abuse and it is our policy to ensure that our campuses are free of drug and alcohol abuse. A pamphlet describing the health risks associated with the use of illicit drugs and the abuse of alcohol, including a description of the applicable legal sanctions for the unlawful possession or distribution of drugs or alcohol, is available to students and staff from the Student Services office. The illicit possession, use, or distribution of drugs or alcohol by any of HCI College's students or staff on the college's premises or at any of its activities may result in the following sanctions:

- Immediate expulsion from school or termination of employment.
- Referral to a counseling agency.
- Referral for prosecution to the appropriate authorities.
- Reentry may be made only at the discretion of the Campus President/Director.

Academic Policies and Student Responsibilities

All students enrolled at HCI College assume an obligation to conduct themselves as responsible members of the community at all times, to respect the personal and property rights of others, and to support the educational mission of the school. The school insists that its students demonstrate personal and professional integrity in addition to academic excellence. Violations will be met with consequences up to and including dismissal from the institution, at the discretion of the HCI Management Team and the Campus President.

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Ethical Code of Conduct

Students are expected to conduct themselves in an ethical, professional, and civil manner. One of the most important standards of conduct at HCI College are the individual's responsibility to the classroom community. This entails not only being attentive and respectful in class, but also helping one another toward success.

Students found guilty of violating the Ethical Code of Conduct, committing academic dishonesty or plagiarism, or failing to meet the professional standards of the school shall be liable for sanctions up to and including dismissal from the school.

Any student suspected of violating these standards will be referred to the President's office to investigate the allegations. The investigation is conducted by the Campus **President**, **the Dean of Academic Affairs**, **the Director of the Program**, **and a faculty representative**. Students are not permitted to bring or be represented by legal counsel during committee proceedings. The student will be provided an opportunity to respond to the allegations in writing and/or in person. The committee may elect to exonerate the student, issue a warning to the student, place the student on an administrative leave of absence, place the student on general probation, or dismiss the student from the school. Students will be informed in writing of the disciplinary action as well as the conditions that must be met in order to remove the disciplinary action. Each student, while in attendance at HCI, assumes the responsibility of becoming familiar with and abiding by the standards of conduct expected by the school after receiving a copy at orientation.

The student will:

- Abide by all local, state and federal laws.
- Abide by all school policies.
- Abide by all conditions of school warning, probation, or suspensions.
- Assist other students with clean-up of lab, classroom, and other areas used for instruction.

The following actions are *violations* of the Student Conduct Code, these violations include but are not limited to:

- Participation in any activity that disrupts or interferes with the education of others or the orderly operation of the school.
- Academic dishonesty of any kind with respect to examinations or course work. This includes any form of cheating and plagiarism.
- Falsification or alteration of school documents, attendance records, or identification cards.
- Using the computer password of another or in any way accessing computer files other than one's own.
- Forgery, issuing bad checks, or not paying financial obligations to the school.
- Theft or the deliberate damaging or misusing of property belonging to others or the property of the school.
- The manufacture, possession, use, or distribution of any form of alcoholic beverages or illegal drugs while on school property.
- Possession, display, or use of any dangerous instrument, weapon, or explosives.
- Deliberate interference with academic freedom, freedom of speech, or movement of any member or guest of the school community.
- Discrimination towards any individual or group, verbal, or nonverbal.
- Any physical altercation with another person on school property.
- Breach of any school discrimination or harassment policy.
- •

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Academic Dishonesty/Plagiarism

The school seeks to foster a spirit of honesty and integrity. Any work submitted by a student must represent original work produced by that student for that class. Any source used by a student must be documented through normal scholarly references and citations, and the extent to which any sources have been used must be apparent to the reader. The school

further considers resubmission of a work produced for one course in a subsequent course or the submission of work done partially or entirely by another to be academic dishonesty. It is the student's responsibility to seek clarification from the course instructor about how much help may be received in completing an assignment, exam, or project and what sources may be used.

HCI College has implemented the use of URKUND anti-plagiarism software for the use of our faculty and students.

Students found guilty of academic dishonesty or plagiarism shall be liable for sanctions up to and including dismissal from the school.

Exposure Policy Student/Employee

DEFINITIONS

- 1. **Contact** Defined as touching or close enough to come in contact with respiratory droplets, blood, blood products, or body fluids on intact skin, clothing, or personal protective equipment (i.e. mask, gown, shoe covers, eye protection).
- 2. **Exposure** Defined as contact with blood, blood products, or body fluids through non-intact skin (i.e. lacerations, abrasions, puncture wounds, or needle sticks) or through contact with the mucous membranes (i.e. mouth, eyes, nose, etc.).

PROCEDURE

In the event of an exposure to blood, blood products, bodily fluids, or other hazard:

- Any necessary first aid treatment will be rendered by available, appropriate personnel. The Exposed Student
 or employee shall, as soon as practical, wash the affected skin area(s) thoroughly with soap and water or
 with any available alcohol-based cleanser. If it is a mucus membrane related exposure (eyes, nose, or mouth)
 please follow the manufacturer Material Safety Data Sheet (MSDS), physician orders, or federal safety and
 first aid guidelines.
- 2. The exposed student or employee shall, as soon as possible, notify the lead/clinical instructor, or supervisor of the incident. The lead/clinical instructor will notify the associated Program's Director or supervisor.
- 3. The Program Director for EMS programs will decide whether or not to call Dr. Keehn or Dr. Russinoff to act as the student's Designated Infection Control Officer (D.I.C.O.). If the decision is made to do this, Dr. Keehn or Dr. Russinoff will advise the student whether the "exposure" was significant or not. If Dr. Keehn or Russinoff is unavailable, then the E.R. Physician can act in this capacity. The Lead/Clinical Instructor should monitor this closely and supervise the process.
- 4. The student or employee will seek emergency care via the Hospital/Emergency Department from which the source patient was treated at/transported to.
- 5. The Emergency Department Physician will provide pre-counseling to both the Exposed Student or employee and Source Patient. The Exposed Student or employee shall request, per Florida State Statute 381.004, that

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the examining physician order a blood draw on the Source Patient for Rapid HIV, Hepatitis B surface antigen, and Hepatitis C antibody. The Exposed Student or employee's blood draw shall include a Rapid HIV, Hepatitis B surface antibody, and Hepatitis C antibody. The Rapid HIV results shall be provided to the Exposed Student or employee and Source Patient immediately. The Exposed Student or employee will be given the option for prophylactic HIV "cocktail" within one (1) hour of exposure. The Emergency Department Physician will provide post counseling.

6. The exposure form will be completed by the Exposed Student or employee and turned into the associated Program Director along with all copies of medical care and treatment reports; as soon as possible, post medical treatment.

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Exposure Flow Chart for Students and Employees

If exposed wash/clean the affected area ASAP. Contact your Supervisor/Instructor.

Go with the source patient to the Emergency Room. Consult either HCI College's D.I.C.O. or the ER Physician about the significance of the exposure. Keep in touch with your Supervisor/Instructor.

If the exposure is significant ask to have the patient's b**lo**od drawn per F.S.S. 381.004 for Rapid HIV, Hepatitis B surface antigen, and Hepatitis C antibodytesting.

If the exposure is significant, consult the D.I.C.O. or ER Physician whether to wait on "cocktail" or not while you wait for the Rapid HIV test.

If Rapid test is positive take "cocktail." Follow up with your personal Physician. If Rapid test is negative do not take "cocktail." Follow up with your personal Physician for the other tests taken. Case 9:22-cv-81883-RAR Document 141-2 Entered on FLSD Docket 12/19/2023 Page 533 of 1026

Dress Code

All students are required to adhere to the following dress code:

- No jewelry with the exception of a watch with a second hand and a solid metal wedding band
- Hair must be a 'natural' color, pulled back, up and off the collar, and clean for both men and women.
- Men must be clean shaven (see exceptions in the Nursing Student Handbook)
- Closed toe sturdy shoes with socks, no sandals or flip flops.
- No body art or piercings should be showing with the exception of one small (1/4 inch or 4mm) set of post earrings to be worn in the earlobes.
- Head coverings are permitted for religious reasons or by physician note. Color must be white or black.

EMT and Paramedics students are required to wear a school sanctioned polo shirt and slacks that are dark blue or black. No denim jeans. Shoes/boots must be black, sturdy, and worn with black socks. A black belt is also part of the uniform.

Nursing students are required to wear navy blue scrubs embroidered with school name, logo, and name tag. Shoes must be white, sturdy, and worn with white socks. A white short or long-sleeved shirt may be worn under the scrub top.

No Smoking Policy

HCI College provides a non-smoking work and study environment. Those who wish to smoke during breaks must go outside do so. Under no circumstances may one smoke within 50 feet of any building entrance.

Violations of the Student Conduct Code and policies may result in, **reprimand, probation, suspension, or dismissal**, depending upon the seriousness of the violation. All violations will be handled according to the disciplinary procedures outlined in the school catalog.

Student Grievance/Complaint Policy

A grievance is a claim, a complaint, or an expression of concern made by a student regarding any aspect of his or her educational experience including misapplication of campus policies, rules, regulations, and procedures, or unfair treatment, such as coercion, reprisal, or intimidation by an instructor or other campus employee, including those on the ground and online. HCI College has a formal procedure to resolve complaints and concerns that students may have about the implementation of the policies and procedures that govern the institution. The institutional community benefits from prompt resolution of any issue that may arise. The student grievance/complaint procedure will be followed only in cases where there is not a grievance procedure governing a specific policy.

Students should initially discuss the grievance with their instructor or program director immediately. An appeal is the escalation of the complaint to a next level authority. If the appeal is about an academic decision such as a grade, please see the academic appeals process.

A student has the right to appeal all matters with respect to:

- 1. Disciplinary action taken for a violation of student conduct standards.
- 2. Admissions decisions
- 3. Tuition and fee matters.
- 4. Financial awards or policies, including satisfactory academic progress.
- 5. Educational policies, procedures, and grading concerns

Concerns about academic matters should first be addressed through the academic appeals process; concerns about nonacademic matters should first be addressed directly with the head of the department or departments involved.

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Certain decisions may not be appealed. If a student is terminated for failing to meet standards of Satisfactory Academic Progress (SAP), including exceeding the maximum timeframe to complete the program, he or she is not entitled to appeal unless there is documented proof of mitigating circumstance such as a medical or disability condition that impacted their ability to study or participate in the program.

A student wishing to escalate their complaint should follow the steps listed below:

- 1. The first step in the process is to address and resolve the dispute with the person/instructor involved through discussion. A student with a grievance or complaint needs to raise their concerns as soon as possible.
- 2. If the dispute cannot be resolved within 72 hours the student is encouraged to make an appointment to discuss it with the Program Director.
- 3. If there are continuing concerns the student should submit them in writing to the Dean of Academic of Academic Affairs.

The written complaint must be submitted within seven calendar days of the incident or notification of termination. *The grievance document should include a description of the disputed items, the date or dates when the issue arose, the reason why the student is grieving the decision, and the steps the student has taken to resolve the dispute to date. When submitting an appeal, the student should include as much factual evidence as possible, such as evidence of extenuating circumstances. If the grievance is ongoing the Dean of Academic Affairs will involve Campus President.

- 4. The Dean of Academic Affairs and the Campus President will oversee the gathering of additional data about the issue or incident as necessary.
- 5. If the dispute cannot be resolved, it will be referred to the Campus Appeals Committee. The student reserves the right to call in to the Committee meeting and present their complaint. The committee will consist of the heads of the applicable departments, the Systems Registrar, the Director of FA, the Dean of Academic Affairs, or their designee. They will meet with the student if requested and/or otherwise assess and develop a resolution to the complaint. A response from the Campus Appeals Committee must be provided to the student within a reasonable time. All decisions by the Campus Appeals Committee will be provided in writing and delivered to the student via their email of record with acknowledgement of receipt required. ***All decisions made by the Campus Appeals Committee are final.
- 6. Under extraordinary circumstances the dispute may be unresolved by the Campus Appeals Committee. At this time, the grievance will escalate to the Office of the President or students may address their concerns to the State Licensing Authority and/or the College's accrediting body. Students who reside out of state may contact any of the agencies listed below or the Campus President for information about agencies in their local area.

Student Complaint Right

ACCREDITING AGENCY - Accrediting Commission of Career Schools and Colleges (ACCSC)

Schools accredited by the Accrediting Commission of Career Schools and Colleges must have a procedure and operational plan for handling student complaints. If a student does not feel that the school has adequately addressed a complaint or concern, the student may consider contacting the Accrediting Commission. All complaints reviewed by the Commission must be in written form and should grant permission for the Commission to forward a copy of the complaint to the school for a response. This can be accomplished by filing the ACCSC Complaint Form. The complainant(s) will be kept informed as to the status of the complaint as well as the final resolution by the Commission.

Please direct all inquiries to: Accrediting Commission of Career Schools & Colleges 2101 Wilson Boulevard, Suite 302 Arlington, VA 22201

(703) 247-4212 www.accsc.org

A copy of the ACCSC Complaint Form is available at the school and may be obtained at www.HCI.edu, by contacting the HCI College Campus President or online at www.accsc.org.

Committee on Accreditation of Educational Programs for the Emergency Medical Services Professions (CoAEMSP) Accreditation

8301 Lakeview Parkway Suite 111-312 Rowlett, TX 75088 Telephone: (214) 703-8445

STATE LICENSING AUTHORITY – Commission for Independent Education

The U.S. Department of Education requires we provide you with contacts with the Florida Commission for Independent Education (CIE) whom you may contact in case you have an issue. We also remind and encourage students to attempt to resolve complaints with the institute itself. Applicable HCI College policies describing HCI College's Student Grievance Procedure and student complaint procedure can be found in the HCI College's Catalog. Students wishing to refer matters to the CIE may contact that agency by letter to:

Commission for Independent Education 325 W. Gaines Street, Suite 1414 Tallahassee, FL. 32399-0400 Email to: cieinfo@fldoe.org www.fldoe.org/policy/cie

Additional information is available at: http://www.fldoe.org/policy/cie/file-a-complaint.stml.Schools licensed by the Commission for Independent Education.

Confidential Hotline

HCI College has contracted with Lighthouse Services, a third party, to provide a confidential hotline where students are welcome to offer comments, suggestions, and report an issue. Lighthouse can be reached at 844-510-0068 or at www.lighthouse-services.com/hci. There are posters with the contact information throughout the campus.

School Bulletin Board

Please check the school bulletin board located in the entrance hallway at the West Palm Beach campus and in the student lounge at the Fort Lauderdale campus on a regular basis for official announcements, updates, and job opportunities.

Student Services Overview

HCI College strives to create a professional working environment so that students become comfortable and familiar with the modern workplace. At the same time, the school has created common spaces where students, faculty, and staff can relax and converse. A great deal of the value of a HCI College education is in the network of supportive relationships one develops while in school and maintains afterward.

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Student Advising

HCI College strives to provide a welcoming supportive environment for both current and potential students paying close attention to individual needs. HCI College is concerned with assisting students in integrating the myriad and varied schedule(s) required by our programs with the many aspects of their lives while supporting personal growth and development. Services include but are not limited to academic advisement, referral to various community agencies, and academic tutoring for students who need further assistance to ensure satisfactory progress through the program(s). HCI College will always endeavor to provide assistance to any and all students including those students requiring special attention. Academic advising and tutoring is coordinated by the program instructor. The program instructors/directors serve as advisors and assist students to receive extra time in the course.

Tutoring Services

Tutoring services are available to promote student academic success. There are faculty and peer tutors to assist students with specific course content. All other tutoring is by appointment coordinated through the Program Director.

HCI College provides online tutoring services for nursing and general education courses 24 hours a day 7 days a week through Tutor.com.

Enrollment Verification

Students may obtain a letter from the Campus President verifying their enrollment. The request must be made in writing and must include the student's name, address, phone number, student identification number, information to be released, the reason for the release, and the location to which the letter should be sent.

Transcript Requests

Students will be provided one official transcript of their grades upon completion of their program of study. Requests for transcripts are made to HCI College registrar. The Family Educational Rights and Privacy Act of 1974 requires that all transcript requests be submitted in writing and be signed by the former or current student. Official Transcript or Records can be requested on our website at https://www.hci.edu/request-transcript. Telephone and or Fax requests for transcripts cannot be processed.

Placement and Career Services

The primary emphasis of placement assistance at HCI College is on the employability of our graduates and their success in the professional world. While no school can guarantee employment, and HCI College makes no guarantee of employment, HCI College strives to help each of its graduates in finding employment in their field of training. HCI College obtains and posts job listings from various sources, including alumni referrals, employers who regularly seek out quality entry-level staff and our many community partners (Extern Sites, Chamber of Commerce, etc.)

Textbooks

Required textbooks are included in the program's tuition. A list of all required textbooks with detailed information can be obtained from the Dean of Academic of Affairs.

Library and Educational Resources

HCI College provides curriculum support and educational resources housed in the library in Suite 204 at the West Palm Beach Campus and in Suite 235 at the Fort Lauderdale Campus. The library contains current text materials, diagnostic training documents, reference materials, major and current titles in program areas and reference databases. HCI College is a member of the Library Information Resources Network (LIRN), an online educational

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database that provides increased access to articles, journals as well as a myriad of reference sources. A professionally trained librarian is on staff to assist the students as well as the faculty and staff at HCI College. The Library is open Monday – Friday, 9:00am - 7:00pm and/or during operational hours and by appointment.

Physical Facilities and Equipment

The Main and Branch of West Palm Beach campus schools, the facilities they occupy, and the equipment they utilize, fully comply with all federal, state, and local ordinances and regulations, including those requirements as relates to fire, health and building safety. The HCI College main campus is located at 1764 North Congress Avenue in West Palm Beach, Florida 33409. The main school occupies approximately 11,273 square feet and is comprised of classroom facilities, administrative offices, a library, computer lab, laboratory, simulation rooms, staff and student lounges, and a conference room. HCI College has added additional space for offices. The institution will be occupying suite 101 which is approximately 3,338/RSF and suite 102 which is approximately 800/ RSF at 1760 North Congress Avenue, West Palm Beach, Florida 33409. The additional space is within the same compound as the current campus. It is approximately 100 feet from the current campus to the additional space. The new space will house the Admissions, Financial Aid, and Registrars departments. There will not be any academic programs held at this space.

The Fort Lauderdale Branch of West Palm Beach is located at 1201 W. Cypress Creek Road, Fort Lauderdale, FL 33309. The branch campus occupies approximately 20,000 square feet and is comprised of classrooms, administrative offices, a library, a student lounge, a staff and faculty lounge, laboratories, and a simulation room to house the Nursing, Paramedic, and EMT programs. The student capacity of the class/lecture rooms range up to 50 students. The Laboratories will accommodate up to 25 students. The classrooms and laboratories are outfitted with updated equipment to meet all training needs. Student restroom area is conveniently located on campus. Both campuses offer ample (free) parking available in close proximity to the classrooms. Although the schools do not provide housing, transportation, or childcare for students, faculty, or staff, there are lodging options close to the facilities and public transit bus lines run nearby. HCI College will always endeavor to provide assistance to any and all students including those students requiring any special attention.

Academic Calendar

HCI College operates on a year-round calendar system divided into three semesters per year (January, May and September). Each program is divided into consecutive weekly sessions within those semesters. HCI College is closed in observance of the following holidays: New Year's Day, Martin Luther King Jr. Day, Memorial Day, Independence Day, Labor Day, Thanksgiving, Day after Thanksgiving, and Christmas. A complete 2019 – 2024 Academic Calendar is located at the back of the Catalog which is found online at www.HCI.edu.

HCI College defines an academic year as attempting a minimum of 24 credit hours/30 weeks. Each semester is 15 weeks in length.

Homework and Make-Up Work

Students will be allowed, at the discretion of the Program Director, to make up work for course work missed. Students must have all make-up work completed before they are released on externship. Students should plan on about an hour of homework per week per credit unit. In other words, for a typical three-credit course, there will be at least three hours of homework per week. Therefore, a full-time student for EMT can regularly expect 12-15 hours of homework per week and the same for paramedic that extends into three semesters. While having a computer is strongly recommended, it is not an absolute requirement for completing one's program. Students are welcome to use computers available on campus in the computer lab to do homework. Consult the current schedule for evening and study hours. Please see Student Services for Library hours as well as information about local public libraries.

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Clock/Credit Hour Description

A semester credit hour is defined as an amount of work represented in intended learning outcomes and verified by evidence of student achievement for academic activities as established by the institution, comprised of the following units: didactic learning environment; supervised laboratory setting of instruction; externship; and out-of-class work/preparation. The following are the measures of these units for establishing credit hour awards:

- Fifteen (15) clock hours in a didactic learning¹ environment = One (1) semester credit hour
- Thirty (30) clock hours in a supervised laboratory setting of instruction² = One (1) semester credit hour
- Forty-Five (45) clock hours of externship = One (1) semester credit hour
- Two (2) clock hours of out-of-class work and/or preparation⁴ for the didactic learning environment or supervised laboratory setting of instruction that are designed to measure the student's achieved competency relative to the required subject matter objectives for every fifteen (15) clock hours.
- Every clock hour consists of 50 minutes of instruction followed by a 10-minute break.

¹A **didactic learning environment** is one that is led by a qualified faculty member for the intention of teaching and learning and can be in a classroom or laboratory setting of instruction.

²A **supervised laboratory setting of instruction** is one where students engage in discussion and/or the practical application of information presented in the didactic portion of the program or discovered through out-of-class work/preparation (e.g., practical application settings, clinical settings, etc.) under the supervision of a qualified school faculty member.

³An **externship** is a component of a program that meets the Commission's externship standards and is offered in a bona fide occupational setting for which training, and education are provided; the externship component may occur throughout the course of a program or as a capstone requirement.

The objectives and goals of an externship are to allow students

to apply practically the knowledge and skills taught in didactic and laboratory settings of instruction.

⁴**Out-of-class work/preparation** is that which students engage in to prepare for the didactic learning environment or supervised laboratory setting of instruction and must be articulated through a course syllabus. An institution must be able to justify the number of hours estimated for that outside-of-class work. The student's work outside of class must be consistent with course educational goals and objectives; documented, assessed/graded; and serve as an integral part of the structured, sequenced educational program as described in the syllabus.

Diploma Programs

Emergency Medical Technician & Paramedic

(Offered at West Palm Beach and Fort Lauderdale locations)

HCI College currently offers the following non-degree/diploma programs:

- Emergency Medical Technician (EMT)
- Paramedic

The Diploma of Completion indicates that the student has achieved the competencies and acquired the skills designated in the National Education Standards which prepares the student to sit for state and/ or national certification. The student must obtain state and/or national certification prior to employment.

Instructional Modes for All Programs

Lecture Hours: Classroom instructional hours.
 Lab Hours: Applied professional projects and procedures under the supervision of an instructor.
 Externships: Practical professional experience in the public safety agencies with a local EMS Provider and supervised by a preceptor, practical professional experience in the local area hospital supervised by a clinical instructor.

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Testing

Weekly and daily tests are given to evaluate student progress in the classroom. The midterm, end term, and final exams are cumulative and must be passed with applicable minimum grades. There is only one make-up exam for any test or exam given. Failure to pass the make-up will result in the student being withdrawn for unsatisfactory progress.

Psychomotor/Skills

Students must show competency in all required skills. Pass/Fail criteria for the Final Practical Skills Evaluation Exam are as follows:

- Fail up to three stations retake the station with a different evaluator.
- Fail any station on a retake meet with Program Director for direction.
- Fail two or more stations on the second attempt meet with Program Director for direction.
- A final scenario is also presented at the end of the course that the student must successfully negotiate. This scenario is graded on a pass/fail basis.

Affective Learning

The student will be evaluated on skill competency, professionalism as well as conscientiousness and interest in learning both in the classroom and in the field.

Written Exams

Exams are given to evaluate the student's progress in the program. The midterm and final exams are cumulative and must be passed with a minimum score of 80% for the EMT and 80% for the Paramedic program.

General Rules Regarding Exams in EMS Programs

Passing grade for the EMT program is 80%.

If the student does not achieve at least an 80% percent average after completing the mid-term exam, the student will be academically withdrawn.

Passing grade for Paramedic program is 80%.

 If the student does not achieve at least an 80% percent average after completing the mid-term exam, the student will be academically withdrawn.

All students must take all exams on the date it is scheduled. If a student misses an exam without an excused absence from the Program Director, the student can only receive a maximum score of 80% on the make-up exam for EMT and Paramedic.

Graduation Requirements for EMS Programs

The final decision as to whether the student passes is determined by and is at the sole discretion of the Medical Director and or EMS Director. The determination is based on an overall assessment of the students' performance including but not limited to overall grade average, clinical performance evaluation, attitude, general performance, knowledge of clinical areas of study, and judgment exhibited by the student throughout the course. It must be stressed that grade point average is not the sole determinant of successful completion of the program. Upon verification that all graduation requirements are met, the graduate will receive the diploma within 14 days of course completion.

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*Most Clinical Sites are within 50 miles of the school; however, there are some site(s) located up to 100 miles from the school. All travel arrangements are the responsibility of the student.

Emergency Medical Technician (EMT) Program Description

(Offered at West Palm Beach and Fort Lauderdale locations)

12 semester credits: approximately 300 clock hours, 1 semester, 4 months

The Emergency Medical Technician Program (EMT) is designed to prepare the student for a career in Emergency Medicine and in preparation to meet educational level competencies according to the most current National EMS Education Standards. The EMT performs basic life-supporting skills including: patient assessment, opening airways, restoring breathing, controlling blood loss, treating victims of shock, immobilizing fractures, bandaging wounds, childbirth assistance, caring for heart attack patients, poison and burn victims, and transportation of patients. Upon graduation the student will be eligible to sit for the National Registry Emergency Medical Technician (NREMT) exam. This entry-level program consists of lectures, labs, clinical rotations and field ride times. The EMT program follows the most current National Emergency Medical Services Education Standards from the U.S. Department of Transportation. It is also in compliance with the State of Florida Statute 401 and the F.A.C. 64J of the Florida Department of Health Bureau of EMS. The student will be expected to satisfactorily complete all skills necessary for the individual to provide emergency medical care at a basic life support level with an ambulance service, pre-hospital provider and or other specialized service becoming a vital link in the health care team chain. Upon successful completion of the program a diploma is granted. This is a pre-requisite for Paramedic. *300 clock hours, 12 college credit hours.*

EMT Program - Admissions Requirements

Registration is considered complete only when the following requirements have been met and the date of such has been indicated on the application.

• The student must meet all HCI College entrance requirements for the EMT Diploma Program.

EMT Program - Clock Hour Breakdown

In Months	4	Theory	150
In Semesters	1	Labs	56
		Externship *	94
		HIV	Included in lab
		TOTAL CLOCK HOURS:	300
		*Ride Time 70 hours	
		*Hospital 24 hours	

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EMT Program - Tuition Breakdown

The College's tuition charges for its EMT program is presented below. A set of required materials, textbooks, and uniforms are provided at no additional cost.

Tuition and Application Fe	e
Tuition	\$ 4,700
Application Fee	\$ 150
Total Program Cost	\$ 4,850

EMT Program - Goals and Objectives

The goal of HCI College's EMT Program is to produce competent, entry-level Emergency Medical Technicians to serve in career positions in the state of Florida. In accordance with the 1994 EMT Department of Transportation (DOT) National Curriculum, this goal will be accomplished through the following objectives:

- To develop in the student an understanding of the Emergency Medical System, including, but not limited to the roles and responsibilities of the EMT.
- To prepare the EMT to provide quality care, to function competently and effectively in a pre-hospital system as an EMT.
- The graduate EMT will be able to demonstrate basic life support skills and the knowledge to utilize those skills in patient encounters.
- To prepare the EMT student to take the Florida State EMT certification exam.
- To make clear and assist the graduate EMT in the recognition of their need for continuing education.
- *Most Clinical Sites are within 50 miles of the school, however, there are some site(s) located up to 100 miles from the school. All travel arrangements are the responsibility of the student.

EMT Program - Course Descriptions

EMS 1119C EMT Lecture/Lab Combined

This course is designed to introduce the student to Emergency Medical Care through classroom lecture and practical application in a laboratory setting. This includes familiarization with the human body, vital signs, and the importance of patient history, AIDS, Blood Borne Pathogens, CPR, use of ventilation, oxygen therapy, and patient situational control as well as examination and assessment of the patient. Also discussed is appropriate medication administration for the EMT, bleeding, shock, soft tissue injuries and their care. *150 Lecture Clock Hours; 56 Lab Clock Hours; 10 credits*

EMS 1431 EMT Hospital/Field Combined

This is the clinical portion of the course. It allows students to correlate the information obtained in the lecture and laboratory portion with patient care. It offers students the opportunity to demonstrate competency in the skills learned in the laboratory. Students will be assigned to specific EMS providers and hospitals to complete a required number of hours of field/clinical time.

The student will be under the direct supervision of paramedic preceptors, nurses, and physicians. *94 Clock Hours; 2 credits*

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Paramedic Program Description (Offered at West Palm Beach and Fort Lauderdale locations) 45 semester credits: approximately 1112 clock hours, 3 semesters, 12 months

The paramedic program prepares the graduate to function in a pre-hospital setting at an advanced level and to be able to demonstrate this advanced knowledge in patient assessments, administration of medications, EKG monitoring, and advanced resuscitation procedures. The program consists of lectures, labs, hospital and ride times in accordance with the latest National EMS Standards. The Paramedic Program will prepare the student to take the Florida State Paramedic exam. Upon successful completion of the program a Diploma is granted. This may be applied as credit earned to an A.S. in EMS.

Paramedic Program - Admissions Requirements

Registration is considered complete only when the following requirements have been met and the date of such has been indicated on the application.

• The student must meet all HCI College entrance requirements for the Paramedic Program.

Paramedic Program - Clock Hours Breakdown

In Months	12	Theory	422
In Semesters	3	Labs	150
		Externship *	540
		HIV	Included in Lab
		TOTAL CLOCK HOURS:	1,112
		*ride time – 340 hours	
		*hospital time – 200 hours	

Paramedic Program - Tuition Breakdown

The College's tuition charges for Paramedic program is presented below. A set of required materials, textbooks, and uniforms are provided at no additional cost.

Tuition and App	lication Fee
Tuition	\$ 9,900
Application Fee	\$ 150
Total Program Cost	\$ 10,050

Per Credit Hour: .	\$220.00
Total Credits:	45

Price Per Semester	
Semester One - Tuition	\$3,300
Semester Two - Tuition	\$3,300
Semester Three - Tuition	\$3,300
Semester Four - Tuition	\$3,300
Total Paramedic Program Tuition	\$9,900

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Paramedic Program - Goals and Objectives

The goal of HCI College's Paramedic Program is to prepare competent entry-level Emergency Medical Technician-Paramedics in the cognitive (knowledge), psychomotor (skills), and effective (behavior) learning domains. In accordance with the most current National EMS Education Standards this goal will be accomplished through the following objectives:

- To prepare the student to demonstrate the cognitive ability to comprehend, apply, and evaluate the clinical information relative to their role as an entry-level Paramedic.
- To prepare the student to demonstrate technical and entry-level proficiency in all psychomotor skills necessary to fulfill the role of Paramedic.
- To assure that the student will, as a Paramedic, demonstrate affective personal behaviors consistent with professional demeanor.
- To prepare the student to manage a team of rescuers, to supervise and perform assessment of the scene and patient, and to apply current patient care protocols given a pre-hospital emergency scenario.
- To assure that the student will contribute in a positive manner to the learning environment, will be an active
 participant in the teaching and learning process, and will seek learning opportunities outside of the
 classroom.
- To prepare the student to demonstrate clinical competence while assigned patient care responsibilities.
- To familiarize the student with the hospital environment. This includes but is not limited to: policies, practices, equipment, and skills as they relate directly and/or indirectly to the Paramedic in the field.

Paramedic Program - Course Descriptions

LECTURE & LAB COURSES EMS 2620C - Paramedic I (Semester I - Lecture Lab Combined)

This course presents the objectives contained in Modules I, and II of the most current National EMS Education Standards the Paramedic. This course stresses theory and procedures used by a comprehensive emergency medical system in advanced pre-hospital care of the emergency patient. Topics studied include role and responsibilities, medical legal issues, well-being of the paramedic, illness and injury prevention, ethics, medical terminology review, patient assessment, air-way management, venous access, medication administration, therapeutic communications, life span development, pathophysiology, management of shock and general pharmacology. This course must be completed with a grade of B (80% grade average) or better to continue in the Paramedic program. *142 Lecture Clock Hours; 50 Lab Clock Hours; 11 credits per semester.*

EMS 2621C - Paramedic II (Semester II - Lecture Lab Combined)

The course presents the objectives contained in Modules III, and IV, of the most current National EMS Education Standards Paramedic. This course stresses theory and procedures used by a comprehensive emergency medical system in advanced pre-hospital care of the emergency patient. Topics studied include the following medical emergencies: cardiology, pulmonary, neurology, endocrinology, allergies, gastroenterology, renal, toxicology, hematology, environmental conditions, communicable diseases, gynecology, obstetrics, and psychiatric emergencies. The following trauma emergencies include: burns, spinal, thoracic, abdominal, musculoskeletal, head, facial, soft tissue, hemorrhage and shock. Course must be completed with a grade of B (80% grade average) or better to continue in the Paramedic program. *140 Lecture Clock Hours; 50 Lab Clock Hours; 11 credits per semester.*

EMS 2622C – Paramedic III (Semester III - Lecture Lab Combined)

The course presents the objectives contained in Modules VI, VII, & VIII of the most current National EMS Education Standards for Paramedic. This course stresses theory and procedures used by a comprehensive EMS System in the care of the emergency patient. Topics studied include the following: neonatology, pediatrics, geriatrics, abuse and

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assault, patients with special challenges, acute interventions for the chronic care patient, assessment-based management, ambulance operations, medical incident command, rescue awareness and operations, hazardous materials incidents, and crime scene awareness. *140 Lecture Clock Hours; 50 Lab Clock Hours; 11 credits per semester.*

HOSPITAL/FIELD COMBINATION COURSES

EMS 2664L - Paramedic I Hospital/Field Combination (Semester I) EMS 2665L - Paramedic II Hospital/Field Combination (Semester II) EMS 2668L - Paramedic III Hospital/Field Combination (Semester III)

These courses present the objectives contained in Modules I through VII of the most current National EMS Education Standards for the Paramedic. These courses allow students to correlate all of the didactic background in the paramedic course with advanced patient care and offer the students opportunities to demonstrate competency in the skills learned. Students will be assigned to specific EMS Providers and hospitals to complete required number of hours of field/clinical time. Students will perform various emergency medical modalities and procedures under direct supervision of paramedic preceptors, nurses and physicians. The courses are completed on a Pass/Fail basis and must be passed to continue in the Paramedic program. Students are not considered as graduates or will be issued any graduation credential until all requirements of the program including externships and required paperwork are complete. *180 Externship Clock Hours; 4 credits per semester for each externship course*.

Paramedic Program - Graduation Requirements

The Paramedic student must complete the following to be considered for graduation; these requirements must be met prior to sitting for the final exam:

- Complete all classes, labs and clinical hours as stated above.
- Complete all skills evaluations; and complete certification in ACLS, PALS, and ITLS or PHTLS.
- Demonstrate competencies in required critical tasks including passing a comprehensive final scenario.
- All required paperwork has been turned in and checked by EMS program Director, including the required number of patient contact reports. *This stipulation must be met each semester as well as prior to the Cumulative Final.*
- Receive final approval (release) from the EMS Program Director and the Medical Director before registering for the State of Florida Certification.

*Most Clinical Sites are within 50 miles of the school, however, there are some site(s) located up to 100 miles from the school. All travel arrangements are the responsibility of the student.

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Associate of Science Degree in Emergency Medical Services

(Offered at West Palm Beach location) 60 College Credits: Approximately 1,337 hours, 4 semesters, 24 Months

A.S. EMS Program Description

The Associates of Science Degree in Emergency Medical Services prepares individuals who are seeking career advancement and increased employment opportunities in the field of Emergency Medical Services. The combination of the EMT-Paramedic curriculum and the general education courses offered by HCI College will enable the student to obtain an Associate of Science Degree in Emergency Medical Services.

A.S. EMS Program - Admissions Requirements

Registration is considered complete only when the following requirements have been met and the date of such has been indicated on the application.

• The student must meet all HCI College entrance requirements for the A.S EMS Program.

A.S. EMS Program - Goals and Objectives

The goal of HCI College's Associate in Science in Emergency Medical Services is to prepare the student with the knowledge, skills and competencies needed to advance their career in the field of health and public safety, and to develop and promote these competencies so as to serve in new and advanced career positions in Emergency Medical Services in the State of Florida. These career advancements aim to enable graduates to collaborate and consult with agencies and other organizations that are committed to the community.

- The student will demonstrate the cognitive ability to comprehend, apply, and evaluate the clinical information relative to their role in EMS.
- The student will demonstrate technical proficiency in all psychomotor skills necessary to fulfill their role in EMS.
- The student will demonstrate affective personal behaviors consistent with professional demeanor.
- The student will demonstrate the ability to manage a team of rescuers, to supervise and perform assessment of the scene and patient, and to apply current patient care protocols given a pre-hospital emergency scenario.
- The student will be familiar with the hospital environment including but not limited to policies, practices, equipment, and skills as they relate directly and or indirectly to the field.

A.S. EMS Program - Course Listing

REQUIRED/CORE COURSES	45 Credits
EMS 2620C Lecture Lab Combined Semester I	
EMS 2621C Lecture Lab Combined Semester II	
EMS 2622C Lecture Lab Combined Semester III	
EMS 2664L Hospital\Field Combination Semester I	
EMS 2665L Hospital\Field Combination Semester II	
EMS 2668L Hospital\Field Combination Semester III	

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GENERAL EDUCATION COURSES – EMS 15 Credits

ENC1101.....English Composition I – 3 credits

ENC1102.....English Composition II or SPC 2608 Communications – 3 credits

MGF1106.....Liberal Arts Mathematics or MTA 1030 Intermediate Algebra – 3 credits

PSY2012.....Introduction to Psychology – 3 credits

AMH2010.....History of the USA: A Survey to 1877 - 3 credits

OR Any Course That Meets College Level Transferability or Program Requirements as Approved by HCI College. At least two general education courses must be taken at HCI College if the student completed the Paramedic program at HCI College.

Total: 60 Credits

Note: if transferring in a qualified Paramedic Program (45 credits), the student must complete 15 credits of General Education Courses through HCI College in order to be issued the AS in EMS degree.

EMS (EMT and Paramedic) Program Curriculum and Course Descriptions

EMT Course Descriptions

EMS 1119C EMT Lecture/Lab Combined

This course is designed to introduce the student to Emergency Medical Care through classroom lecture and practical application in a laboratory setting. This includes familiarization with the human body, vital signs, and the importance of patient history, AIDS, Blood Borne Pathogens, and CPR, use of ventilation and oxygen therapy and patient situational control as well as examination and assessment of the patient. Also discussed is appropriate medication administration for the EMT as well as bleeding, shock, soft tissue injuries and their care. *150 Lecture Clock Hours; 50 Lab Clock Hours; 10 credits*

EMS 1431 EMT Hospital/Field Combined

This is the clinical portion of the course. It allows students to correlate the information obtained in the lecture and laboratory portion with patient care. It offers students the opportunity to demonstrate competency in the skills learned in the laboratory. Students will be assigned to specific EMS providers and hospitals to complete a required number of hours of field/clinical time.

The student will be under the direct supervision of paramedic preceptors, nurses, and physicians. 50 Clock Hours; 2 credits

Paramedic Course Descriptions

Lecture Lab Combined EMS 2620C – Semester I

This course presents the objectives contained in Modules I, and II of the most current National EMS Education Standards the Paramedic. This course stresses theory and procedures used by a comprehensive emergency medical system in advanced pre-hospital care of the emergency patient. Topics studied include: role and responsibilities, medical legal issues, well-being of the paramedic, illness and injury prevention, ethics, medical terminology review, patient assessment, air-way management, venous access, medication administration, therapeutic communications, life span development, pathophysiology, management of shock and general pharmacology. This course must be completed with a grade of B (80% grade average) or better to continue in the Paramedic program. *142 Lecture Clock Hours; 50 Lab Clock Hours; 11 credits per semester. Prerequisites: EMS 1119c, EMS 1431*

Lecture Lab Combined EMS 2621C – Semester II

The course presents the objectives contained in Modules III, and IV, of the most current National EMS Education Standards Paramedic. This course stresses theory and procedures used by a comprehensive emergency medical system in advanced pre-hospital care of the emergency patient. Topics studied include the following medical emergencies: cardiology, pulmonary, neurology, endocrinology, allergies, gastroenterology, renal, toxicology,

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hematology, environmental conditions, communicable diseases, gynecology, obstetrics, and psychiatric emergencies. The following trauma emergencies include: burns, spinal, thoracic, abdominal, musculoskeletal, head, facial, soft tissue, hemorrhage and shock. Course must be completed with a grade of B (80% grade average) or better to continue in the Paramedic program.

140 Lecture Clock Hours; 50 Lab Clock Hours; 11 credits per semester. Prerequisites: EMS 1119c, EMS 1431

Lecture Lab Combined EMS 2622C – Semester III

The course presents the objectives contained in Modules VI, VII, & VIII of the most current National EMS Education Standards for Paramedic. This course stresses theory and procedures used by a comprehensive EMS System in the care of the emergency patient. Topics studied include the following: neonatology, pediatrics, geriatrics, abuse and assault, patients with special challenges, acute interventions for the chronic care patient, assessment-based management, ambulance operations, medical incident command, rescue awareness and operations, hazardous materials incidents, and crime scene awareness. *140 Lecture Clock Hours; 50 Lab Clock Hours; 11 credits per semester. Prerequisites: EMS 1119c, EMS 1431*

HOSPITAL/FIELD COMBINATION

EMS 2664L - Semester I EMS 2665L - Semester II EMS 2668L - Semester III

These courses present the objectives contained in Modules I through VII of the most current National EMS Education Standards for the Paramedic. These courses allow students to correlate all of the didactic background in the paramedic course with advanced patient care and offer the students opportunities to demonstrate competency in the skills learned. Students will be assigned to specific EMS Providers and hospitals to complete required number of hours of field/clinical time. Students will perform various emergency medical modalities and procedures under direct supervision of paramedic preceptors, nurses and physicians. The courses are completed on a Pass/Fail basis and must be passed to continue in the Paramedic program. Students are not considered as graduates or will be issued any graduation credential until all requirements of the program including externships and required paperwork are complete.

180 Externship Clock Hours; 4 credits per semester for each externship course. Prerequisites: EMS 1119c, EMS 1431

General Education Course Descriptions

ENC 1101 English Composition I......3 credits Writing skills are enhanced by good reading skills. This course is designed to develop and enhance clear, effective written communication skills utilizing various rhetorical methods.

PSY 2012 General Psychology3 credits

This course will introduce the student to the description and understanding of analysis of human behavior through the study of individuals, and their interaction, in the social and physical environments.

ENC 1102 English Composition II......3 credits

As a continuation of English Composition I this course is designed with an emphasis on the development of a more in depth analytical and argumentative writing style. Readings are employed as a basis for these writings emphasizing literature & research.

MGF 1106 Liberal Arts Mathematics3 credits

This course will give the student the ability to utilize mathematical and computational skills essential for success in a myriad of areas and everyday situations. It will give the student skills needed in probability and statistics sets, logic, and geometry.

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AMH 2010 History of the USA: A Survey up to 1877......3 credits

Triumph and tragedy pervade the history of these United States. This course provides an interpretative overview of the economic, social, political and cultural forces up to 1870 that have made the United States what it is today.

A.S. EMS Program - Graduation Requirements

The final decision as to whether the student passes is determined by and is at the sole discretion of the Medical or EMS Director. The determination is based on an overall assessment of the students' performance including but not limited to overall grade average clinical performance evaluation, attitude, general performance, knowledge of clinical areas of study, and judgment exhibited by the student throughout each course. It must be stressed that grade point average is not the sole determinant of the granting of a degree. In addition, successful completion of all General Education requirements; each class must be passed with a grade of 'C' or higher and have current Paramedic license in the State of Florida. (See page 14)

A.S. EMS Program - Tuition & Fees

The College's tuition charges for the A.S. EMS program is presented below. A set of required materials, textbooks and uniforms are provided at no additional cost.

Tuition and Applicat	ion Fee
Tuition	\$ 19,575
Application Fee	\$ 150
Total Program Cost	\$ 19,725

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Associate Degree in Nursing (ADN)

(Offered at West Palm Beach and Fort Lauderdale locations) 72 Semester Credits: approximately 1485 clock hours, six semesters, approximately 24 months

Nursing Program Description

This degree program focuses on: wellness of self and others; technical nursing skills across the life span in acute care facilities, long-term care facilities and the community environment; critical care concepts; and professional development. Upon graduation, the student is awarded an Associate Degree in Nursing (ADN) and is eligible to take the National Council Licensure Exam (NCLEX-RN) to become a registered nurse (RN) and subsequently seek employment in the field. The program is approved through the Florida State Board of Nursing.

The nursing program at HCI College is committed to providing the best education for students seeking an Associate Degree in Nursing. The program is designed to provide educational and clinical experiences leading to employment in beginning positions as registered nurses in hospitals or comparable facilities.

Associate of Science Degree in Nursing (ADN) - Admissions Requirements

Registration is considered complete only when the following requirements have been met and the date of such has been indicated on the application.

• The student must meet all HCI College entrance requirements for the Associate Degree in Nursing.

Nursing Program - Goals and Objectives

After successful completion of the program, the student will obtain an Associate's Degree in Nursing, thereby allowing the student to take the National Council of State Boards of Nursing exam. Upon successful completion of this exam, the student will be awarded the Registered Nursing Licensure by the State of Florida. The end of program student learning outcomes for the Associate Nursing program are:

- 1. Safety: Provide safe and effective patient-centered nursing care, utilizing evidence-based practice.
- 2. Legal & Ethical: Incorporate legal and ethical guidelines into practice and promote patient advocacy.
- 3. Communication: Integrate effective communication skills to promote safety, psychosocial integrity, and support decision making while managing patient care.
- 4. Leadership: Demonstrate leadership skills in the management of care for diverse patient populations while integrating health promotion and maintenance in patient care.
- 5. Critical Thinking: Use critical thinking to guide clinical decision making in the maintenance of physiological integrity through the implementation of the nursing process.

Nursing (ADN) Program - Tuition & Fees

The College's tuition charges for Nursing (ADN) program is presented below. A set of required materials and textbooks are provided at no additional cost. The only additional charge is the application fee of \$50.

Tuition and Application Fee	
Tuition	\$50,850
Application Fee	\$50
Total Program Cost	\$50,900

Tuition and Fees Breakdown Per Semester:

Semester	Course Number	Course Name	Credits	Tuition
	BSC2085C	Human Anatomy & Physiology I (MPC)	4	\$2,580
Semester	ENC1101	English Composition I	3	\$1,935
	MGF1106	Liberal Arts Mathematics	3	\$1,935
1	PSY2012	General Psychology	3	\$1,935
		Total for Semester One		\$8,385
	MCB2010C	Microbiology (MPC)	4	\$2,580
_		Elements of Nutrition (MPC)	3	\$1,935
Semester	BSC2086	Human Anatomy & Physiology II (MPC)	4	\$2,580
_	DEP2004	Human Growth & Development (MPC)	3	\$1,935
2	SPC2608	Speech	3	\$1,935
		Total for Semester Two		\$10,965
	NUR1023	Nursing Llosturo	5	¢2.750
C		Nursing I, Lecture Nursing I, Lab	2	\$3,750 \$1,500
Semester	NUR1022L	Nursing I, Clinical	3	
3	NUR2140	Introduction to Pharmacology for Nursing	3	\$2,250 \$2,250
3	NUR2140	Total for Semester Three	5	\$2,230 \$9,750
				<i>\$3):00</i>
	NUR1213	Nursing II, Lecture	7	\$5 <i>,</i> 250
Semester	NUR1213L	Nursing II, Clinical	3	\$2,250
_	NUR2520	Psychiatric Nursing, Lecture	3	\$2,250
4	NUR2520L	Psychiatric Nursing, Clinical	1	\$750
		Total for Semester Four		\$10,500
Semester	NUR2261	Nursing III, Lecture	5	\$3,750
Jemester	NUR2261L	Nursing III, Clinical	4	\$3,000
5		Total for Semester Five		\$6,750
Comontor				
Semester	NUR2943L	Nursing Capstone	6	\$4,500
6		Total for Semester Six		\$4,500
0				

Nursing Program - Graduation Requirements

- General Education courses must be taken in their course sequencing and must be taken prior to the nursing courses. In some cases, the Vice President of Academic and Regulatory Affairs may make an exception.
- The Student must maintain a "B" grade in all nursing core courses and a "C" grade in general education courses for program continuation and graduation.
- The student must complete 100% of all required clinical/simulation hours.
- Complete the proctored Specialty Exam for each semester as required with only two (2) attempts per semester permitted (a second attempt with remediation process completed).
- Complete Dosage Calculation Tests per the program's requirement.

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- Achieve a 95% on the Comprehensive Predictor. If a student does not achieve a 95%, they will have one
 opportunity to retake the Comprehensive Predictor after completing two weeks of prescribed remediation.
- Achieve "Green Light" status with Virtual ATI (VATI). Students must achieve "Green Light" status by the last day of the final term in the Nursing program. Students who fail to achieve "Green Light" status within that timeframe will be dismissed from the nursing program. Students who are dismissed may be eligible to re-take the Capstone if they have not exhausted the course repeat policy. Any student who receives anomaly warnings based on the Predictor test or during enrollment in Virtual ATI (VATI) must retake a Predictor on campus and achieve a minimum score of 95% as well as complete additional remediation as recommended by the Director of Nursing prior to release of the student name and transcript to the Florida Board of Nursing.
- The student must complete a minimum of 72 credit hours.
- Meet all financial obligations to the school.

Upon successful completion of the program and graduation requirements listed above:

Graduated students may be qualified to sit for the National Council Licensing Exam (NCLEX-RN).

The Application Form and Application Fee in this packet should be submitted prior to submitting the Enrollment. All required documents must be submitted with enrollment agreement. Tuition and related fees are due **in full** at time of registration and acceptance of the enrollment agreement.

Nursing Program - Course Listing

Semester	Course Number	Course Name	Credits
	BSC2085C	Human Anatomy & Physiology I (MPC)	4
Semester	ENC1101	English Composition I	3
Jemester	MGF1106	Liberal Arts Mathematics	3
1	PSY2012	General Psychology	3
		Total Credits for Semester One	13
	MCB2010C	Microbiology (MPC)	4
_	HUN1201	Elements of Nutrition (MPC)	3
Semester	BSC2086	Human Anatomy & Physiology II (MPC)	4
2	DEP2004	Human Growth & Development (MPC)	3
2	SPC2608	Speech	3
		Total Credits for Semester Two	17
	NUR1023	Nursing I, Lecture	5
Semester	NUR1022L	Nursing I, Lab	2
	NUR1023L	Nursing I, Clinical	3
3	NUR2140	Introduction to Pharmacology for Nursing	3
		Total Credits for Semester Three	13
	NUR1213	Nursing II, Lecture	7
Semester	NUR1213L	Nursing II, Clinical	3
Semester	NUR2520	Psychiatric Nursing, Lecture	3
4	NUR2520L	Psychiatric Nursing, Clinical	1
		Total Credits for Semester Four	14
Semester	NUR2261	Nursing III, Lecture	5
Semester	NUR2261L	Nursing III, Clinical	4
5		Total Credits for Semester Five	9
_			5
Semester	NUR2943L	Nursing Capstone	6
6		Total Credits for Semester Six	6
		TOTAL	72

Nursing Program - Course Descriptions

NUR1023 Nursing I, Lecture, 5 credits NUR1022L Nursing I, Lab, 2 credits

NUR1023L Nursing I, Clinical, 3 credits

This course introduces the student to the integrated processes, client needs concepts, and quality and safety in nursing care. The student will demonstrate the understanding of fundamental knowledge, skills, and competencies in the safe and effective care of the client across the lifespan. **Prerequisites: BSC2085C, ENC1101, MGF1106, PSY2012, MCB2010C, HUN1201, BSC2086C, DEP2004, SPC2608.**

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NUR2140 Introduction to Pharmacology for Nursing, Lecture, 3 credits

This course introduces the student to the pharmacological concepts and principles related to safe administration of pharmacological and parenteral agents. Students will develop an understanding of the mechanism of drug action, dosage calculation, and assessment of expected outcomes related to each major drug classification. **Prerequisites: BSC2085C, ENC1101, MGF1106, PSY2012, MCB2010C, HUN1201, BSC2086C, DEP2004, SPC2608.**

NUR1213 Nursing II, Lecture, 7 credits

NUR1213L, Nursing II, Clinical, 3 credits

This course prepares the student to provide and manage care of the client with acute and chronic medical-surgical health issues across the lifespan. In addition, the student will apply integrated processes, safe and effective care, health promotion and maintenance, psychosocial and physiological integrity, and risk reduction principals. **Prerequisites: BSC2085C, ENC1101, MGF1106, PSY2012, MCB2010C, HUN1201, BSC2086C, DEP2004, SPC2608, NUR1023, NUR1022L, NUR1023L, NUR2140.**

NUR2520 Psychiatric Nursing, Lecture 3 credits

NUR2520L Psychiatric Nursing, Clinical, 1 credit

This course prepares the student to support the emotional, mental, and social wellbeing of the client experiencing stressful events, as well as the client with acute and chronic mental illness. Prerequisites: BSC2085C, ENC1101, MGF1106, PSY2012, MCB2010C, HUN1201, BSC2086C, DEP2004, SPC2608, NUR1023, NUR1022L, NUR1023L, NUR2140.

NUR2261 Nursing III, Lecture, 5 credits

NUR2261L Nursing III, Clinical, 4 credits

This course is a continuation of Nursing II in preparing the student to provide and manage care of the client with acute and chronic medical-surgical health issues across the lifespan. The student will apply integrated processes, safe and effective care, health promotion and maintenance, psychosocial and physiological integrity, and risk reduction principals. Special populations such as obstetrics, newborn, and pediatrics will also be covered. **Prerequisites: BSC2085C, ENC1101, MGF1106, PSY2012, MCB2010C, HUN1201, BSC2086C, DEP2004, SPC2608, NUR1023, NUR1022L, NUR1023L, NUR2140, NUR1213, NUR1214L, NUR1213L, NUR2520, NUR2520L.**

NUR2943 Nursing Capstone, Lecture, 6 credits

This course requires the student to demonstrate competency in application and analyzing care of the client across the lifespan. The student will receive feedback and develop a custom remediation plan to improve knowledge, skills, and competencies prior to the final written and psychomotor performance assessment. **Prerequisites: BSC2085C, ENC1101, MGF1106, PSY2012, MCB2010C, HUN1201, BSC2086C, DEP2004, SPC2608, NUR1023, NUR1022L, NUR1023L, NUR2140, NUR1213, NUR1214L, NUR1213L, NUR2520, NUR2520L.**

Note: Most Clinical Sites are within 50 miles of the school, however, there are some site(s) located up to 100 miles from the school. All travel arrangements are the responsibility of the student.

General Education Course Descriptions

ENC 1101 English Composition I......3 credits

Writing skills are enhanced by good reading skills. This course is designed to develop and enhance clear, effective written communication skills utilizing various rhetorical methods.

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PSY 2012 General Psychology3 credits

This course will introduce the student to the description and understanding of analysis of human behavior through the study of individuals, and their interaction, in the social and physical environments.

BSC 2085C Human Anatomy and Physiology I4 credits

First semester of a two-semester sequence dealing with the structure and function of the human body and mechanisms for maintaining homeostasis within it. Includes the study of cells, tissues, and the integumentary, skeletal, muscular and nervous systems. Prerequisite for BSC 2086 C. This is a lecture science course where a corequisite lab is required.

BSC 2086C Human Anatomy and Physiology II4 credits

Second semester of a two-semester sequence dealing with the structure and function of the human body and mechanisms for maintaining homeostasis within it. A continuation of BSC2085, the circulatory, endocrine, digestive, excretory, respiratory, and reproductive systems of the body are studied. This is a lecture science course where a corequisite lab is required.

DEP 2004 Human Growth and Development......3 credits

This course explores the effects of genetic, psychological, maturational and social factors at various stages during the lifespan.

HUN 1201 Elements of Nutrition3 credits

This course provides an in-depth view of digestion, absorption, and the metabolic pathways of the nutrients and hormonal regulation of these pathways. Factors related to regulating energy needs, current government dietary guidelines, specific lifecycle needs and research-based standards for analyzing nutrient adequacy are examined. Concerns with food-borne illness and water contamination are also reviewed.

MCB 2010C Microbiology4 credits

This fundamental course in Microbiology is designed to fulfill the needs of nursing students as well as other allied health majors. The course stresses the structure, nutrition, growth, control, metabolism, and introductory genetics of bacteria. An introduction to fungi, parasites, and viruses is included. Laboratory experience in techniques and primary isolation will be provided. Lab fee required.

MGF 1106 Liberal Arts Mathematics3 credits

This course will give the student the ability to utilize mathematical and computational skills essential for success in a myriad of areas and everyday situations. It will give the student skills needed in probability and statistics sets, logic, and geometry.

SPC 2608 Speech3 credits

Emphasizes the link between the fundamental theories in speech communication and effective public speaking. Includes practical training and study in public presentation skills, audience analysis, speech construction and problemsolving using lecture and experiential learning format. Case 9:22-cv-81883-RAR Document 141-2 Entered on FLSD Docket 12/19/2023 Page 555 of 1026

Bachelor of Science RN to BSN Program

(Offered at West Palm Beach location) 120 College Credits: 7 Semesters, Approximately 12-24 Months

The framework of the RN to BSN program includes wide broad areas of knowledge, skills performance, critical thinking, caring, professionalism, and collaboration. These areas will be reflected in the program outcomes, which will be incorporated into competencies throughout the BSN program.

RN to BSN Program Description

The nursing program at HCI College is committed to providing the best education for students seeking a Bachelor of Science Degree in Nursing (BSN). This degree program focuses on: wellness of self and others; continues to expand on technical nursing skills across the lifespan; critical care concepts; and professional development, including leadership and management. Upon graduation, the student is awarded a Bachelor of Science degree in nursing (BSN) and can subsequently seek a higher level of employment in the nursing field.

RN to BSN Admissions Requirements

Registration is considered complete only when the following requirements have been met and the date of such has been indicated on the application.

• The student must meet all HCI College entrance requirements for the RN to BSN Program.

Students are given the following directions:

However, you choose to access the course, you must have a computer that is in good working condition. On-line courses move quickly through the material and usually require frequent computer work, along with frequent access to the Internet. Having a computer that is in bad repair, or a poor connection to the Internet, would be like taking a traditional course without a book or any handouts and only attending the lectures part of the time. Here is a list of some of the hardware/software you will need for an on-line course:

Technical Requirements:

- A minimum of a 2 GHz Processor, 4 GB of available Memory (RAM)
- An Internet Service Provider (ISP) such as Xfinity, Verizon or other such companies with connection of at least 512kbps download speed
- At least 10 GB of free storage space
- For Windows based computers you must have Windows 10 or above operating systems
- For Apple based computers you must have Mac High Sierra 10.13 or above operating systems
- A CD-ROM drive (Most courses will not use CD-ROMs as they are cloud based)
- Word processing application that will be able to open and save in (.docx, .xlsx, .pptx) format
- An e-mail account of your own such as Gmail, Yahoo, Outlook
- Web browser such as Microsoft Edge, Internet Explorer, Firefox, Chrome, Safari
- A printer is strongly recommended

In addition to having these hardware/software elements, you should be knowledgeable about your word processing software. You should also be able to connect to the Internet without assistance. You should know how to surf the Web and how to do simple Web searches. You should know how to send and receive email messages as well as how to send and retrieve attachments to email messages.

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After successful completion of the program, the student will obtain a Bachelor of Science in Nursing. The goals and objectives for HCI College's Bachelor Nursing program are comprised from our mission statement and core values:

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Demonstrate the cognitive ability to comprehend, apply, and evaluate the clinical information relative to their role in Nursing.

Engage in learning, and professional development of others.

- Demonstrate technical proficiency in all psychomotor skills necessary to fulfill their role in Nursing.
- Demonstrate affective personal behaviors consistent with professional demeanor.

Integrate knowledge, ethical principles, and clinical excellence in nursing.

Show compassion, caring, and empathy at all times toward patients.

• Familiarity with the hospital environment including (but not limited to) policies, practices, equipment, and skills as they relate directly and or indirectly to the field of Nursing

RN to BSN Core Courses - Tuition & Fees

RN to BSN - Goals and Objectives

Integrate a holistic approach to patients.

Tuition	\$15,000.00
Registration Fees	\$3,150.00
Total Fees	\$18,150.00

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RN to BSN Core Courses - Tuition and Fess			
Semester	Tuition and Fees		
Semester I (8 credits)	\$2,000		
Non-refundable Registration Fee	\$450		
Semester II (9 credits)	\$2,250		
Non-refundable Registration Fee	\$450		
Semester III (9 credits)	\$2,250		
Non-refundable Registration Fee	\$450		
Semester IV (9 credits)	\$2,250		
Non-refundable Registration Fee	\$450		
Semester V (9 credits)	\$2,250		
Non-refundable Registration Fee	\$450		
Semester VI (9 credits)	\$2,250		
Non-refundable Registration Fee	\$450		
Semester VII (7 credits)	\$1,750		
Non-refundable Registration Fee	\$450		
Total	\$18,150		

RN to BSN - Graduation Requirements

- The Student must successfully complete all nursing and general education courses with a minimum grade of a "C".
- All financial obligations to HCI College are paid in full.

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• Student must complete a minimum of 120 credit hours, with the last 30 credit hours to be earned at HCI College.

RN to BSN - Course Listing

GENERAL EDUCATION COURSES				
Credit Conversion:				
15 Lecture Hours =1 Credit Hour				
30 Lab Hours =1 Credit Hour				a 1 .
Course # and Title	Theory Hours	Lab Hours	Clinic/ Simulation	Credit Hours
BIO3020&3020L: Human Biology with Lab	45	30	0	4
CHM3010 & 3010L: Organic Chemistry with Lab	45	30	0	4
PHI3334: Philosophy & Critical Thinking	45	0	0	3
NUT3100: Nutrition Diet Therapy and Nutrition Care in Disease	45	0	0	3
AML3000: American Literature	45	0	0	3
PSY4070: Developmental Psychology	45	0	0	3
STA3100: Statistics	45	0	0	3
Total Hours	315	60	0	23
Nursing Core Classes				
Course # and Title	Theory	Lab	Clinic/	Credit
Course # and Title	Hours	Hours	Simulation	Hours
NUR3825: Transitional Nursing Role Perspectives	45	0	0	3
NUR3125: Advanced Pathophysiology for Nursing	45	0	0	3
NUR3119: Heritage of Nursing Concepts/Theories	45	0	0	3
NUR3069: Advance Health Assessment	45	0	0	3
NUR3678: Nursing Care for the Geriatric Patients	45	0	0	3
NUR3164: Nursing Research and Informatics	45	0	0	3
-	45	0	0	3
NUR3164: Nursing Research and Informatics NUR4827: Leadership and Management in Professional				
NUR3164: Nursing Research and Informatics NUR4827: Leadership and Management in Professional Nursing	45	0	0	3

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NUR4655: Nursing in a Multicultural Society	45	0	0	3
NUR4945: Capstone experience	60	0	0	4
TOTAL Nursing Core Classes	555	0	0	37
TOTAL Classes	870	60	0	60

RN to BSN - Course Descriptions

NUR3825 Transitional Nursing Role Perspectives3 Credits

Role expectations for baccalaureate nurse; development of a professional self-concept; interface of personal and professional growth; transition from task to theory will be explored and real-world experience discussed. Legal issues in nursing will be discussed in detail as well as the historical and current issues affecting healthcare today.

NUR4107 Nursing Perspectives/Global Trends3 credits

This course is focused on the major challenges of health care on a global level. The role of the nursing profession within the global community is emphasized, centered on meeting Millennium Development Goals. Using the concepts of Transformational Leadership, this course assists the learner in recognizing and addressing the major challenges facing global health care.

NUR3119 Heritage of Nursing Concepts/Theories3 credits

Focus is on philosophical and theoretical foundations of nursing as a profession. The student is introduced to the history of nursing through defining concepts and the development of theories across the last century. Teaching strategies are designated to enhance students' abilities and skills to bridge the theory practice gap and expand their knowledge regarding theoretical concepts.

NUR3164 Nursing Research and Informatics3 credits

Concepts in research, healthcare informatics, trends and exploring innovative strategies and applications are introduced and used to document in the electronic health record. Students learn the relationship between nursing research and utilization of evidence-based practice and how to apply it when documenting in the patient's record. This course also explores the research process as a foundation for acquiring skills needed to access, critically appraise and synthesize literature.

NUR3069 Advance Health Assessment......3 credits

The registered nurse student will learn a knowledge base which details the physiological, pathophysiological and psychological aspects of performing a complete and comprehensive health assessment in a variety of environments within diverse populations of health care clients.

NUR3678 Nursing Care for the Geriatric Patient......3 credits

The course implements topics that focus on the recommended competencies as developed by the American Association of Colleges of Nurses (AACN) for the baccalaureate nurse. Emphasis is placed on the aging population and the need for a transformational leadership in a health workforce that is capable of delivering competent care to older adults. The second half of the course emphasizes the growing vulnerable population focusing on the leadership role of the nurses in advocacy, cultural competence, and ethical issues specific to social justice and distribution of resources.

NUR4847 Clinical Decision Making/Critical Thinking......3 credits

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This course provides a conceptual understanding of the logical and critical thought processes required of the professional nurse.

NUR4655 Nursing in a Multicultural Society3 credits

The course presents concepts in trans-cultural nursing focusing on the nurse leader developing cultural competency while learning more about the health/illness beliefs of patients. The course is developed to provide the cultural foundation of existing models related to trans-cultural nursing and allows the nurse leader to identify key components impacting the cultural diversity of identified sub-cultures. Health care delivery within the United States is also discussed with a focus on the Institute of Medicine report on Standards of Care as it applies to health disparities.

NUR4827 Leadership and Management in Professional Nursing3 credits

Leadership and management theories will be explored incorporating critical thinking, conflict management, decision making, and problem-solving skills. A primary focus of this course is to enhance professional nurses' understanding of the concepts and skills needed to be effective leaders in today's health care arena.

NUR4636 Community Health Nursing3 credits

This course examines the role of the nurse in dealing with family crisis, gerontological problems, child-bearing, child raising families, and medical-surgical conditions within the context of the community. Assessment of the community and its healthcare delivery system epidemiology is studied within the social structure of families and communities.

NUR4945 Capstone Experience......4 credits

This course allows the students to integrate, synthesize knowledge and skills from other courses completed in the BSN program. The course is designed to enhance students' awareness of the main challenges that face the healthcare system, with emphasis on their professional roles and potentials in improving the quality of care using research and leadership skills.

NUR3125 Advanced Pathophysiology for Nursing3 credits

This course teaches the advanced study of pathophysiology and symptomatology across the life span. The focus is on alterations in physiologic functions and manifestation of disease. Signs, symptoms and diagnostic findings of common alterations are presented. Students will also gain an understanding of nursing interventions to promote adaptation.

General Education Course Descriptions

AML 3000 American Literature3 credits

This course explores select American authors and literary texts. Topics include historical background, social forces, literary genres and elements.

PSY 4070 Developmental Psychology......3 credits

The focus of this course will be on individual development from early childhood to late adolescence. At a general level we will examine the genetic and biological contributions to individual development, the social contextual contributions, and the interaction between these two general sets of variables. Specific topics will include behavioral genetics, temperament, parent child relations, sibling relations, peer relations, the self, intelligence, emotional development, and problems of social development (antisocial behavior, depression).

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The main objective of this course is to learn probability, discrete distributions, continuous distributions, bivariate distributions, and functions of random variables.

CHM 3010 & CHM 3010L - Organic Chemistry with Lab......4 credits

This course consists of an introduction to the classification, structure, reactions, and reaction mechanisms of carbon compounds. The laboratory portion of the class represents the chemistry concepts. Using models, chemistry experiments and multimedia, the student will obtain a representative explanation of the conceptual lessons taught in the lecture component of this course.

PHI 3334 - Philosophy & Critical Thinking......3 credits

This course provides the fundamentals of effective problem solving both in theory and practice. This course covers problem solving, logical reasoning, critical analysis of information, and cooperative learning. Students will use research methods and evaluating any problems by applying a logical process to its solution.

BIO 3020 & BIO 3020L - Human Biology with Lab......4 credits

Course examines human form and function and the relationship of humans to other living things. Fundamental biological principles as they apply to the human are explored. The course is intended for liberal arts students who do not currently plan to major in the biological or health sciences. The lab component compliments the theory.

NUT 3100 Nutrition Diet Therapy and Nutrition Care in Disease3 credits

In this course students will learn the principles of diet therapy and nutrition care in disease to prepare them with entry level, holistic knowledge of the use of nutrition care to meet patients' therapeutic needs both in an inpatient care, outpatient care and rehabilitation setting.

Distance Learning Online General Education Courses

HCI College offers general education requirements through distance learning. Courses can be taken, depending on availability, at the student's convenience. The inclusion of General Education in every degree program reflects HCI College's conviction that successful, satisfying lives require a wide range of skills and knowledge. These skills include the ability to reason logically and quantitatively and to communicate effectively; an understanding of the sciences that makes sense of the natural environment; a familiarity with the cultural movements that have shaped societies and their values. General Education augments and rounds out the specialized training students receive in their majors and aims to cultivate a knowledgeable, informed, literate human being.

It is imperative that the student understand and respect confidentiality regarding discussions, information sharing and not to, at any time, divulge answers or course information that would present an unfair advantage to current and/or future students. Any student enrolled in an online course and or courses is expected to abide by all HCI College rules, regulations and policies as previously presented herein. Distance Learning/Online HCI College students have access to and receive the same services as commuter students.

General Education Objectives

HCI College offers general education courses through Distance Learning that challenge the student to acquire skills and knowledge that are desirable not only for personal enrichment but enable the student to enhance and further their professional lives. The General Education Curriculum is designed to enable the student to:

- Master basic skills in English, Mathematics, Social Science & The Humanities
- Communicate accurately and effectively in both verbal & written form
- Gain and apply critical thinking skills in order to analyze complex material

Requirements to meet these objectives include, but are not limited to, with a grade of 'C' or higher, completing all homework assignments, and activities.

Academic Guidelines

Academic guidelines are the same for Distance Learning/Online General Education as for other courses/programs offered at HCI College.

Student Verification Statement

HCI College requires that the school verify the identity of students when course materials and/or course assessment activities are conducted either partially or entirely online. A student's login and password are intended to provide the student with secure access to course materials and are also intended to help the school meet this mandate. If HCI College feels that at any time the student on-line is not the same student that is registered participating in class discussions, completing quizzes or exams, and is not the student who is registered to complete all class work, the school may require the use of a proctor for exams in distance-delivered (Internet) courses. This requirement will then provide a second level of student identity verification. Finally, an instructor may require students to use a webcam during exams, as another means of student identity verification through voice and visual recognition. If HCI College feels that the student is not the one completing the class work the student will be dismissed for academic dishonesty. This includes any form of cheating and/or plagiarism (page 20 of HCI College catalog, student conduct code). HCI College protects student privacy and will notify students of any projected additional student charges associated with the verification of student identity at the time of registration or enrollment.

Technical Requirements

On-line courses require access to technology that is accessible to you at times whenever you can get to it. This means that you have to have access to a computer that is connected to an Internet account with as Xfinity, Verizon or other such companies. This must be a good connection that is dependable and accessible. Most people find it necessary to have their own PC, but you **can come into HCI College and use the computer lab**. However, you choose to access the course, you must have a computer that is in good working condition. On-line courses move quickly through the material and usually require frequent computer work, along with frequent access to the Internet. Having a computer that is in bad repair, or a poor connection to the Internet, would be like taking a traditional course without a book or any handouts and only attending the lectures part of the time. Here is a list of some of the hardware/software you will need for an on-line course:

- A minimum of a 2 GHz Processor, 4 GB of available Memory (RAM)
- An Internet Service Provider (ISP) such as Xfinity, Verizon or other such companies with connection of at least 512kbps download speed
- At least 10 GB of free storage space
- For Windows based computers you must have Windows 10 or above operating systems
- For Apple based computers you must have Mac High Sierra 10.13 or above operating systems
- A CD-ROM drive (Most courses will not use CD-ROMs as they are cloud based)
- Word processing application that will be able to open and save in (.docx, .xlsx, .pptx) format
- An e-mail account of your own such as Gmail, Yahoo, Outlook
- Web browser such as Microsoft Edge, Internet Explorer, Firefox, Chrome, Safari
- A printer is strongly recommended

In addition to having these hardware/software elements, you should be knowledgeable about your word processing software. You should also be able to connect to the Internet without assistance. You should know how to surf the

Web and how to do simple Web searches. You should know how to send and receive email messages as well as how to send and retrieve attachments to email messages.

Distance Learning Orientation - How Online Courses Work

The first on-line course that you take with HCI College will start with an orientation that is given to you the day that you sign up for class. This orientation will include a password and an ID that is required each time you sign into the class. This information will also be emailed to you with instructions once your enrollment is completed. Be sure to carefully write down any access codes, passwords, or user IDs that you will need to access the course material. You will be required to enter this information exactly as it was originally written in order to access the content of your course. This is also for verification that ensures that you are the same student who is participating in class discussions, completing all required coursework, including quizzes, tests and exams and receives academic credit.

Getting in Touch

Once you sign into a class you should find your instructor's email address. Be sure to record all such information. Many students report that they have much more contact with on-line instructors than with those who teach traditional classes. It is a good idea to contact your instructor as soon as you know you will be taking the class. Your instructor can tell you how your class is organized and what you need to know to begin. In many cases, the instructor will send you the initial documents or information via email whenever you contact them. Your instructor will receive the class roster on the first day of the semester and will attempt to contact you. One of the biggest problem's instructors have in teaching an online class is the initial contact with the students. If the class roster contains information about you that is incorrect or incomplete it may delay, or make it impossible, to get in touch with you. For these reasons, get in touch with your instructor as soon as possible. After the class starts being sure to check your email messages every day for correspondence with your instructor. It is very important that every time you send email to your instructor, you list in the Subject Line the name of the course you are taking, or some other pertinent information that lets the instructor know what the message is about.

Additionally,

- Be sure to write every message to your instructor as though it were a letter or assignment.
- Use complete sentences and good grammar.
- Do not use "net speak" or abbreviations.
- Do not use slang or informal language.
- Use good paragraphs and do not type in all caps (capitalization).
- It is okay to use bold or italics to emphasize a point, but using all capitals is the 'net equivalent' of shouting. When submitting assignments by attachments, be sure to put your name at the top of the document, just as you would an assignment you were turning in by hand.
- Double-space assignment attachments so that they are easier to read, and your instructor can make notes to you.

Distance Learning Assignments

On-line courses are, by nature, independent, "directed study" courses. Your instructor will direct your studies, but you will have to work independently to complete the assignments. When and where you do these assignments is up to you. However, deadlines are usually given and must be observed. At the completion of their online courses, many students have reported that keeping up is easy to do if you try to remain disciplined in getting your work done on time. Online classes typically have a fairly high attrition, or dropout, rate because of a student tendency to fall behind on assignments.

The actual work of on-line classes may come in many diverse forms. However, most courses taught on-line will require more activities and writing assignments than traditional classes. Occasionally, an instructor will have pages on the course website to provide content for the class. Often, these pages will contain *hypertext*, or words and

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phrases that have imbedded codes in them. By simply clicking on the hypertext, you will move to other pages or websites that have additional information about the topic at hand. Another approach for your assignments may be that your instructor will place files with the activities or assignments on a web page for you to download or to view while online. You can usually use the "**PRINT**" button on your browser to print out the directions or assignments.

Distance Learning Exams/Quizzes

Assessment is an important part of any educational process. Test/exams/quizzes also have another very important purpose: They give feedback about how effective the instruction has been. Instructors may use any or all of several methods of assessing the learning process and product.

Proctored Exams are often used in online classes. In this approach, students must visit the college campus, or some other approved site, to take the exam under the supervision of someone who is approved by the instructor. Many times, the student makes an appointment to take the exam at a time that is convenient to themselves and the proctor (examiner).

Online Exams are tests that are posted on the course's web page and taken while connected to the Internet. These exams are very convenient for the student but must be taken with careful attention to the instructions given by the instructor. Security is very important in this case and the exam may be available for only a short period of time.

"*Take Home Exams*" In this case the exam may look more like another assignment. Your instructor may send you a file with the exam questions for you to download and print. You then answer the questions and turn-in your responses by email, fax, or by hand. Many instructors have a special area of their Course Site called **Dropbox**, or **Digital Dropbox**. Dropbox is an online data storage and file sharing technology. Instructors check both share and receive the work via Dropbox. Dropbox will only let the student who left the document pick-up a corrected, or graded, document.

Surveys may be used to assess students' experience with the materials and methods of the on-line class. Colleges and instructors often use surveys to get students' perceptions about how effective the instruction has been. Sometimes these surveys are the equivalent of the Course Evaluations that are conducted in regular classes each semester. Take these instruments seriously and give candid and useful feedback about the course and the instruction. This information is not available to the instructor until the course is finished and grades have been determined. In this case, every attempt is made to ensure that students' comments are confidential, and the names of the students are not available to the instructor, and you may be asked to visit a separate web site to complete this type of survey. Your instructions will tell you which of these are being used.

Distance Learning Discussions

Discussions are invaluable parts of college classes. Therefore, they are almost always used in online classes. There are many ways in which discussions may be conducted. Generally, there are two types of discussions: synchronous or asynchronous. Synchronous discussions are "real-time" discussions that are similar to chat rooms. In this setting, students and instructors go to a common webpage or "chat room" and conduct a live discussion. Be sure to note whether these activities are

mandatory and if so, how they count in determining your final grade for the course. Sometimes instructors will make available an outline, or "lecture notes" for the discussion. Some general ground rules for "virtual classroom" behavior are:

- Pay Attention
- Have a back-up plan: Be prepared in case there is equipment or other element failure.

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General Education Course Descriptions

ENC 1101 English Composition I.....**3 credits** Writing skills are enhanced by good reading skills. This course is designed to develop and enhance clear, effective written communication skills utilizing various rhetorical methods.

ENC 1102 English Composition II......3 credits

As a continuation of English Composition I this course is designed with an emphasis on the development of a more in depth analytical and argumentative writing style. Readings are employed as a basis for these writings emphasizing literature & research.

SPC 2608 Speech3 credits

Emphasizes the link between the fundamental theories in speech communication and effective public speaking. Includes practical training and study in public presentation skills, audience analysis, speech construction and problemsolving using lecture and experiential learning format.

MGF 1106 Liberal Arts Mathematics3 credits

This course will give the student the ability to utilize mathematical and computational skills essential for success in a myriad of areas and everyday situations. It will give the student skills needed in probability and statistics sets, logic, and geometry.

PSY 2012 General Psychology......3 credits

This course will introduce the student to the description and understanding of analysis of human behavior through the study of individuals, and their interaction, in the social and physical environments.

CGS 1100 Microcomputer Applications......3 credits

To be comfortable with computers and their technology, the student will in this course have hands on experience with word processing, electronic spreadsheets, Power Point, and database management software. Also included in the course is a brief overview of microcomputer concepts. All applications software utilized will be windows-based.

AMH 2010 History of the USA: A Survey up to 1877......3 credits

Triumph and tragedy pervade the history of these United States. This course provides an interpretative overview of the economic, social, political and cultural forces up to 1870 that have made the United States what it is today.

Administrator and Faculty

Administrators

De Guzman, Pedro	President and Chief Executive Officer HCI Corporate	
Petersson, Dr. Arlette	Vice President of Academic and Regulatory Affairs HCI Corporate	Ed.D. Dowling College MBA Dowling College
Miller, Ryan	Vice President of Finance HCI Corporate	MBA Savannah State University
Caren Stewart	Vice President of Administration HCI Corporate	
Shelpman, Jr., David	Campus President West Palm Beach & Fort Lauderdale Campuses	MHRM Keller Graduate School BS DeVry University
Kaufman, Lori	Director of Online Education HCI Corporate	MS Long Island University – C.W. Post BS Towson State University
Bernadette Shaia	Senior Staff Accountant HCI Corporate	
Bertalotto, Ryan	Director of IT/Facilities HCI Corporate	

West Palm Beach Campus Managers and Staff

Shelpman, Jr., David	Campus President	MHRM
	West Palm Beach & Fort Lauderdale	Keller Graduate School
	Campuses	BS
		DeVry University
Ruiz, Carmen	Systems Librarian	MLS
	West Palm Beach &	Indiana University
	Fort Lauderdale	
Keehn, DO. FACOEP, Dr. Steven	Medical Director	Doctor of Osteopathic Medicine
	West Palm Beach	Nova Southeastern University
DeVevo, Knolan	Director of Nursing	MSN
		Jacksonville University
		BSN
		Florida Atlantic University
		AAS Nursing
		Palm Beach State College
Botting, Phil	EMS Program Director	BS
	West Palm Beach	Barry University
		FL State Certified Paramedic
Assevero, Tara	Nursing Clinical Coordinator	MBA
		American InterContinental University
Moritz, Dana	Academic Administration Assistant –	BS
	Nursing Department	Hofstra University
	West Palm Beach	
Marciante, Mike	Fire Science Coordinator	AS in EMS
	West Palm Beach & Fort Lauderdale	Palm Beach State College
Atkinson, Kacey	Regional Director of Financial Aid	MBA, MS
	HCI Corporate	Nova Southeastern University
Williams, Anna	Associate Director of Financial Aid	
	West Palm Beach	
Simpson, Biaggia	Financial Aid Officer	
	West Palm Beach	
Nelson-Daley, Latoya	Financial Aid Officer	
	West Palm Beach	
Andrews, Tangela	Business Office Manager	МНА
	West Palm Beach & Fort Lauderdale	Kaplan University
		BA
		Keiser University
McClung, Vanessa	Systems Registrar	МВА
	HCI Corporate	South University

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Dudeck, Pamela	Associate Registrar West Palm Beach	Associate in Liberal Arts Monmouth College, NJ
Moeckel, Amber	Associate Registrar West Palm Beach	
Beckles, Claude	Director of Admissions West Palm Beach	
Zimbaldi, Krystal	Associate Director of Admissions West Palm Beach	BS SUNY Albany
Sgherza, Lisa	Admissions Representative	BS University of Texas El Paso
Abreu, Yairen	Admissions Representative	BS Florida Atlantic University
Dowis, Bri	Admissions Representative	BS Carson Newman University
Veshlage, Theresa	Admissions Representative	
de Quesada Vila, Karen	Admissions Representative	BS University of South Florida
Wallace, Vivek	Admissions Representative	
Peterson, Misty	New Student Coordinator	
Cruz, Jacqueline	Director of First Impressions	
Sherrard, Joan	Director Career Services West Palm Beach	MBA University of Phoenix
Pike, Jennifer	Career Services Advisor West Palm Beach	BS Florida Atlantic University

Fort Lauderdale Campus Managers and Staff

Shelpman, Jr., David	Campus President West Palm Beach & Fort Lauderdale Campuses	MHRM Keller Graduate School BS DeVry University
Rosenzweig, Dr. Jack	Dean of Academic Affairs Fort Lauderdale	Doctorate Nova Southeastern University MS The University of Toledo
Ruiz, Carmen	Systems Librarian West Palm Beach & Fort Lauderdale	MLS Indiana University
Russinoff, Dr. Ian	Medical Director Fort Lauderdale	Doctor of Osteopathic Medicine SUNY Downstate Medical Center
Riggs, Darline	Director of Nursing	MSN Florida Atlantic University BSN Florida Atlantic University RN Broward Community College
Levy, Tianah	Full-time Instructor and Associate Director of Nursing	MSN Capella University BSN Chamberlain College of Nursing
Alvarez, Pamela	Academic Administrative Assistant	MBA Everglades University BS Brown Mackie College
Berger, Peter	EMS Program Director Fort Lauderdale	MS Oklahoma State University BA University of South Florida BS University of Florida
Tiebklang, Siriuma	Financial Aid Manager	AS Broward State College
Acevedo, Angela	Financial Aid Officer	BS Keiser University
Greene, Mara	Registrar	MS in Education Capella University BSBA, Healthcare Management

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		Kaplan University Post Grad Certificate, Ed. Leadership
		Northcentral University
Mclure, Amanda	Director of Admissions	AA
		Newport Business Institute
Hall, Janice	Admission Representative	МВА
		University of Phoenix
Phillips, Maurice	Admissions Representative	
Garcia, Raquel	Admissions Representative	BS
		State University of Oneonta
Acevedo, Stephanie	Admission Representative	BS
		Florida International University
Ciottolo, Eliana	Admission Representative	MA
		University of Art & Design
		BS
		Santa Maria University
Delfani, Anamaria	Director Career Services	
	Fort Lauderdale	
Edwards, Lorna	Student Services Coordinator	BS
	Fort Lauderdale	Barry University

Nursing Faculty

West Palm Beach

Aldrich, Cecelia	Nursing Instructor	BSN University of Miami BA in Early Child Development Florida State University
Augustine, Grace	Nursing Instructor	PhD NursingBarry UniversityMSN-ARNPSouth UniversityBSNLynn UniversityASNBroward College
Baer, Priscilla	Nursing Instructor	MSN-CNE Jacksonville University BSN Jacksonville University ASN Santa Fey State College

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		AAN Santa Fey State College
Brady, Lisa	Nursing Instructor	MSN Loyola University BS in Human Services Lesley University ASN Yavapai University
Cain, Norma	Nursing Instructor	PhDNewburgh CollegeDoctor of MinistryNewburgh CollegeMSNUniversity of PhoenixASN-BSNSouth University
Cain, Sharon	Nursing Instructor	MSN-FNP South University BSN Our Lady of the Lakes ASN Dade Medical College
Carr, Sarah	Nursing Instructor	MSN Western Governors University BSN University of Vermont
Chambers, Shoshanna	Nursing Instructor	BSN Coppin State University
Christmas, Christina	Nursing Instructor	MSN Western Governors University BSN Palm Beach State College
Colia, Jeanne	Nursing Instructor	MSN Barry University Western Governors University BSN State University at Stony Brook AAS Suffolk Community College

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Cooke, Karli	Nursing Instructor	MSN Governors State University BSN Aurora University
Dennis, Alecia	Nursing Instructor	BSN University of Texas at Arlington ADN Broward State College
Germinal, Garry	Nursing Instructor	MSN, BSN, ASN Excelsior College
Graham-Moore, Tiffany	Nursing Instructor	MSN/NP, BSN South University ADN CUNY Borough of Manhattan Community College
Lane, Laila	Nursing Instructor	MSN Florida Atlantic University BA Psychology University of Central Florida ASN Palm Beach State College
Sheffield, Christopher	Nursing Instructor	BSN Capella University AASN San Antonio College – School of Nursing
Sierra, Giovanna	Nursing Instructor	BSN University of Lowell
Sweeting, Leona	Nursing Instructor	BSN Chamberlain University College of Nursing ASN Keiser University
Vieux, Linda	Nursing Instructor	BSN Oklahoma Panhandle State University ADN Rose State College
Willis-Jones, Masiai	Nursing Instructor	MSN Palm Beach Atlantic University ADN HCI College

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Ziemba, Kathryn	Nursing Instructor	BSN
		Palm Beach State College
		ASN
		Cape Cod Community College

Fort Lauderdale

Adderly, Minnette	Part-time Instructor	MSN Florida Atlantic University	
Adkinson, Mindy	Full-time Nursing Instructor BSN Nova Southeastern Univers		
Allison, Hermena	Part-time Nursing Instructor MSN, BSN University of Phoenix		
Ariza, Andrea	Part-time Nursing Instructor	MSN Grand Canyon University	
Battle, Shalonna	Part-time Nursing Instructor	ARNP, WHNP-BC Frontier Nursing University	
Baudin, Myrna	Part-time Nursing Instructor	BSN Barry University	
Chery, Manoucheka	Full Time Nursing Instructor	MSN, BSN Grand Canyon University	
Clarke, Michele	Full Time Nursing Instructor	MSN Wilkes University	
Desgraves, Florence	Part-time Nursing Instructor	PMHNP, MSN, BSN Chamberlain University	
Hylton, Kim	Part-Time Nursing Instructor	MSN, BSN Grand Canyon University	
Levy, Tianah	Full-time Instructor and Associate Director of Nursing	MSN, BSN Chamberlain College of Nursing	
Manu, Emelia	Part-time Nursing Instructor	BSN Florida Atlantic University	
Miller-Simpson, Jullet	Part-time Nursing Instructor	MSN Western Governors University	
PetitHomme, Edna	Part-time Nursing Instructor	DNP, ARNP, FNP-BC, CCHP Florida Atlantic University	
Rakes, Tiffany	Full Time Nursing Instructor	BSN Missouri Southern State University	
Saint Jean, Anna	Part-time Nursing Instructor	MSN, BSN University of Phoenix	

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Salmon, Loni	Part-time Nursing Instructor	FNP, APRN, MSN
		Chamberlain College of Nursing
Stephens, Nicole	Part-time Nursing Instructor	MSN, BSN
		Nova Southeastern University
Timme, Robert	Full-time Nursing Instructor	BSN
		University of Phoenix
Vassell, Crystol	Part-time Nursing Instructor	MSN
		Wilkes University

Emergency Medical Services Faculty

West Palm Beach

Ambrogio, Dion	EMS Instructor	AS in EMS HCI College FL State Certified Paramedic
Arenas, AJ	EMS Instructor	BS in Construction Management Fl International University FL State Certified Paramedic
Brian Boggio	EMS Instructor	AA in Religion Lynn University FL State Certified Paramedic
Cottrell, Leigh	EMT Instructor	AS in EMS HCI College FL State Certified Paramedic
Crum, David	EMS Instructor	AS in EMS Palm Beach State FL State Certified Paramedic
Davis, Chase	EMS Instructor	MS in Public Administration Florida International University AS in Fire Science Columbia Southern University FL State Certified Paramedic
Esarry, Bradley	EMS/EMT Instructor	AS in EMS HCI College FL State Certified Paramedic
Fallick, Jason	EMT/Paramedic Instructor	AS in EMS Broward College FL State Certified Paramedic
Flechaus, Connor	EMS/EMT Instructor	AS in EMS

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		HCI College
		FL State Certified Paramedic
Foulds, Cori	EMT Instructor	BS in Criminal Justice
		Northern Michigan University
		FL State Certified Paramedic
France, Dom	EMS Instructor	AS in EMS
		Palm Beach State College
		FL State Certified Paramedic
Gordon, Nick	EMT/Paramedic Instructor	AS in EMS
		Palm Beach State College
		FL State Certified Paramedic
Gluck, John	EMS Instructor	AS in EMS
		HCI College
		FL State Certified Paramedic
Hart, Giovanni	EMS Instructor	AS in EMS
		Broward College
		FL State Certified Paramedic
Lee, Bryan	EMS Instructor	AS in EMS
		Palm Beach State College
		FL State Certified Paramedic
Lovvorn, Jason	EMS Instructor	AS in EMS
		Tallahassee Community College
		FL State Certified Paramedic
Marciante, Mike	EMT Lead Instructor	AS in EMS
		Palm Beach State College FL State Certified Paramedic
Makey Christenhan	EMS Instructor	AS in EMS
McKay, Christopher	EMIS Instructor	Seminole State College of FL
		FL State Certified Paramedic
Montag, Jason	EMT/Paramedic Instructor	AS in EMS
		Broward State College
		FL State Certified Paramedic
Moreno, Al	EMT/Paramedic Instructor	AA
		Palm Beach State
		FL State Certified Paramedic
Parada, Alexander	EMS Instructor	BS Biology
		St Leo University
		FL State Certified Paramedic
Pardon, Brendan	EMS Instructor	AS in EMS
		American Medical Academy

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Permenter, Steven	EMS Instructor	BS in International Studies University of Central Florida FL State Certified Paramedic	
Phillips, Paul	EMS Instructor	BA in Communications Lynn University FL State Certified Paramedic	
Piester, Trevor	EMS Instructor	BBA Northwood University FL State Certified Paramedic	
Ramirez, Leonardo	EMS Instructor	BS in Criminal Justice Alabama State University FL State Certified Paramedic	
Reeves, James	EMT/Paramedic Instructor	AS in Fire Science Columbia Southern University FL State Certified Paramedic	
Saleh, Aiman	EMS/EMT Instructor	AS in EMS HCI College FL State Certified Paramedic	
Sharman, Ryan	EMS/EMT Instructor	BA in Hospitality Management Lynn University FL State Certified Paramedic NREMT-P	
Stolpman, Richard	EMT/Paramedic Instructor	AA in Health Sciences University of Northern Florida FL State Certified Paramedic	
Varano, Eric	EMT/Paramedic Instructor	AS in EMS Palm Beach State College FL State Certified Paramedic	
Whitmore, Chris	EMT/Paramedic Instructor	BS in Business Management State University of New York at Fredonia FL State Certified Paramedic	
Zeltmann, Daniel	EMS Instructor	BS in Organizational Management Florida Atlantic University FL State Certified Paramedic	

Fort Lauderdale

Arias, Bernard	EMS Instructor	AS in EMS
		HCI College
		FL State Certified
		Firefighter/Paramedic
Bevins, Lisa	EMS Instructor	AS in EMS
		Broward College

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		FL State Certified aramedic
Cecil, James	EMS Instructor	ADN/RN, Paramedic Emergency Education Institute NREMT Paramedic
Charles, Jackson	EMS Instructor	AS in Fire science Columbia Southern University FL State Certified Firefighter/Paramedic
De La Torre, Alexis	EMS Instructor	AS in Fire Science Columbia Southern University FL State Certified Firefighter/Paramedic
Demierre, J.P.	EMS Instructor	AS in Fire Science and EMS Broward College FL State Certified Firefighter/Paramedic
Ferris, Daniel	EMS Instructor	AS in EMS HCI College FL State Certified Firefighter/Paramedic
Leger, Wilson	EMS Instructor	AS in EMS Broward College FL State Certified Firefighter/Paramedic
Petit-Frere, Clovis	EMS Instructor	AS in EMS Broward College FL State Certified Firefighter/Paramedic
Vallejo, Geovanny	EMS Instructor Clinical Coordinator	AS Fire Science Broward College FL State Certified Firefighter/Paramedic
Watler, Chris	EMS Instructor	AS EMS Broward College FL State Certified Firefighter/Paramedic
Wasa, Alex	EMS Instructor	AS in EMS NREMT Paramedic
Williams, Brad	EMS Instructor	AS in EMS Palm Beach State College FL State Certified Firefighter/Paramedic

General Education Instructors and Online Instructors

Berger, Bari	Nursing	MSN, MBA University of Phoenix	
Birchbauer, Jennifer	General Psychology Developmental Psychology Human Growth and Development	MA - Psychology Argosy University	
Gene Gerard	History University of Oklahoma		
Huwe, Dr. Michael	Anatomy & Physiology	MD, Chiropractic Medicine Logan College of Chiropractic	
Mahler, Victoria	English Composition I American Literature Speech	MAED - English East Carolina University	
McPartland, Dr. Shawn	Anatomy & Physiology I Anatomy & Physiology II Microbiology	MD Medicine State University of New York	
Neuman, Amanda	Speech	MA -Communications/Speech Central Michigan University	
Nottingham, Dr. Stacey	Anatomy & Physiology I Anatomy & Physiology II	DC LIFE University	
Summer, Jonathan	Liberal Arts Math	MS Mathematics University of Nevada – Las Vegas	
Wasserman, Dr. Gail	Elements of Nutrition	DC New York Chiropractic College MS - Human Nutrition University of Bridgeport	
Williams, Dr. Teresa	Speech	Ed.D. Educational Leadership Argosy University MS Technical and Professional Communications Kennesaw State University	
Wilson, Dr. Rebecca	Psychology Human Growth and Development	PsyD California Southern University MS – Education Community and College Counseling Longwood University	

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Appendix

ACCSC Complaint Form

Name of Complainant:				
Address:				
City:	State	Zip Code:		
Telephone Number:				
School Name:				
School Address:				
School City:	State:	Zip Code:		
Telephone Number:				

INSTRUCTIONS

- 1. Please attach a statement describing the nature of the complaint. The statement should include a description of the events or circumstances upon which the complaint is based and the names and titles (if any) of the individuals involved.
- 2. In order for a complaint to be processed and considered by the Commission, you must give written permission for the complaint to be forwarded to the school for a response. If you do grant the Commission permission, please sign your name in the space provided below.

STATEMENT GRANTING PERMISSION TO FORWARD COMPLAINT TO SCHOOL

I certify that the information I have provided is correct to the best of my knowledge and grant permission for the complaint to be forwarded to the school for a response.

Signature:

Date:

The response and the complaint will be kept on file for future reference.

SUBMIT TO: Executive Director Accrediting Commission of Career Schools and Colleges 2101 Wilson Boulevard / Suite 302 Arlington, Virginia 22201

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Consumer Information Guide & Student Right to Know - West Palm Beach

The *Higher Education Opportunity Act* (HEOA) of 2008 requires that Institutions make available to their student's information regarding placement rates, including the methodology and time frame applicable to the rates. Data is taken directly from the Annual Reports submitted to *Accrediting Commission of Career Schools and Colleges* (ACCSC) for the reporting period based on the length of the program in months and the Florida Board of Nursing for NCLEX-RN licensure pass rates by calendar year. This information is compiled based on the requirements of our accrediting body and state regulations. Information is maintained, tracked and updated in our student data base system.

Program	Degree Type	Length in Months	Reporting Period	Completion	Placement (Employed in Field/Available for Employment)	Licensure
Emergency Medical	AS	24	(2020) 4/1/2016 – 3/31/2017	100%	96% (23/24)	No Exam
Services			(2019) 4/1/2015 – 3/31/2016	79%	100% (19/19)	No Exam
			(2018) 4/1/2014 – 3/31/2015	100	100% (11/11)	No Exam
			(2017) 4/1/2013 – 3/31/2014	100	100% (3/3)	No Exam
			(2016) 4/1/2012 – 3/31/2013	-	-	No Exam
			(2015) 4/1/2011 – 3/31/2012	-	-	No Exam
			(2014) 4/1/2010 – 3/31/2011	100%	100% (73/73)	No Exam
			(2013) 4/1/2009 – 3/31/2010	100%	88% (29/33)	No Exam
			(2012) 4/1/2008 – 3/31/2009	100%	90% (9/10)	No Exam
Emergency Medical	Diploma	4	(2020) 10/1/2018 – 9/30/2019	68%	55% (41/76)	73%
Technician			(2019) 10/1/2017 – 9/30/2018	78%	55% (41/74)	74%
			(2018) 10/1/2016 – 9/30/2017	86%	59% (30/51)	78%
			(2017) 10/1/2015 – 9/30/2016	78%	75% (21/28)	82%
			(2016) 10/1/2014 – 9/30/2015	86%	80% (4/5)	61%
			(2015) 10/1/2013 – 9/30/2014	88%	81% (13/16)	70%
			(2014) 10/1/2012 – 9/30/2013	86%	62% (39/63)	64%
			(2013) 10/1/2011 – 9/30/2012	93%	77% (44/57)	-
			(2012) 10/1/2010 – 9/30/2011	92%	76% (13/17)	90%
Fire Science	AS	24	(2020) 4/1/2015 – 3/31/2016	100%	100% (1/1)	No Exam
			(2019) 4/1/2015 – 3/31/2016	-	-	No Exam
			(2018) 4/1/2014 – 3/31/2015	-	-	No Exam
			(2017) 4/1/2013 – 3/31/2014	-	-	No Exam
			(2016) 4/1/2012 – 3/31/2013	-	-	No Exam
			(2015) 4/1/2011 – 3/31/2012	-	-	No Exam
			(2014) 4/1/2010 - 3/31/2011	100%	100% (4/4)	No Exam
			(2013) 4/1/2009 – 3/31/2010	100%	100% (8/8)	No Exam
			(2012) 4/1/2008 - 3/31/2009	100%	100% (3/3)	No Exam
Nursing	ADN	20	(2020) 10/1/2016 – 9/30/2017	62%	48% (61/126)	61%
			(2019) 10/1/2015 – 9/30/2016	53%	58% (41/71)	41%
			(2018) 10/1/2014 – 9/30/2015	87%	70% (74/106)	78%

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			(2017) 4/1/2014 – 3/31/2015	87%	75% (36/48)	26%
			(2016) 4/1/2013 – 3/31/2014	-	-	-
			(2015) 4/1/2012 – 3/31/2013	-	-	-
			(2014) 4/1/2011 – 3/31/2012	-	-	-
			(2013) 4/1/2010 – 3/31/2011	-	-	-
	FL Board o	of Nursing	(2020) 1/1/2020 – 12/31/2020 (NCLEX Code: 704146)	Below	Benchmark	72%
	FL Board o	of Nursing	(2020) 1/1/2020 – 12/31/2020 (NCLEX Code: 707055)	Below	Benchmark	56%
	FL Board o	of Nursing	(2019) 1/1/2019 – 12/31/2019	Below	Benchmark	41%
	FL Board o	of Nursing	(2018) 1/1/2018 – 12/31/2018	Below	Benchmark	54%
	FL Board o	of Nursing	(2017) 1/1/2017 – 12/31/2017	Below	Benchmark	59%
	FL Board o	of Nursing	(2016) 1/1/2016 – 12/31/2016	Below	Benchmark	69%
	FL Board o	of Nursing	(2015) 1/1/2015 – 12/31/2015	Below	Benchmark	63%
	FL Board o	of Nursing	(2014) 1/1/2014 - 12/31/2014	Below	Benchmark	26%
Paramedic	Diploma	12	(2020) 10/1/2017 – 9/30/2018	100%	85% (44/52)	67%
			(2019) 10/1/2016 – 9/30/2017	58%	92% (48/52)	94%
			(2018) 10/1/2015 – 9/30/2016	71%	92% (36/39)	71%
			(2017) 10/1/2014 – 9/30/2015	83%	88% (21/24)	76%
			(2016) 10/1/2013 – 9/30/2014	84%	70% (16/23)	84 %
			(2015) 10/1/2012 – 9/30/2013	75%	73% (27/37)	100%
			(2014) 10/1/2011 – 9/30/2012	70%	70% (23/33)	71%
			(2013) 10/1/2010 – 9/30/2011	70%	86% (18/21)	-
			(2012) 10/1/2009 – 9/30/2010	79%	76% (48/63)	94%
RN to BSN	BSN	24	(2020) 4/1/2016 – 3/31/2017	0% (0/1)	-	No Exam
			(2019) 4/1/2015 – 3/31/2016	-	-	No Exam
			(2018) 4/1/2014 - 3/31/2015	-	-	No Exam
			(2017) 4/1/2013 - 3/31/2014	-	-	No Exam
			(2016) 4/1/2012 - 3/31/2013	-	-	No Exam
			(2015) 4/1/2011 - 3/31/2012	-	-	No Exam
			(2014) 4/1/2010 - 3/31/2011	-	-	No Exam
			(2013) 4/1/2009 - 3/31/2010	-	-	No Exam

Key:

No Exam: Licensure/Certification not required to work in the State of Florida.

(-): No Graduates in the reporting year indicated, meaning no placement or licensure activity during this time period.

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Program	Degree Type	Length in Months	Reporting Period	Completion	Placement (Employed in Field/Available for Employment)	Licensure
Nursing	ADN	20	(2020) 10/1/2016 – 9/30/2017	20%	83% (5/6)	100%
			(2019) 10/1/2015 – 9/30/2016	-	-	-
			(2018) 10/1/2014 – 9/30/2015	-	-	-
			(2017) 10/1/2013 – 9/30/2014	-	-	-
			(2016) 10/1/2012 – 9/30/2013	-	-	-
	FL Board o	of Nursing	(2020) 1/1/2020 – 12/31/2020	Below Benchmark		60%
	FL Board o	of Nursing	(2019) 1/1/2019 – 12/31/2019	Meets/exceed benchmark		80%
	FL Board o	of Nursing	(2018) 1/1/2018 – 12/31/2018		-	-
	FL Board o	of Nursing	(2017) 1/1/2017 – 12/31/2017		-	-

Program	Degree Type	Length in Months	Reporting Period	Completion	Placement (Employed in Field/Available for Employment)	Licensure
Emergency Medical	Diploma	4	(2020) 10/1/2018 – 9/30/2019	65%	59% (20/34)	72%
Technician			(2019) 10/1/2017 – 9/30/2018	78%	29% (5/17)	56%
			(2018) 10/1/2016 – 9/30/2017	-	-	-
			(2017) 10/1/2015 – 9/30/2016	-	-	-
			(2016) 10/1/2014 – 9/30/2015	-	-	-
Paramedic	Diploma	12	(2020) 10/1/2016 – 9/30/2017	33%	100% (1/1)	100%
			(2019) 10/1/2016 – 9/30/2017	-	-	-
			(2018) 10/1/2015 – 9/30/2016	-	-	-
			(2017) 10/1/2014 – 9/30/2015	-	-	-
			(2016) 10/1/2013 – 9/30/2014	-	-	-

Key:

No Exam: Licensure/Certification not required to work in the State of Florida.

(-): No Graduates in the reporting year indicated, meaning no placement or licensure activity during this time period.

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Academic Calendar 2019 - 2024: West Palm Beach (Main Campus)

Terms	Start Date	End Date	Break	Holidays	Orientation				
Full Term	9/3/2019	12/21/2019	11/28/2019 -		Wed - 08/28/2019 - EMT & PARA				
Mini - Term - A	9/3/2019	10/19/2019	11/29/2019	11/11/2019 - Veteran's Day	Thurs - 08/29/2019 - Nursing				
Mini - Term - B	10/28/2019	12/21/2019	Thanksgiving Break		Thurs - 10/24/2019 - Nursing Mid				
	Winter Break 12/22/2019 - 1/5/2020								

HCI College - West Palm Beach Campus 2019 Calendar

HCI College - West Palm Beach Campus 2020 Calendar

Terms	Start Date	End Date	Break	Holidays	Orientation
Full Term	1/6/2020	4/25/2020	3/22/2020 -		Thurs -1/2/2020 - EMT & PARA
Mini - Term - A	1/6/2020	2/22/2020	3/29/2020 Spring	1/20/2020 - MLK Jr. Day	Fri - 1/3/2020 - Nursing
Mini - Term - B	3/2/2020	4/25/2020	Break		Thurs - 2/27/2020 - Nursing Mid

Term Code	Start Date	End Date	Break	Holidays	Orientation
Full Term	5/4/2020	8/22/2020			Wed - 4/29/2020 - EMT & PARA
Mini - Term - A	5/4/2020	6/20/2020	6/28/2020 - 7/5/2020 Summer Break	5/25/2020 - Memorial Day	Thurs - 4/30/2020 - Nursing
Mini - Term - B	7/6/2020	8/22/2020			Thurs -7/2/2020 - Nursing Mid

Term Code	Start Date	End Date	Break	Holidays	Orientation			
Full Term	8/31/2020	12/19/2020	11/22/2020 -		Wed - 08/26/2020 - EMT & PARA			
Mini - Term - A	8/31/2020	10/17/2020	11/29/2020	9/7/2020- Labor Day	Thurs - 08/27/2020 - Nursing			
Mini - Term - B	10/26/2020	12/19/2020	Thanksgiving Break		Thurs - 10/22/2020 - Nursing Mid			
	Winter Break 12/20/2020 - 01/10/2021							

HCI College - West Palm Beach Campus 2021 Calendar Terms Start Date End Date Break Holidays Orientation Full Term 1/11/2021 5/1/2021 Wed -1/6/2021 - EMT & PARA 3/28/2021 - 4/4/2021 1/18/2021 - MLK Jr. Day Mini - Term - A 1/11/2021 2/27/2021 Thurs - 1/7/2021 - Nursing Spring Break 3/8/2021 5/1/2021 Mini - Term - B Thurs - 3/4/2021 - Nursing Mid

Term Code	Start Date	End Date	Break	Holidays	Orientation
Full Term	5/10/2021	8/28/2021			Wed - 5/5/2021 - EMT & PARA
Mini - Term - A	5/10/2021	6/26/2021	7/4/2021 - 7/11/2021 Summer Break	5/31/2021 - Memorial Day	Thurs - 5/6/2021 - Nursing
Mini - Term - B	7/12/2021	8/28/2021			Thurs -7/8/2021 - Nursing Mid

Term Code	Start Date	End Date	Break	Holidays	Orientation			
Full Term	9/7/2021	12/18/2021	11/25/2021 -		Wed - 09/01/2021 - EMT & PARA			
Mini - Term - A	9/7/2021	10/23/2021	11/26/2021		Thurs - 09/02/2021 - Nursing			
Mini - Term - B	11/1/2021	12/18/2021	Thanksgiving Break		Thurs - 10/28/2021 - Nursing Mid			
	Winter Break 2/19/2021 - 01/09/2022							

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HCI College - West Palm Beach Campus 2022 Calendar

Term Code	Start Date	End Date	Break	Holidays	Orientation		
Full Term	1/10/2022	4/30/2022			Wed -1/5/2022 - EMT & PARA		
Mini - Term - A	1/10/2022	2/26/2022	3/27/2022 - 4/3/2022 Spring Break	1/17/2022 - MLK Jr. Day	Thurs - 1/6/2022 - Nursing		
Mini - Term - B	3/7/2022	4/30/2022	opinig break		Thurs - 3/3/2022 - Nursing Mid		
Term Code	Start Date	End Date	Break	Holidays	Orientation		
Full Term	5/9/2022	8/27/2022			Wed - 5/4/2022 - EMT & PARA		
Mini - Term - A	5/9/2022	6/25/2022	7/3/2022 - 7/10/2022	5/30/2022 - Memorial Day	Thurs - 5/5/2022 - Nursing		
Mini - Term - B	7/11/2022	8/27/2022	Summer Break		Thurs - 7/7/2022 - Nursing Mid		
Term Code	Start Date	End Date	Break	Holidays	Orientation		
Full Term	9/6/2022	12/17/2022	11/24/2022 -		Wed - 08/31/2022 - EMT & PARA		
Mini - Term - A	9/6/2022	10/22/2022	11/25/2022 Thanksgiving Break	09/05/2022 - Labor Day	Thurs - 09/01/2022 - Nursing		
Mini - Term - B	10/31/2022	12/17/2022	Thanksgiving Break	<u> </u>	Thurs - 10/27/2022 - Nursing Mid		
Winter Break 12/18/2022 - 01/08/2023							
			Winter Break 12/18	3/2022 - 01/08/2023			
		Н		2/2022 - 01/08/2023 Pach Campus 2023 Calendar			
		Н		· · · · ·			
Term Code	Start Date	H End Date		· · · · ·	Orientation		
Term Code Full Term	Start Date 1/9/2023		CI College - West Palm Be Break	ach Campus 2023 Calendar	Orientation Wed -1/4/2023 - EMT & PARA		
		End Date	Cl College - West Palm Be Break 3/26/2023 - 4/2/2023	ach Campus 2023 Calendar			
Full Term	1/9/2023	End Date 4/29/2023	CI College - West Palm Be Break	ach Campus 2023 Calendar Holidays	Wed -1/4/2023 - EMT & PARA		
Full Term Mini - Term - A	1/9/2023 1/9/2023	End Date 4/29/2023 2/25/2023	Cl College - West Palm Be Break 3/26/2023 - 4/2/2023	ach Campus 2023 Calendar Holidays	Wed -1/4/2023 - EMT & PARA Thurs - 1/5/2023 - Nursing		
Full Term Mini - Term - A Mini - Term - B	1/9/2023 1/9/2023 3/6/2023	End Date 4/29/2023 2/25/2023 4/29/2023	CI College - West Palm Be Break 3/26/2023 - 4/2/2023 Spring Break Break	Holidays 1/16/2023 - MLK Jr. Day	Wed -1/4/2023 - EMT & PARA Thurs - 1/5/2023 - Nursing Thurs - 3/2/2023 - Nursing Mid		
Full Term Mini - Term - A Mini - Term - B Term Code	1/9/2023 1/9/2023 3/6/2023 Start Date	End Date 4/29/2023 2/25/2023 4/29/2023 End Date	Cl College - West Palm Be Break 3/26/2023 - 4/2/2023 Spring Break Break 7/2/2023 - 7/09/2023	Holidays 1/16/2023 - MLK Jr. Day	Wed -1/4/2023 - EMT & PARA Thurs - 1/5/2023 - Nursing Thurs - 3/2/2023 - Nursing Mid Orientation		
Full Term Mini - Term - A Mini - Term - B Term Code Full Term	1/9/2023 1/9/2023 3/6/2023 Start Date 5/8/2023	End Date 4/29/2023 2/25/2023 4/29/2023 End Date 8/26/2023	CI College - West Palm Be Break 3/26/2023 - 4/2/2023 Spring Break Break	Holidays 1/16/2023 - MLK Jr. Day Holidays	Wed -1/4/2023 - EMT & PARA Thurs - 1/5/2023 - Nursing Thurs - 3/2/2023 - Nursing Mid Orientation Wed - 5/3/2023 - EMT & PARA		
Full Term Mini - Term - A Mini - Term - B Term Code Full Term Mini - Term - A Mini - Term - B	1/9/2023 1/9/2023 3/6/2023 Start Date 5/8/2023 5/8/2023 7/10/2023	End Date 4/29/2023 2/25/2023 4/29/2023 End Date 8/26/2023 6/24/2023	CI College - West Palm Be Break 3/26/2023 - 4/2/2023 Spring Break Break 7/2/2023 - 7/09/2023 Summer Break	Holidays 1/16/2023 - MLK Jr. Day Holidays 5/29/2023 - Memorial Day	Wed -1/4/2023 - EMT & PARA Thurs - 1/5/2023 - Nursing Thurs - 3/2/2023 - Nursing Mid Orientation Wed - 5/3/2023 - EMT & PARA Thurs - 5/4/2023 - Nursing Thurs - 7/6/2023 - Nursing Mid		
Full Term Mini - Term - A Mini - Term - B Term Code Full Term Mini - Term - A Mini - Term - B Term Code	1/9/2023 1/9/2023 3/6/2023 Start Date 5/8/2023 5/8/2023 7/10/2023 Start Date	End Date 4/29/2023 2/25/2023 4/29/2023 8/26/2023 6/24/2023 8/26/2023 End Date	CI College - West Palm Be Break 3/26/2023 - 4/2/2023 Spring Break Break 7/2/2023 - 7/09/2023 Summer Break Break	Holidays 1/16/2023 - MLK Jr. Day Holidays	Wed -1/4/2023 - EMT & PARA Thurs - 1/5/2023 - Nursing Thurs - 3/2/2023 - Nursing Mid Orientation Wed - 5/3/2023 - EMT & PARA Thurs - 5/4/2023 - Nursing Thurs - 7/6/2023 - Nursing Mid		
Full Term Mini - Term - A Mini - Term - B Term Code Full Term Mini - Term - A Mini - Term - B Term Code Full Term	1/9/2023 1/9/2023 3/6/2023 Start Date 5/8/2023 5/8/2023 7/10/2023 Start Date 9/5/2023	End Date 4/29/2023 2/25/2023 4/29/2023 6/24/2023 6/24/2023 8/26/2023 8/26/2023 End Date 12/16/2023	Cl College - West Palm Be Break 3/26/2023 - 4/2/2023 Spring Break Break 7/2/2023 - 7/09/2023 Summer Break Break 11/23/2023 -	Holidays 5/29/2023 - Memorial Day Holidays	Wed -1/4/2023 - EMT & PARA Thurs - 1/5/2023 - Nursing Thurs - 3/2/2023 - Nursing Mid Orientation Wed - 5/3/2023 - EMT & PARA Thurs - 5/4/2023 - Nursing Thurs - 7/6/2023 - Nursing Mid Orientation Wed - 08/30/2023 - EMT & PARA		
Full Term Mini - Term - A Mini - Term - B Term Code Full Term Mini - Term - A Mini - Term - B Term Code	1/9/2023 1/9/2023 3/6/2023 Start Date 5/8/2023 5/8/2023 7/10/2023 Start Date	End Date 4/29/2023 2/25/2023 4/29/2023 8/26/2023 6/24/2023 8/26/2023 End Date	CI College - West Palm Be Break 3/26/2023 - 4/2/2023 Spring Break Break 7/2/2023 - 7/09/2023 Summer Break Break	Holidays 1/16/2023 - MLK Jr. Day Holidays 5/29/2023 - Memorial Day	Wed -1/4/2023 - EMT & PARA Thurs - 1/5/2023 - Nursing Thurs - 3/2/2023 - Nursing Mid Orientation Wed - 5/3/2023 - EMT & PARA Thurs - 5/4/2023 - Nursing Thurs - 7/6/2023 - Nursing Mid Orientation		

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Academic Calendar 2019 - 2024: Fort Lauderdale (Branch of West Palm Beach)

	HCI College - Fort Lauderdale Campus 2019 Calendar									
Terms	Start Date	End Date	Break	Holidays	Orientation					
EMT/PARA	9/3/2019	12/21/2019	11/28/2019 -	11/11/2019 -	Wed - 08/28/2019 - EMT & PARA					
Full Term Nursing	10/28/2019	2/22/2020	11/29/2019 Thanksgiving Break	Veteran's Day	Thurs- 10/24/2019- Nursing					
Mini - Term - A	10/28/2019	12/21/2019	12/22/2019-1/5/2020	1/20/2020 - MLK Jr.						
Mini - Term - B	1/6/2020	2/22/2020	Winter Break	Day	Thurs- 1/2/2020- Nursing Mid					

Terms	Start Date	End Date	Break	Holidays	Orientation
EMT/PARA	1/6/2020	4/25/2020			Thurs -1/2/2020 - EMT & PARA
Full Term Nursing	3/2/2020	6/20/2020	3/22/2020 - 3/29/2020	5/25/2020 - Memorial	Fri - 2/27/2020 - Nursing
Mini - Term - A	3/2/2020	4/25/2020	Spring Break	Day	
Mini - Term - B	5/4/2020	6/20/2020			Thurs - 4/30/2020 - Nursing Mid

Terms	Start Date	End Date	Break	Holidays	Orientation
EMT/PARA	5/4/2020	8/22/2020			Wed - 4/29/2020 - EMT & PARA
Full Term Nursing	7/6/2020	10/17/2020	6/28/2020 - 7/5/2020 Summer Break (EMT & PARA)	5/25/2020 - Memorial Day (EMT & PARA) 9/7/2020- Labor Day	Thurs -7/2/2020 - Nursing
Mini - Term - A	7/6/2020	8/22/2020			
Mini - Term - B	8/31/2020	10/17/2020			Thurs -8/27/2020 - Nursing Mid
Terms	Start Date	End Date	Burst		
	Start Date	End Date	Break	Holidays	Orientation
EMT/PARA	8/31/2020	12/19/2020	11/22/2020 -	Holidays	Orientation Wed - 08/26/2020 - EMT & PARA
EMT/PARA Full Term Nursing			11/22/2020 - 11/29/2020		
•	8/31/2020	12/19/2020	11/22/2020 -	Holidays 1/18/2021- MLK Jr. Day	Wed - 08/26/2020 - EMT & PARA

HCI College	 Fort Lauderdale 	e Campus 2021	L Calendar

Terms	Start Date	End Date	Break	Holidays	Orientation
EMT/PARA	1/11/2021	5/1/2021		1/18/2021- MLK Jr.	Wed -1/6/2021 - EMT & PARA
Full Term Nursing	3/8/2021	6/26/2021	3/28/2021 - 4/4/2021	Day (EMT & PARA)	Thurs - 3/4/2021 - Nursing
Mini - Term - A	3/8/2021	5/1/2021	Spring Break	5/31/2021 -	
Mini - Term - B	5/10/2021	6/26/2021		Memorial Day	Thurs - 5/6/2021 - Nursing Mid

Terms	Start Date	End Date	Break	Holidays	Orientation
EMT/PARA	5/10/2021	8/28/2021			Wed - 5/5/2021 - EMT & PARA
Full Term Nursing	7/12/2021	10/23/2021	7/4/2021 - 7/11/2021 Summer Break (EMT &	5/31/2021 - Memorial Day (EMT & PARA)	Thurs -7/8/2021 - Nursing
Mini - Term - A	7/12/2021	8/28/2021	PARA)	9/6/2021- Labor Day	
Mini - Term - B	9/7/2021	10/23/2021			Thurs - 09/02/2021 - Nursing Mid
Terms	Start Date	End Date	Break	Holidays	Orientation
Terms EMT/PARA	Start Date 9/7/2021	End Date 12/18/2021	11/25/2021 -	Holidays	Orientation Wed - 09/01/2021 - EMT & PARA
			11/25/2021 - 11/26/2021		
EMT/PARA	9/7/2021	12/18/2021	11/25/2021 -	Holidays 1/17/2022- MLK Jr. Day	Wed - 09/01/2021 - EMT & PARA

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	HCI C	ollege - Fort Lauderdale Ca	mpus 2022 Calendar	
Start Date	End Date	Break	Holidays	Orientation
1/10/2022	4/30/2022		1/17/2022 MUK IF	Wed -1/5/2022 - EMT & PARA
3/7/2022	6/25/2022	3/27/2022 - 4/3/2022 Day (EMT & PARA) Spring Break 5/30/2022 - Memorial Day		Thurs - 3/3/2022 - Nursing
3/7/2022	4/30/2022			
5/9/2022	6/25/2022		Thurs - 5/5/2022 - Nursing Mid	
Start Date	End Date	Break	Holidays	Orientation
5/9/2022	8/27/2022			Wed - 5/4/2022 - EMT & PARA
7/11/2022	10/22/2022			Thurs - 7/7/2022 - Nursing
7/11/2022	8/27/2022	PARA)	9/5/2022- Labor Day	
9/6/2022	10/22/2022			Thurs - 09/01/2022 - Nursing Mid
	r	1	T	
Start Date	End Date	Break	Holidays	Orientation
9/6/2022	12/17/2022	11/25/2022 Thanksgiving Break 12/18/2022 - 01/01/2023 Winter	Day 1/16/2023- MLK Jr. Day	Wed - 08/31/2022 - EMT & PARA
10/31/2022	2/25/2023			Thurs - 10/27/2022 - Nursing
10/31/2022	12/17/2022			
1/9/2023	2/25/2023			Thurs - 1/5/2023 Nursing Mid
		allogo - Fort Laudordalo Ca	mpus 2022 Calendar	
	ilei ei	bliege - i bit Ladderdale Cal	inpus 2025 Calendar	
Start Date	End Date	Break	Holidays	Orientation
1/9/2023	4/29/2023		1/16/2022 MUK Ir	Wed -1/4/2023 - EMT & PARA
3/6/2023	6/24/2023	3/26/2023 - 4/2/2023	Day (EMT & PARA)	Thurs - 3/2/2023 - Nursing
3/6/2023	4/29/2023	Spring Break	5/29/2023 - Memorial	
5/8/2023	6/24/2023		Day	Thurs - 5/4/2023 - Nursing Mid
Start Date	End Date	Break	Holidays	Orientation
5/8/2023	8/26/2023	7/2/2022 7/00/2022	E/20/2022 Mamorial	Wed - 5/3/2023 - EMT & PARA
7/10/2023	10/21/2023			Thurs -7/6/2023 - Nursing
7/10/2023	8/26/2023	PARA)	9/4/2023- Labor Day	
9/5/2023	10/21/2023			Thurs -08/31/2023 - Nursing Mid
Start Date	End Date	Break	Holidays	Orientation
	1/10/2022 3/7/2022 3/7/2022 5/9/2022 5/9/2022 7/11/2022 7/11/2022 9/6/2022 10/31/2022 10/31/2022 10/31/2022 10/31/2022 10/31/2022 3/6/2023 3/6/2023 3/6/2023 3/6/2023 3/6/2023 5/8/2023 5/8/2023 5/8/2023 7/10/2023	Start Date End Date 1/10/2022 4/30/2022 3/7/2022 6/25/2022 3/7/2022 6/25/2022 3/7/2022 6/25/2022 3/7/2022 6/25/2022 5/9/2022 6/25/2022 Start Date End Date 5/9/2022 8/27/2022 7/11/2022 8/27/2022 7/11/2022 8/27/2022 9/6/2022 10/22/2022 9/6/2022 10/22/2022 9/6/2022 12/17/2022 10/31/2022 2/25/2023 10/31/2022 12/25/2023 10/31/2022 12/25/2023 10/31/2022 12/25/2023 10/31/2022 12/25/2023 3/6/2023 2/25/2023 3/6/2023 6/24/2023 3/6/2023 6/24/2023 3/6/2023 6/24/2023 3/6/2023 6/24/2023 3/6/2023 6/24/2023 3/6/2023 8/26/2023 3/6/2023 8/26/2023 7/10/2023 8/26/2023 <td>Start Date End Date Break 1/10/2022 4/30/2022 3/27/2022 - 4/3/2022 3/7/2022 6/25/2022 3/27/2022 - 4/3/2022 3/7/2022 4/30/2022 Spring Break 3/7/2022 4/30/2022 Spring Break 3/7/2022 6/25/2022 Spring Break 5/9/2022 6/25/2022 Spring Break 5/9/2022 8/27/2022 7/3/2022 - 7/10/2022 7/11/2022 8/27/2022 Marce Break 7/11/2022 10/22/2022 T/3/2022 - 7/10/2022 7/11/2022 10/22/2022 Marce Break 9/6/2022 10/22/2022 T/3/2022 - 7/10/2022 10/31/2022 12/17/2022 11/25/2022 10/31/2022 12/25/2023 Thanksgiving Break 10/31/2022 12/25/2023 Break 1/9/2023 2/25/2023 Break 1/9/2023 4/29/2023 3/26/2023 - 4/2/2023 3/6/2023 6/24/2023 Spring Break 1/9/2023 4/29/2023 Spring Break 3/6/2023 6/24/2023<td>1/10/2022 4/30/2022 3/7/2022 6/25/2022 3/7/2022 6/25/2022 3/7/2022 6/25/2022 Spring Break L1/17/2022 - MEK Jr. Day (EMT & PARA) 5/9/2022 6/25/2022 Start Date End Date S/9/2022 8/27/2022 7/11/2022 8/27/2022 7/11/2022 8/27/2022 7/11/2022 8/27/2022 7/11/2022 10/22/2022 7/11/2022 8/27/2022 9/6/2022 10/22/2022 10/31/2022 12/17/2022 11/24/2022 - 11/25/2022 10/31/2022 12/25/2023 Thanksgiving Break Jr. Day 10/31/2022 12/25/2023 Thanksgiving Break Jr. Day 1/11/26/2023 - MEK Jr. Day 3/6/2023 6/24/2023 3/6/2023 6/24/2023 3/26/2023 6/24/2023 3/26/2023 8/26/2023 5/8/2023 8/26/2023 7/10/2023 10/21/2023</td></td>	Start Date End Date Break 1/10/2022 4/30/2022 3/27/2022 - 4/3/2022 3/7/2022 6/25/2022 3/27/2022 - 4/3/2022 3/7/2022 4/30/2022 Spring Break 3/7/2022 4/30/2022 Spring Break 3/7/2022 6/25/2022 Spring Break 5/9/2022 6/25/2022 Spring Break 5/9/2022 8/27/2022 7/3/2022 - 7/10/2022 7/11/2022 8/27/2022 Marce Break 7/11/2022 10/22/2022 T/3/2022 - 7/10/2022 7/11/2022 10/22/2022 Marce Break 9/6/2022 10/22/2022 T/3/2022 - 7/10/2022 10/31/2022 12/17/2022 11/25/2022 10/31/2022 12/25/2023 Thanksgiving Break 10/31/2022 12/25/2023 Break 1/9/2023 2/25/2023 Break 1/9/2023 4/29/2023 3/26/2023 - 4/2/2023 3/6/2023 6/24/2023 Spring Break 1/9/2023 4/29/2023 Spring Break 3/6/2023 6/24/2023 <td>1/10/2022 4/30/2022 3/7/2022 6/25/2022 3/7/2022 6/25/2022 3/7/2022 6/25/2022 Spring Break L1/17/2022 - MEK Jr. Day (EMT & PARA) 5/9/2022 6/25/2022 Start Date End Date S/9/2022 8/27/2022 7/11/2022 8/27/2022 7/11/2022 8/27/2022 7/11/2022 8/27/2022 7/11/2022 10/22/2022 7/11/2022 8/27/2022 9/6/2022 10/22/2022 10/31/2022 12/17/2022 11/24/2022 - 11/25/2022 10/31/2022 12/25/2023 Thanksgiving Break Jr. Day 10/31/2022 12/25/2023 Thanksgiving Break Jr. Day 1/11/26/2023 - MEK Jr. Day 3/6/2023 6/24/2023 3/6/2023 6/24/2023 3/26/2023 6/24/2023 3/26/2023 8/26/2023 5/8/2023 8/26/2023 7/10/2023 10/21/2023</td>	1/10/2022 4/30/2022 3/7/2022 6/25/2022 3/7/2022 6/25/2022 3/7/2022 6/25/2022 Spring Break L1/17/2022 - MEK Jr. Day (EMT & PARA) 5/9/2022 6/25/2022 Start Date End Date S/9/2022 8/27/2022 7/11/2022 8/27/2022 7/11/2022 8/27/2022 7/11/2022 8/27/2022 7/11/2022 10/22/2022 7/11/2022 8/27/2022 9/6/2022 10/22/2022 10/31/2022 12/17/2022 11/24/2022 - 11/25/2022 10/31/2022 12/25/2023 Thanksgiving Break Jr. Day 10/31/2022 12/25/2023 Thanksgiving Break Jr. Day 1/11/26/2023 - MEK Jr. Day 3/6/2023 6/24/2023 3/6/2023 6/24/2023 3/26/2023 6/24/2023 3/26/2023 8/26/2023 5/8/2023 8/26/2023 7/10/2023 10/21/2023

Full Term Nursing

Mini - Term - A

Mini - Term - B

10/30/2023

10/30/2023

1/8/2024

2/24/2024

12/16/2023

2/24/2024

11/24/2023

Thanksgiving Break

12/24/2023 -

01/07/2024 Winter

Break

Day 1/15/2024 MLK Jr.

Day

Thurs - 10/26/2023 - Nursing

Thurs - 1/4/2024 - Nursing Mid



Catalog Addendum No. 1 2021 Catalog, Volume IV Addendum Effective: April 28, 2021

Medical Assisting Diploma Program (Offered at the Fort Lauderdale location)

36 semester credits: approximately 1050 clock hours, 3 semesters, 10 months

The Medical Assisting diploma program is designed to prepare students for positions as entry-level medical assistants in a physician's office, or other medical facilities. This program focuses on providing instruction, through a combination of classroom, laboratory and clinical experiences, in the skills necessary to assist physicians in both the administrative and clinical duties of a medical facility. Upon successful completion of the program a diploma is granted.

Admissions Requirements:

Applicants should apply for admission order to be officially accepted into a program or class. To begin the application process, the applicant can visit our website at www.HCI.edu or call HCI College at (954) 626-0255 (FortLauderdale campus) or come into our office for a tour and visit with our Admissions Representative. Please note that all requisite documents are required to be submitted before starting classes.

Medical Assisting Diploma Program – Admissions Requirements

In order to begin the Medical Assisting Program, an applicant must:

- Complete and sign an application including payment of the application fee.
- Be 18 years of age prior to the start of classes
- Provide a valid Driver's License or government issued photo ID
- Provide proof of High School graduation (Diploma), or successful completion of the General Education Development test (GED), or may provide a recognized equivalent of a high school diploma, or verification of graduation from an Associate degree or higher program from an accredited college or university. Acceptance of any of the documents listed above is at the sole discretion of the Institution.
- Pass the SmarterMeasure Learning Readiness Indicator with a minimum score of 70% in Technical Competency, 70% in Life Factors, and 60% in Technical Knowledge (please see the SmarterMeasure policy for more information).

Medical Assisting Program – Clock Hours Breakdown

In Months	10	Theory	510
In Semesters	3	Labs	270
		Externship	270
			1,050

Medical Assisting Program – Tuition Breakdown

The College's tuition charges for its Medical Assisting program are presented below. A set of required materials, textbooks, and uniforms are provided at no additional cost.

Tuition and Application Fee	
Tuition	\$ 17,500
Application Fee	\$ 50
Total Program Cost	\$ 17,550

Medical Assisting Program – Goals and Objectives:

The goal of HCI College's Medical Assisting Program is to prepare students to perform administrative and certain clinical duties under the direction of a physician. Administrative duties may include scheduling appointments, maintaining medical records, billing, and coding information for insurance purposes. Clinical duties may include taking and recording vital signs and medical histories, preparing patients for examination, drawing blood, and administering medications as directed by physician.

Course Number	Required Courses	Semester Hours
HLT101	Introduction to Health Careers	3
MED101	Medical Terminology	4
MED110	Foundations of Anatomy and Physiology	4
MED231	Clinical Skills for Medical Assistants	3
MED233	Medical Procedures	3
MED242	Fundamentals of Pharmacology	4
MED251	Allied Health Clinical Skills	3
MED253	Allied Health Laboratory Skills	3
MED265	Medical Assisting Externship	6
MOS201	Introduction to Electronic Health Records	3
Total Credits		36

NOTE: In the State of Florida, qualified graduates from this program may be eligible to sit for one or both of the following certifications: Registered Medical Assistant (RMA) or Certified Clinical Medical Assistant (CCMA). The College makes no representation, promise, or guarantee that completion of this program either assures

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eligibility for or passage of any certification examination, acceptance by any state board, or that this program is intended toprepare graduates for employment in any state other than Florida. Prospective and current students, as well as graduates, are responsible for researching and understanding all examination, registration, or licensure requirements in any state in which they seek to become registered, licensed, or employed.

Medical Assisting Program - Course Descriptions

HLT101 Introduction Health Careers

This course describes health care delivery systems and health occupations. The course also includes communication and use of interpersonal skills, legal and ethical responsibilities and provides a presentation of wellness and disease concepts. Other components of the course include recognition of and practice of safety and security procedure, recognition and response to emergency situations, factors related to the transmission of diseases, HIV/AIDS awareness, domestic violence awareness, cardio-pulmonary resuscitation, OSHA/ standard precautions blood borne pathogen awareness, infection control/hand washing, and Alzheimer's awareness. Lab included.

MED101 Medical Terminology 4 credit hours

The student will study medical terminology including word components, definitions, spelling and pronunciation. Study will also include the use of medical references and resources for both research and practice.

MED110 Foundations of Anatomy and Physiology 4 credit hours

This course introduces the student to the structures, functions, and interrelationships of the human body systems. The course content will include the discussion of the functions and structures of the body and the movement and support of integration and coordination.

MED231 Clinical Skills for Medical Assistants 3 credit hours

This course develops the theory and practical components relating to universal precautions, OSHA safety regulations, aseptic technique, instrumentation, patient interviewing, taking and recording vital signs. Lab included. Prerequisite(s): MED110.

MED233 Medical Procedures

This course covers instruction in clinical skills for the allied health fields. This course focuses on preparation of the patient, pulmonary function and assisting with and documenting routine clinical procedures. Lab included. Prerequisite(s): MED110.

MED242 Fundamentals of Pharmacology

This course is the study of drugs with emphasis on concepts related to steps in the drug cycle and drug effects. A systems approach is used in learning major classifications of drugs and drugs of choice for selected disease processes and pathological conditions. Prerequisite(s): MED101 or HLT101.

4 credit hours

3 credit hours

3 credit hours

MED251 Allied Health Clinical Skills

This course covers the performance and quality control for medical tests common to a medical office. Skills covered include assisting with X-ray safety and techniques, rehabilitation and therapeutic modalities and performing electrocardiograms. Lab included. Prerequisite(s): MED110.

MED253 Allied Health Laboratory Skills

This course involves the study of medical laboratory procedures, and covers the collection, performance and quality control for medical tests common to a physician's office, including clinical chemistry, phlebotomy, and urinalysis. Lab included. Prerequisite(s): MED110.

MOS201 Introduction to Electronic Health Records 3 credit hours

This course introduces basic concepts of use and maintenance of an Electronic Health Records (EHR) system. Provides exposure to basic navigation of an EHR. Explores issues around privacy, security, government regulations and ethical legal aspects of the health information technology environment. Lab included.

MED265 Medical Assisting Externship

This course provides experience in selected physician's offices or other health care facilities. A qualified medical professional supervises the student during this activity. Prerequisite(s): Completion of all core courses.

Payment Period

The payment period shall be the semester. All tuition is due and payable on the first day of the payment period. Regardless of the student's funding source, all tuition must be paid in full thirty (30) days prior to the end of the payment period. The College reserves the right to withhold a grade report, diploma or transcript until all academic and financial requirements for the program have been met. Failure or withdrawal from a course does not give the student the right to repeat the course without additional charges. A student who voluntarily withdraws from or isterminated by the College after starting classes is obligated to the College for tuition and fees as per the refund policy.

- 1. Each student is entitled to one official copy of his/her official transcript and a diploma upon graduation. Theadditional transcript fee applies to any additional copies of official transcripts.
- 2. Students must be current with all financial obligations to the College in order to receive an official transcriptand their diploma. Students may obtain unofficial transcripts at any time at no cost.
- 3. The bad check fee is charged for any check that is returned unpaid.

Graduation Requirements

 A student must meet the following requirements to qualify for graduation from any program ofstudy:

6 credit hours

3 credit hour

3 credit hours

- Successfully complete all courses in the program of study with a cumulative grade point average of 2.0 or higher.
- Meet or exceed the minimum standards of satisfactory academic progress (SAP);
- Satisfy all programmatic requirements; and
- Satisfy all financial obligations to the College.

Class Size

All students are taught by individualized instruction. The average student ratio is 20:1 for any session.Maximum class size is 30 students per session with exception of bigger classroom that may fit or have room for up to 35 students. Lab size is between 10 and 15 students.

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Satisfactory Academic Progress Policy

In order to demonstrate SAP toward completion of the Nursing Program, a student must maintain a specific course grade point average (see Required Grades) and must progress through the program at a specific minimum pace to ensure that the student does not exceed 150% of the published length of the Nursing Program ("Maximum Timeframe"). Maximum Time Frame for the Nursing Program is exceeded when a student attempts more than 108 semester credits. SAP is evaluated at the end of every semester in order to reestablish a student's eligibility to continue receiving federal financial aid funds for the next semester. The following abbreviations are used throughout this policy:

- (SAP) Satisfactory Academic Progress
- (CGPA) Communitive Grade Point average
- (AFAW) Academic Financial Aid Warning
- (AFAP) Academic Financial Aid Probation

There are two standards that must be met:

The **qualitative standard** for each program requires that a student achieve a minimum **CGPA** of 2.00 or better for the first semester in the program. When evaluated at the end of each semester, a student must achieve the **CGPA** listed on in Diagram 1 within this document at the end of the corresponding semester. At completion of the program, every nursing student must have a **CGPA** of at least 2.48 in order to graduate from the Nursing Program.

The **quantitative standard** requires students to complete the Nursing Program within the Maximum Timeframe of the program. Transfer credits that are accepted by HCI College for credit toward the Nursing Program are included in the calculation of the Maximum Time Frame.

The required minimum pace of completion percentage (Completion Rate) is derived by dividing the number of earned credits by the number of credits attempted. In this calculation, transfer credits are counted as both attempted and earned credits.

Students must successfully maintain a Completion Rate of at least 67% by the end of the first Semester and maintain a 67% minimum Completion Rate in all following semesters. The courses withdrawn during the add/drop period are not included in the Completion Rate as either attempted or completed credits. However, if a student withdraws from a course after the add/drop period has expired, the credits for that course will be included as credits attempted in the Completion Rate.

Treatment of incompletes, course completers, withdrawals, repetitions, transfer credit, audited courses, leaves of absence, and official grade changes.

- <u>Course Incomplete grades</u>: Grades of Incomplete are included in the minimum pace of completion percentage as credits attempted but are not included in GPA or **CGPA** until the official grade is posted.
- <u>Completers (non-graduates)</u>: A student who completes the academic requirements for a program but does not yet have the degree or certificate is not eligible for further additional federal student aid funds for that program.
- <u>Withdrawals</u>: Courses withdrawn during the add/drop period are not included as attempted credits in the minimum pace of completion percentage or in the student's GPA/**CGPA**. Courses withdrawn after add/drop period are included as attempted but not completed for the Completion Rate. They are not included in GPA or **CGPA**.
- <u>Repeated Courses</u>: Students may use federal student aid funds for which they are entitled to retake any course they previously completed with a grade of F. Students may also use federal student aid funds to retake a course they previously completed with a passing grade one time to improve their grade. For financial aid purposes each time a course is taken it counts as an attempted course for the Completion Rate. The higher grade will count towards the cumulative grade point average.
- <u>Transfer credits</u>: Transfer credits are considered as both attempted and completed for the Completion Rate. They are not included in the calculation of GPA or **CGPA**.
- <u>Audited Courses</u>: Courses taken as audits are not taken for credit and are not included in SAP calculations for the Completion Rate, GPA or **CGPA**.
- <u>Leaves of Absence (LOA)</u>: HCI does not grant LOAs during a term. Any complete term during which a student is on an authorized LOA will not be included in the Completion Rate calculation.
- <u>Grade Changes</u>: In the event a grade for a prior term is officially changed by HCI College after SAP has been evaluated for that term, SAP will be reevaluated using the new grade at the next SAP evaluation point, however, the College may elect to reevaluate SAP for the student immediately following the official grade change.

Financial Aid Warning

If a student does not achieve the required minimum **CGPA** of 2.0 at the end of the first semester or the required **CGPA** at the end of any following semester as set forth on Diagram 1 (semester 2, 3,4, 5, etc.), or if

the student fails to achieve a 67% minimum pace of completion percentage after any semester, the student will be placed on **AFAW** for the next semester. Students on **AFAW** status remain eligible to receive federal financial aid for the semester on which they are on **AFAW**. Students may not be on **AFAW** for more than one consecutive semester.

- If a student successfully obtains the required minimum CGPA or achieves a minimum pace of completion percentage of 67% or better at the conclusion of the semester on AFAW, the student will be removed from AFAW.
- A student who is not meeting SAP requirements at the end of the semester on AFAW will lose eligibility to continue receiving federal financial aid, but the student may appeal the student's SAP status in order to preserve his/her financial aid eligibility. (Please see the section below "SAP Appeal Process" for information on how an SAP Appeal may be filed).
- If a student files an SAP appeal that is denied, they will be dismissed from the program and HCI College.
- Following a successful SAP appeal, the student will be placed on AFAP. Students on AFAP must
 meet with their academic advisor to develop an academic plan if the student is expected to need
 more than one semester to resume meeting SAP requirements. Students expected to need only
 one semester to resume meeting SAP requirements may also receive an academic plan at the
 discretion of HCI College and will be informed of the College's decision with the decision on the
 student's SAP appeal. All academic plans will be developed according to the judgement of the
 academic advising staff. Academic plans will contain a roadmap for the student to resume
 meeting SAP requirements by a specific point in time and may contain and benchmarks that the
 student needs to achieve in order to eventually resume meeting SAP requirements.
- At the conclusion of the student's semester on **AFAP** status, the student's progress shall be evaluated to determine if the student has resumed meeting SAP requirements or if the student is meeting the requirements established in the student's Academic Plan.
- If a student is on **AFAP** completes 67% or more of credit hours attempted by the next SAP review period and meets the applicable CGPA requirement stated on Diagram 1, the student will be removed from **AFAP** status and returned to good standing for academic/SAP purposes.
- If a student on **AFAP** has an academic plan that provides a pathway for the student to resume meeting SAP requirements within more than one semester and the student fails to meet requirements established in the academic plan, the student will be ineligible for federal financial aid and will be dismissed from HCI College.
- If the student on **AFAP** has an academic plan that provides a pathway for the student to resume meeting SAP requirements within more than one semester and the student is meeting the requirements established in the academic plan, the student will continue to be eligible to receive federal financial aid as outlined in the academic plan.

SAP Appeal Process

HCI College may only approve an appeal by a student if it is determined the student will meet SAP requirements based on the qualitative and/or quantitative standards in the next SAP review period or if the academic plan that the college proposes for the student demonstrates that a reasonable pathway exists to enable the student to resume meeting SAP requirements.

To appeal the loss of federal student aid eligibility due to SAP, the student must submit a written request to the Dean of Academic Affairs, or any such person designated by the Campus President. The reason for the appeal must be the result of mitigating circumstances, and documentation supporting a claim of mitigating circumstances must be provided in addition to the student's plan for improvement. As part of the appeal, the student must document in writing why they did not meet SAP, and what in the student's situation has changed that will allow them to meet SAP going forward. Typical student life issues and making the transition to college are not considered mitigating circumstances under this policy. Examples of mitigating circumstances that may impact Academic Progress include the following:

- Death of an immediate family member
- Student illness requiring hospitalization (this includes mental health issues) •
- Illness of an immediate family member where the student is a primary caretaker •
- Illness of an immediate family member where the family member is the primary financial support ٠
- Abusive relationships
- Divorce proceedings •
- Previously undocumented disability •
- Natural disaster •
- Family emergency ٠
- Financial hardship such as foreclosure or eviction •
- Other special circumstances

The Dean of Academic Affairs and/or designee will determine the appropriateness of the mitigating circumstance regarding severity, timeliness, and the student's ability to avoid the circumstance in the future. Upon receipt of the request for appeal and the supporting documentation, the Dean of Academic Affairs or designee will notify the student of the College's determination in writing of receiving the student's complete appeal submission.

Readmission to HCI College Following Dismissal for Failure to Meet SAP

If a student files an unsuccessful SAP appeal, which is denied, the student will be dismissed pursuant to HCI College policy but may apply to be readmitted after the end of the semester for which the SAP appeal was denied. Sitting out one term does not automatically reinstate a student's federal student aid eligibility.

A student who seeks to be readmitted after remaining out of school for one full semester will be subject to HCI College's evaluation of the student's academic records to determine if it is possible for the student to resume meeting SAP requirements.

If HCI College determines that the student may be able to resume meeting SAP requirements, the student may be readmitted but is not eligible for federal student aid funds until the student successfully meets SAP requirements.

2.00

Diagram 1 **Total Credits GPA** Requirement Attempted Semester One

Semester Two	2.12
Semester Three	2.21
Semester Four	2.33
Semester Five	2.48
Semester Six	2.48

Note:

The Veterans Administration is notified of unsatisfactory progress of a veteran student who remains on academic probation beyond two consecutive semesters/pay periods. At that point, veterans' benefits can be terminated. A student terminated from veterans' benefits due to unsatisfactory progress maybe recertified for benefits when the student meets the CGPA requirement or meets the minimum 67% Completion Rate requirement for progression.



Catalog Addendum No. 2 2021 Catalog, Volume IV Addendum Effective: May 5, 2021

Effective May 5, 2021 HCI College has changed its Advanced Standing/Credit Transfer Policy for students entering the program for the May 10, 2021 start and thereafter.

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Advanced Standing/Credit Transfer

HCI College may accept transfer credits for a course completed in other post-secondary institutions when comparable in scope and content to HCI College's own coursework. HCI College does not accept experiential learning in lieu of transfer credits. HCI College will evaluate the comparability, applicability, source, and age of the previously earned credit; academic preparedness of the student at the time of credit transfer, grade earned for the credit transferred and apply a systematic, consistent process for determining whether to accept the credit earned at other institutions. In order for transfer of credit to be accepted it must meet the minimum criteria:

- Transfer grade must be a "C" or higher for all general education courses and must have been completed in the past fifteen (15) years from the prospective student's start date to be considered for transfer with the exception for the following courses which must have been completed in the past five (5) years from the prospective student's start date:
 - o BSC 2085C Anatomy and Physiology I
 - o BSC 2086C Anatomy and Physiology II
 - MCB 2010C Microbiology
- Transfer course code level must be equal to or greater than the credit to be awarded
- Credit amount must be equal to or greater to be awarded
- Transfer credit must have been earned from a nationally or regionally accredited institution
- HCI College will not accept transfer credits for Nursing Core classes except for the Licensed Practical Nurses stipulation stated below.

Licensed Practical Nurses (LPN) with an unencumbered license upon meeting all other admission criteria will receive transfer credits for NUR1023 and NUR1023L if they pass the RN Fundamentals exam with a level II or higher. The fee for the RN Fundamentals exam is \$39. Applicants must pay the \$39 fee for the RN Fundamentals exam prior to taking the exam. The exam will be administered at HCI College. There are no exceptions or a second attempt on the exam. LPNs who meet the above criteria must complete NUR1022L at HCI College.

Official transcripts must be received by the registrar's office no later than the first day of the term of which the student is scheduled to start.

A petition for credit for prior training will be evaluated by the Registrar, or the Vice President of Academic and Regulatory Affairs. Official transcripts and course descriptions (if the course differs from the state numbering system) are required to approve applicable credit. At a minimum, 25% of the credits required for non-degree and undergraduate degree programs must be completed at HCI College in order to receive a certificate, diploma, or a degree from the school awarding the degree.

Transfer Students must complete the following:

- All General Admissions Requirements
- All program specific Requirements
- HCI College application, application fee, and enrollment agreement
- Request that an official transcript from previous institution(s) be sent to HCI College
- Meet with the appropriate school official to review transcripts for potential transfer of credits



Catalog Addendum No. 3 2021 Catalog, Volume IV Addendum Effective: May 18, 2021

Catalog, Page 2

Fire Science (Associate of Science) has been removed from under *Program Approvals*.

Catalog, Page 10

Fire Science has been removed from under *History and Philosophy*.

Catalog, Page 11

Fire Science has been removed from under *Program Advisory*.

Catalog, Page 96

Fire Science Program has been removed.



Catalog Addendum No. 4 2021 Catalog, Volume IV Addendum Effective: June 10, 2021

Medical Assisting Diploma Program (Offered at the Fort Lauderdale location)

36 semester credits: approximately 1000 clock hours, 3 semesters, 10 months

The Medical Assisting diploma program is designed to prepare students for positions as entry-level medical assistants in a physician's office, or other medical facilities. This program focuses on providing instruction, through a combination of classroom, laboratory and clinical experiences, in the skills necessary to assist physicians in both the administrative and clinical duties of a medical facility. Upon successful completion of the program a diploma is granted.

Admissions Requirements:

Applicants should apply for admission order to be officially accepted into a program or class. To begin the application process, the applicant can visit our website at www.HCI.edu or call HCI College at (954) 626-0255 (FortLauderdale campus) or come into our office for a tour and visit with our Admissions Representative. Please note that all requisite documents are required to be submitted before starting classes.

Medical Assisting Diploma Program – Admissions Requirements

In order to begin the Medical Assisting Program, an applicant must:

- Complete and sign an application including payment of the application fee.
- Be 18 years of age prior to the start of classes
- Pass the Wonderlic Scholastic Level Exam (SLE) with a minimum score of 13 (please see the Wonderlic policy for more for further information)
- Provide a valid Driver's License or government issued photo ID
- Provide proof of High School graduation (Diploma), or successful completion of the General Education Development test (GED), or may provide a recognized equivalent of a high school diploma, or verification of graduation from an Associate degree or higher program from an accredited college or university. Acceptance of any of the documents listed above is at the sole discretion of the Institution.
- Pass the SmarterMeasure Learning Readiness Indicator with a minimum score of 70% in Technical Competency, 70% in Life Factors, and 60% in Technical Knowledge (please see the

SmarterMeasure policy for more information).

Medical Assisting Program – Clock Hours Breakdown

			1,000
		Externship	180
In Semesters	3	Labs	270
In Months	10	Theory	550

Medical Assisting Program – Tuition Breakdown

The College's tuition charges for its Medical Assisting program are presented below. A set of required materials, textbooks, and uniforms are provided at no additional cost.

Tuition and Application Fee			
Tuition	\$ 17,500		
Application Fee	\$50		
Total Program Cost	\$ 17,550		

Per Course: \$1750.00

Price Per Semester					
Semester One - Tuition \$7,000					
Semester Two - Tuition	\$7,000				
Semester Three - Tuition	\$3,500				
Total Paramedic Program Tuition \$17,500					

Medical Assisting Program – Goals and Objectives:

The goal of HCI College's Medical Assisting Program is to prepare students to perform administrative and certain clinical duties under the direction of a physician. Administrative duties may include scheduling appointments, maintaining medical records, billing, and coding information for insurance purposes. Clinical duties may include taking and recording vital signs and medical histories, preparing patients for examination, drawing blood, and administering medications as directed by physician.

Course Number	Required Courses	Academic Semester Hours	Financial Aid Semester Hours
HLT101	Introduction to Health Careers	3	2.83
MED101	Medical Terminology	4	3
MED110	Foundations of Anatomy and Physiology	4	3
MED231	Clinical Skills for Medical Assistants	4	3.5
MED233	Medical Procedures	3	2.83
MED242	Fundamentals of Pharmacology	4	3
MED251	Allied Health Clinical Skills	3	2.83
MED253	Allied Health Laboratory Skills	4	3.5
MED265	Medical Assisting Externship	4	4
MOS201	Introduction to Electronic Health Records	3	2.83
Total Credits		36	31

NOTE: In the State of Florida, qualified graduates from this program may be eligible to sit for one or both of the following certifications: Registered Medical Assistant (RMA) or Certified Clinical Medical Assistant (CCMA). The College makes no representation, promise, or guarantee that completion of this program either assures eligibility for or passage of any certification examination, acceptance by any state board, or that this program is intended toprepare graduates for employment in any state other than Florida. Prospective and current students, as well as graduates, are responsible for researching and understanding all examination, registration, or licensure requirements in any state in which they seek to become registered, licensed, or employed.

Medical Assisting Program - Course Descriptions

HLT101 Introduction Health Careers

3 credit hours

This course describes health care delivery systems and health occupations. The course also includes communication and use of interpersonal skills, legal and ethical responsibilities and provides a presentation of wellness and disease concepts. Other components of the course include recognition of and practice of safety and security procedure, recognition and response to emergency situations, factors related to the transmission of diseases, HIV/AIDS awareness, domestic violence awareness, cardio-pulmonary resuscitation, OSHA/ standard precautions blood borne pathogen awareness, infection control/hand washing, and Alzheimer's awareness. Lab included.

MED101 Medical Terminology

The student will study medical terminology including word components, definitions, spelling and pronunciation. Study will also include the use of medical references and resources for both research and practice.

MED110 Foundations of Anatomy and Physiology 4 credit hours

This course introduces the student to the structures, functions, and interrelationships of the human body systems. The course content will include the discussion of the functions and structures of the body and the movement and support of integration and coordination.

MED231 Clinical Skills for Medical Assistants 3 credit hours

This course develops the theory and practical components relating to universal precautions, OSHA safety regulations, aseptic technique, instrumentation, patient interviewing, taking and recording vital signs. Lab included. Prerequisite(s): MED110.

MED233 Medical Procedures 3 credit hours

This course covers instruction in clinical skills for the allied health fields. This course focuses on preparation of the patient, pulmonary function and assisting with and documenting routine clinical procedures. Lab included. Prerequisite(s): MED110.

MED242 4 credit hours Fundamentals of Pharmacology

This course is the study of drugs with emphasis on concepts related to steps in the drug cycle and drug effects. A systems approach is used in learning major classifications of drugs and drugs of choice for selected disease processes and pathological conditions. Prerequisite(s): MED101 or HLT101.

MFD251 Allied Health Clinical Skills 3 credit hour

This course covers the performance and quality control for medical tests common to a medical office. Skills covered include assisting with X-ray safety and techniques, rehabilitation and therapeutic modalities and performing electrocardiograms. Lab included. Prerequisite(s): MED110.

MED253 Allied Health Laboratory Skills

This course involves the study of medical laboratory procedures, and covers the collection, performance and quality control for medical tests common to a physician's office, including clinical chemistry, phlebotomy, and urinalysis. Lab included. Prerequisite(s): MED110.

MOS201 Introduction to Electronic Health Records 3 credit hours

This course introduces basic concepts of use and maintenance of an Electronic Health Records (EHR) system. Provides exposure to basic navigation of an EHR. Explores issues around privacy, security, government regulations and ethical legal aspects of the health information technology environment. Lab included.

3 credit hours

4 credit hours

MED265 Medical Assisting Externship

6 credit hours

This course provides experience in selected physician's offices or other health care facilities. A qualified medical professional supervises the student during this activity. Prerequisite(s): Completion of all core courses in semesters one and two.

Payment Period

The payment period shall be the semester. All tuition is due and payable on the first day of the payment period. Regardless of the student's funding source, all tuition must be paid in full thirty (30) days prior to the end of the payment period. The College reserves the right to withhold a grade report, diploma or transcript until all academic and financial requirements for the program have been met. Failure or withdrawal from a course does not give the student the right to repeat the course without additional charges. A student who voluntarily withdraws from or isterminated by the College after starting classes is obligated to the College for tuition and fees as per the refund policy.

- 1. Each student is entitled to one official copy of his/her official transcript and a diploma upon graduation. Theadditional transcript fee applies to any additional copies of official transcripts.
- 2. Students must be current with all financial obligations to the College in order to receive an official transcriptand their diploma. Students may obtain unofficial transcripts at any time at no cost.
- 3. The bad check fee is charged for any check that is returned unpaid.

Graduation Requirements

- A student must meet the following requirements to qualify for graduation from any program ofstudy:
- Successfully complete all courses in the program of study with a cumulative grade point average of 2.0 or higher.
- Meet or exceed the minimum standards of satisfactory academic progress (SAP);
- Satisfy all programmatic requirements; and
- Satisfy all financial obligations to the College.

Class Size

All students are taught by individualized instruction. The average student ratio is 20:1 for any session.Maximum class size is 30 students per session with exception of bigger classroom that may fit or have room for up to 35 students. Lab size is between 10 and 15 students.

2021-2024 Academic Calendar – Modular Terms*

Term Code	Class Start Date	Class End Date	Helideva / Preska			
Code	Code Date Holidays / Breaks Summer 2021					
210706P	7/6/2021	10/23/2021				
210706C	7/6/2021	7/31/2021				
210700C	8/2/2021	8/28/2021				
210830C	8/30/2021	9/25/2021	9/6/2021- Labor Day			
210927C	9/27/2021	10/23/2021	57672621 Labor Bay			
2105270	572172021	· · ·	2021			
			11/21/2021-11/28/2021- Thanksgiving			
211025P	10/25/2021	3/5/2022	Break; 12/26/2021-1/9/2022- Winter Break			
211025C	10/25/2021	11/20/2021				
211129C	11/29/2021	12/25/2021	12/24/2021- Christmas Eve			
220110C	1/10/2022	2/5/2022	1/17/2022- MLK Jr. Day			
220207C	2/7/2022	3/5/2022				
		Spring	g 2022			
220307P	3/7/2022	6/25/2022	5/30/2022- Memorial Day			
220307C	3/7/2022	4/2/2022				
220404C	4/4/2022	4/30/2022				
220502C	5/2/2022	5/28/2022				
220531C	5/31/2022	6/25/2022				
		Summ	er 2022			
220627P	6/27/2022	10/15/2022				
220627C	6/27/2022	7/23/2022	7/4/2022- Independence Day			
220725C	7/25/2022	8/20/2022				
220822C	8/22/2022	9/17/2022	9/5/2022- Labor Day			
220919C	9/19/2022	10/15/2022				
		Fall	2022			
221017P	10/17/2022	3/4/2023	12/18/2022-1/8/2023- Winter Break			
221017C	10/17/2022	11/12/2022				
221114C	11/14/2022	12/17/2022	11/20/2022-11/27/2022-Thanksgiving Break			
230109C	1/9/2023	2/4/2023	1/16/2023- MLK Jr. Day			
230206C	2/6/2023	3/4/2023				
		• • •	g 2023			
230306P	3/6/2023	6/24/2023	5/29/2023- Memorial Day			
230306C	3/6/2023	4/1/2023				
230403C	4/3/2023	4/29/2023				
230501C	5/1/2023	5/27/2023				

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230530C	5/30/2023	6/24/2023				
	Summer 2023					
230626P	6/26/2023	10/14/2023				
230626C	6/26/2023	7/22/2023	7/4/2023- Independence Day			
230724C	7/24/2023	8/19/2023				
230821C	8/21/2023	9/16/2023	9/4/2023- Labor Day			
230918C	9/18/2023	10/14/2023				
		Fall	2023			
231016P	10/16/2023	3/2/2024	12/17/2023-1/7/2024- Winter Break			
231016C	10/16/2023	11/11/2023				
			11/19/2023-11/26/2023- Thanksgiving			
231113C	11/13/2023	12/16/2023	Break			
240108C	1/8/2024	2/3/2024	1/15/2024- MLK Jr. Day			
240205C	2/5/2024	3/2/2024				

*All dates are subject to change without notice.

Satisfactory Academic Progress Policy for Medical Assisting

In order to demonstrate SAP toward completion of the Medical Assisting Program, a student must maintain a 2.0 and must progress through the program at a specific minimum pace to ensure that the student does not exceed 150% of the published length of the Medical Assisting Program ("Maximum Timeframe"). Maximum Time Frame for the Medical Assisting Program is exceeded when a student attempts more than 54 semester credits. SAP is evaluated at the end of every semester in order to reestablish a student's eligibility to continue receiving federal financial aid funds for the next semester. The following abbreviations are used throughout this policy:

- (SAP) Satisfactory Academic Progress
- (CGPA) Communitive Grade Point average
- (AFAW) Academic Financial Aid Warning
- (AFAP) Academic Financial Aid Probation

There are two standards that must be met:

The **qualitative standard** for each program requires that a student achieve a minimum **CGPA** of 2.00 or better each semester in the program. When evaluated at the end of each semester, a student must achieve the **CGPA** of 2.0 within this document at the end of the corresponding semester. At completion of the program, every medical assisting student must have a **CGPA** of at least 2.0 in order to graduate from the Medical Assisting Program.

The **quantitative standard** requires students to complete the Medical Assisting Program within the Maximum Timeframe of the program. Transfer credits that are accepted by HCI College for credit toward the Medical Assisting Program are included in the calculation of the Maximum Time Frame.

The required minimum pace of completion percentage (Completion Rate) is derived by dividing the number of earned credits by the number of credits attempted. In this calculation, transfer credits are counted as both attempted and earned credits.

Students must successfully maintain a Completion Rate of at least 67% by the end of the first Semester and maintain a 67% minimum Completion Rate in all following semesters. The courses withdrawn during the first seven (7) days of the semester are not included in the Completion Rate as either attempted or completed credits. However, if a student withdraws from a course after the first seven (7) days of the semester, the credits for that course will be included as credits attempted in the Completion Rate.

Treatment of incompletes, course completers, withdrawals, repetitions, transfer credit, audited courses, leaves of absence, and official grade changes.

- <u>Course Incomplete grades</u>: Grades of Incomplete are included in the minimum pace of completion percentage as credits attempted but are not included in GPA or **CGPA** until the official grade is posted.
- <u>Completers (non-graduates)</u>: A student who completes the academic requirements for a program but does not yet have the degree or certificate is not eligible for further additional federal student aid funds for that program.
- <u>Withdrawals</u>: Courses withdrawn during the first seven (7) days of the semester are not included as attempted credits in the minimum pace of completion percentage or in the student's GPA/CGPA. Courses withdrawn after the first seven (7) days of the semester are included as attempted but not completed for the Completion Rate. They are not included in GPA or CGPA.
- <u>Repeated Courses</u>: Students may use federal student aid funds for which they are entitled to retake any course they previously completed with a grade of F. Students may also use federal student aid funds to retake a course they previously completed with a passing grade one time to improve their grade. For financial aid purposes each time a course is taken it counts as an attempted course for the Completion Rate. The higher grade will count towards the cumulative grade point average.
- <u>Transfer credits</u>: Transfer credits are considered as both attempted and completed for the Completion Rate. They are not included in the calculation of GPA or **CGPA**.
- <u>Audited Courses</u>: Courses taken as audits are not taken for credit and are not included in SAP calculations for the Completion Rate, GPA or **CGPA**.
- <u>Leaves of Absence (LOA)</u>: HCI does not grant LOAs during a term. Any complete term during which a student is on an authorized LOA will not be included in the Completion Rate calculation.
- <u>Grade Changes</u>: In the event a grade for a prior term is officially changed by HCI College after SAP has been evaluated for that term, SAP will be reevaluated using the new grade at the next SAP evaluation point, however, the College may elect to reevaluate SAP for the student immediately following the official grade change.

Financial Aid Warning

If a student does not achieve the required minimum **CGPA** of 2.0 at the end of each semester or if the student fails to achieve a 67% minimum pace of completion percentage after any semester, the student will be placed on **AFAW** for the next semester. Students on **AFAW** status remain eligible to receive federal financial aid for the semester on which they are on **AFAW**. Students may not be on **AFAW** for more than one consecutive semester.

- If a student successfully obtains the required minimum **CGPA** or achieves a minimum pace of completion percentage of 67% or better at the conclusion of the semester on **AFAW**, the student will be removed from **AFAW**.
- A student who is not meeting SAP requirements at the end of the semester on AFAW will lose eligibility to continue receiving federal financial aid, but the student may appeal the student's SAP status in order to preserve his/her financial aid eligibility. (Please see the section below "SAP Appeal Process" for information on how an SAP Appeal may be filed).
- If a student files an SAP appeal that is denied, they will be dismissed from the program and HCI College.
- Following a successful SAP appeal, the student will be placed on AFAP. Students on AFAP must
 meet with their academic advisor to develop an academic plan if the student is expected to need
 more than one semester to resume meeting SAP requirements. Students expected to need only
 one semester to resume meeting SAP requirements may also receive an academic plan at the
 discretion of HCI College and will be informed of the College's decision with the decision on the
 student's SAP appeal. All academic plans will be developed according to the judgement of the
 academic advising staff. Academic plans will contain a roadmap for the student to resume
 meeting SAP requirements by a specific point in time and may contain and benchmarks that the
 student needs to achieve in order to eventually resume meeting SAP requirements.
- At the conclusion of the student's semester on **AFAP** status, the student's progress shall be evaluated to determine if the student has resumed meeting SAP requirements or if the student is meeting the requirements established in the student's Academic Plan.
- If a student is on **AFAP** completes 67% or more of credit hours attempted by the next SAP review period and meets the applicable CGPA, the student will be removed from **AFAP** status and returned to good standing for academic/SAP purposes.
- If a student on **AFAP** has an academic plan that provides a pathway for the student to resume meeting SAP requirements within more than one semester and the student fails to meet requirements established in the academic plan, the student will be ineligible for federal financial aid and will be dismissed from HCI College.
- If the student on **AFAP** has an academic plan that provides a pathway for the student to resume meeting SAP requirements within more than one semester and the student is meeting the requirements established in the academic plan, the student will continue to be eligible to receive

federal financial aid as outlined in the academic plan.

Satisfactory Academic Progress Policy for Paramedic Program

In order to demonstrate SAP toward completion of the Paramedic Program, a student must maintain a specific course grade point average (see Required Grades) and must progress through the program at a specific minimum pace to ensure that the student does not exceed 150% of the published length of the Paramedic Program ("Maximum Timeframe"). Maximum Time Frame for the Paramedic Program is exceeded when a student attempts more than 67.5 semester credits. SAP is evaluated at the end of every semester in order to reestablish a student's eligibility to continue receiving federal financial aid funds for the next semester. The following abbreviations are used throughout this policy:

- (SAP) Satisfactory Academic Progress
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- (AFAW) Academic Financial Aid Warning
- (AFAP) Academic Financial Aid Probation

There are two standards that must be met:

The **qualitative standard** for the Paramedic program requires that a student achieve a minimum **CGPA** of 3.00 or better each semester in the program. When evaluated at the end of each semester, a student must achieve the **CGPA** of 3.0 within this document at the end of the corresponding semester. At completion of the program, every Paramedic student must have a **CGPA** of at least 3.0 in order to graduate from the Paramedic Program.

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The required minimum pace of completion percentage (Completion Rate) is derived by dividing the number of earned credits by the number of credits attempted. In this calculation, transfer credits are counted as both attempted and earned credits.

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- If the student on **AFAP** has an academic plan that provides a pathway for the student to resume meeting SAP requirements within more than one semester and the student is meeting the requirements established in the academic plan, the student will continue to be eligible to receive federal financial aid as outlined in the academic plan.

SAP Appeal Process

HCI College may only approve an appeal by a student if it is determined the student will meet SAP requirements based on the qualitative and/or quantitative standards in the next SAP review period or if the academic plan that the college proposes for the student demonstrates that a reasonable pathway exists to enable the student to resume meeting SAP requirements.

To appeal the loss of federal student aid eligibility due to SAP, the student must submit a written request to the Dean of Academic Affairs, or any such person designated by the Campus President. The reason for the appeal must be the result of mitigating circumstances, and documentation supporting a claim of mitigating circumstances must be provided in addition to the student's plan for improvement. As part of the appeal, the student must document in writing why they did not meet SAP, and what in the student's situation has changed that will allow them to meet SAP going forward. Typical student life issues and making the transition to college

are not considered mitigating circumstances under this policy. Examples of mitigating circumstances that may impact Academic Progress include the following:

- Death of an immediate family member
- Student illness requiring hospitalization (this includes mental health issues)
- Illness of an immediate family member where the student is a primary caretaker
- Illness of an immediate family member where the family member is the primary financial support
- Abusive relationships
- Divorce proceedings
- Previously undocumented disability
- Natural disaster
- Family emergency
- Financial hardship such as foreclosure or eviction
- Other special circumstances

The Dean of Academic Affairs and/or designee will determine the appropriateness of the mitigating circumstance regarding severity, timeliness, and the student's ability to avoid the circumstance in the future. Upon receipt of the request for appeal and the supporting documentation, the Dean of Academic Affairs or designee will notify the student of the College's determination in writing of receiving the student's complete appeal submission.

Readmission to HCI College Following Dismissal for Failure to Meet SAP

If a student files an unsuccessful SAP appeal, which is denied, the student will be dismissed pursuant to HCI College policy but may apply to be readmitted after the end of the semester for which the SAP appeal was denied. Sitting out one term does not automatically reinstate a student's federal student aid eligibility.

A student who seeks to be readmitted after remaining out of school for one full semester will be subject to HCI College's evaluation of the student's academic records to determine if it is possible for the student to resume meeting SAP requirements.

If HCI College determines that the student may be able to resume meeting SAP requirements, the student may be readmitted but is not eligible for federal student aid funds until the student successfully meets SAP requirements.

Note:

The Veterans Administration is notified of unsatisfactory progress of a veteran student who remains on academic probation beyond two consecutive semesters/pay periods. At that point, veterans' benefits can be terminated. A student terminated from veterans' benefits due to unsatisfactory progress maybe recertified for benefits when the student meets the **CGPA** requirement or meets the minimum 67% Completion Rate requirement for progression.

Refund Schedule for Paramedic and Medical Assisting Programs

The refund schedule is as follows:

- Students who withdraw during the first seven (7) days of enrollment (semester) will receive a 100% refund of all monies paid for tuition, fees, and supplies (excluding the nonrefundable application fee).
 Students who attend beyond the seven (7) day period will be responsible for 100% of the tuition and fee charges for courses attended in the period of enrollment (semester).
- > The Withdrawal Date for refund computation will be one of the following:
 - The date Withdrawal/Cancellation Form signed by Student.
 - The date of withdrawal for unsatisfactory progress.
 - The date of withdrawal for excessive absences will be the last date of attendance.
 - The date of involuntary withdrawal by HCI College for actions that the College may deem to be in violation of its policies and procedures.

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Financial Services

GENERAL INFORMATION

The United States Department of Education has determined HCI College is an institution eligible to participate in Federal Student Aid financial aid programs for its approved programs. The Financial Aid Department at HCI College provides assistance to nursing, paramedic, and medical assisting students requesting financial aid to assist with paying tuition and other education-related expenses incurred while in attendance at HCI College. The Financial Aid Department has established procedures to assure fair and consistent treatment of all applicants.

HCI College believes the primary responsibility for educational costs rests foremost with a student and their family. However, financial aid is available to those who qualify to meet the difference between students' resources and actual needs. The total costs associated with attending HCI College, including but not limited to tuition and fees, books, supplies, room and board, personal expenses, and allowable travel expenses are examined to determine each student's eligibility for financial aid. Students requesting financial aid must submit a Free Application for Federal Student Aid (FAFSA) using FAFSA-on-the-Web at www.fafsa.ed.gov or use the FAFSA Mobile App. HCI College uses the information submitted by students and their families (if applicable) to determine eligibility for financial aid. The information students submit on the FAFSA is confidential.

HCI College maintains full-time Financial Aid staff to meet students' needs. Students are encouraged to make appointments with the Financial Aid department to ensure they obtain the funding needed for their college investment.

Financial Options (if applicable and eligible):

- 1. Apply for Federal Financial Aid Programs
- 2. Apply for Private Funding
- 3. Other Sources (check, credit card)

Other sources must be discussed with the Financial Aid Department.

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Add/Drop Period – Associate Degree of Science in Nursing and Associate of Science in Emergency **Medical Services Programs**

HCI College has a 14 day add/drop period for core courses and a seven day add/drop period for General Education courses.

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Refund Schedule for EMT

Students who withdraw during the first seven (7) days of enrollment (semester) will receive a 100% refund of all monies paid for tuition, fees, and supplies (excluding the nonrefundable application fee).

Tuition for the EMT program will be refunded on a pro-rated basis. The pro-rata refund will apply to the proportion of the Semester taught of the Enrollment Term (as defined by Program).

Proportion of Semester Taught	Tuition Refund Percentage
0% through and including 40%	Pro-Rata
More than 40% and including 50%	40%
More than 50%	0% (No Tuition Refund)

The Withdrawal Date for refund computation will be one of the following:

- The date Withdrawal/Cancellation Form signed by Student. •
- The date of withdrawal for unsatisfactory progress. •
- The date of withdrawal for excessive absences will be the last date of attendance.
- The date of involuntary withdrawal by HCI College for actions that the College may deem to be in violation of its policies and procedures.

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Paramedic Program - Tuition Breakdown

The College's tuition charges for Paramedic program is presented below. A set of required materials, textbooks, and uniforms are provided at no additional cost.

Tuition and Application Fee				
Tuition	\$ 9,900			
Application Fee	\$ 50			
Total Program Cost	\$ 9,950			
Per Credit Hour:				

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Price Per Semester				
Semester One - Tuition \$3,300				
Semester Two - Tuition	\$3,300			
Semester Three - Tuition	\$3,300			
Total Paramedic Program Tuition \$9,900				

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Academic Calendar 2021 – 2024: West Palm Beach

Additional Paramedic Terms

	HCI College - West Palm Beach Campus 2021 Calendar				
Terms	Start date	End Date	Break	Holidays	Orientation
Full Term Paramedic	7/12/2021	10/23/2021		9/6/2021- Labor Day	Wed - 7/7/2021 - Paramedic
Full Term Paramedic	11/1/2021	2/26/2022	11/25/2021 - 11/26/2021 Thanksgiving Break 12/19/2021 - 01/02/2022 Winter Break	1/17/2022- MLK Jr. Day	Wed - 10/27/2021 - Paramedic
		HCI Colle	ge - West Palm Beach Campus 20	22 Calendar	
			- -		
Full Term Paramedic	3/7/2022	6/25/2022	3/27/2022 - 4/3/2022 Spring Break	5/30/2022 - Memorial Day	Wed - 3/2/2022 - Paramedic
Full Term Paramedic	7/11/2022	10/22/2022		9/5/2022- Labor Day	Wed - 7/6/2022 - Paramedic
Full Term Paramedic	10/31/2022	2/25/2023	11/24/2022 - 11/25/2022 Thanksgiving Break 12/18/2022 - 01/01/2023 Winter Break	1/16/2023- MLK Jr. Day	Wed - 10/26/2022 - Paramedic
		HCI Colle	ge - West Palm Beach Campus 20	23 Calendar	
Full Term Paramedic	3/6/2023	6/24/2023	3/26/2023 - 4/2/2023 Spring Break	5/29/2023 - Memorial Day	Wed - 3/1/2023 - Paramedic
Full Term Paramedic	7/10/2023	10/21/2023		9/4/2023- Labor Day	Wed -7/5/2023 - Paramedic
Full Term Paramedic	10/30/2023	2/24/2024	11/23/2023 - 11/24/2023 Thanksgiving Break 12/24/2023 - 01/07/2024 Winter Break	1/15/2024 MLK Jr. Day	Wed - 10/25/2023 - Paramedic

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Academic Calendar 2021 – 2024: Fort Lauderdale (Branch of West Palm Beach)

Additional Paramedic Terms

	HCI College - West Palm Beach Campus 2021 Calendar					
Terms	Start date	End Date	Break	Holidays	Orientation	
			11/25/2021 - 11/26/2021 Thanksgiving Break 12/19/2021 - 01/02/2022			
Full Term Paramedic	11/1/2021	2/26/2022	Winter Break	1/17/2022- MLK Jr. Day	Wed - 10/27/2021 - Paramedic	
		HCI College	e - West Palm Beach Campus 202	2 Calendar		
Full Term Paramedic	3/7/2022	6/25/2022	3/27/2022 - 4/3/2022 Spring Break	5/30/2022 - Memorial Day	Wed - 3/2/2022 - Paramedic	
Full Term Paramedic	7/11/2022	10/22/2022		9/5/2022- Labor Day	Wed - 7/6/2022 - Paramedic	
Full Term Paramedic	10/31/2022	2/25/2023	11/24/2022 - 11/25/2022 Thanksgiving Break 12/18/2022 - 01/01/2023 Winter Break	1/16/2023- MLK Jr. Day	Wed - 10/26/2022 - Paramedic	
Tuli Terri Faramedic	10/31/2022				Wed - 10/20/2022 - Parametic	
		HCI College	e - West Palm Beach Campus 202	23 Calendar		
Full Term Paramedic	3/6/2023	6/24/2023	3/26/2023 - 4/2/2023 Spring Break	5/29/2023 - Memorial Day	Wed - 3/1/2023 - Paramedic	
Full Term Paramedic	7/10/2023	10/21/2023		9/4/2023- Labor Day	Wed -7/5/2023 - Paramedic	
Full Term Daramodia	10/20/2022	2/24/2024	11/23/2023 - 11/24/2023 Thanksgiving Break 12/24/2023 - 01/07/2024	1/15/2024 MIK Is Day	Wod 10/35/2022 Decempedia	
Full Term Paramedic	10/30/2023	2/24/2024	12/24/2023 - 01/07/2024 Winter Break	1/15/2024 MLK Jr. Day	Wed - 10/25/2023 - Parame	



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Medical Assisting Diploma Program (Offered at the Fort Lauderdale location)

36 semester credits: approximately 855 clock hours, 3 semesters, 10 months

The Medical Assisting diploma program is designed to prepare students for positions as entry-level medical assistants in a physician's office, or other medical facilities. This program focuses on providing instruction, through a combination of classroom, laboratory and clinical experiences, in the skills necessary to assist physicians in both the administrative and clinical duties of a medical facility. Upon successful completion of the program a diploma is granted.

Medical Assisting Program – Clock Hours Breakdown

In Months	10	Theory	455
In Semesters	3	Labs	220
		Externship	180
			855

Medical Assisting Program – Tuition Breakdown

The College's tuition charges for its Medical Assisting program are presented below. A set of required materials, textbooks, and uniforms are provided at no additional cost.

Tuition and Application Fee		
Tuition	\$ 17,500	
Application Fee	\$ 50	
Total Program Cost	\$ 17,550	

Per Course: \$1750.00

Price Per Semester		
Semester One - Tuition	\$7,000	
Semester Two - Tuition	\$7,000	
Semester Three - Tuition	\$3,500	
Total Medical Assisting Program	\$17,500	
Tuition		

Medical Assisting Program – Goals and Objectives:

The goal of HCI College's Medical Assisting Program is to prepare students to perform administrative and certain clinical duties under the direction of a physician. Administrative duties may include scheduling appointments, maintaining medical records, billing, and coding information for insurance purposes. Clinical duties may include taking and recording vital signs and medical histories, preparing patients for examination, drawing blood, and administering medications as directed by physician.

Course Number	Required Courses	Academic Semester Hours	Financial Aid Semester Hours
HLT101	Introduction to Health Careers	3	2.5
MED101	Medical Terminology	4	2.5
MED110	Foundations of Anatomy and Physiology	4	2.5
MED231	Clinical Skills for Medical Assistants	4	2.5
MED233	Medical Procedures	3	2.5
MED242	Fundamentals of Pharmacology	4	2.5
MED251	Allied Health Clinical Skills	3	2.5
MED253	Allied Health Laboratory Skills	4	2.5
MED265	Medical Assisting Externship	4	4
MOS201	Introduction to Electronic Health Records	3	2.5
Total Credits		36	26

NOTE: In the State of Florida, qualified graduates from this program may be eligible to sit for one or both of the following certifications: Registered Medical Assistant (RMA) or Certified Clinical Medical Assistant (CCMA). The

HCI002441

College makes no representation, promise, or guarantee that completion of this program either assures eligibility for or passage of any certification examination, acceptance by any state board, or that this program is intended toprepare graduates for employment in any state other than Florida. Prospective and current students, as well as graduates, are responsible for researching and understanding all examination, registration, or licensure requirements in any state in which they seek to become registered, licensed, or employed.

Medical Assisting Program - Course Descriptions

HLT101 Introduction Health Careers

This course describes health care delivery systems and health occupations. The course also includes communication and use of interpersonal skills, legal and ethical responsibilities and provides a presentation of wellness and disease concepts. Other components of the course include recognition of and practice of safety and security procedure, recognition and response to emergency situations, factors related to the transmission of diseases, HIV/AIDS awareness, domestic violence awareness, cardio-pulmonary resuscitation, OSHA/ standard precautions blood borne pathogen awareness, infection control/hand washing, and Alzheimer's awareness. Lab included.

MED101 Medical Terminology

The student will study medical terminology including word components, definitions, spelling and pronunciation. Study will also include the use of medical references and resources for both research and practice.

Foundations of Anatomy and Physiology **MED110** 4 credit hours

This course introduces the student to the structures, functions, and interrelationships of the human body systems. The course content will include the discussion of the functions and structures of the body and the movement and support of integration and coordination.

MED231 Clinical Skills for Medical Assistants 4 credit hours

This course develops the theory and practical components relating to universal precautions, OSHA safety regulations, aseptic technique, instrumentation, patient interviewing, taking and recording vital signs. Lab included. Prerequisite(s): MED110.

MED233 Medical Procedures

This course covers instruction in clinical skills for the allied health fields. This course focuses on preparation of the patient, pulmonary function and assisting with and documenting routine clinical procedures. Lab included. Prerequisite(s): MED110.

MED242 Fundamentals of Pharmacology

This course is the study of drugs with emphasis on concepts related to steps in the drug cycle and drug effects. A systems approach is used in learning major classifications of drugs and drugs of choice for selected disease processes and pathological conditions. Prerequisite(s): MED101 or HLT101.

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4 credit hours

3 credit hours

4 credit hours

3 credit hours

MED251 Allied Health Clinical Skills

This course covers the performance and quality control for medical tests common to a medical office. Skills covered include assisting with X-ray safety and techniques, rehabilitation and therapeutic modalities and performing electrocardiograms. Lab included. Prerequisite(s): MED110.

MED253 Allied Health Laboratory Skills

This course involves the study of medical laboratory procedures, and covers the collection, performance and quality control for medical tests common to a physician's office, including clinical chemistry, phlebotomy, and urinalysis. Lab included. Prerequisite(s): MED110.

MOS201 Introduction to Electronic Health Records 3 credit hours

This course introduces basic concepts of use and maintenance of an Electronic Health Records (EHR) system. Provides exposure to basic navigation of an EHR. Explores issues around privacy, security, government regulations and ethical legal aspects of the health information technology environment. Lab included.

MED265 Medical Assisting Externship

This course provides experience in selected physician's offices or other health care facilities. A qualified medical professional supervises the student during this activity. Prerequisite(s): Completion of all core courses in semesters one and two.

4 credit hours

3 credit hour

4 credit hours

Class Start Date	Class End Date	Holidays / Breaks			
7/6/2021	7/31/2021				
8/2/2021	8/28/2021				
8/30/2021	9/25/2021	9/6/2021- Labor Day			
9/27/2021	10/23/2021				
10/25/2021	11/20/2021				
	11/21/2021-11/28/2021- Thanksgiving Break				
11/29/2021	12/25/2021	12/24/2021- Christmas Eve			
	12/26/2021	-1/9/2022- Winter Break			
1/10/2022	2/5/2022	1/17/2022- MLK Jr. Day			
2/7/2022	3/5/2022				
3/7/2022	4/2/2022				
4/4/2022	4/30/2022				
5/2/2022	5/28/2022				
5/31/2022	6/25/2022	5/30/2022- Memorial Day			
6/27/2022	7/23/2022	7/4/2022- Independence Day			
7/25/2022	8/20/2022				
8/22/2022	9/17/2022	9/5/2022- Labor Day			
9/19/2022	10/15/2022				
10/17/2022	11/12/2022				
11/14/2022	12/17/2022	11/20/2022-11/27/2022-Thanksgiving Break			
	12/18/2022-1/8/2023- Winter Break				
1/9/2023	2/4/2023	1/16/2023- MLK Jr. Day			
2/6/2023	3/4/2023				
3/6/2023	4/1/2023				
4/3/2023	4/29/2023				
5/1/2023	5/27/2023				
5/30/2023	6/24/2023	5/29/2023- Memorial Day			
6/26/2023	7/22/2023	7/4/2023- Independence Day			
7/24/2023	8/19/2023				
8/21/2023	9/16/2023	9/4/2023- Labor Day			
9/18/2023	10/14/2023				
10/16/2023	11/11/2023				
11/13/2023	12/16/2023	11/19/2023-11/26/2023- Thanksgiving Break			
	12/17/2023-1/7/2024- Winter Break				
1/8/2024	2/3/2024	1/15/2024- MLK Jr. Day			
2/5/2024	3/2/2024				

2021-2024 Academic Calendar – Modular Terms*

*All dates are subject to change without notice.



Catalog Addendum No. 6 2021 Catalog, Volume IV Addendum Effective: August 18, 2021

Catalog, Page 15 Associate Degree in Nursing - Admission Requirements

(Offered at West Palm Beach and Fort Lauderdale locations) Effective August 18, 2021

In order to begin the Associate Degree in Nursing, an applicant must:

- Complete and sign an application including payment of the application fee.
- Be 18 years of age prior to the start of classes.
- Provide a valid Driver's License or government issued photo ID.
- Provide proof of High School graduation (Diploma) or successful completion of the General Education Development test (GED), or recognized equivalents of a high school diploma, or provide verification of graduation of an Associate degree or higher from an accredited college or university. Acceptance of any of the documents listed above is at the sole discretion of the School.
- Meet HCI College's technical requirements
- Pass the SmarterMeasure Learning Readiness Indicator with a minimum score of 70% in Technical Competency, 70% in Life Factors, and 60% in Technical Knowledge (please see the SmarterMeasure policy for more information).
- Pass the Test of Essential Academic Skills (TEAS) with a minimum composite score of 55 (please see the TEAS policy for further information).
- Pass the Test of Essential Academic Skills (TEAS) with a minimum composite score of 55 (please see the TEAS policy for further information) or earn a minimum score of 80 on each of the following sections on the HESI A2 Exam: Reading Comprehension, Grammar, Vocabulary and Knowledge, Anatomy and Physiology, and Math. The results of the HESI A2 will be accepted for up to one year after the test date of the exam.
- Must sign the Background Check and Drug Screening Acknowledgement

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Leave of Absence Policy and Procedure

HCI College recognizes there may be times during a student's enrollment where unforeseen circumstances may prevent a student from continuously attending classes. In the event of such extenuating circumstances, a student may apply for a Leave of Absence (LOA). Examples of acceptable reasons for an LOA are jury duty, military duty, or circumstances such as those covered under the Family Medical Leave Act of 1993 (FMLA). To be eligible to apply for a leave of absence, a student must have completed one full semester at the school and be in good academic standing.

Procedure

Students must apply for a LOA with the Dean of Academic Affairs using the HCI College Leave of Absence Request form and submit all required supporting documentation. The student must provide the reason for requesting the LOA and indicate the expected date of return, which must be at the beginning of a semester.

Students need to be current in any financial obligations to the school and must continue to make their tuition payments while on a Leave of Absence. Student must complete their current semester in order to be eligible for an approved Leave of Absence. If the student is a recipient of Federal Financial Aid, the student is required to meet with the Financial Aid office prior to HCI College granting the LOA. The Financial Aid office will advise the student of the effects of an LOA, including the student's failure to return on the approved date and their loan repayment terms. The Leave of Absence does not begin until the student has received written approval back from HCI College granting permission for the approved time frame. Students taking an approved LOA do not incur any additional charges for the period of the approved leave.

Approval

A Leave of Absence is granted at the discretion of HCI College if it is able to establish a reasonable expectation of the date of the student's return from the LOA. A Leave of Absence may be granted for a period not to exceed 180 days. However, a second LOA may be granted as long as the total number of days does not exceed 180 days in any twelve-month period. Students must request an extension to their Leave of Absence in writing and wait for approval.

In the event, the Leave of Absence is not granted, the student is required to register for and attend classes or withdraw from the school.

Return from Leave of Absence

Upon the student's return from the LOA by the approved return date, they will be permitted to continue the coursework they began prior to the Leave of Absence. Refer to the LOA Policy for more information.

If a student does not resume attendance on the date set forth in the official LOA form, they will be withdrawn from the school. The date of determination (DOD) will be the date the student was scheduled to return, or the date the student notified the school they would not be returning. Tuition: charges and refund calculations will be determined based on that date and will be applied to the student's account. A student who has received Federal student loans will have their grace period calculated using the LOA beginning

date, which may cause the student loan to enter repayment immediately if the grace period has been exhausted.

Copyright Infringement

Copyright is a form of protection provided by the laws of the United States (title 17, US Code and 1976 Copyright Act) to authors of literary, dramatic, musical, artistic, and other intellectual works, both published and unpublished. The principle of "Fair Use" allows for the public to freely utilize portions of copyrighted material for purposes of commentary or criticism, including limited academic use. Complete information about copyright may be obtained from the U.S. Copyright Office, or online at www.copyright.gov.

HCI College students and employees are not permitted to engage in activities that violate US copyright laws, including the unlawful reproduction or distribution of copyrighted material through physical or electronic means. Those found to violate these regulations will be subject to negative consequences up to and including termination. Records and evidence of such actions may also be shared with proper legal authorities for prosecution. Unauthorized distribution of copyrighted material, including peer-topeer file sharing may be subject to civil and criminal liabilities. The penalties for violation may be found at <u>www.copyright.gov</u>.



Catalog Addendum No. 7 2021 Catalog, Volume IV Addendum Effective: August 31, 2021

Medical Assisting Diploma Program – Admissions Requirements (Offered only at the Fort Lauderdale Campus)

In order to begin the Medical Assisting Program, an applicant must:

- Complete and sign an application including payment of the application fee.
- Be 18 years of age prior to the start of classes
- Pass the Wonderlic Scholastic Level Exam (SLE) with a minimum score of 12 (please see the Wonderlic policy for more for further information)
- Provide a valid Driver's License or government issued photo ID
- Provide proof of High School graduation (Diploma), or successful completion of the General Education Development test (GED) or may provide a recognized equivalent of a high school diploma, or verification of graduation from an Associate degree or higher program from an accredited college or university. Acceptance of any of the documents listed above is at the sole discretion of the Institution.
- Pass the SmarterMeasure Learning Readiness Indicator with a minimum score of 70% in Technical Competency, 70% in Life Factors, and 60% in Technical Knowledge (Please see the SmarterMeasure policy for more information).



Catalog Addendum No. 8 2021 Catalog, Volume IV Addendum Effective: September 29, 2021

Veterinary Assisting Diploma Program

35 semester credits: approximately 720 clock hours, 3 semesters, 10 months

Program Description:

The diploma program in Veterinary Assisting is designed to prepare students for entry-level employment as an assistant to a veterinarian or veterinary technician. The program will provide students with a foundation of knowledge in ethics and law, animal anatomy and physiology, medical terminology, and animal care activities. Through hands-on learning, students will learn to keep medical and imaging records, offer client education, assist with nursing duties, prepare for surgeries, and assist in a routine exam. This program includes a clinical externship experience. Upon successful completion of the program a diploma is granted.

Admissions Requirement:

Applicants should apply for admission order to be officially accepted into a program or class. To begin the application process, the applicant can visit our website at www.HCI.edu or call HCI College at (561) 586-0121 (West Palm Beach Campus), (954) 626-0255 (Fort Lauderdale Campus), or come into our office for a tour and visit with our Admissions Representative. Please note that all requisite documents are required to be submitted before starting classes.

Veterinary Assisting Diploma Program - Admission Requirements

In order to begin the Veterinary Assisting Program, an applicant must:

- Complete and sign an application including payment of the application fee.
- Be 18 years of age prior to the start of classes
- Pass the Wonderlic Scholastic Level Exam (SLE) with a minimum score of 12 (please see the Wonderlic policy for more for further information)
- Provide a valid Driver's License or government issued photo ID
- Provide proof of High School graduation (Diploma), or successful completion of the General Education Development test (GED) or may provide a recognized equivalent of a high school diploma, or verification of graduation from an Associate degree or higher program from an accredited college or university. Acceptance of any of the documents listed above is at the sole discretion of the Institution.
- Pass the SmarterMeasure Learning Readiness Indicator with a minimum score of 70% in Technical Competency, 70% in Life Factors, and 60% in Technical Knowledge (Please see the SmarterMeasure policy for more information).

Veterinary Assisting Diploma Program – Clock Hours Breakdown

In Months	10	Theory	390
In Semesters	3	Labs	150
		Externship	180
			720

Veterinary Assisting Diploma Program – Tuition Breakdown

The College's tuition charges for its Veterinary Assisting program are presented below. A set of required materials, textbooks, and uniforms are provided at no additional cost.

Tuition and Application Fee	
Tuition	\$ 18,500
Application Fee	\$ 50
Total Program Cost	\$ 18,550

Per Course: \$1,850

Total Financial Aid Credits: 22

	Price Per Semester					
Semester One - Tuition	\$7,400					
Semester Two - Tuition	\$7,400					
Semester Three - Tuition	\$3,700					
Total Program Tuition	\$18,500					
A set of required materials, textbooks, and uniforms are provided at no additional cost.						

Veterinary Assisting Diploma Program – Goals and Objectives:

The goal of HCI College's Veterinary Assisting Program is to prepare students to perform a diverse variety of tasks in customer/client service and education; front desk and clerical responsibilities; preparation of exam rooms; and assisting in areas of filling scripts, setting up lab work, and assisting with nursing and animal care. Veterinary assistants work under the supervision of veterinarians and veterinary technicians, through the establishment of standard levels of knowledge, practical experience, and skills.

NOTE: The College makes no representation, promise, or guarantee that completion of this program either assures eligibility for or passage of any certification examination, acceptance by any state board, or that this program is intended to prepare graduates for employment in any state other than Florida.

Course Code	Course Description	Credits
	Core Courses	
VAT100	Introduction to Veterinary Assisting	4
VAT110	Medical Terminology	4
VAT120	Anatomy and Physiology	4
VAT130	Laboratory Procedures	3
VAT140	Pharmacology	3
VAT150	Radiology	3
VAT170	Veterinary Clinical Procedures	3
VAT180	Hospital and Surgical Procedures	3
VAT200	Externship	4
SLS110	Career Preparation	4

Course Descriptions

SLS110

Career Preparation

This course provides students with the foundation for job preparation and job searching. Students will identify their qualifications for their chosen career; identify what employers look for in strong candidates; build resumes and cover letters; gain tips on completing applications; job and informational interviewing; as well as job searching, professional networking, and tips for setting up a successful career. This course will also introduce students to the application of basic interpersonal communication skills, with a focus on achieving success in the workplace. Prerequisite(s): None

VAT100

Introduction to Veterinary Assisting

This class will introduce students to the role of the Veterinary Assistant as a member of an animal care team. Emphasis will be on OSHA, safety protocols, cleaning and disinfection. This class is designed to familiarize students with general veterinary office procedures. Students will learn to greet clients, answer the telephone, schedule appointments, admit patients, perform basic filing, and maintain and retrieve medical records. Students will also understand basic invoicing, billing, and payment and account procedures. Topics in human-animal bond, professional and appropriate appearance and language in the workplace are discussed. Students will also learn the correct use of electronic communication in the veterinary care center. Pre-requisites: None

VAT110 Medical Terminology

Students will learn the structure of medical terms and abbreviations. Large and small breed recognition, identifying normal and abnormal animal behavior, and proper restraint of large and small animals are also discussed. Pre-requisites: None

VAT120 Anatomy and Physiology

In this course, student will learn animal body systems and major organs. Grooming, nutrition, basic health care management, and animal sexing are also discussed in this course. Pre-requisites: VAT110

VAT130 Laboratory Procedures

In this course, students will learn how to properly obtain and handle voided urine and fecal samples, assist in obtaining blood samples for procedures, and how to prepare and set up various laboratory tests and laboratory equipment. Handling of deceased animals will also be covered in this course. Lab included. Pre-requisites: None

VAT140 Pharmacology

In this course, an overview of drugs will be discussed to familiarize students with common generic and brand name medications. Classes of medications and medical abbreviations associated with prescriptions, reading and filling prescriptions,

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4 credit hours

4 credit hours

4 credit hours

4 credit hours

3 credit hours

3 credit hours

and dosing and dispensing will be discussed. Students will also learn basic administration of medications. Lab included. Prerequisites: None

VAT150 Radiology

Students will learn the safety measures related to diagnostic imaging, as well as, labeling, filing, processing and development of images for diagnostic purposes. Lab included. Pre-requisites: VAT110

VAT170 Veterinary Clinical Procedures

In this course, students will understand and learn the proper procedure to perform a physical examination on an animal. Students will also learn how to assist in the restraint and positioning of animals. Basic nursing skills such as nail trims, external anal gland expressions, external ear cleaning, and bathing will be discussed. Animal CPR is also taught. Lab included. Prerequisites: VAT110

VAT180 Hospital and Surgical Procedures 3 credit hours

In this course, students will understand basic surgical preparation, including equipment, sterilization methods, asepsis, common surgical instruments and suture material, positioning, scrubbing, maintenance of surgical logs, and proper operating room sanitation and etiquette. In the course, students will also learn about basic cleanliness and orderliness of a veterinary facility. Lab included. Pre-requisites: VAT110

VAT200 Veterinary Assisting Externship 4 credit hours

In this course, students will work in a live animal care setting for 180 hours. A qualified veterinary care professional supervised the student during this activity. Pre-requisites: Completion of all core courses, including all pre-clinical requirements.

Payment Period

The payment period shall be the semester. All tuition is due and payable on the first day of the payment period. Regardless of the student's funding source, all tuition must be paid in full thirty (30) days prior to the end of the payment period. The College reserves the right to withhold a grade report, diploma or transcript until all academic and financial requirements for the program have been met. Failure or withdrawal from a course does not give thestudent the right to repeat the course without additional charges. A student who voluntarily withdraws from or isterminated by the College after starting classes is obligated to the College for tuition and fees as per the refund policy.

- 1. Each student is entitled to one official copy of his/her official transcript and a diploma upon graduation. The additional transcript fee applies to any additional copies of official transcripts.
- 2. Students must be current with all financial obligations to the College in order to receive an official transcriptand their diploma. Students may obtain unofficial transcripts at any time at no cost.
- 3. The bad check fee is charged for any check that is returned unpaid.

Graduation Requirements

- A student must meet the following requirements to qualify for graduation from any program ofstudy:
- Successfully complete all courses in the program of study with a cumulative grade point average of 2.0 or higher.
- Meet or exceed the minimum standards of satisfactory academic progress (SAP);
- Satisfy all programmatic requirements; and .
- Satisfy all financial obligations to the College.

3 credit hours

3 credit hours

Class Size

All students are taught by individualized instruction. The average student ratio is 20:1 for any session. Maximum class size is 30 students per session with exception of bigger classroom that may fit or have room for up to 35 students. Lab size is between 10 and 15 students.

Satisfactory Academic Progress Policy for Veterinary Assisting

In order to demonstrate SAP toward completion of the Veterinary Assisting Program, a student must maintain a 2.0 and must progress through the program at a specific minimum pace to ensure that the student does not exceed 150% of the published length of the Veterinary Assisting Program ("Maximum Timeframe"). Maximum Time Frame for the Veterinary Assisting Program is exceeded when a student attempts more than 54 semester credits. SAP is evaluated at the end of every semester in order to reestablish a student's eligibility to continue receiving federal financial aid funds for the next semester. The following abbreviations are used throughout this policy:

- (SAP) Satisfactory Academic Progress
- (CGPA) Communitive Grade Point average •
- (AFAW) Academic Financial Aid Warning
- (AFAP) Academic Financial Aid Probation

There are two standards that must be met:

The **gualitative standard** for each program requires that a student achieve a minimum **CGPA** of 2.00 or better each semester in the program. When evaluated at the end of each semester, a student must achieve the CGPA of 2.0 within this document at the end of the corresponding semester. At completion of the program, every veterinary assisting student must have a CGPA of at least 2.0 in order to graduate from the Veterinary Assisting Program.

The quantitative standard requires students to complete the Veterinary Assisting Program within the Maximum Timeframe of the program. Transfer credits that are accepted by HCI College for credit toward the Veterinary Assisting Program are included in the calculation of the Maximum Time Frame.

The required minimum pace of completion percentage (Completion Rate) is derived by dividing the number of earned credits by the number of credits attempted. In this calculation, transfer credits are counted as both attempted and earned credits.

Students must successfully maintain a Completion Rate of at least 67% by the end of the first Semester and maintain a 67% minimum Completion Rate in all following semesters. The courses withdrawn during the first seven (7) days of the semester are not included in the Completion Rate as either attempted or completed credits. However, if a student withdraws from a course after the first seven (7) days of the semester, the credits for that course will be included as credits attempted in the Completion Rate.

Treatment of incompletes, course completers, withdrawals, repetitions, transfer credit, audited courses, leaves of absence, and official grade changes.

- Course Incomplete grades: Grades of Incomplete are included in the minimum pace of completion percentage as credits attempted but are not included in GPA or CGPA until the official grade is posted.
- <u>Completers (non-graduates)</u>: A student who completes the academic requirements for a program but does not yet have the degree or certificate is not eligible for further additional federal student aid funds for that program.

- <u>Withdrawals</u>: Courses withdrawn during the first seven (7) days of the semester are not included as attempted credits in the minimum pace of completion percentage or in the student's GPA/**CGPA**. Courses withdrawn after the first seven (7) days of the semester are included as attempted but not completed for the Completion Rate. They are not included in GPA or **CGPA**.
- <u>Repeated Courses</u>: Students may use federal student aid funds for which they are entitled to retake any course they previously completed with a grade of F. Students may also use federal student aid funds to retake a course they previously completed with a passing grade one time to improve their grade. For financial aid purposes each time a course is taken it counts as an attempted course for the Completion Rate. The higher grade will count towards the cumulative grade point average.
- <u>Transfer credits</u>: Transfer credits are considered as both attempted and completed for the Completion Rate. They are not included in the calculation of GPA or **CGPA**.
- <u>Audited Courses</u>: Courses taken as audits are not taken for credit and are not included in SAP calculations for the Completion Rate, GPA or **CGPA**.
- <u>Leaves of Absence (LOA)</u>: HCI does not grant LOAs during a term. Any complete term during which a student is on an authorized LOA will not be included in the Completion Rate calculation.
- <u>Grade Changes</u>: In the event a grade for a prior term is officially changed by HCI College after SAP has been evaluated for that term, SAP will be reevaluated using the new grade at the next SAP evaluation point, however, the College may elect to reevaluate SAP for the student immediately following the official grade change.

Financial Aid Warning

If a student does not achieve the required minimum **CGPA** of 2.0 at the end of each semester or if the student fails to achieve a 67% minimum pace of completion percentage after any semester, the student will be placed on **AFAW** for the next semester. Students on **AFAW** status remain eligible to receive federal financial aid for the semester on which they are on **AFAW**. Students may not be on **AFAW** for more than one consecutive semester.

- If a student successfully obtains the required minimum CGPA or achieves a minimum pace of completion percentage of 67% or better at the conclusion of the semester on AFAW, the student will be removed from AFAW.
- A student who is not meeting SAP requirements at the end of the semester on AFAW will lose eligibility to continue receiving federal financial aid, but the student may appeal the student's SAP status in order to preserve his/her financial aid eligibility. (Please see the section below "SAP Appeal Process" for information on how an SAP Appeal may be filed).
- If a student files an SAP appeal that is denied, they will be dismissed from the program and HCI College.
- Following a successful SAP appeal, the student will be placed on AFAP. Students on AFAP must meet with their academic advisor to develop an academic plan if the student is expected to need more than one semester to resume meeting SAP requirements. Students expected to need only one semester to resume meeting SAP requirements may also receive an academic plan at the discretion of HCI College and will be informed of the College's decision with the decision on the student's SAP appeal. All academic plans will be developed according to the judgement of the academic advising staff. Academic plans will contain a roadmap for the student to resume meeting SAP requirements by a specific point in time and may contain and benchmarks that the student needs to achieve in order to eventually resume meeting SAP requirements.

- At the conclusion of the student's semester on **AFAP** status, the student's progress shall be evaluated to determine if the student has resumed meeting SAP requirements or if the student is meeting the requirements established in the student's Academic Plan.
- If a student is on **AFAP** completes 67% or more of credit hours attempted by the next SAP review period and meets the applicable CGPA, the student will be removed from **AFAP** status and returned to good standing for academic/SAP purposes.
- If a student on **AFAP** has an academic plan that provides a pathway for the student to resume meeting SAP requirements within more than one semester and the student fails to meet requirements established in the academic plan, the student will be ineligible for federal financial aid and will be dismissed from HCI College.
- If the student on AFAP has an academic plan that provides a pathway for the student to resume meeting SAP requirements within more than one semester and the student is meeting the requirements established in the academic plan, the student will continue to be eligible to receive federal financial aid as outlined in the academic plan.

SAP Appeal Process

HCI College may only approve an appeal by a student if it is determined the student will meet SAP requirements based on the qualitative and/or quantitative standards in the next SAP review period or if the academic plan that the college proposes for the student demonstrates that a reasonable pathway exists to enable the student to resume meeting SAP requirements.

To appeal the loss of federal student aid eligibility due to SAP, the student must submit a written request to the Dean of Academic Affairs, or any such person designated by the Campus President. The reason for the appeal must be the result of mitigating circumstances, and documentation supporting a claim of mitigating circumstances must be provided in addition to the student's plan for improvement. As part of the appeal, the student must document in writing why they did not meet SAP, and what in the student's situation has changed that will allow them to meet SAP going forward. Typical student life issues and making the transition to college are not considered mitigating circumstances under this policy. Examples of mitigating circumstances that may impact Academic Progress include the following:

- Death of an immediate family member
- Student illness requiring hospitalization (this includes mental health issues)
- Illness of an immediate family member where the student is a primary caretaker
- Illness of an immediate family member where the family member is the primary financial support
- Abusive relationships
- Divorce proceedings
- Previously undocumented disability
- Natural disaster
- Family emergency
- Financial hardship such as foreclosure or eviction
- Other special circumstances

The Dean of Academic Affairs and/or designee will determine the appropriateness of the mitigating circumstance regarding severity, timeliness, and the student's ability to avoid the circumstance in the future. Upon receipt of the request for appeal and the supporting documentation, the Dean of Academic Affairs or designee will notify the student of the College's determination in writing of receiving the student's complete appeal submission.

Readmission to HCI College Following Dismissal for Failure to Meet SAP

If a student files an unsuccessful SAP appeal, which is denied, the student will be dismissed pursuant to HCI College policy but may apply to be readmitted after the end of the semester for which the SAP appeal was denied. Sitting out one term does not automatically reinstate a student's federal student aid eligibility.

A student who seeks to be readmitted after remaining out of school for one full semester will be subject to HCI College's evaluation of the student's academic records to determine if it is possible for the student to resume meeting SAP requirements.

If HCI College determines that the student may be able to resume meeting SAP requirements, the student may be readmitted but is not eligible for federal student aid funds until the student successfully meets SAP requirements.

Note:

The Veterans Administration is notified of unsatisfactory progress of a veteran student who remains on academic probation beyond two consecutive semesters/pay periods. At that point, veterans' benefits can be terminated. A student terminated from veterans' benefits due to unsatisfactory progress maybe recertified for benefits when the student meets the CGPA requirement or meets the minimum 67% Completion Rate requirement for progression.

Refund Schedule for the Veterinary Assisting Program

The refund schedule is as follows:

- Students who withdraw during the first seven (7) days of enrollment (semester) will receive a 100% refund of all monies paid for tuition, fees, and supplies (excluding the nonrefundable application fee). Students who attend beyond the seven (7) day period will be responsible for 100% of the tuition and fee charges for courses attended in the period of enrollment (semester).
- > The Withdrawal Date for refund computation will be one of the following:
 - The date Withdrawal/Cancellation Form signed by Student.
 - The date of withdrawal for unsatisfactory progress.
 - The date of withdrawal for excessive absences will be the last date of attendance.
 - The date of involuntary withdrawal by HCI College for actions that the College may deem to be in violation of its policies and procedures.

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The return of Title IV funds under the Federal Refund Policy follows a specific order, as follows:

- (1) Unsubsidized Direct Loan,
- (2) Subsidized Direct Loan,
- (3) Direct PLUS Loan,
- (4) Pell Grant,
- (5) Iraq and Afghanistan Service Grants
- (6) Federal Supplemental Educational Opportunity Grant (FSEOG),
- (7) TEACH Grants

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COMMISSION FOR INDEPENDENT EDUCATION

PROFESSIONAL NURSING STUDENT DISCLOSURE

CIE Form 609a Section 1005.04, Florida Statutes Rule 6E-1.0032, Florida Administrative Code

Name of Institution and CIE ID No. Health Career Institute #2077

NCLEX Code # 704146

Professional Nursing

You are considering enrollment in a program that offers education and experiential learning relating to a career as a Professional Nurse. To practice as a Professional Nurse in Florida, you are required to pass the National Council Licensure Examination for Registered Nurses (NCLEX-RN). This is a standardized exam taken by students nationally.

In 2018, the national passage rate for first time test takers for the NCLEX-RN is 85.11%.

In the same year, ____0____ students from this institution took the NCLEX-RN for the first time and the institutional passage rate for first time test takers is no test takers.

Status with the Florida Board of Nursing: _____X____Not on probation

On probation

Additional information about passage rates can be found online at

http:// floridanursing.gov/education-and-training-programs/.

Student Signature 16242A

(Institution Representative Signature)

Tiffany King (Print Name)

1/31/2020

(Date)

Yairen Abreu

(Print Name and Title)

1/31/2020

(Date)

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COMMISSION FOR INDEPENDENT EDUCATION

PROFESSIONAL NURSING STUDENT DISCLOSURE

CIE Form 609a Section 1005.04, Florida Statutes Rule 6E-1.0032, Florida Administrative Code

Name of Institution and CIE ID No. Health Career Institute #2077

NCLEX Code # 704146

Professional Nursing

You are considering enrollment in a program that offers education and experiential learning relating to a career as a Professional Nurse. To practice as a Professional Nurse in Florida, you are required to pass the National Council Licensure Examination for Registered Nurses (NCLEX-RN). This is a standardized exam taken by students nationally.

In 2018, the national passage rate for first time test takers for the NCLEX-RN is 85.11%.

first time test takers is no test takers.

Status with the Florida Board of Nursing: _____X ____Not on probation

On probation

Additional information about passage rates can be found online at

http:// floridanursing.gov/education-and-training-programs/.

DocuSigned by:

(Student Signature

Rebecca May Freeman (Print Name)

9/11/2020

(Date)

Erystal Eimbaldi

(Institution Representative Signature)

krystal zimbaldi admissions (Print Name and Title)

9/11/2020

(Date)

Case 9:22-cv-81883-RAR Document 141-2 Entered on FLSD Docket 12/19/2023 Page 636 of 1026

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COMMISSION FOR INDEPENDENT EDUCATION

PROFESSIONAL NURSING STUDENT DISCLOSURE

CIE Form 609a Section 1005.04, Florida Statutes Rule 6E-1.0032, Florida Administrative Code

Name of Institution and CIE ID No. Health Career Institute #2077

NCLEX Code # 704146

Professional Nursing

You are considering enrollment in a program that offers education and experiential learning relating to a career as a Professional Nurse. To practice as a Professional Nurse in Florida, you are required to pass the National Council Licensure Examination for Registered Nurses (NCLEX-RN). This is a standardized exam taken by students nationally.

In 2018, the national passage rate for first time test takers for the NCLEX-RN is 85.11%.

In the same year, ____0____ students from this institution took the NCLEX-RN for the first time and the institutional passage rate for first time test takers is no test takers.

Status with the Florida Board of Nursing: X_____Not on probation

On probation

Additional information about passage rates can be found online at

http:// floridanursing.gov/education-and-training-programs/.

Brittany Roberso

(Student Signature) 7400.

Brittany Roberson (Print Name)

5/27/2020

(Date)

(Institution Representative signature)

Lisa Sgherza (Print Name and Title)

5/27/2020

(Date)

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Case 9:22-cv-81883-RAR Document 141-2 Entered on FLSD Docket 12/19/2023 Page 639 of DocuSign Envelope ID: 8E7E619D-D3BF-4990-B92C-C01747523A81 1026



COMMISSION FOR INDEPENDENT EDUCATION

PROFESSIONAL NURSING STUDENT DISCLOSURE

CIE Form 609a Section 1005.04, Florida Statutes Rule 6E-1.0032, Florida Administrative Code

Name of Institution and CIE ID No. Health Career Institute #2077

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In 2018, the national passage rate for first time test takers for the NCLEX-RN is 85.11%.

In the same year, ____0____ students from this institution took the NCLEX-RN for the first time and the institutional passage rate for first time test takers is no test takers.

Status with the Florida Board of Nursing: _____X ____Not on probation

On probation

Additional information about passage rates can be found online at

http:// floridanursing.gov/education-and-training-programs/.

DocuSigned by:

(Student Signature)

Bianca Vinas

(Print Name)

1/5/2021

(Date)

х

DocuSigned by:

(Institution Representative Signature)

Lisa Sgherza

(Print Name and Title)

1/5/2021

(Date)

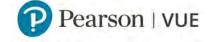
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1026



Report 4 – Jurisdiction Program Summary of all First-Time Candidates Licensed in All Jurisdictions



NCSBN Confidential

FL - HEALTH CAREER INSTITUTE - ADN (US70705500)

NCLEX-RN

NCLEX	NCLEX		01/	01/2018 -	03/31/20	18	04/	01/2018 -	06/30/20	18	07/	01/2018 -	09/30/20	18	10/	01/2018 -	12/31/20 ⁻	18		Tot	al		
Education Program	Education Program City	NCLEX Graduation Date	Total Delivered	Total Passed	Total Failed	% Pass Rate	Total Delivered	Total Passed	Total Failed	% Pass Rate	Total Delivered	Total Passed	Total Failed	% Pass Rate	Total Delivered	Total Passed	Total Failed	% Pass Rate	Total Delivered	Total Passed	Total Failed	% Pass Rate	
		01/2017	0	0	0	0.00%	0	0	0	0.00%	1	1	0	100.00%	0	0	0	0.00%	1	1	0	100.00%	
		01/2018	1	1	0	100.00%	0	0	0	0.00%	0	0	0	0.00%	0	0	0	0.00%	1	1	0	100.00%	
		03/2018	0	0	0	0.00%	3	0	3	0.00%	0	0	0	0.00%	0	0	0	0.00%	3	0	3	0.00%	
		04/2018	0	0	0	0.00%	1	0	1	0.00%	3	1	2	33.33%	1	0	1	0.00%	5	1	4	20.00%	
	WEST		05/2018	0	0	0	0.00%	0	0	0	0.00%	8	6	2	75.00%	1	0	1	0.00%	9	6	3	66.67%
FL - HEALTH		06/2018	0	0	0	0.00%	0	0	0	0.00%	2	2	0	100.00%	3	1	2	33.33%	5	3	2	60.00%	
CAREER		07/2018	0	0	0	0.00%	0	0	0	0.00%	1	1	0	100.00%	2	1	1	50.00%	3	2	1	66.67%	
INSTITUTE -	BEACH	08/2017	12	7	5	58.33%	2	0	2	0.00%	0	0	0	0.00%	0	0	0	0.00%	14	7	7	50.00%	
ADN (US7070550		08/2018	0	0	0	0.00%	0	0	0	0.00%	0	0	0	0.00%	4	2	2	50.00%	4	2	2	50.00%	
0)		09/2017	2	0	2	0.00%	0	0	0	0.00%	1	0	1	0.00%	0	0	0	0.00%	3	0	3	0.00%	
-,		09/2018	0	0	0	0.00%	0	0	0	0.00%	0	0	0	0.00%	5	4	1	80.00%	5	4	1	80.00%	
		10/2018	0	0	0	0.00%	0	0	0	0.00%	0	0	0	0.00%	7	5	2	71.43%	7	5	2	71.43%	
		11/2018	0	0	0	0.00%	0	0	0	0.00%	0	0	0	0.00%	2	1	1	50.00%	2	1	1	50.00%	
		12/2017	5	5	0	100.00%	2	1	1	50.00%	1	0	1	0.00%	1	0	1	0.00%	9	6	3	66.67%	
	Total		20	13	7	65.00%	8	1	7	12.50%	17	11	6	64.71%	26	14	12	53.85%	71	39	32	54.93%	

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HCI Sub. Prod. 04/24/23 - 002022

COMMISSION FOR	INDEPENDENT	EDUCATION
		LDUGATION

PROFESSIONAL NURSING STUDENT DISCLOSURE

CIE Form 609a Section 1005.04, Florida Statutes Rule 6E-1.0032, Florida Administrative Code

Name of Institution and CIE ID No. HCI College #2077

NCLEX Code # 704146

Professional Nursing

You are considering enrollment in a program that offers education and experiential learning relating to a career as a Professional Nurse. To practice as a Professional Nurse in Florida, you are required to pass the National Council Licensure Examination for Registered Nurses (NCLEX-RN). This is a standardized exam taken by students nationally.

In 2020, the national passage rate for first time test takers for the NCLEX-RN is <u>82.80</u>%.

In the same year, <u>18</u> students from this institution took the NCLEX-RN for the first time and the institutional passage rate for first time test takers is <u>72.22</u>%.

Status with the Florida Board of Nursing: <u>X</u>Not on probation

____On probation

Additional information about passage rates can be found online at

http:// floridanursing.gov/education-and-training-programs/.

(Student Signature)

(Institution Representative Signature)

(Print Name)

(Print Name and Title)

(Date)

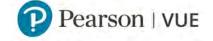
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Report 4 – Jurisdiction Program Summary of all First-Time Candidates Licensed in All Jurisdictions



NCSBN Confidential

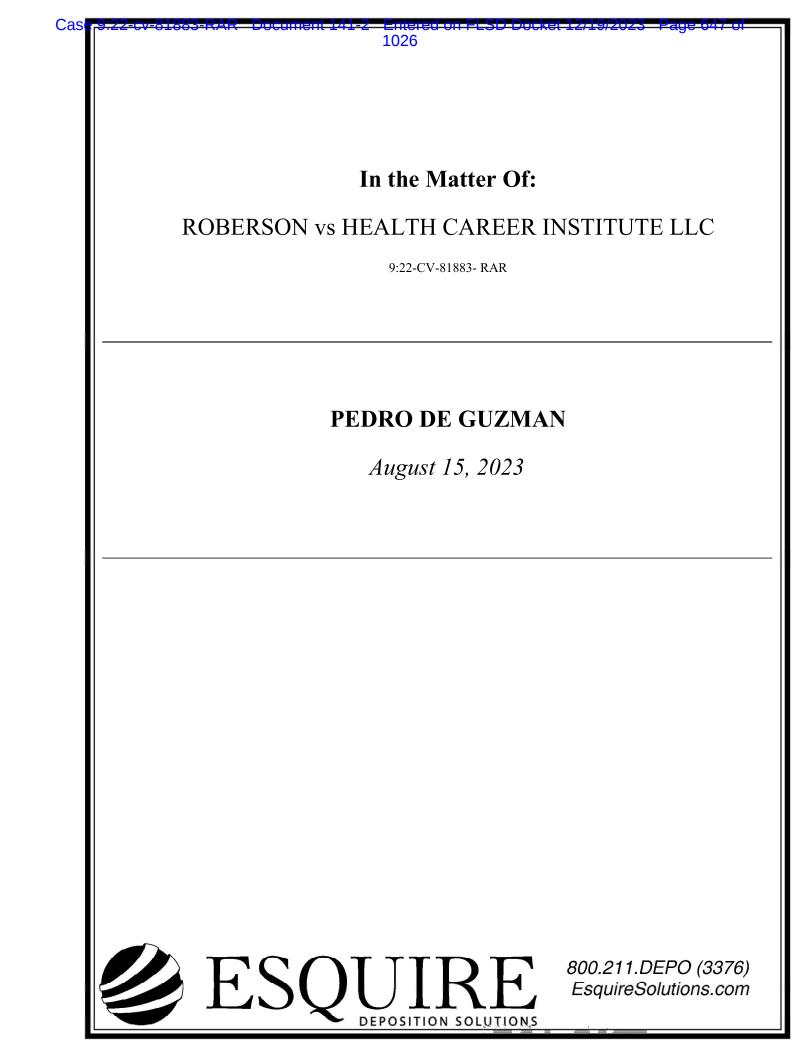
FL - HCI COLLEGE - WEST PALM BEACH - ADN (US70705500)

NCLEX-RN

NCLEX			01/01/2020 - 03/31/2020						06/30/20	20	07/01/2020 - 09/30/2020				10/	01/2020 -	20	Total				
Education Program		NCLEX Graduation Date	Total Delivered	Total Passed	Total Failed	% Pass Rate	Total Delivered	Total Passed	Total Failed	% Pass Rate	Total Delivered	Total Passed	Total Failed	% Pass Rate	Total Delivered	Total Passed	Total Failed	% Pass Rate	Total Delivered	Total Passed	Total Failed	% Pass Rate
		01/2019	1	1	0	100.00%	0	0	0	0.00%	1	0	1	0.00%	0	0	0	0.00%	2	1	1	50.00%
		01/2020	15	9	6	60.00%	15	7	8	46.67%	1	0	1	0.00%	0	0	0	0.00%	31	16	15	51.61%
		02/2019	0	0	0	0.00%	2	1	1	50.00%	0	0	0	0.00%	0	0	0	0.00%	2	1	1	50.00%
		02/2020	1	0	1	0.00%	4	1	3	25.00%	0	0	0	0.00%	0	0	0	0.00%	5	1	4	20.00%
		04/2019	1	0	1	0.00%	1	0	1	0.00%	0	0	0	0.00%	0	0	0	0.00%	2	0	2	0.00%
		04/2020	0	0	0	0.00%	11	9	2	81.82%	0	0	0	0.00%	1	0	1	0.00%	12	9	3	75.00%
		05/2018	0	0	0	0.00%	0	0	0	0.00%	0	0	0	0.00%	1	0	1	0.00%	1	0	1	0.00%
FL - HCI	WEST PALM	05/2020	0	0	0	0.00%	14	10	4	71.43%	7	2	5	28.57%	0	0	0	0.00%	21	12	9	57.14%
COLLEGE -		06/2020	0	0	0	0.00%	0	0	0	0.00%	3	2	1	66.67%	1	0	1	0.00%	4	2	2	50.00%
PALM		08/2019	1	0	1	0.00%	1	0	1	0.00%	0	0	0	0.00%	0	0	0	0.00%	2	0	2	0.00%
BEACH -	BEACH	08/2020	0	0	0	0.00%	0	0	0	0.00%	7	6	1	85.71%	4	2	2	50.00%	11	8	3	72.73%
ADN (US7070550		09/2019	2	1	1	50.00%	0	0	0	0.00%	0	0	0	0.00%	0	0	0	0.00%	2	1	1	50.00%
0)		09/2020	0	0	0	0.00%	0	0	0	0.00%	0	0	0	0.00%	14	8	6	57.14%	14	8	6	57.14%
		10/2019	3	0	3	0.00%	1	0	1	0.00%	0	0	0	0.00%	0	0	0	0.00%	4	0	4	0.00%
		10/2020	0	0	0	0.00%	0	0	0	0.00%	0	0	0	0.00%	5	2	3	40.00%	5	2	3	40.00%
		11/2018	0	0	0	0.00%	1	1	0	100.00%	0	0	0	0.00%	0	0	0	0.00%	1	1	0	100.00%
		11/2019	2	1	1	50.00%	0	0	0	0.00%	0	0	0	0.00%	0	0	0	0.00%	2	1	1	50.00%
		12/2018	1	1	0	100.00%	0	0	0	0.00%	0	0	0	0.00%	0	0	0	0.00%	1	1	0	100.00%
		12/2019	22	17	5	77.27%	5	3	2	60.00%	0	0	0	0.00%	0	0	0	0.00%	27	20	7	74.07%
	Total		49	30	19	61.22%	55	32	23	58.18%	19	10	9	52.63%	26	12	14	46.15%	149	84	65	56.38%

The numbers included in the report reflect the most up-to-date and accurate numbers at the time the report was generated. Page 99/236

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PEDRO DE GUZMAN ROBERSON vs HEALTH CAREER INSTITUTE LLC August 15, 2023

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF FLORIDA WEST PALM BEACH DIVISION CASE NO.: 9:22-CV-81883- RAR

BRITTANY ROBERSON, REBECCA FREEMAN, BIANCA VIÑAS, TIFFANY KING, and TRESHA THOMPSON, individually and on behalf of others similarly situated,

Plaintiffs,

-vs-

HEALTH CAREER INSTITUTE LLC (dba HCI COLLEGE LLC and HCI ACQUISITION LLC), FLORIAN EDUCATION INVESTORS LLC, and STEVEN W. HART,

Defendants.

DEPOSITION OF PEDRO DE GUZMAN AS HCI COLLEGE, LLC'S 30(b)(6) REPRESENTATIVE

> Tuesday, August 15, 2023 10:18 - 7:26 p.m.

1601 Forum Place, Suite 505 West Palm Beach, Florida 33401

Reported By: Wendy Beath Anderson, RDR, CRR, CRC Notary Public, State of Florida Esquire Deposition Services West Palm Beach Office Job #J9995647



Case 9:22-cv-81883-RAR Document 141-2 Entered on FLSD Docket 12/19/2023 Page 649 of 1026 PEDRO DE GUZMAN August 15, 2023 **ROBERSON vs HEALTH CAREER INSTITUTE LLC** 2 1 **APPEARANCES:** 2 On behalf of Plaintiffs: 3 REBECCA EISENBREY, ESQUIRE VICTORIA ROYTENBERG, ESQUIRE PROJECT OF PREDATORY STUDENT LENDING 4 769 Centre Street, Suite 166 5 Jamaica Plain, Massachussets 02130 6 and 7 NICOLE MAYER, ESQUIRE MAYER LAW 8 171 Dommerich Drive Maitland, Florida 32751 9 10 On behalf of the Defendants: 11 MICHAEL J. CARNEY, ESQUIRE 12 BARBARA FOX, ESQUIRE 13 KUBICKI DRAPER 110 East Broward Boulevard, Suite 1400 Fort Lauderdale, Florida 33301 14 and 15 16 BOB L. HARRIS, ESQUIRE (VIA ZOOM) MESSER CAPARELLO 2618 Centennial Place 17 Tallahassee, Florida 32308 18 19 20 21 22 23 24 25 🖉 ESOI 800.211.DEPO (3376)

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Case 9:22-cv-81883-RAR Document 141-2 Entered on FLSD Docket 12/19/2023 Page 650 of 1026 PEDRO DE GUZMAN August 15, 2023 ROBERSON vs HEALTH CAREER INSTITUTE LLC 111 1 them. 2 Ο. You said "now." Is that a change in policy? 3 Α. The policy, over time, you know, if the student owes us money, our policy has changed over time. 4 So was there a time when you wouldn't 5 0. Okay. 6 send it to the Florida Board of Nursing if they were 7 behind? 8 Α. I'm sorry, I don't know specific ones off the 9 top of my head, but I know at the time that was the 10 policy, that we could not release students to the 11 Florida Board of Nursing or send their transcripts if 12 the students were, you know, in arrears in what they 13 owed us. 14 And just what is the -- the financial 0. 15 arrangement with Tuition Options, do they get a 16 percentage of payments? What is the financial arrangement, if you know? 17 18 I don't know the dollar amount. I know they Α. 19

19 get paid -- they're a servicer. So they don't get a 20 percentage of what they collect. They just get a fee. 21 There's a monthly fee per student that they service that 22 they get paid. That's how they get paid.

Q. And for HCI, when a student enters into one of these payment plans -- and I am not a finance guy, so be patient with me -- but what is the financial consequence



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	PEDRO DE GUZMANAugust 15, 2023ROBERSON vs HEALTH CAREER INSTITUTE LLC152
1	A. Yes.
2	Q. So in the third paragraph it says, "In the
3	same year" that's referring to 2018 "zero students
4	from this institution took the NCLEX-RN for the first
5	time and the institutional passage rate for first-time
6	test-takers is no test-takers"; is that right?
7	A. That's what it says.
8	Q. And in 2018, did HCI students take the
9	NCLEX-RN?
10	A. HCI students in 2018, did they take the
11	NCLEX-RN? Yes.
12	Q. Okay. How many times has HCI applied to ACEN
13	for programmatic accreditation?
14	A. For which campus?
15	Q. Let's start with West Palm.
16	A. I believe twice. Well, no. West Palm now
17	would be three times, I believe.
18	Q. Okay. And you haven't achieved it yet; is
19	that right?
20	A. That's correct.
21	Q. Have you been granted candidacy status before?
22	A. Before, when?
23	Q. Have you been granted candidacy status with
24	ACEN?
25	A. Yes.
	ESQUIRE 800.211.DEPO (3376) Esquire Solutions.com

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	ROBERSON vs HEALTH CAREER INSTITUTE LLC 188
1	them these authorization guidelines and we kind of
2	use those as a guide on the things that we need to talk
3	about.
4	Q. Okay. And speaking of those guidelines, who
5	drafts the authorization guidelines?
6	A. Usually that's, you know, it's a what's
7	that word a collaborative effort typically with the
8	CEO, the CFO and the chairman, you know, with feedback,
9	from, you know, other members of the senior team
10	sometimes, but primarily the CFO, the CEO and the
11	chairman.
12	Q. Okay. And who enforces the guidelines?
13	A. Well, you know, senior level team for HCI, we
14	do. It's one of our responsibilities, is to enforce the
15	guidelines.
16	Q. And I know we have not and I'm happy to, we do
17	have it as an exhibit if you'd like to have it in front
18	of you, but the guidelines say that exceptions have to
19	be run by the chairman. Does that sound right?
20	A. Yeah, there's basically some of that on there.
21	Basically, what we have is executive committee, which is
22	made up of myself and the CFO and the chairman. And the
23	rule of thumb is that on the major items that are
24	flagged on the authorization guidelines, we need to be
25	in agreement on those. So that includes the chairman.
	ESQUIRE B00.211.DEPO (3376) EsquireSolutions.com

Case 9	:22-cv-81883-RAR Document 141-2 Entered on FLSD Docket 12/19/2023 Page 653 or 1026
	PEDRO DE GUZMANAugust 15, 2023ROBERSON vs HEALTH CAREER INSTITUTE LLC264
1	CERTIFICATE OF OATH
2	STATE OF FLORIDA
3	COUNTY OF PALM BEACH
4	
5	I, the undersigned authority, certify that PEDRO DE
6	GUZMAN personally appeared before me and was duly sworn
7	on the 15th day of August, 2023.
8	
9	Witness my hand and official seal this 28th day of
10	August, 2023.
11	
12	11 1 North
13 14	There Malin-
15	
16	Wendy Beath Anderson, RDR, CRR, CRC Notary Public State of Florida
17	My Commission Expires: 9/23/2025 My Commission No.: HH 178324
18	Job #J9995647
19	
20	
21	
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24	
25	
	ESQUIRE 800.211.DEPO (3376) EsquireSolutions.com

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PEDRO DE GUZMAN ROBERSON vs HEALTH CAREER INSTITUTE LLC August 15, 2023 265

1	CERTIFICATE OF REPORTER
2	STATE OF FLORIDA
3	COUNTY OF PALM BEACH
4	
5	I, Wendy Beath Anderson, Certified Realtime
6	Reporter and Notary Public in and for the State of Florida at Large, do hereby certify that I was
7	authorized to and did stenographically report said deposition of PEDRO DE GUZMAN; that a review of the
8	transcript was requested; and that the foregoing transcript is a true record of my stenographic notes.
9	I FURTHER CERTIFY that I am not a relative,
10	employee, or attorney, or counsel of any of the parties, nor am I a relative or employee of any of the parties'
11	attorney or counsel connected with the action, nor am I financially interested in the action.
12	The foregoing certification of this transcript
13	does not apply to any reproduction of the same by any means unless under the direct control and/or direction
14	of the certifying reporter.
15	Dated this 28th day of Algust 2023.
16	Dated Unis Zoth nay of August 2023.
17	Maener Waller-
18	Wendy Beath Anderson, RDR, CRR, CRC
19	Job #J9995647
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	ESQUIRE BOO.211.DEPO (3376) EsquireSolutions.com

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Case 9:22-cv-81883-RAR Document 141-2 Entered on FLSD Docket 12/19/2023 Page 656 of 1026

Candidacy Review - Second Submission

HCI College – Fort Lauderdale

Nursing Department Associate Nursing Program/Pre-licensure Program Option Only Day and Evening Program Options Fort Lauderdale, Florida

This review is <u>only</u> for the HCI College – Fort Lauderdale site in Fort Lauderdale, Florida, and <u>only</u> for the associate nursing program that location.

Standard 2 – Faculty and Staff

Criterion 2.1 and Criterion 2.2

The associate nursing program at HCI College – Fort Lauderdale (HCICFL) has five full-time faculty teaching (p. 9; Appendix C, pp. 64–77). Table 2.1A (p. 12) indicates that two are credentialed with a baccalaureate degree in nursing while the remaining three are credentialed with a master's degree in nursing; this information is replicated in the faculty profile table, which is required. Therefore, the faculty should delete Table 2.1A in the Self-Study Report.

According to the faculty profile table, the associate nursing program has five full-time exclusive faculty teaching in the program. All are credentialed with a baccalaureate degree with a major in nursing. Three are also credentialed with a master's degree with a major in nursing, and one of these full-time faculty is currently enrolled in a doctorate of philosophy (PhD) in nursing program with an anticipated date of completion in June 2020. One of the faculty members is also credentialed with a master's degree in health care administration (MHA).

According to the faculty profile table, one full-time faculty member is the Simulation Coordinator while two full-time faculty members are noted to have the title of Associate Director. No additional information was provided regarding these positions. In the Self-Study Report, these positions must be described in the narrative for Criterion 1.7, including information about the percentage of teaching. If 51% or more of the position is administrative/coordinating duties, then the individual in the position would not be considered faculty by ACEN Glossary definition and the person would not be included in the faculty profile table or faculty numbers. If the position has 51% or more teaching responsibilities, then the position is still described in the narrative for Criterion 1.7, but the individual would be included in the faculty profile table and faculty numbers. See the ACEN Glossary definition of faculty and nursing program coordinator. Copies of all job descriptions should be in the virtual supporting evidence available with the Self-Study Report. See the ACEN Guidelines for Written Reports available on the ACEN website for additional information regarding virtual supporting evidence. HCI College – Fort Lauderdale PAGE 2

According to the presentation, HCICFL has 19 part-time faculty teaching in the associate nursing program (p. 9; Appendix C, pp. 64-77). Table 2.2A (p. 14) indicates that four are credentialed with a baccalaureate degree, 13 with a master's degree in nursing, and two with a doctorate of clinical practice (DNP); this information is replicated in the faculty profile table, which is required. Therefore, the faculty should delete Table 2.1A in the Self-Study Report.

According to the faculty profile table, the associate nursing program has 19 exclusive part-time faculty teaching. Of these, 16 are credentialed with a baccalaureate degree with a major in nursing. Nine part-time faculty are also credentialed with a master's degree in nursing while one is also credentialed with a master's degree in business administration (MBA). Three part-time faculty are credentialed with a master's degree in nursing as well as a DNP. The remaining three part-time faculty are noted to not have a baccalaureate degree in nursing but are credentialed with a master's degree in nursing.

The reviewers noted that the information in the faculty profile table conflicts with the information in Table 2.2A, which only has two faculty with doctoral degrees. Providing duplicated information in the Self-Study Report increases the program's chances of providing conflicting information. Therefore, as noted above, Table 2.2A should be deleted; faculty should also verify the information in the faculty profile table is accurate.

The reviewers noted that the faculty profile table provided blank tables for full-time shared and part-time shared faculty as well as a non-nurse table (pp. 74–77). If the program does not have full- or part-time shared nursing faculty or non-nurse faculty, then these tables should not be included in the Self-Study Report.

The Florida Board of Nursing (FBON) requires that 50% or more of the faculty be credentialed with a master's degree or higher in nursing or have a baccalaureate degree in nursing with a master's degree or higher in a related field. All faculty are required to have a minimum of a baccalaureate degree in nursing and meet one of the following: at least two years of full-time experience in clinical practice as a registered nursing, be actively engaged in studies leading to the next highest degree in nursing or related field, have the equivalent of at least two full-time academic experience, or have current certification as an APRN in Florida (Appendix C, pp. 64-65).

The reviewers noted that the information regarding the FBON also included the requirements for the nurse administrator and for faculty teaching in a practical nursing program. In the Self-Study Report, information about the requirements for the nurse administrator should be in the narrative for Criterion 1.6 and not in the faculty profile table. Additionally, since the program seeking accreditation is an associate degree program, information about faculty teaching in a practical nursing program should not be provided.

The Commission for Independent Education (CIE) is reported to not have specific educational and experiential requirements for faculty (Appendix C, p. 66). However, the reviewers are aware of state regulations related to faculty credentialing in Florida Rules Chapter 6E, Florida Administrative Code 6E-1.0032 (7), which CIE is required to uphold. The faculty should ensure

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that current information regarding all state regulatory agencies is provided in the faculty profile table cover sheet for the Self-Study Report.

HCICFL requires that faculty have an unencumbered registered nurse or advanced registered nurse practitioner license, a minimum of three years of practical work experience in the subject areas taught, and a minimum of a master's degree in nursing from an accredited institution recognized by the U.S. Department of Education (USDE). Faculty who are experientially qualified may hold a baccalaureate degree in nursing or a baccalaureate degree with a concentration in nursing (Table 2.1B, p. 12).

The Accrediting Commission of Career Schools and Colleges (ACCSC), which is the institutional accrediting agency, is reported to require the institution have a sufficient number of faculty to serve the number of students enrolled and maintain a satisfactory working relationship with the students. Faculty must be certified or licensed as required by law and must have the appropriate qualifications and be able to teach in a manner that permits educational objectives to be met. Faculty must also receive training in instructional methods and teaching skills or be experienced teachers. Faulty teaching in a technical or occupationally related course must also have a minimum of four years related practical experience (Table 2.5A, p. 15).

Based upon the information provided, the full- and part-time faculty meet the requirements of each agency with the potential exception of CIE. In the Self-Study Report, the faculty must provide all information regarding faculty requirements related to each agency.

Qualification and Professional Development addenda were provided (Appendix D, pp. 78–101). However, the information was not provided in the same order as the names listed in the faculty profile table. In the Self-Study Report, the faculty must provide the addenda in the same order as the faculty names appear in the faculty profile table. All full-time exclusive faculty should appear in alphabetical order followed by all part-time exclusive faculty in alphabetical order.

The full-time faculty have reported clinical expertise in medical-surgical, geriatrics, pediatrics, and mental health nursing. The part-time faculty have reported clinical expertise in medicalsurgical, geriatrics, women's health, maternal-child, pediatrics, mental health, case management, primary care, and midwifery nursing. Based upon the information provided, each faculty member appears to be qualified to teach in their assigned courses.

The reviewers noted that the addenda indicate that several faculty members are nurse practitioners in various population foci; however, other than reflecting an APRN license, this information was not available in the actual profile table with the APRN license. In the Self-Study Report, the faculty profile table should include the type of APRN and should also provide information regarding current certification of each APRN faculty member.

Table 2.1C (p. 13) provides some information regarding faculty qualifications as well as examples of how expertise is maintained while Table 2.1D (pp. 13–14) provides examples of full-time faculty scholarship activities. Specific information regarding how faculty expertise is maintained should be provided in the narrative for Criterion 2.6 in the Self-Study Report. The Qualification and Professional Development addenda, which are reviewed as a component of

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Criterion 2.1 and Criterion 2.2, should provide evidence of each faculty member's expertise as well as maintenance of that expertise. A review of the addenda did not consistently support the information in Table 2.1C and 2.1D; faculty were noted to primarily have only formal education or clinically based professional development.

Faculty must maintain expertise in their areas of responsibility, including didactic, skills, simulation, online, and/or clinical learning environments. The Qualification and Professional Development addenda must also clearly demonstrate how each faculty member has the training in instructional methods and teaching skills required by ACCSC. All faculty must have supporting documentation available during the initial accreditation visit related to the professional development reported.

Three full-time faculty are noted to have assignments in the skills or simulation laboratory, which includes the Simulation Coordinator. The faculty profile table indicates that 15 of the part-time faculty have laboratory assignments.

If additional laboratory personnel are used, then this information should be provided in the narrative for Criterion 2.7 of the Self-Study Report, and a Laboratory Personnel Table should be provided. The credentials for any potential laboratory personnel should be commensurate with the role responsibilities and meet the requirements of the governing organization, its accrediting agency, and any state regulatory agencies. See the ACEN Glossary definitions of faculty and laboratory personnel. Copies of all job descriptions must be accessible in the virtual supporting evidence with the Self-Study Report.

Criterion 2.5

HCICFL currently has 114 students enrolled in nursing courses (p. 9), which provides a fulltime-faculty-to-student ratio of 1:22-23. There are 42 students in the day program option and 72 students in the evening program option (Table 2.5G, p. 19). The faculty-to-student ratios are reported to be a maximum of 1:20 in theory, 1:10 in skills/simulation, and 1:10 in clinical learning experiences (Table 2.5B, p. 16). According to Table 2.5C (p. 16) for the 2018, 2019, and 2020 academic years, the highest faculty-to-student ratios have been 1:30 in lecture and 1:10 in laboratory and clinical learning experiences. The overall faculty-to-student ratio was 1:50 in 2018.

However, Table 2.5C (p. 17) provides conflicting information regarding the ratios reported. This table indicates the faculty-to-student ratios have been 1:7–39 in the courses taught in academic years 2018, 2019, and 2020. This table does not delineate the faculty-to-student ratios specific to didactic, skills, and/or clinical course components. The reviewers are not able to verify which set of faculty-to-student ratios are accurate since inconsistent information has been provided.

In the Self-Study Report, the faculty should identify the maximum faculty-to-student ratios in the didactic, skills, simulation, online, and/or clinical learning environments. Faculty to student ratios tables for each of the courses/sections currently being taught during the academic term/year of the initial accreditation visit. Additional faculty-to-student ratio tables for previous

academic terms/years should be accessible in the virtual supporting evidence available with the Self-Study Report.

Table 2.5A (pp. 15–16) is reported to provide information regarding the ACCSC guidelines related to having a sufficient number of faculty; however, this table only references sufficient faculty and provides information regarding the ACCSC requirements for faculty. Since this information is also provided in the faculty profile table cover sheet, the table should be deleted in the Self-Study Report.

Faculty are reported to have flexible scheduling to provide release time to maintain clinical practice and to participate in professional organizations. According to Table 2.5E (pp. 17–18) faculty responsibilities include direct face time (75%), professional development (10%), and other professional activities such as committee work, course preparation, advising, and tutoring (15%). The average direct face time for teaching by full-time faculty is reported to be 30 contact hours per week (Table 2.5D, p. 17).

Table 2.5F1 is reported to provide the amount of direct face time for full-time faculty in an unspecified academic term. Full-time faculty are noted to have direct face times ranging from 20 to 32 hours; some have assignments in only clinical while others have assignments in didactic, skills/simulation, and clinical. Two faculty members have contact hours in only didactic or skills/simulation. No information is provided regarding the compensation for hours over the 30 required in direct contact time; additional clarification must be provided in the Self-Study Report.

Table 2.5F2 (pp. 18–19) provides information about the direct face time for part-time faculty. The majority are noted to have direct face time in either skills/simulation and/or clinical. However, five part-time faculty have didactic hours, and a sixth part-time faculty member has hours "as needed." The part-time faculty direct contact hours range from 2-20 hours. The reviewers identified that one part-time faculty member has a comparable workload to full-time faculty.

Faculty are also reported to teach in both the day and evening program options. The reviewers are not clear regarding if the direct contact hours are for both the day and evening program option or a combination of those hours. In the Self-Study Report, Table 2.5F1 and Table 2.5F2 should be modified to reflect the number of direct contact hours in didactic, skills/simulation, and clinical in both the day and evening program options.

A workload allocation table should be provided for the current academic term/year. Additional faculty workload tables for two to three previous academic terms/years should also be accessible as virtual supporting evidence available with the Self-Study Report.

The narrative implies that the faculty-to-student ratios are comparable in other programs offered by HCICFL and that those programs also offered with both day and evening program options. However, specific workload information for other departments was not provided. In the Self-Study Report, specific information regarding the direct and indirect contact hours for

other faculty teaching at HCICFL should be provided and compared to the nursing workload for an academic term.

Analysis

The program is currently in compliance with the selected Criteria for Standard 2 with the following areas needing development:

- Ensure the faculty profile table does not include administrators regardless of teaching responsibilities.
- Ensure evidence demonstrates that the full-time nursing faculty meet the educational and experiential qualification requirements of the state, including the Commission for Independent Education.
- Ensure evidence demonstrates that the part-time nursing faculty meet the educational and experiential qualification requirements of the state, including the Commission for Independent Education.
- Ensure the faculty maintain expertise in their areas of responsibility, including didactic, skills, simulation, online, and/or clinical learning environments.
- Ensure the nursing faculty workload is comparable to the workload of other faculty teaching within the governing organization.

All Criteria for Standard 2 must be met prior to Initial Accreditation.

Standard 4 - Curriculum

The faculty are reported to have transitioned to a concept-based curriculum in Fall 2019 and are currently teaching out the former curriculum. No specific information is provided regarding when the teach-out will be completed or when the concept-based curriculum is fully implemented. The narrative for Standard 4 is focusing on the new concept-based curriculum and does not provides specifics regarding the former curriculum with the exception of a program of study (Appendix, Table 4.1A, pp. 102–103). In the Self-Study Report, if both curricula are still being taught, then the narrative must provide information about both.

The reviewers also noted that while the new curriculum is referenced as concept-based, the curriculum model does not reflect a concept-based model. Courses are noted to be the same course rubric and name as the courses in the teach-out curriculum. Based upon narrative, the reviewers concluded that the faculty have tried to shift from a medical focus in the nursing courses to a nursing concept focus. In the Self-Study Report, the faculty should provide additional clarification.

Criterion 4.1

The faculty are reported to have used a variety of professional standards, competencies, and guidelines to develop the curriculum, including the Quality and Safety Education for Nurses (QSEN) Competencies and the licensure examination client needs categories (p. 21). The

presentation does not demonstrate how each of these has been used throughout the curriculum.

The narrative for Criterion 4.1 does not specify the actual end-of-program SLOs that have been identified. In the narrative for Criterion 4.2, the narrative indicates that there are five end-ofprogram SLOs (p. 23). The only place that the end-of-program SLOs are located is in Appendix F, Table 4.1C (pp. 105–114). However, the reviewers noted that end-of-program SLO #2 actually includes three outcome statements (provide, use, understand) and end-of-program SLO #4 has two outcome statements (incorporate and promote). Therefore, the program actually has eight end-of-program SLOs. The action verbs for some (e.g., understand) do not lend themselves to progression from simple to complex throughout the curriculum. The faculty must clearly delineate the separate outcome statements or revise the current information to reflect only five end-of-program SLOs.

Criterion 4.2

The narrative for Criterion 4.2 discusses the recent revision of the curriculum (pp. 22–23). This information needs to be moved to the narrative for Criterion 4.3 in the Self-Study Report. The focus of the narrative for Criterion 4.2 would be to provide evidence regarding how the endof-program SLOs have been used to organize the curriculum, guide the delivery of instruction, and direct learning activities.

According to the narrative for Criterion 4.2, the faculty have mapped course-level student learning outcomes across the curriculum to demonstrate progression (p. 22); the reader is referred to Appendix F, Table 4.1C (pp. 105–114), which is reported to describe how the endof-program SLOs are leveled across the curriculum in each of the courses. However, the reviewers noted that the course-specific information provided in this table do not correlate with the course objectives in the abbreviated syllabi provided. The reviewers are unclear regarding where the information provided in the table is actually within the curriculum.

Appendix F, Table 4.1C is also reported to reflect the course activities. A closer review of the table identified that it references course activities; however, this information does not clearly reflect a specific course learning outcome or end-of-program SLO.

The abbreviated syllabi (Appendix H, pp. 123–148) have 4–12 course student learning outcomes (CSLOs) each, which are content- and population-specific. The reviewers also are not clear whether these are the abbreviated syllabi for the new 'concept-based' curriculum or the teach-out curriculum. The reviewers are not able to determine a direct correlation of the CSLOs to the end-of-program SLOs identified. The reviewers noted that the majority of the CLSO use action verbs appropriate for the level; however, some courses do use lower level action verbs (e.g., identify) that would not be appropriate beyond the first semester of nursing.

In the Self-Study Report, the faculty should revise Appendix F, Table 4.1C into two separate tables that provide clear and distinct information about the curriculum. The first table should compare the end-of-program SLOs to each CSLO throughout the curriculum. The table would allow faculty to demonstrate how the end-of-program SLOs organize the curriculum and how

progression of learning (e.g., simple to complex) is occurring. A second table should include the specific CSLOs and the identified teaching strategies and learning activities aligned with each. The faculty may also elect to include the evaluation methods used for each CSLO; this aspect of the table can then be referenced in the narrative for Criterion 4.7 related to evaluation methods.

Criterion 4.7

The current narrative for Criterion 4.7 (pp. 23–24) indicates that students are evaluated in didactic, clinical, and laboratory learning environments. Students are required to successfully pass in all areas and must achieve a passing grade of 80% or higher (p. 24).

The narrative provided indicates that the faculty use standardized testing, teacher-made examinations, skills competencies, clinical evaluations, and reflective writing assignments. However, specific information about each type of assessment and how it relates to the end-ofprogram SLOs was not provided.

The abbreviated syllabi also indicate that the faculty use a variety of evaluation methodologies to verify the achievement of the course objectives. Examples include quizzes/examinations, standardized testing, unspecified homework, adaptive quizzing, papers, case studies, skills validations, and clinical evaluations. The reviewers noted that each of these assessment methods were not referenced in the Criterion 4.7 narrative.

Appendix | (pp. 149–152) provides the clinical evaluation form for an unspecified course. The student is assessed using a five-point Likert scale with "5=consistently performs competently, 4=frequency performs competently, 3=usually performs competently, 2=seldom performs competently, I=never performs competently"; the student appears to be evaluated at mid-term and at the end of the rotation. The tool has competency areas related to knowledge, critical thinking, nursing diagnosis, planning, implementation, evaluation, skills performance, collaboration, and caring. Each of these competency areas has 2-9 sub-objectives; the subobjectives appear to be the basis for evaluating the students. The tool does not reflect the endof-program SLOs. Additionally, no information is provided regarding how the clinical evaluation tools progress from simple to complex throughout the curriculum.

Although the faculty are using a variety of assessment methods, no information is provided regarding how each assessment method is aligned with the end-of-program SLOs. In the narrative for Criterion 4.7 of the Self-Study Report, the faculty should describe each type of assessment methodology used in the program as well as information regarding how each is aligned with the end-of-program SLOs. Copies of all rubrics and clinical evaluation tools must be provided in the virtual supporting evidence while examples of student work using the rubrics and tools must be accessible during the initial accreditation visit.

Criterion 4.8

HCICFL uses credit-to-contact-hour ratios of 1:1 in didactic, 1:2 in skills, and 1:3 in clinical learning experiences, which provides 15 contact hours in didactic, 30 contact hours for skills, and 45 contact hours for clinical for each one credit (p. 24). The program of study provided for the teach-out and new "concept-based" curricula (Appendix E, Table 4.1A, pp. 102–103; Table 4.1B, p. 104) both delineated the number of contact hours in each course and the learning environments specific to the course (e.g., didactic, skills and/or clinical). Based upon the information provided, the program of study remains at 72 semester credits, but the didactic hours have increased by 60 hours, the laboratory hours have decreased by 90, and the clinical hours have decreased by 80 hours. There has also been an increase from no hours in simulation to 217 hours of simulation. In the Self-Study Report, additional information is needed in the narrative for Criterion 4.3 regarding the recent change in curriculum; the information should include the rationale for the changes in contact hours in the various learning environments when the courses appear to be the same.

The teach-out pre-licensure program option is 72 semester credits, which consists of 30 semester credits in general education courses and 42 semester credits in nursing courses (Appendix E, Table 4.1A, pp. 102–103)). This program of study can be completed in five semesters of nursing. Although the catalog is dated 2020 and students were admitted to the new curriculum in Fall 2019, it appears that the catalog reflects the previous curriculum as general education courses are listed as co-requisite courses (Catalog, p. 74). There is a lack of clarity about the teach-out and new curriculum in the Candidacy presentation and in the information available to the public.

The "concept-based" pre-licensure program option is 72 semester credits, which consists of 30 semester credits in general education courses and 42 semester credits in nursing courses (p. 9; Appendix E, Table 4.1B, p. 104). The program of study can be completed in five semesters (p. 9; Appendix E, Table 4.1B, p. 104); a semester is defined as 15 weeks (p. 25). All general education courses are required as prerequisites to the nursing courses in this program option.

Appendix G (pp. 115–120) provides information regarding the requirements of the FBON, CIE, and ACCSC related to program length as well as requirements within the curriculum. In the Self-Study Report, the table should only provide information regarding program length. Information regarding curriculum requirements should be provided in the Criterion where this information applies. For example, the use of simulation would be in the narrative for Criterion 4.9, curriculum content would be a component of the curriculum development (Criterion 4.3) and the professional standard upon which it was developed (Criterion 4.1), while information regarding the type of general education or number of credits would appear in the narrative for Criterion 4.4 in the Self-Study Report.

The FBON is reported to not have any requirements related to program length. The CIE is reported to require that an associate degree be a minimum of 60 semester credits or 90 quarter credits or the recognized clock hour equivalent. There should be a minimum of 15 semester hours or 22.5 guarter hours in general education courses in an associate of science 1026

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degree or 36 semester credits or 54 quarter credits in an associate of arts degree (pp. 116–117).

ACCSC is reported to require than an associate degree be a minimum of 60 semester credits or 90 quarter credits earned over a period of four semesters or six quarters. Additionally, the program of study should have a minimum of 30 semester hours or 45 quarter hours in the area of concentration (e.g., major/discipline) as well as 15 semester hours or 22.5 quarter hours in general education courses (p. 119). Based upon the information provided, the associate nursing program offered at HCICFL meets the requirements of each agency.

Criterion 4.9

The current narrative for Criterion 4.9 discusses the new reflective writing assignment (p. 26). The reviewers are not clear how this relates to practice learning environments. This information should be moved to the narrative for Criterion 4.7 in the Self-Study Report. Information is provided regarding how the program uses the nursing skills laboratory (pp. 26–27) as well as how clinical learning environments are selected based on the opportunity for students to achieve the CSLOs.

According to the new program of study, the faculty are also using simulation; however, no information is provided regarding this in the narrative for Criterion 4.9. In the Self-Study Report, the faculty must provide information regarding the use of simulation. Information should include the number of hours in each course/semester, the scenarios completed throughout the curriculum, the number of students in each cohort, and any state regulations related to the use of simulation, especially if in lieu of direct patient care. According to Appendix G (p. 115), the FBON allows up to 50% of the clinical hours to be in simulation.

The nursing program is reported to use a variety of practice learning environments, including long-term care facilities, rehabilitation facilities, outpatient pediatric facilities, outpatient clinics, and specialty facilities. Appendix H (pp. 121-122) provides a list of 12 sites used by the program. The table provides limited specific information regarding the sites. The faculty should modify the table to provide specific information about the site, including the type of facility and general information (e.g., 75-bed long-term care facility), the units used at the site, and the courses using the location. Information about the contact person, address, and distance from the college is not needed.

The list of practice learning environments does not appear to include any acute care hospitals. Although the faculty have designated some practice learning environments (e.g., a rehabilitation center) as acute care settings, the reviewers are not clear how the practicum experiences necessary in a pre-licensure registered nursing program can be provided when acute care hospitals are not used. In addition, the catalog (pp. 71–72) states that nursing students will practice technical skills in acute care settings and address critical care concepts and that graduates will be prepared to practice in settings such as hospitals. However, the practice learning environments listed in the Candidacy Presentation to not align with this information published in the catalog. Additional information about the practice learning environments must be provided in the Self-Study Report.

Additionally, specific information regarding how faculty ensure the practice learning environments are evidence-based and reflect nationally established patient health and safety goals was not provided. Faculty and students are reported to evaluate the sites at the end of the rotation; however, information regarding these evaluations was not described and data from the evaluations was not provided.

In the Self-Study Report, the faculty must ensure the narrative for Criterion 4.9 addresses each of the components of the Criterion. Information regarding any evaluation process of the practice learning environments must be provided and the supporting documentation of the process/processes should be accessible in the virtual supporting evidence available with the Self-Study Report.

Criterion 4.11

The presentation does not identify the delivery modality or modalities used by the program (e.g., face-to-face, hybrid, or online). The narrative for Criterion 5.3 indicates that a learning management system (LMS) is accessible (pp. 40-41). The LMS is reported to be used for course materials and communication.

The narrative discusses teaching strategies used by the program but does not indicate how the strategy is appropriate for the delivery modality/modalities used by the program. The current information provided should be moved to the narrative for Criterion 4.2 and also can be incorporated into the narrative for Criterion 4.6 related to educational theories and contemporary practice.

In the Self-Study Report, the narrative for Criterion 4.11 must clearly identify the type of delivery modality/modalities used by the program. The information from the narrative for Criterion 4.2, Criterion 4.6, or Criterion 4.7 should not be duplicated in the narrative for Criterion 4.11. Instead, the narrative for Criterion 4.11 should be specific to how the teaching strategies, learning activities, and evaluation methods are appropriate for the face-to-face, hybrid, and/or online delivery modality in which it is used. The faculty could use a table format to provide this information.

<u>Analysis</u>

The program is not in compliance with Standard 4 as Criteria 4.1, 4.2, and 4.9 are not met at this time, as evidenced by:

- Failure to provide evidence the curriculum incorporates established professional nursing standards, guidelines, and competencies.
- Failure to provide evidence that the end-of-program student learning outcomes are used to organize the curriculum, guide the delivery of instruction, and direct learning activities.
- Failure to provide evidence that there is progression in the course student learning outcomes/course objectives throughout the curriculum in support of the end-ofprogram student learning outcomes.

• Failure to provide evidence student clinical experiences and practice learning environments are evidence-based; reflect contemporary practice and nationally established patient health and safety goals; and support the achievement of the end-of-program student learning outcomes.

With the following areas needing development:

- Ensure evaluation methodologies are varied, reflect established professional and practice competencies, and measure the achievement of the end-of-program student learning outcomes.
- Ensure learning activities, instructional materials, and evaluation methods are appropriate for all delivery formats and consistent with the end-of-program student learning outcomes.

All Criteria for Standard 4 must be met prior to Initial Accreditation.

Standard 5 - Resources

Criterion 5.1

The narrative for Criterion 5.1 provides information about the budgeting process (pp. 31–32). This information should be moved to the narrative for Criterion 1.9 in the Self-Study Report. The narrative for Criterion 5.2 should provide information about the sources of funding for HCIFL and the nursing program as well as information about the budgets for the overall college, the nursing program, and a comparative program/department that is similar in size.

The narrative is also noted to provide information about the default rate for the institution (pp. 30–31). This information should be moved to the narrative for Criterion 3.6 in the Self-Study Report.

The narrative indicates that HCICFL has revenue from tuition and general fees (p. 31). Table 5.1A (p. 30) provides information about the overall operating budget for an unspecified fiscal year (FY). The nursing program is reported to comprise 90% of the college's operating budget (p. 30).

Table 5.1B (p. 31) provides information about the associate nursing program's budget. The table includes the income from tuition as well as expenses related to capital equipment, salaries and other expenses for fiscal FY 2017, FY 2018, and FY 2019. Using the information in the table the reviewers determined that the income has increased approximately 94% since 2017 while the expenses have only increased by approximately 84% resulting in a net profit each year.

Table 5.1 D (p. 31) provides information regarding the budget related to the library's online database system for FY 2018, FY 2019, and FY 2020. The budget for the system is noted to have decreased by 46% from FY 2018 to FY 2020. No explanation is provided regarding the

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decrease in funding for the online system; additional clarification is needed in the Self-Study Report.

In the Self-Study Report, the faculty should also compare the budget of the nursing program to another program similar in size offered at HCICFL. Three years of budgets for HCICFL, the nursing program, and the comparative program must be available for the initial accreditation visit either as virtual supporting evidence with the Self-Study Report or on site.

The reviewers noted that the narrative for Criterion 5.2 provides information regarding the monies spent for the nursing program during a recent renovation (pp. 38–39). This information should be moved to the narrative for Criterion 5.1 in the Self-Study Report.

Criterion 5.2

The reviewers noted that the narrative for Criterion 5.2 provides information about the various faculty and student services available as well as the hours of operation (Table 5.2A, pp. 32–35). This information should be moved to the narrative for Criterion 3.4 in the Self-Study Report. The narrative for Criterion 5.2 should focus only those physical resources used by the nursing program to meet the needs of faculty, staff and students. Examples include offices/workspaces, classrooms, computer laboratories, skills and/or simulation laboratories.

HCICFL is reported to have moved into renovated space (p. 35). Table 5.2B (pp. 36–37) provides a list of the various spaces available, including offices, conference room, classrooms, computer laboratory, and skills laboratory.

The nurse administrator is reported to have a private office while the other faculty have a shared faculty workroom with six workstations; each workstation is reported to have a computer, bookshelves, filing cabinets, and a "swing" desk (p. 36). Later, the narrative indicates that two full-time faculty also have private offices (p. 38); however, this is not included in Table 5.2B. Consistent information must be provided throughout the Self-Study Report regarding the faculty offices/workspaces. The presentation is not clear regarding where the workspaces are for the other faculty who teach at HCICFL since the number of workspaces identified will accommodate the current number of full-time faculty with an extra desk/workspace for all 19 of the part-time faculty to share when on campus. Additional information is needed regarding the available faculty offices/workspaces. Information must also be provided regarding the workspace for nursing support personnel.

A conference room is reported to be accessible for "general college use" (p. 36) and can accommodate eight people (Table 5.2D, p. 38). According to the narrative, a vacant office is also available to use if a private meeting space is needed for the faculty to meet with students (p. 36).

Six classrooms are reported to be available with varying square footage (p. 36); these classrooms are reported to be shared with the EMS program. While the square footage in each classroom is provided in Table 5.2B, information regarding the seating capacity is provide in Table 5.2C (p. 38). Classrooms are reported to be equipped with desks, chairs, a faculty desk,

and an LCD projector (p. 36); Table 5.2C also indicates that the classroom have a whiteboard and podium (p. 38). In the Self-Study Report, the faculty should provide the information regarding the seating capacity in Table 5.2B instead of the square footage or in addition to the square footage; this would allow the faculty to delete Table 5.2C.

A computer laboratory is available and provides access to 16 desktop computers; an additional 30 laptop computers are also reported to be available (p. 35). The library is also reported to provide access to four computer workstations (p. 37). Table 5.2B (p. 37) indicates that there is a computer laboratory with 500 square feet and is reported to be available for test taking; however, the narrative indicates that a calendar is created prior to each semester to identify the days and times the computer laboratories are open to students (p. 36). Additional information is needed in the Self-Study Report regarding the accessibility of the computer laboratory to students outside of scheduled class time. Wi-Fi access is reported to be available in the classrooms and common areas (p. 35). The Director of IT is reported to maintain all faculty and student computers. The IT Support Center is reported to be accessible on Mondays through Fridays from 8:00 a.m. until 9:00 p.m. (p. 40).

The narrative for Criterion 5.2 does not provide specific information regarding either the skills laboratory or simulation laboratory. In the narrative for Criterion 4.9, the reviewers noted that the laboratory provides access to low-, medium-, and high-fidelity simulators (p. 25) and that the skills laboratory is used to practice skills using similar equipment found in the actual clinical setting (p. 25). The narrative in Criterion 4.9 also indicates that the skills laboratory has a scheduled lab time for supervised practice as well as open laboratory hours (p. 26). Table 5.2A (p. 35) indicates the laboratory is accessible Mondays through Fridays from 8:30 a.m. until I I:00 p.m. as well as additional hours by appointment.

The only additional information regarding the skills/simulation laboratory is the square footage (Table 5.2B, p. 36), which indicates that there are two laboratories and the information about the recent purchase of capital equipment (p. 38). No information is provided regarding the number of hospital beds/workstations or the number of students that can be accommodated at the same time.

In the Self-Study Report, the faculty must specify the number of hospital beds/work stations available in each laboratory, must clarify whether the skills laboratory and simulation laboratory are separate areas, and must provide information regarding the times that the skills laboratory is accessible to the students outside of scheduled class times.

Criterion 5.3

Limited information is provided regarding the library except to indicate that the librarian is available five days per week on campus as well as virtually (p. 39) and that the library provides access to four computer workstations (p. 37) as well as to the Library and Information Resource Network (LIRN) online database. Table 5.3A (p. 40) provides information regarding the specific databases available through LIRN, which includes, but is not limited to, ProQuest Nursing and Allied Health database, MEDLINE Plus, and PubMed.

No information is provided regarding the hours of operation or whether the online resources are accessible remotely. Additionally, no information is provided regarding potential hard copy resources that may be accessible in the physical library. Additional information must be provided regarding the learning resources available to students in the library as well as the times that these resources are accessible.

The narrative indicates that "the development and management of the collection is governed by the faculty, students, and program leadership" in reference to the library resources. However, specific information regarding the faculty role in the selection and deselection of learning resources used by the program, including those in the library, was not provided. In the Self-Study Report, the narrative for Criterion 5.3 must describe the selection and deselection process for learning resources; the narrative must include information about the faculty role in the process.

<u>Analysis</u>

The program is not in compliance with Standard 5 as Criteria 5.2 and 5.3 are not met at this time, as evidenced by:

- Failure to provide evidence that physical resources are sufficient to ensure the achievement of the end-of-program student learning outcomes and program outcomes and meet the needs of the faculty, staff, and students.
- Failure to provide evidence that the learning resources and technology are comprehensive, current, and accessible to the faculty and students.

With the following areas needing development:

- Ensure all students have sufficient access to the nursing skills laboratories to meet their learning needs.
- Ensure that the learning resources and technology are selected with faculty input.

All Criteria for Standard 5 must be met prior to Initial Accreditation.

Standard 6 - Outcomes

Systematic Plan of Evaluation

The faculty are reported to have developed a systematic plan of evaluation (SPE) using the 2017 ACEN Standards and Criteria. The reviewers noted that the levels headings in the narrative for Standard 6, in some places, reflect the Standards and Criteria for a graduate level program instead of an associate degree program since the level headings reference role-specific professional competency (p. 50). The faculty must ensure that the Standards and Criteria for an associate degree program are used throughout the entire Self-Study Report.

Appendix K (pp. 153–167) provides a copy of the SPE for 2020. The SPE is noted to have two sections labeled "plan" and "evaluation." The plan section has columns labeled "element," "expected level of achievement" (ELA), "frequency responsible person/committee," and "assessment methods and evaluation criteria" while the evaluation section has columns labeled "date evaluated, results of data collection and analysis" and "actions for program development, maintenance, or revision." The SPE is noted to include each end-of-program SLO (pp. 154–163) as well as program outcomes related to licensure examination pass rate (pp. 164-165), program completion rate (p. 166), and job placement rate (p. 167).

Criterion 6.1: End-of-Program Student Learning Outcomes

The narrative for Criterion 6.1 provides information about the general SPE as well as program completion (pp. 43, 55–56; Table 6.1E1, p. 53), job placement (pp. 43, 56–57; Table 6.1E1, p. 54), and licensure examination pass rates (pp. 53-54; Table 6.1E1, p. 53). Information about the program outcomes should not appear in the narrative for Criterion 6.1. Instead, information about licensure examination pass rates should be in the narrative for Criterion 6.2 while program completion appears in Criterion 6.3 and job placement in Criterion 6.4 in the Self-Study Report.

The current narrative for Criterion 6.1 describes the various evaluation methods used throughout the nursing program. This information should be moved to the narrative for Criterion 4.7 in the Self-Study Report. The narrative for Criterion 6.1 in the Self-Study Report should focus on the evaluation methods used at or near the end of the associate nursing program that demonstrate the extent to which the students have achieved the end-of-program SLOs specific to the program prior to graduation. The narrative should focus on those methods, the ELA related to each method, the data collected, the analysis of the data collected, and any actions taken.

Table 6.1A (pp. 45–49) is reported to provide information regarding each end-of-program SLO, as well as the expected levels of achievement (ELA) and measurement methods. The reviewers noted that the measurement methods column has three or more methods identified while the ELA column has a single ELA that is essentially the same for each end-of-program SLO. This ELA is "ATI best practice benchmark of Level 2 measured by the RN Content Mastery Series 2016 Proficiency levels by content area" (p. 45) or "95% predictability on the ATI Comprehensive Predictor (pp. 46-47, 49), or "meet or exceed the national average for the client need categories listed" (pp. 47-49).

The narrative then provides several tables that delineate the standardized testing results throughout the program. Some of the tables are noted to be for the overall standardized examination (Table 6.1C1, p. 51; Table 6.1C4, p. 52) while others appear to reflect sub-scales related to client needs categories (Table 6.1C2, p. 51; Table 6.1C3, p. 52; Table 6.5C5, p. 53).

As noted, the SPE does include each end-of-program SLO (pp. 154–163). The ELAs cited in the SPE are the same as those in Table 6.1A above. In the Self-Study Report, the faculty should delete Table 6.1A and instead refer the reader to the SPE to avoid duplicating the data. As

noted above, faculty are collecting and reporting data across the curriculum instead of at or near the end of the program.

The reviewers also noted that the clinical, laboratory and simulation evaluation tools are also an assessment method (pp. 155, 157, 159, 161-162). However, there is no ELA related to any of these tools and no data is provided.

While the faculty are attempting to measure the achievement of the end-of-program SLOs, the faculty identified overall standardized testing scores with some use of "client needs" category scores for some identified end-of-program SLOs. An overall standardized testing score will not measure achievement of an individual end-of-program SLO and its embedded concepts/competencies. In addition, although some of the identified methods of assessment describe the use of "client needs" category scores for evaluation of selected end-of-program SLOs, the reviewers noted that the same client need category (i.e., psychosocial integrity) is used for end-of-program SLO #2 related to the provision of quality, safe, and evidence-based patient-centered care as well as end-of-program SLO #3 related to integration of culturally competent care (pp. 156, 158). Further, end-of-program SLO #5 related to the use of technology to reduce error will be evaluated using comprehensive predictor sub-scores for safety and infection control, pharmacological and parenteral therapies, and reduction of risk potential (p. 162). There is a lack of congruence between the identified end-of-program SLOs and the selected assessment methods, which will result in data that are not useful for program decision-making and program improvement.

The faculty should ensure that the SPE includes each end-of-program SLO with an ELA and data specific to each; the data should be collected in those courses at or near the end of the program. The faculty should identify appropriate direct assessment methods related to each end-of-program SLO as well as the concepts/competencies within each, and the ELA should be consistent with the assessment method as well as the end-of-program SLO. The assessment methods should include direct methods of assessment (e.g., scores on sub-scales of clinical evaluation tool or standardized examination) and may include indirect measures (e.g., surveys). If the faculty use surveys to collect data, then the response rates (number of surveys returned divided by the number of surveys distributed/graduates) should be recorded for each survey, whether print, digital, telephone, or other survey method to ensure sufficient data has been collected to inform program decision-making.

The faculty are currently proposing to analyze the data annually. Although assessment of student achievement of the end-of-program SLOs may be performed every semester or annually, faculty may elect to analyze the data results every 2-5 years to ensure sufficient data are collected. For example, the first two end-of-program SLOs are reviewed in the first year, the second two are evaluated in the second year, and so on until all have been evaluated, at which point the process starts over. The faculty must identify a data collection and analysis cycle for each PSLO. Data collected and analysis should be recorded in the SEP, or there should be a reference to the location of the raw data and analysis (e.g., meeting minute dates, program reports). If the data and analysis are not recorded in the SPE, copies of this information (e.g., meeting minutes, program reports) should be available as virtual supporting evidence with the Self-Study Report; see the ACEN Guidelines for Written Reports regarding supporting evidence.

Criterion 6.2: Licensure Examination Pass Rate

The outcome for licensure examination pass rate has an ELA of "greater than or equal to 80% for all first-time test takers within the first year" (p. 164); Table 6.1E1 (p. 53) only has "greater than or equal to 80%." The program reports licensure examination pass rates of 80% in 2019 (Table 6.1E2, p. 54); Table 6.1F1 (p. 54) indicates 80% (12/15), which is replicated in Table 6.1F2 (p. 55). Table 6.2A (p. 58) provides information regarding the quarterly pass rates during 2019. A review of the FBON website indicated that the program did not have licensure examination pass rates for 2017 or 2018. The licensure examination pass rate for 2019 was 80% (12/15).

Disaggregated data by date of completion or program option (day and evening) were not provided. The faculty should provide disaggregated data by date of completion and program option in addition to the aggregated data for the entire.

Program Outcomes

While the Candidacy Presentation does not require the faculty to provide a narrative related to Criterion 6.3 and Criterion 6.4, the reviewers have provided the following feedback. This is based upon the information available in the SPE and narrative as described above.

The outcome for program completion has an ELA of "greater than or equal to 43% (program completion rate is calculated at 150% timeframe)" (p. 166); Table 6.1E1 (p. 53) has only "greater than or equal to 43%." No information is provided in the SPE regarding the rationale used to establish the ELA at 43%; the narrative for Criterion 6.1 (p. 43) implies the rationale is based upon historical performance of the college graduates and those of comparable institutions. However, no specific information was provided regarding the historical data or the comparable institutions. In the Self-Study Report, specific information regarding the rationale used by faculty must be provided and should reflect student demographics.

The program reports program completion rates of 46% in 2019 (Table 6.1E2, p. 5); Table 6.1G1 (p. 55) indicates that students who started in 2017 had a 46% completion rate while Table 6.1G2 (p. 56) indicates a completion rate of 50% for the cohort that began in February 2017 and 43% for the cohort who began in March 2017. Table 6.2H2 appears to indicate additional cohorts in 2017.

Comprehensive disaggregated data by date of completion and program option were not provided. The faculty should provide disaggregated data by date of completion and program option in addition to aggregated data for the entire program.

The outcome for job placement has an ELA of "greater than or equal to 65% will be placed within six months of licensure" (p. 167); Table 6.1E1 (p. 54) has only "greater than or equal to 65%" but also indicates in 2019 the rate was "greater than or equal to 60%." This ELA does not reflect the ACEN definition of job placement since it only considers those graduates who successfully pass the licensure examination. No information is provided regarding the rationale used to establish the ELA at 43% in the SPE. The narrative for Criterion 6.1 (p. 43) indicates the rationale is based upon the needs in the general area of Broward County; however, the

presentation indicates that the program not being programmatically accredited has prevented some graduates from obtaining employment. In the Self-Study Report, specific information regarding the rationale used by faculty must be provided and should reflect program demographics.

The program reports job placement rates of 68.75% in 2019 (Table 6.1H1, p. 57), and Table 6.2H2 (p. 57) provides data related to cohorts that began in February 2017, March 2017, July 2017, October 2017, January 2018, March 2018, May 2018, and July 2018. Data related to job placement do not need to be disaggregated, but all graduates need to be accounted for. No information was provided regarding the response rates; therefore, the reviewers are not able to verify that sufficient data have been collected to inform program decision-making.

<u>Analysis</u>

The program is not in compliance with Standard 6 as Criterion 6.1 is not met at this time, as evidenced by:

- Failure to establish that there is ongoing assessment of the extent to which students attain the end-of-program student learning outcomes.
- Failure to establish that assessment data are consistently analyzed and used in program decision-making for the maintenance and improvement of students' attainment of the end-of-program student learning outcomes.

With the following areas needing development:

- Ensure the program demonstrates that there are specific, measurable expected levels of achievement for each end-of-program student learning outcome.
- Ensure the program demonstrates that there are appropriate assessment methods that result in meaningful data for each end-of-program student learning outcome.
- Ensure the program demonstrates evidence of licensure examination pass rate data disaggregated by date of program completion, program option, and aggregated for the program as a whole.
- Ensure there are specific, measurable expected level(s) of achievement for program completion that are determined by the faculty and reflecting student demographics.
- Ensure the program demonstrates evidence of program completion data and that data are aggregated for the nursing program as a whole as well as disaggregated by date of program completion or entering cohort and program option.
- Review and revise the expected level of achievement for job placement to be congruent with the ACEN definition of job placement.
- Ensure there are specific, measurable expected level(s) of achievement for job placement that are determined by the faculty and reflecting program demographics.
- Ensure that job placement data are sufficient to inform program decision-making.

Criteria for Standard 6 must be met prior to Initial Accreditation.

All Criteria for all six Standards must be met to achieve Initial Accreditation.

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Recommendation for Candidacy Action:

Based upon the independent analysis of the Candidacy Presentation by each reviewer, the consensus of the reviewers is to recommend:

Approval

Deferral

X Disapproval

Summary:

In the Self-Study Report, tables should appear at the top of the next page after being referenced in the narrative unless the entire table will fit in the remaining white space available on the page. Tables should ideally appear on the same page; the faculty should consider using a landscape format and a slightly smaller font size to facilitate this. If a table is larger than a single page, then the faculty should ensure that column headers appear on each subsequent page of the table. For tables larger than I-2 pages, the faculty should consider including them as virtual supporting evidence with the Self-Study Report or providing only an example of the table with the overall table being available as virtual supporting evidence during the initial accreditation visit.

Currently, the program is not in compliance with Standard 4 Curriculum, Standard 5 Resources, or Standard 6 Outcomes. The program also has multiple areas needing development. The faculty are encouraged to use the feedback provided throughout this review to address the concerns in each Standard.

The reviewers noted minimal to no progress since the submission of the first Candidacy Presentation in July 2019. At that time, the program was not in compliance with Standard 2, Standard 4, and Standard 6 while being in minimal compliance with Standard 5. As noted above, the program remains in non-compliance with Standard 4 and Standard 6 and is now in noncompliance with Standard 5. The program demonstrated improvement with Standard 2. The issues in Standard 4 Curriculum have worsened, and the program has regressed into noncompliance with Standard 5 Resources. The reviewers also noted that many of the same areas needing development were cited in the original submission as compared to the current presentation.

Therefore, the reviewers recommend a disapproval. The program may restart the Candidacy process when the program can realistically be in compliance with all Standards in preparation for the initial site visit and the program has an opportunity to address the areas needing development. An initial accreditation visit must not be scheduled until the program has been consistently at or above an 80% licensure examination pass rate for all first-time test-takers within the same 12-month period. It is highly recommended that the nurse administrator and the faculty attend an upcoming ACEN Self-Study Forum to facilitate a better understanding of the accreditation process. The program should use the feedback provided in both reviews to make changes.

Reviewers' Names & Signatures:

Nell Ard, PhD, RN, CNE, ANEF Director	Suzette Farmer, PhD, RN Director

Date: _____

Date: _____

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EXHIBIT 28

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To: "Nell Ard" </NArd@acenursing.org>, "Gregory Donaldson" <gdonaldson@acenursing.org> Subject: RE: HCI College - Fort Lauderdale

Date: Mon, 17 Apr 2023 19:01:29 -0000

Importance: Normal

Inline-Images: image001.png; image002.jpg; image003.jpg; image004.jpg; image005.jpg; image006.png; image007.png; image008.png; image009.png; image010.png; image011.png; image012.png; image013.png

Oh I'm sorry! I don't know where your first email went off to. 😕

Thanks for the re-response - I appreciate it!

Christine Favole Data and Records Specialist



the leading authority for nursing education accreditation

Accreditation Commission for Education in Nursing, Inc. 3390 Peachtree Road NE, Suite 1400 | Atlanta, Georgia 30326

- P. (404) 975-5000
- E. <u>cfavole@acenursing.org</u> www.acenursing.org



From: Nell Ard <NArd@acenursing.org>
Sent: Monday, April 17, 2023 3:00 PM
To: Christine Favole <CFavole@acenursing.org>; Gregory Donaldson <GDonaldson@acenursing.org>
Subject: RE: HCI College - Fort Lauderdale

I responded to this - earlier today. Fort Lauderdale and West Palm are separate NEUs.

Nell Ard, PhD, RN, CNE, ANEF Interim CEO



ACEN, the leading authority for nursing education accreditation

Accreditation Commission for Education in Nursing, Inc. 3390 Peachtree Road NE, Suite 1400 | Atlanta, Georgia 30326 P. (404) 975-5000

E. nard@acenursing.org www.acenursing.org

For more information or to register, visit www.acenursing.org

The leading authority for nursing education accreditation

leading authority for nursing education accreditation





From: Christine Favole <CFavole@acenursing.org> Sent: Monday, April 17, 2023 2:41 PM To: Nell Ard <<u>NArd@acenursing.org</u>>; Gregory Donaldson <<u>GDonaldson@acenursing.org</u>> Subject: HCI College - Fort Lauderdale

Hello! I need some help responding to a prospective student about HCI College, specifically the Fort Lauderdale campus.

Greg helped me determine last week that the eligibility for HCI-Ft Lauderdale expired in September 2022, and so far they have not reapplied. However, we did see that the HCI-West Palm Beach location is still eligible through 11/2023. Case 9:22-cv-81883-RAR Document 141-2 Entered on FLSD Docket 12/19/2023 Page 680 of Also of note, this eligibility is in Salesforce as just "HCI College," without a campus indicator.

I looked through their most recent eligibility application (<u>V:\4072\A\Candidacy</u>) to try to see if the Ft Lauderdale campus is now included with the active eligibility. They do mention that campus on the first page of their application (Candidacy Eligibility Application - West Palm Beach - Final (11-17-2022).pdf), and it is also included on the letter of accreditation from ACCSC. Were they intending for this application to be inclusive of both campuses?

Before I respond to the student to say that no, the Ft Lauderdale campus is not currently eligible, I wanted to be absolutely sure it wasn't now being included as an OCIS or Branch of HCI-WPB.

Thank you both for your help!

Christine Favole Data and Records Specialist



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Accreditation Commission for Education in Nursing, Inc.

3390 Peachtree Road NE, Suite 1400 | Atlanta, Georgia 30326

- P. (404) 975-5000
- E. <u>cfavole@acenursing.org</u>

www.acenursing.org



From: Accreditation Commission for Education in Nursing <<u>webadmin@acenursing.org</u>>
Sent: Friday, April 14, 2023 1:26 PM
To: Verification <<u>Verification@acenursing.org</u>>
Subject: Verification of Accreditation Status

Requestor Name
Rafaela Vianna
Requestor Email
viannarafaela@icloud.com
Name of Institution (School/College/University) to Verify - Do Not Abbreviate.
HCI College
City
Fort Lauderdale
State
FL
Nursing Program Level Type
Associate
Year of Graduation

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2023

Month of Graduation

Unknown

Comments

Hi, the HCI school located in Fort Lauderdale informed me that they are in process to become accredited by ACEN. I would like to confirm if the information is accurate. I'll be graduating in June of 2024. Thank you

Subject

ACEN Accreditation Verification

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EXHIBIT 29



Entered on FLSD Docket 12/19/2023 Page 683 of 2101 Wilson Boulevard, Suite 302 Arlington, Virginia 22201 703.247.4212

ELECTRONIC DELIVERY

703.247.4533 fax

www.accsc.org

October 2, 2023

HCI College

1764 N. Congress Ave., Ste. 203 West Palm Beach, Florida 33409

Dear

At the August 2023 meeting, the Accrediting Commission of Career Schools, and Colleges ("ACCSC" or "the Commission") considered the previous decision to defer final action on the following applications submitted by HCI College located in West Palm Beach, Florida.

- Application for Renewal of Accreditation
- Application for New Non-Degree Program Veterinary Assistant (Diploma)
- Outcomes Report
- The June 27, 2022 complaint submitted by

Upon review of the March 17, 2023 Deferral and the school's response to that letter, the Commission voted to again defer final action until the February 2024 meeting in order to provide the school with an additional opportunity to demonstrate compliance with accrediting standards. The reasons for the Commission's decision and the Commission's requirements for HCI College to demonstrate compliance are set forth below.

 HCI College must demonstrate that the school assesses educational quality, institutional effectiveness, and student achievement taking into account the rates at which students graduate from the Nursing-DE (BSN) program (*Section VII (B)(1)*, *Substantive Standards, Standards of Accreditation*). The school reported below-benchmark student achievement rates for two programs of the six offered by the school: Emergency Medical Technician (Diploma) and Nursing-DE (BSN).

In response to the Deferral, the school indicated that "[a]t this time, the College has decided to cease enrollment in the EMT program. The College plans to submit a Notice of Discontinued Programs form in the near future" (June 13, 2023 HCI College Response, pg. 4). The Commission noted that the school has not submitted the Notice of Discontinued Programs and therefore requires additional information regarding the status of the program.

With regard to the Nursing-DE program, the Commission reviewed the following history of reporting student achievement outcomes:

- The school submitted a Graduation and Employment Chart with the 2020 Annual Report prepared using a July 2020 Report Date. The school reported one cohort start in September 2016. One student started and subsequently withdrew for a 0% graduation rate.
- The school submitted a Graduation and Employment Chart with the 2021 Annual Report prepared using a July 2021 Report Date. The school reported one cohort start in January 2018. Five students started and two subsequently withdrew for a 60% graduation rate.

School #M072133 Deferral

Deferral

HCI College - West Palm Beach, Florida School #M072133 October 2, 2023 Page 2 of 8

> The school submitted a Graduation and Employment Chart with the 2022 Annual Report prepared using a July 2022 Report Date. The school reported a total of five cohort starts (May 2018, September 2018, October 2018, January 2019, and March 2019). Eleven students started and nine withdrew for a graduation rate of 18%.

The school submitted a Graduation and Employment Chart with the January 11, 2023 response to the December 19, 2022 On-Site Evaluation Report prepared using January 2023 Report Date. The school reported a total of six cohort starts (October 2018, January 2019, March 2019, May 2019, July 2019, and September 2019). Nine students started and eight withdrew for a graduation rate of 11%.

The school submitted a Graduation and Employment Chart with the June 13, 2023 response to the March 17, 2023 Deferral prepared using July 2023 Report Date. The school reported a total of three cohort starts (May 2019, July 2019, September 2019). Four students started and three withdrew for a graduation rate of 25%.

The Nursing program received approval in December 2014 and the school reported the first student start in September 2016. The school ceased enrollment in the program at some time in 2020. Based on an aggregation of the data reported by HCI College for the Nursing-DE (BSN) program, the school has started a total of 21 students in the three years from September 2016 through September 2019 and graduated 6 students for a graduation rate of 29%. Overall, the school has yet to demonstrate that the Nursing-DE (BSN) program has been implemented in a manner that leads to student success. HCI College's response included the following assessment:

The Nursing-DE (BSN) program struggled with enrollment and retention. This program started its first enrollment in September of 2016 with one student. There were no enrollments in 2017. In 2018, the College made a strong effort to promote the program to its alumni. In 2018, the enrollment increased. Currently, there are no enrollments in this program. There were two issues that may have caused the low enrollment and poor retention. One reason was financial; this program at the time was not eligible to participate in Federal Student Aid funding. Additionally, the program is not programmatically accredited. The College paused enrollment in 2020 to better assess the program and determine its viability. During that time, the College has been approved to offer Federal Student Aid funds for this program. The College plans to begin enrollment in the program starting in January 2024. Upon enrolling students, the College plans to apply for programmatic accreditation. The College does not plan on altering the admissions requirements at this time. (June 13, 2023 HCI College Response, pg. 3).

The Commission found that the school's explanation does not reflect a meaningful assessment of graduation rates for the Nursing-DE (BSN) program. While lack of access to funding and lack of programmatic accreditation may have impacted the numbers of students enrolling in the program, HCI College does not explain how those factors presented barriers to graduation.

Exhibit 16 of the school's submission is the Nursing-DE (BSN) Improvement Plan, which appears to be an abbreviated statement of the admissions requirements, teaching methods, resource materials, and student services for this program, rather than an assessment or improvement plan. The Commission noted that the plan outlined very few action steps. According to the plan, there will be no changes made to curriculum or admissions requirements; however, there is no assessment or justification to show that these two elements are appropriately designed to support successful

HCI College - West Palm Beach, Florida School #M072133 October 2, 2023 Page 3 of 8

Deferral

completion of the program requirements and therefore do not require modification. Similarly, the plan states that the school "plans to continue using the distance education learning format." The response does not show that the school has evaluated the impact of distance education delivery on the graduation rates of this program.

The Commission noted that HCI College took the proactive step of ceasing enrollment in the program during 2020 to "better assess the program and determine its viability;" however, the response does not describe that assessment or provide evidence that the program remains viable. According to the response, the program is now eligible for federal student aid funding and the school plans to start a new class in 2024. The response does not explain how the school decided to begin offering the program again, other than access to funding. After a hiatus of more than three years, the Commission questioned how the school has maintained the capacity to offer the program. ACCSC's Rules of Process and Procedure state that "[w]hen a previously operational program has not had any enrollments or graduates for 24 months, the Commission may, at its discretion, request additional supporting information from the school to determine whether it has maintained the capacity to offer the program" (Section IV (E)(6)(f)(ii), Rules of Process and Procedure, Standards of Accreditation). Based on the questions raised by this response, the Commission is interested in the school's justification for restarting the program when the rates of student graduation from the first starts have not shown students successfully achieving the outcomes of this program. The school was unable to provide retention or other contemporaneous data because the program has been inactive since 2020. In absence of that data, it is not clear that HCI Colleges limited efforts will result in an acceptable graduation rate once the school restarts the Nursing-DE (BSN) program.

The reference to programmatic accreditation raises additional questions. The response does not identify the specific programmatic accreditor, what role this accreditation will have in improving graduation rates, or whether the programmatic accreditation is a condition for employment or licensure. The Commission noted that the program has been approved since December 2014 and questions why the school has not previously made application for programmatic accreditation.

Based on the foregoing the Commissionis interested in obtaining information regarding the onstatus of the programs as described above. Accordingly, the Commission directs the school to submit the following:

- Documentation demonstrating that the school has uploaded the Notice of Discontinued Programs a. form (available at accsc.org) for the Emergency Medical Technician (Diploma) program to the School Submission Center on ACCSC's College 360 Database, in accordance with the Instructions for Electronic Submission;
- A narrative describing an evaluation of the Nursing-DE (BSN) program in context of student b. achievement outcomes, specifically rates of student graduation, that includes but is not limited to, the following:
 - i. A study of admissions requirements, particularly with regard to how the school ensures that applicants are prepared to succeed in a distance education learning environment, including technical skills, competencies, access to technology and learning styles conducive to online learning;
 - ii. An assessment of faculty effectiveness in the distance education learning environment;

HCI College - West Palm Beach, Florida School #M072133 October 2, 2023 Page 4 of 8

Deferral

- iii. A study of the whether the opportunities and means for timely and meaningful interaction between faculty and students is sufficient, in terms of the distance education learning environment;
- iv. An evaluation of the effectiveness of the school's orientation to the distance education learning environment; and
- v. An assessment of the adequacy of student support services available to students in a distance education learning environment;
- c. A list of the factors impacting student graduation the school identified through the program evaluation progress in item (b.) above;
- d. A description of the strategies the school has implemented and how those strategies are designed to address the factors listed in item (c.) above;
- e. A narrative regarding the programmatic accreditation referenced in the response, including the agency providing the accreditation, whether the accreditation is required for employment/licensure, and the school's reason for not seeking the programmatic accreditation sooner;
 - f. A narrative explaining how the school has maintained the capacity, including the equipment, facilities, faculty, curriculum, and learning resource system necessary to deliver the program; and
 - g. Any additional information that the school believes will assist the Commission in determining the school's compliance with accrediting standards.
- 2. HCI College must demonstrate that the classification of each graduate as employed in a trainingrelated field is for a reasonable period of time, is based on program objectives, and can be considered consistent and sustainable (Section VII (B)(3), Substantive Standards, Standards of Accreditation). The results of the third-party verification of employment records conducted in conjunction with the renewal of accreditation process show 36% (62 of 171) were verified as correct. At the February 2023 meeting, the Commission reviewed a list of graduates that could not be verified, were verified as different, and were verified as not correct by the independent third party and documentation that the school relied upon to classify each graduate "Employed in Field." The Commission found many inconsistencies between the data and supporting documentation

The school's analysis of the accuracy of its employment records appears to have focused on strengthening career services and engaging with a third-party employment verification company on a quarterly basis. In response to the March 6, 2023 Deferral, HCI College provided a copy of the Career Services Policies and Procedures Manual. The Commission noted that the manual (page 7) states that a graduate is considered placed when working a "[s]chedule of no less than 7.5 hours per week for any single employer for part-time employment and 30 hours per week for full time employment." The Commission guestioned whether 7.5 hours per week can be considered reasonable, sustainable, or indicative that the graduate attained the educational objectives of the program. In addition, the Commission is interested in how the school portrays the potential outcome of the program to prospective students.

Based on the foregoing, the Commission directs the school to submit the following:

a. For each program, provide a statement of the educational objectives, including the name, nature, and level of the occupation for which training is provided;

HCI College - West Palm Beach, Florida School #M072133 October 2, 2023 Page 5 of 8

- b. For each program, explain how a schedule of 7.5 hours per week can be considered reasonable and sustainable, and therefore successful attainment the educational objectives;
- c. If the school determines that changes are needed to the stated policies and procedures, provide a description of the changes and a copy of the revised policies and procedures;
- d. Provide a copy of the catalog, cross-referenced to the ACCSC Catalog Checklist to show how the vocational outcome of the program is disclosed to prospective students; and
- e. Any additional information that the school believes will assist the Commission in determining the school's compliance with accrediting standards.
- 3. HCI College must demonstrate that the school utilizes an enrollment agreement that includes, at a minimum, all required items listed on the ACCSC Enrollment Agreement Checklist and that clearly states the obligations of both the student and school (Section IV (C)(2), Substantive Standards, Standards of Accreditation). At issue is how the school discloses graduation requirements for the Nursing (ADN) program to prospective students. According to the school's January 5, 2023 response to the Commission's November 18, 2022 letter, the school published a new catalog on March 17, 2021, with the following nursing graduation requirements:
 - General Education courses must be taken in their course sequencing and must be taken ٠ prior to the nursing courses. In some cases, the Vice President of Academic and Regulatory Affairs may make an exception.
 - . The Student must maintain a "B" grade in all nursing core courses and a "C" grade in general education courses for program continuation and graduation.
 - ٠ The student must complete 100% of all required clinical/simulation hours.
 - Complete the proctored Specialty Exam for each semester as required with only two (2) attempts per semester permitted (a second attempt with remediation process completed).
 - ٩, Complete Dosage Calculation Tests per the program's requirement.
 - Achieve a 95% on the Comprehensive Predictor. If a student does not achieve a 95%, ٠ they will have one opportunity to retake the Comprehensive Predictor after completing two weeks of prescribed remediation.
 - Achieve "Green Light" status with Virtual ATI (VATI). Students must achieve "Green Light" status by the last day of the final term in the Nursing program. Students who fail to achieve "Green Light" status within that timeframe will be dismissed from the nursing program. Students who are dismissed may be eligible to re-take the Capstone if they have not exhausted the course repeat policy. Any student who receives anomaly warnings based on the Predictor test or during enrollment in Virtual ATI (VATI) must retake a Predictor on campus and achieve a minimum score of 95% as well as complete additional remediation as recommended by the Director of Nursing prior to release of the student name and transcript to the Florida Board of Nursing.
 - The student must complete a minimum of 72 credit hours. ٠
 - Meet all financial obligations to the school. ٠

During the February 2023 review, the Commission noted that the school had not incorporated these programmatic graduation requirements into the enrollment agreement. In response to the March 17,

HCI College - West Palm Beach, Florida School #M072133 October 2, 2023 Page 6 of 8

Deferral

2023 Deferral, HCI College submitted a sample of recently executed enrollment agreements. The Commission noted that the agreement for the Nursing program disclosed programmatic graduation requirements listed below that are not consistent with the previously stated requirements:

I understand that in order to graduate from the program and to receive a certificate of completion, diploma or degree I must successfully complete the required number of scheduled credit/clock hours as specified in the Catalog and on the Enrollment agreement. In the final semester, students are required to achieve a minimum raw score of 72.7 on the Predicted Probability of Passing NCLEX-RN ATI Proctored Exam - the Comprehensive Predictor Test (CPT). Students who score below a 72.7 on the CPT will be permitted one retake upon completing the two-week remediation program. Failure to achieve a raw score of 72.7 for the second time will result in repeating the Nursing Capstone (NUR2943L). If a student fails to meet the required score at the end of the second attempt of NUR2943L, the student will be dismissed. (June 13, 2023 HCI College Response, pg. 120).

The Commission found that the school has yet to demonstrate that graduation requirements are stated accurately or consistently in both the catalog and enrollment agreement. Accordingly, the Commission directs the school to submit the following:

- A description of the graduation requirements for the Nursing (ADN) program;
- b. A copy of the enrollment agreement for the Nursing program;
- c. The Commission will review the catalog provided in response to the previous item; and
- d. Any additional information that the school believes will assist the Commission in determining the school's compliance with accrediting standards.
- HCI College must demonstrate that the school and its branch in Ft. Lauderdale, Florida (HCI College B072560) maintain compliance with all applicable local, state, and federal requirements (Section 1 (G)(2)(d), Rules of Process and Procedure, Standards of Accreditation). The Commission noted that the Class Action Complaint contains allegations regarding violations of accrediting standards. In reviewing the response, the Commission noted that due to the ongoing lawsuit, the school's legal counsel advised only providing a general response to ACCSC's letter. Given the lack of specific information, the Commission is interested in monitoring the status of the case as information becomes available. While the Commission understands the advice of legal counsel, the Commission expects proactive updates as available regarding this case.

Based on the foregoing, the Commission directs the school to provide the following:

- a. Any available documentation regarding the Class Action Complaint and
- b. Any other information or documentation that HCI Colleges believes will assist the Commission with determining the school's compliance with accrediting standards in this regard.
- HCI College must demonstrate its financial structure is sound with resources sufficient for the proper operation of the school and the discharge of obligations to students (Section I(C)(1), Substantive Standards, Standards of Accreditation). A review of HCI College's fiscal year ended December 31, 2022 and 2021 audited financial statements showed the following:
 - HCI College decreased its net income of \$1,172,865 at December 31, 2021 to a net loss of \$947,640 at December 31, 2022 (181% decrease);

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- HCI College decreased its net cash provided by operating activities of \$1,880,464 at December 31, 2021 to net cash used by operating activities of \$1,276,210 at December 31, 2022 (168% decrease);
- HCI College decreased its net increase in cash and cash equivalents of \$399,147 at December 31, 2021 to a net decrease in cash and cash equivalents of \$585,333 at December 31, 2022 (247% decrease);
- Note 6 Litigation (pg. 13-14) indicates the school is a defendant in a case initiated on December 2, 2022 by several students alleging the school misrepresented its historic professional testing passage rates in a way that was deceptive to induce students to attend the school and misrepresented the requirements necessary to graduate from the school (pg. 13-14); and
- Note 11 Composite Score indicates the school calculated a low composite score of 1.3 out of ٠ 3.0 at December 31, 2022 (pg. 16).

Based on the foregoing, the Commission is interested in obtaining and reviewing additional information to assess whether the school is financially sound and directs HCI College to submit the following:

- a. HCI College's internally prepared financial statements for twelve-months to cover the period of January 1, 2023 through December 31, 2023, prepared in accordance with requirements set forth in ACCSC's Instructions for the Preparation and Submission of Financial Statements and Related Information;
- b. A Management Discussion and Analysis narrative examining and explaining the HCI College's current financial condition to include:
 - i. A discussion that addresses school's financial performance goals and results;
 - ii. A financial improvement plan to return to profitability;
 - iii. Anticipated future demands, events, conditions, and trends that may impact the school; and
 - iv. Specific comments relative to the school's financial position and condition, its revenues and costs, assets and liabilities, and other obligations and commitments;
- c. HCI College's full fiscal year 2023 budget with a budget-to-actual analysis for the twelve-months to cover the period of January 1, 2023 through December 31, 2023;
- d. HCI College's current status with the U.S. Department of Education regarding the school's fiscal year end December 31, 2022 audited financial statements, to include correspondence between the school and the U.S. Department of Education; and
- Any other information or documentation that HCI College believes will assist the Commission in e. its review of the school's financial position.

RESPONSE REQUIREMENTS:

By applying for accreditation, a school accepts the obligation to demonstrate continuous compliance with the Standards of Accreditation. While the Commission employs its own methods to determine a school's compliance with accrediting standards, the burden rests with the school to establish that it is meeting the standards. The Commission's deliberations and decisions are made on the basis of the written record and

Deferral

HCI College - West Palm Beach, Florida School #M072133 October 2, 2023 Page 8 of 8

thus a school must supply the Commission with complete documentation of the school's compliance with accrediting standards.

HCI College must provide a response to the items expressed above that provides the information requested along with any additional information that the school believes supports a demonstration of compliance with accrediting standards.¹ If the school's response contains documentation that includes personal or confidential student or staff information that is not required for the Commission's review (e.g., social security numbers, dates of birth, etc.), please remove or redact that information.

HCI College must upload the school's electronic response directly to ACCSC's College 360 Database. The ACCSC College 360 database can be accessed by clicking here. Please note that the password utilized by the institution to access the Annual Report Portal is the same to access the School Submission section of the College 360 database. The Instructions for Electronic Submission can be found here. A detailed overview on how to upload a school submission can be found here.

Keep in mind, the school's response must be prepared in accordance with ACCSC's Instructions for Electronic Submission (e.g., prepared as one Portable Document Format ("PDF") file that has been prepared using Adobe Acrobat software (version 8.0 or higher) and which has a .pdf extension as part of the file name). The school will receive an e-mail confirmation that the file has been received within 24 hours of the submission.

The response must also include a signed certification attesting to the accuracy of the information and be received in the Commission's office on or before December 14, 2023. If a response is not received in the Commission's office on or before December 14, 2023, the Commission will consider further appropriate action.

For assistance with the password or for any other questions regarding the electronic submission requirements, please contact . Please note that any password requests to access College 360 must be made by the school director, or designated member of the school's management team, via e-mail.

Sinc	erely,	
c:	-	

For further assistance or additional information, please contact

¹ ACCSC has issued a module of the Blueprints for Success Series, Preparing a Comprehensive Response for Commission Consideration, which provides a framework for submitting a well-documented, organized, electronic response for Commission consideration. ACCSC encourages the school to review this module prior to formulating its response to this letter. More information is available under the Resources section at www.accsc.org.

EXHIBIT 30 (filed under seal)

EXHIBIT 31 (filed under seal)

EXHIBIT 32 (filed under seal)

EXHIBIT 33 (filed under seal)

EXHIBIT 34 (filed under seal)

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EXHIBIT 35

H4	977930 12 Case 0:2	2 ov 9		RETAL	L INSTAL	LLMEN	T CONTRA	CT Dockot 12/	7000100		28/2020
Date	5/28/2020		rollment art Date	7/6/2020	Expe	ctéd026 ion Date	12/22/2021	Student ID		ruge oor e	,
As payr	nent for tuition	n, related	costs and f	fees at (School) HCI - COI	LEGE					
located	in (City, State) WEST	PALM BE	EACH, FL	the sum of		\$23,821.00	(inclu	des principa	and interest) v	will be due
as follo	ws:	50	installme	ents of		\$476.42		beginning or	1	7/15/2020	

All subsequent installments shall be due and payable on the same day of each consecutive month thereafter until paid in full.

In this Retail Installment Contract ("Contract"), the words "you" and "your" mean the Buyer and Co-Signer, individually and collectively, who sign this Agreement. The word "School" means the School named above in this Contract. The word "Lender" means HCI - COLLEGE. This Contract is for educational goods and services provided to you by SCHOOL and subject to the terms and conditions contained in the the Final Disclosure Statement ("Final Disclosure") under the federal Truth-in-Lending Act, which is incorporated herein by reference as though set forth in full and which will be provided to you after you sign this Contract with Lender. You agree to review the Final Disclosure upon receiving it and to contact the Lender with any questions. You understand that if the information in your Final Disclosure Statement conflicts with the information in this Agreement, the information in your Final Disclosure Statement shall control.

We may deem you to be in default of this Contract if you fail to pay any installment or fee due for more than 10 days after the scheduled due date. Should we deem you to be in default, the whole sum of principal and interest may immediately become due and payable at the option of the holder of this Contract after any notice of default and opportunity to cure default has been provided to you as required by applicable law. If you file for bankruptcy, you may still be required to pay back the credit extended under this Contract. If action should be instituted on this Contract, you promise to pay such sum as the court may grant as attorney fees and court costs, to the extent permissible under state law.

Your payments will be applied first to late charges and accrued finance charges and the remainder to principal. You acknowledge that you have consented to receive electronically all Truth-in-Lending disclosures that are required to be delivered to you and that you have consented to such disclosures being sent to you via an e-mail which provides you with a secure electronic link to such disclosures. You acknowledge that you have been provided an Application Disclosure and Approval Disclosure Statement under the Federal Truth-in-Lending Act and Self-Certification Form if applicable setting forth important terms of the credit to be provided to you and that you have been instructed to contact your School if you have any questions prior to accepting this Contract. You further acknowledge that by signing this Contract you accept the offer of credit and waive any remaining time in the (30) day period stated on the Approval Disclosure regardless of whether you have used the entire review and signature period.

You agree that the Lender, its successors and assigns and their respective service providers may call you, leave you a voice, prerecorded or artificial voice message or send you an SMS text, e-mail or other electronic message for any purpose related to your loan application or account (each a "Communication"). You agree that we may call or text you at any telephone number associated with your account, including cellular telephone numbers and may send an e-mail to any current or future email address associated with your account. You also agree that we may include your personal information in a current or future Communication and may send a Communication using an automatic telephone dialing system. We will not charge you for a Communication, but you understand that your service provider may. You understand and agree that we may communicate with you in any manner permitted by law that does not require your prior consent.

You may withdraw your consent to receive electronic documents, notices or disclosures at any time. In order to withdraw consent to conduct business electronically, please contact Lender or Tuition Options by telephone (800-423-5513), mail (PO Box 387, Marlton, NJ 08053) or email (servicing.center@tuitionoptions.com).

By signing below, you acknowledge receipt of a complete and true copy of this Contract and jointly and severally agree to all of the terms and conditions.

BUYER	CO-SIGNER	
Name BRITTANY ROBERSON Date	Name	Date
Address 9506 MINORCA WAY	Address	
City PALM BEACH GARDENS State FL Zip 33418	City	State Zip
Home Tel. (561) 234 - 6603 Work Tel. () -	Home Tel. () -	Work Tel. () -
Social Security Number xxx-xx-	Social Security Number xxx-xx	

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AMOUNT FINANCED: \$23,821.00 The amount of credit provided to the one my behalf.

CASH PRICE: \$23,821.00 The price at which School offers to sell for cash the portion of the educational services funded through this Contract.

TOTAL SALES PRICE: \$23,821.00 The sum of the Cash Price and the Finance Charge.

FINANCE CHARGE: \$.00 The Finance Charge will be shown in the attached Approval Disclosure as an estimate and will be in the Final Disclosure after the Approval Disclosure signature, and is equal to the Finance Charge collected if you make the required installment payments per the terms of this Contract. Interest is calculated on a daily simple interest basis according to the outstanding balance and the daily interest rate will be equal to the annual interest rate divided by the number of days in the year.

INTEREST: Interest will accrue at a fixed annual rate of 0.00% on the unpaid balance of the Amount Financed beginning on the date on which lender extends credit to you in consideration for this Contract and credits the amounts financed under this Contract.

LATE CHARGES: NO LATE FEE, to the extent permitted by state law. I will pay only one late fee for any late installment payment, regardless of the number of days it is late.

PREPAYMENT: If you payoff the credit extended to you early, in whole or in part, you will not pay a penalty. Subject to applicable law, you may be entitled to a refund of part of the finance charge.

ASSIGNMENT: This Contract may be assigned to Tuition Options (TO). Any other assignee should contact TO at (800) 423-5513 to inquire as to the validity of such assignment.

RETURNED CHECK FEE: You will be charged a fee of \$15.00 for each payment that is made by a check that is returned for insufficient funds.

COLLECTION FEES: If your account is in default and referred to a collection agency or an outside attorney to collect the outstanding debt, you will pay the costs, including reasonable attorney fees, to the extent permitted by state law.

WAIVER: Lender will not lose any rights under this Contract if it delays taking action for any reason. Any change to this Contract must be in writing and signed by Lender.

SEVERABILITY: If any provision of this Agreement is determined to be unenforceable or is prohibited by law, such provision shall be considered ineffective without invalidating the remaining provisions of the Agreement.

REPAYMENT PERIOD: The Repayment Period may be shortened or extended as described within this Agreement. If you have more than one loan with us, you consent and agree that we may extend the Repayment Period for any of your loans to expire at the end of the longest Repayment Period for any of your loans and we may send you a single statement with a single minimum payment amount that will fully amortize your loans over the adjusted Repayment Period. The length of the Repayment Period is subject to limitations on the period of repayment under applicable law.

The amount of the scheduled monthly payment may increase or decrease to amortize the new outstanding loan balance at the then current interest rate in equal monthly installments by the end of the Repayment Period. We will inform you in advance of any change in the scheduled monthly payment.

Will be (Which may c	hange based on	your first disbu	rsement date) :		
	Disburs	sement Number	Date of Disbursement	Disbursement Amount	
		1	07/01/2020	\$23,821.00	
Borr	ower Initials:	BR	Co	-Signer Initials:	
	-	_			

Itemization of the Amour	nt Financed
1. Cash Price a. Cost of Attendance	\$23,246.00
b. Registration Fee	\$0.00
с.	\$0.00
2. Total Cash Price	\$0.00
3. Less Deductions a. Cash Down Payment	\$0.00
b.	\$0.00
с.	\$0.00
4. Total Deductions	\$0.00
5. Amount Financed	\$23,821.00

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ARBITRAGTON. PERASE READ THIS PROVISION OF 14415 CONTRACT VERY SAREA (1912) 2023 Page 699 of

IT PROVIDES THAT ALL DISPUTES, CLAIMS OR CONTROVERSIES ARISING OUT OF OR RELATED TO THIS CONTRACT SHALL BE RESOLVED BY BINDING ARBITRATION UNLESS YOU REJECT THIS PROVISION BELOW. ARBITRATION REPLACES THE RIGHT TO GO TO COURT, INCLUDING THE RIGHT TO A JURY. IN ARBITRATION, A DISPUTE IS RESOLVED BY AN ARBITRATOR INSTEAD OF A JUDGE OR JURY. ARBITRATION PROCEDURES ARE SIMPLER AND MORE LIMITED THAN COURT PROCEDURES.

This Agreement to Arbitrate does not apply if, on the date you submit your Application or on the date the arbitration provision is invoked, you are covered by the federal Military Lending Act as a member of the Armed Forces or a dependent of such a member.

AGREEMENT TO ARBITRATE. Either you or we may, without the other's consent, elect mandatory, binding arbitration for any dispute, claim or controversy arising out of or related to this Contract, or breach thereof, which shall be settled by arbitration in accordance with the Consumer Rules of the American Arbitration Association, and judgment upon the award rendered by the arbitrator(s) may be entered in any court having jurisdiction. "Claim" includes any past, present or future claim, dispute or controversy, including the validity or enforceability of this Arbitration Provision, between you and us or our employees, agents, successors, assigns or affiliates arising from or relating to (1) the credit application; (2) this Contract; and (3) any related transaction, occurrence or relationship. This includes any Claim based on common or constitutional law, contract, tort, statute, regulation, or other grounds. If either party elects to resolve a Claim through arbitration, you and we agree that no trial by jury or other judicial proceeding will take place. Rather, the Claim will be arbitrated on an individual basis, and not on a class or representative basis.

The arbitration hearing will be carried out in the federal district where you reside, unless you and we agree otherwise. Or, if all parties consent, the arbitration hearing can be by telephone. Unless the arbitrator awards them to a party, each party is responsible for the fees of its attorneys, experts, witnesses, and any other fees or costs, including any amount we have advanced. The arbitrator shall follow governing substantive law and any applicable statute of limitations. The arbitrator will decide any dispute regarding the arbitrability of a Claim. An arbitrator has the authority to order specific performance, compensatory damages, punitive damages, and any other relief allowed by applicable law. An arbitrator's authority to make awards is limited to awards to you or us alone. Furthermore, Claims brought against either party may not be joined or consolidated in arbitration with claims brought by or against someone other than you, unless agreed to in writing by all parties. No arbitration award or decision will have any preclusive effect as to issues or claims in any dispute with anyone who is not a named party to the arbitration.

Any arbitration award shall be in writing, shall include a written reasoned opinion, and will be final and binding subject only to any right to appeal under the Federal Arbitration Act ("FAA"), 9 U.S.C. Sections 1, et seq. This arbitration provision survives any (i) termination, payoff, assignment or transfer of this Contract, (ii) any legal proceeding by you or us to collect a debt owed by the other, and (iii) any bankruptcy proceeding in which you or we are the debtor. With but one exception, if any part of this arbitration provision is deemed or found to be unenforceable for any reason, the remainder of this arbitration provision will remain in full force and effect. The one exception is that, if a finding of a partial unenforceability would allow arbitration to proceed on a class-wide basis, then this arbitration provision will be unenforceable in its entirety. You and we expressly agree that this arbitration provision is governed by the FAA to the exclusion of any different or inconsistent state or local law. By signing this Contract, you are agreeing to the terms of this arbitration provision, unless you reject it as provided in the next paragraph.

CAUTION: It is important that you read this arbitration provision thoroughly before you sign the Contract. By signing this Contract, you are acknowledging that you have read and understand this arbitration provision. If you do not understand something in this arbitration provision, do not sign this Contract; instead, ask your lawyer. You can reject this arbitration provision by not initialing the box in the Acceptance of Arbitration section of this Contract before you sign this Contract. If you do so, this arbitration provision will not be a part of this Contract, but all of the rest of this Contract will continue to be binding and effective.

ACCEPTANCE OF ARBITRATION: Initialing here or declining to do so will not affect the terms under which we will finance or any of the terms of this Contract, except that the arbitration provision either will be or will not be a part of this Contract. By initialing this section, you acknowledge you have read this provision and agree to the arbitration of all disputes.

Buyer Initials: <u>BR</u>	_ Co-Buyer Initials:
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NOTICE ABOUT FURNISHING OF NEGATIVE INFORMATION TO CREDIT REPORTING AGENCIES: We may report information about your account to credit bureaus. Late payments, missed payments, or other defaults on your account may be reflected in your credit report.

<u>ADDITIONAL PROVISIONS</u>: You agree that you must repay the amounts owing under this Contract even though you may be under 18 years of age at the time you sign it. You agree to notify School of any change in your name, address, phone number, e-mail address, and/or applicable school enrollment status within ten (10) days of such occurrence. Buyer shall send any notices required under this Contract to HCI - COLLEGE, 1764 NORTH CONGRESS AVE, WEST PALM BEACH, FL 33409.

<u>NOTICE</u>: This is a consumer credit transaction.

#298.3

IMPORTANS OF DER AL-BRABE-BOMMISSION MOTILE AN ENOUGH DER OF TESTS CONSEMER LA DEB CONDEATORS SUBJECT TO ALL CLAIMS AND DEFENSES WHICH THE DEBTOR COULD ASSERT AGAINST THE SELLER OF GOODS OR SERVICES OBTAINED PURSUANT HERETO OR WITH THE PROCEEDS HEREOF. RECOVERY HEREUNDER BY THE DEBTOR SHALL NOT EXCEED AMOUNTS PAID BY THE DEBTOR HEREUNDER.

<u>CALIFORNIA RESIDENTS: NOTICE</u>: YOU MAY ASSERT AGAINST THE HOLDER OF THIS CONSUMER CREDIT CONTRACT YOU SIGNED IN ORDER TO FINANCE THE COST OF THE EDUCATIONAL PROGRAM ALL OF THE CLAIMS AND DEFENSES THAT YOU COULD ASSERT AGAINST THIS INSTITUTION, UP TO THE AMOUNT YOU HAVE ALREADY PAID UNDER THE CONSUMER CREDIT CONTRACT.

California Married Applicants: The applicant, if married, may apply for a separate account.

FLORIDA RESIDENTS: Any Florida documentary stamp tax applicable, pursuant to Chapter 201, Florida Statutes, to this contract, will be reported and remitted by the Lender or one of its affiliates.

HAWAII RESIDENTS: Do not sign this contract before you read it. When you sign this contract, you are entitled to a copy of it that is filled in, in every necessary respect. You should keep it. This contract is covered by Hawaii's credit sale law and you have the rights of a buyer under that law. You also may have rights under the other state and federal laws

IOWA & KANSAS RESIDENTS: **IMPORTANT: READ BEFORE SIGNING.** THE TERMS OF THIS AGREEMENT SHOULD BE READ CAREFULLY BECAUSE ONLY THOSE TERMS IN WRITING ARE ENFORCEABLE. NO OTHER TERMS OR ORAL PROMISES NOT CONTAINED IN THIS WRITTEN CONTRACT MAY BE LEGALLY ENFORCED. YOU MAY CHANGE THE TERMS OF THIS AGREEMENT ONLY BY ANOTHER WRITTEN AGREEMENT.

MASSACHUSETTS RESIDENTS: Massachusetts law prohibits discrimination based upon marital status, individual's sex, gender identity, age or sexual orientation.

NEBRASKA RESIDENTS: (For purposes of the following notice, the word "you" refers to the Borrower not the Lender)

A credit agreement must be in writing to be enforceable under Nebraska law. To protect you and us from any misunderstandings or disappointments, any contract, promise, undertaking, or offer to forbear repayment of money or to make any other financial accommodation in connection with this loan of money or grant or extension of credit, or any amendment of, cancellation of, waiver of, or substitution for any or all of the terms or provisions of any instrument or document executed in connection with this loan of money or grant or extension of credit, must be in writing to be effective.

<u>OHIO RESIDENTS</u>: The Ohio Laws against discrimination require that all creditors make credit equally available to all creditworthy customers and that credit reporting agencies maintain separate credit histories on each individual upon request. The Ohio Civil Rights Commission administers compliance with this law.

TEXAS RESIDENTS: To contact the School about this account, call 800-423-5513. This contract is subject in whole or in part to Texas law which is enforced by the Consumer Credit Commissioner, 2601 North Lamar Boulevard, Austin, Texas 78705-4207; (800) 538-1579; www.occc.state.tx.us, and can be contacted relative to any inquiries or complaints.

WISCONSIN RESIDENTS:

EXPLANATION OF PERSONAL OBLIGATION FOR PRIVATE EDUCATION RETAIL INSTALLMENT SALE AGREEMENT WITH BUYER: BRITTANY ROBERSON

(a) You have agreed to pay the "Total of Payments" under a consumer credit transaction between the Buyer and School made on the date, and for in the amount shown, in the Final Disclosure Statement, for purposes of financing educational goods and services.

(b) You will be liable and fully responsible for payment of the above amount, even though you may not be entitled to any of the goods or services furnished thereunder.

(c) You may be sued in court for the payment of the amount due under this consumer credit transaction, even though the customer named above may be working or have funds to pay the amount due.

(d) This explanation is not the agreement under which you are obligated, and the guaranty or agreement you have executed must be consulted for the exact terms of your obligations.

(e) You are entitled now, or at any time, to one free copy of any document you sign evidencing this transaction.

(f) The undersigned acknowledges receipt of an exact copy of this notice.

No provision of any marital property agreement (pre-marital agreement), unilateral statement under Section 766.59, Wisconsin Statutes, or court decree under Section 766.70, Wisconsin Statutes, adversely affects the interest of the Lender unless the Lender, prior to the time that the loan is approved, is furnished with a copy of the agreement, statement, or decree or has actual knowledge of the adverse provision when the obligation to the Lender is incurred. If the loan for which I am applying is granted, my spouse will also receive notification that credit has been extended to me.

#298.4

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Spouses of married Wisconsin residents must read the Retail Installment Contract and then sign below to acknowledge having actual knowledge of the credit being extended under this Retail Installment Contract and having waived the notice requirements of Wisconsin Statute Section 766.56(3)(b). **Borrower Married Cosigner Married** (Name of Wisconsin Borrower) (Social Security Number of Wisconsin Borrower) (Printed Name of Wisconsin Borrower's Spouse) (Signature of Wisconsin Borrower's Spouse) (Name of Wisconsin Cosigner) (Social Security Number of Wisconsin Cosigner) (Printed Name of Wisconsin Cosigner's Spouse) (Signature of Wisconsin Cosigner's Spouse) **Education Loan** (Name of Loan Program) (Name of Lender)

The terms of this Contract are contained on more than one page.

NOTICE TO CALIFORNIA CO-SIGNER

NOTICE TO CO-SIGNER (Traduccion en Ingles Se Requiere Por La Ley):

You are being asked to guarantee this debt. Think carefully before you do. If the borrower does not pay the debt, you will have to. Be sure you can afford to pay if you have to, and that you want to accept this responsibility.

You may have to pay up to the full amount of the debt if the borrower does not pay. You may also have to pay late fees or collection costs, which increase this amount. The holder of the loan can collect this debt from you without first trying to collect from the borrower. The holder of the loan can use the same collection methods against you that can be used against the borrower, such as suing you, garnishing your wages, etc. If this debt is ever in default, that fact may become part of your credit record.

This notice is not the contract that makes you liable for the debt.

AVISO PARA EL FIADOR (Spanish Translation Required by Law):

Se le está pidiendo que garantice esta deuda. Piénselo con cuidado antes de ponerse de acuerdo. Si la persona que ha pedido este préstamo no paga la deuda, usted tendrá que pagarla. Esté seguro de que usted podrá pagar si sea obligado a pagarla y de que usted desea aceptar la responsabilidad.

Si la persona que ha pedido el préstamo no paga la deuda, es posible que usted tenga que pagar la suma total de la deuda, mas los cargos por tardarse en el pago o el costo de cobranza, lo cual aumenta el total de esta suma.

El acreedor (financiero) puede cobrarle a usted sin, primeramente, tratar de cobrarle al deudor. Los mismos metodos de cobranza que pueden usarse contra el deudor, podran usarse contra usted, tales como presentar una demanda en corte, quitar parte de su sueldo, etc. Si alguna vez no se cumpla con la obligación de pagar esta deuda, se puede incluir esa información en la historia de credito de usted.

Este aviso no es el contrato mismo en que se le echa a usted la responsabilidad de la deuda.

PLS000404

#298.6

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ILLINOIS RESIDENTS:

EXPLANATION OF GUARANTOR'S OBLIGATION FOR ILLINOIS PRIVATE EDUCATION RETAIL INSTALLMENT AGREEMENT WITH BUYER: <u>BRITTANY ROBERSON</u>

Applies Only To Co-Signers Who Are NOT a Parent or Spouse of Illinois Buyer

The person signing this document and the Private Education Retail Installment Sale Agreement ("you" and "your") agrees to pay all amounts the Buyer owes under the Agreement for purchases of educational services, books, and equipment from the School.

Your obligation arises only after the School or any subsequent holder of the Agreement ("we," "us," and "our") has attempted through the use of the court system to collect this amount from the Buyer.

If we cannot collect this amount from the Buyer, you will be obligated to pay, even though you are not entitled to any of the goods or services furnished. We are entitled to sue you in court for the payment of the amount due.

The person signing below acknowledges that he or she: (a) is a not parent or spouse of the Buyer identified above; (b) read and received a copy of the Private Education Retail Installment Sale Agreement and this document from the School.

IOWA AND SOUTH CAROLINA RESIDENTS

NOTICE TO CO-SIGNER OF SOUTH CAROLINA OR IOWA PRIVATE EDUCATION RETAIL INSTALLMENT SALE AGREEMENT BETWEEN SCHOOL AND BUYER: <u>BRITTANY ROBERSON</u> (Buyer's Name)

RETAIL INSTALLMENT ACCOUNT #: 1217536

AMOUNT OF DEBT: The "Total Loan Amount" shown in the Final Disclosure Statement accompanying the Agreement.

You agree to pay the debt identified above although you may not personally receive any property, services, or money.

You may be sued for payment although the Buyer who receives the property, services, or money is able to pay.

This notice is not the contract that obligates you to pay the debt. Read the Private Education Retail Installment Sale Agreement and the Final Disclosure Statement for the exact terms of your obligation. You acknowledge receiving a copy of this notice.

NEW YORK RESIDENTS

NOTICE TO CO-SIGNER OF NEW YORK PRIVATE EDUCATION RETAIL INSTALLMENT SALE AGREEMENT BETWEEN SCHOOL WITH BUYER: <u>BRITTANY ROBERSON</u> (Buyer's Name)

RETAIL INSTALLMENT ACCOUNT #: 1217536

AMOUNT OF DEBT: The "Total Loan Amount" shown in the Final Disclosure Statement accompanying the Agreement.

You agree to pay the debt identified above although you may not personally receive any property, services, or money. You may be sued for payment although the Buyer is able to pay.

You should know that the Total of Payments shown in the Final Disclosure Statement does not include court costs or attorney's fees, or other costs or charges that may be stated in the Agreement. You will also have to pay some or all of these costs and charges if the Agreement for this consumer credit account, payment of which you are guaranteeing, requires the Buyer to pay such costs and charges.

If any debt incurred on the Account is ever in default, that fact may become a part of your credit record.

This notice is not the agreement or other writing that obligates you to pay. Read that writing for the exact terms of your obligations and of your rights to limit or end your obligations.



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NOTICE TO THE BUYER: (1) DO NOT SIGN THIS CONTRACT BEFORE YOU READ IT OR IF IT CONTAINS ANY BLANK SPACES TO BE FILLED IN. (2) YOU ARE ENTITLED TO AN EXACT AND COMPLETELY FILLED-IN COPY OF THIS CONTRACT. KEEP A COPY TO PROTECT YOUR LEGAL RIGHTS. (3) YOU CAN PREPAY THE FULL AMOUNT DUE UNDER THIS CONTRACT AT ANY TIME AND UNDER CERTAIN CONDITIONS TO OBTAIN A PARTIAL REFUND OF THE CREDIT SERVICE CHARGE. (4) IF YOU DESIRE TO PAY OFF IN ADVANCE THE FULL AMOUNT DUE, THE AMOUNT WHICH IS OUTSTANDING WILL BE FURNISHED UPON REQUEST. (5) YOU MAY CANCEL THIS TRANSACTION AT ANY TIME PRIOR TO MIDNIGHT OF THE THIRD BUSINESS DAY AFTER THE DATE YOU RECEIVE THE FINAL DISCLOSURE STATEMENT. PLEASE READ THE FINAL DISCLOSURE STATEMENT FOR AN EXPLANATION OF YOUR CANCELLATION RIGHTS AND RESPONSIBILITIES.

By signing below, you certify that, to the best of your knowledge, the information provided in this contract is accurate and complete and understand that the Lender will rely on this information to make its credit decision. By signing below, you understand and agree that: (1) you are applying to the School, at the Campus indicated above, for a Retail Installment Contract (the "Contract") that finances the purchase of certain goods and services from the School for qualified higher educational expenses; (2) the Contract will be governed by and subject to applicable federal law and the law of the state where the School Campus is located; and (3) the Lender or its designee may verify information about you contained in this contract and your credit history through credit reporting agencies and any person, business entity or governmental agency that can provide such information. You understand and agree that the Lender may request consumer credit reports about you to evaluate this contract, for servicing and collection purposes, and for other legitimate purposes associated with your Contract. Upon your request, the Lender will inform you if a consumer report was requested and, if it was, provide you with the name and address of the consumer reporting agency that furnished the report.

By signing below, you certify that you have read and understand the disclosures made here and you agree to the terms of this contract.

RETAIL INSTALLMENT CONTRACT

BRITTANY ROBERSON	lanelda	
Buyer	School Representative	
1614390-2020-05-28 14:59:52-23.124.37.178	lanelda	
Buyer's Signature	Signature	
05/28/2020	05/28/2020	
Date	Date	

The undersigned hereby agrees and accepts the terms and conditions of this Contract. The undersigned further acknowledges that the Federal Notice to Co-signer, Supplemental State Notices to Co-signer (if applicable) and a completely filled in and exact copy of all pages of this Contract have been received and consents to be bound thereby.

Co-signer:	
Co-signer Signature:	
Date:	

PLS000406

#298.8

Page: 8 of 18

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Illinois Co-signer Disclosure:

Co-signer:	
Co-signer Signature:	
Date	

You ______ (Cosigner) by signing the retail installment contract and this document are agreeing that you will pay <u>\$23,821.00</u> (total deferred payment price) for the purchase of educational goods and services purchased by **BRITTANY ROBERSON** (name of buyer) from **HCI - COLLEGE** (SCHOOL NAME).

Your obligation arises only after the seller or holder has attempted through the use of the court system to collect this amount from the buyer. If the seller cannot collect this amount from the buyer, you will be obligated to pay even though you are not entitled to any of the goods or services furnished. The seller is entitled to sue you in court for the payment of the amount due.

PLS000407

#298.9 Page: 9 of 18

IMPORTANT FEDERAL LAW NOTICE TO CO-SIGNER:

You are being asked to guarantee this debt. Think carefully before you do. If the borrower does not pay the debt, you will have to. Be sure you can afford to pay if you have to, and that you want to accept this responsibility.

You may have to pay up to the full amount of the debt if the borrower does not pay. You may also have to pay late fees or collection costs, which increase this amount. The holder of this Retail Installment Contract can collect this debt from you without first trying to collect from the borrower.

The holder of this Retail Installment Contract can use the same collection methods against you that can be used against the borrower, such as suing you, garnishing your wages, etc. If this debt is ever in default, that fact may become a part of your credit record.

This notice is not the contract that makes you liable for the debt.

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Page 1 of 2

BORROWER:

BRITTANY ROBERSON

9506 MINORCA WAY

PALM BEACH GARDENS, FL 33418

LENDER:

HCI - COLLEGE

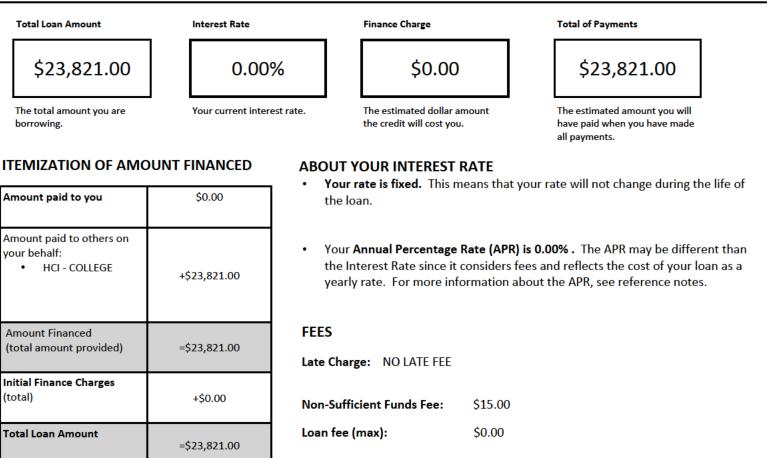
1764 NORTH CONGRESS AVE

WEST PALM BEACH, FL 33409

LENDER EMAIL: servicing.center@tuitionoptions.com

of

Loan Rates & Estimated Total Costs



Estimated Repayment Schedule & Terms

	MONTHLY PAYMENTS		
50 MONTH LOAN TERM	At 0.00% * the fixed interest rate on your loan		The endine and T eac
7/15/2020 - 8/15/2024 50 monthly payments	\$476.42	◄	The estimated Tota Payments at the Maximum Rate of Interest would be

* The fixed interest rate on your loan of 0.00% is also the maximum interest rate possible for s_{23}

Page 2 of 2

Federal Loan Alternatives

Loan program Current Interest Rates by Program Type			
DIRECT for Students	4.530% fixed	ed Undergraduate subsidized	
	4.530% fixed	Undergraduate unsubsidized	
	6.080% fixed	Graduate unsubsidized	
PLUS For Parents and Graduate/Professional Students	7.080% fixed	Federal Direct Loan	

You may qualify for Federal education loans.

For additional information, contact your school's financial aid office or the Department of Education at: <u>https://studentaid.ed.gov/sa/</u>

Next Steps & Terms of Acceptance

This offer is good until:

June 27, 2020

1. Find Out About Other Loan Options

Contact your school's financial aid office for more information.

2. You Have Until June 27, 2020 to Accept this Offer The terms of this offer will not change except as permitted by law.

To accept the terms of this loan, please sign the enclosed Retail Installment Contract and Self-Certification Form and return to:

> HCI - COLLEGE 1764 NORTH CONGRESS AVE WEST PALM BEACH, FL 33409 (561) 586 - 0121

REFERENCE NOTES

Fixed Interest Rate

- This loan has a fixed interest rate that will not change during the life of your loan.
- The Interest Rate may be higher or lower than your Annual Percentage Rate (APR) as the APR considers certain fees paid to obtain this loan, the Interest Rate, and if payments are deferred while in school.

Bankruptcy Limitations

• If you file bankruptcy, you may still be required to pay back this loan.

Prepayments:

• If you pay the loan off early, in whole or in part, you will not pay a penalty. Subject to applicable law, you may be entitled to a refund of part of the finance charge.

<u>See</u> your contract for any additional information about nonpayment, default, any required repayment in full before the scheduled date, and prepayment refunds and penalties.

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Private Education Loan Applicant Self-Certification

This space for lender use only

OMB No. 1845-0101 Form Approved Exp. Date 8-31-2022

Important: Pursuant to Section 155 of the Higher Education Act of 1965, as amended, (HEA) and to satisfy the requirements of Section 128(e)(3) of the Truth in Lending Act, a lender must obtain a self-certification signed by the applicant before disbursing a private education loan. The school is required on request to provide this form or the required information only for students admitted or enrolled at the school. Throughout this Applicant Self-Certification, "you" and "your" refer to the applicant who is applying for the loan. The applicant and the student may be the same person.

Instructions: Before signing, carefully read the entire form, including the definitions and other information on the following page. Submit the signed form to your lender.

SECTION 1: NOTICES TO APPLICANT

- Free or lower-cost Title IV federal, state, or school student financial aid may be available in place of, or in addition to, a private education loan. To apply for Title IV federal grants, loans and work-study, submit a Free Application for Federal Student Aid (FAFSA) available at www.fafsa.ed.gov, or by calling 1-800-4-FED-AID, or from the school's financial aid office.
- A private education loan may reduce eligibility for free or low-cost federal, state, or school student financial aid.
- You are strongly encouraged to pursue the availability of free or lower-cost financial aid with the school's financial aid office.
- The financial information required to complete this form can be obtained from the school's financial aid office. If the lender has provided this information, you should contact your school's financial aid office to verify this information and to discuss your financing options.

SECTION 2: COST OF ATTENDANCE AND ESTIMATED FINANCI	AL ASSISTANCE			
If information is not already entered below, obtain the needed inform line. Sign and date where indicated. See Section 5 for definitions of		lid office and enter it on the appropriate		
A. Student's cost of attendance for the period of enrollment covere	d by the loan	\$23,246.00		
B. Estimated financial assistance for the period of enrollment covered by the loan \$0.00				
C. Difference between amounts A and B		\$23,246.00		
WARNING: If you borrow more than the amount on line C, you ri free or low-cost federal, state, or school financial aid	sk reducing your eligibility for			
SECTION 3: APPLICANT INFORMATION				
Enter or correct the information below.				
Full Name and Address of School HCI - COLLEGE 1764 NORTH COL	NGRESS AVE WEST PALM BEAC	H FL 33409		
Applicant Name (last, first, MI) ROBERSON, BRITTANY	Date of Birth (mm/dd/yyyy)	08/03/1986		
Permanent Street Name 9506 MINORCA WAY				
City, State, Zip PALM BEACH GARDENS, FL 33418				
Area Code / Telephone Number Home (561) 234 - 6603 Other	() -			
E-mail Address _broberson0803@starkstate.net	_			
Period of Enrollment Covered by the Loan (mm/dd/vvvv) From 07/0	- 6/2020 To 12/22/2021			

If the student is <u>not</u> the applicant, provide the student's name and date of birth.

Student Name (last, first, MI)

Student Date of Birth (mm/dd/yyyy)

SECTION 4: APPLICANT SIGNATURE

I certify that I have read and understood the notices in Section 1 and, that to the best of my knowledge, the information provided on this form is true and correct.

Signature of Applicant: 1614390-2020-05-28 14:59:52-23.124.37.178 Date (mm/dd/yyyy):

SECTIONS: DEFINITIONS 883-RAR Document 141-2 Entered on FLSD Docket 12/19/2023 Page 710 of 1026

Cost of attendance is an estimate of tuition and fees, room and board, transportation, and other costs for the period of enrollment covered by the loan, as determined by the school. A student's cost of attendance may be obtained from the school's financial aid office.

Estimated financial assistance is all federal, state, institutional (school), private, and other sources of assistance used in determining eligibility for most Title IV student financial aid, including amounts of financial assistance used to replace the expected family contribution. The student's estimated financial assistance is determined by the school and may be obtained from the school's financial aid office.

A **lender** is a private education lender as defined in Section 140 of the Truth in Lending Act and any other person engaged in the business of securing, making, or extending private education loans on behalf of the lender.

Period of enrollment is the academic year, academic term (such as semester, trimester, or quarter), or the number of weeks of instructional time for which the applicant is requesting the loan.

A **private education loan** is a loan provided by a private education lender that is not a Title IV loan and that is issued expressly for postsecondary education expenses, regardless of whether the loan is provided through the school that the student attends or directly to the borrower from the private education lender. A private education loan does not include (1) An extension of credit under an open-end consumer credit plan, a reverse mortgage transaction, a residential mortgage transaction, or any other loan that is secured by real property or a dwelling; or (2) An extension of credit in which the school is the lender if the term of the extension of credit is 90 days or less or an interest rate will not be applied to the credit balance and the term of the extension of credit is one year or less, even if the credit is payable in more than four installments.

Title IV student aid includes the Federal Pell Grant Program, the Federal Supplemental Educational Opportunity Grant (FSEOG) Program, the Federal Work-Study (FWS) Program, the William D. Ford Federal Direct Loan (Direct Loan) Program, the Federal Perkins Loan Program, and the Teacher Education Assistance for College and Higher Education (TEACH) Grant Program. To apply for Title IV federal grants, loans, and work-study, submit a Free Application for Federal Student Aid (FAFSA), which is available at www.fafsa.gov, by calling 1-800-4-FED-AID, or from the school's financial aid office.

SECTION 6: Paperwork Reduction Notice

Paperwork Reduction Notice: According to the Paperwork Reduction Act of 1995, no persons are required to respond to a collection of information unless it displays a currently valid OMB control number. The valid OMB control number for this information collection is 1845-0101. The time required to complete this information collection is estimated to average 0.25 hours (15 minutes) per response, including the time to review instructions, search existing data resources, gather and maintain the data needed and complete and review the information collection.

If you have any comments concerning the accuracy of the time estimate(s) or suggestions for improving this form, please write to: U.S. Department of Education, Washington, DC 20202-4651.

If you have any comments or concerns regarding the status of your individual submission of this form, contact your lender.

Case 9:2 FACTS	2-CV-81883-RAR Document 141-2 Er WHAT DOES TUITION OPTIONS DO	itered on ELSD Docket 12/ STH YOUR PERSONAL INFO	19/2023 Page 711 of RMATION?				
Why?	right to limit some but not all sharing. Fe	Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.					
What?	The types of personal information we collect and share depend on the product or service you have with us. This information can include: • Social Security number and purchase history • account balances and payment history • transaction history and account transactions When you are <i>no longer</i> our customer, we continue to share information as described in this notice.						
How?	the section below, we list the reasons fina	All financial companies need to share customers' personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customers' personal information; the reasons Tuition Options choose to share; and whether you can limit this sharing.					
Reasons we can s	share your personal information	Does Tuition Options share?	Can you limit this sharing?				
such as to process	business purposes – your transactions, maintain your account(s), ders and legal investigations, or report to credit	Yes	No				
For our marketin to offer our produc	g purposes – ts and services to you	Yes	No				
For joint marketi	ng with other financial companies	No	We Don't Share				
	'everyday business purposes – 'our transactions and experiences	Yes	No				
	' everyday business purposes – /our creditworthiness	No	We Don't Share				
For our affiliates	to market to you	No	We Don't Share				
For nonaffiliates	to market to you	No We Don't Share					
Questions?	Go to <u>www.tuitionoptions.com</u> .						

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Who we are	
Who is providing this notice?	TUITION OPTIONS
What we do	
How does Tuition Options protect my personal information?	To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings.
How does Tuition Options collect my personal information?	 We collect your personal information, for example, when you apply for financing or open an account show us your government-issued ID or give us your contact information or pay your bills We also collect your personal information from others, such as affiliates or other companies.
Why can't I limit all sharing?	 Federal law gives you the right to limit only sharing for affiliates' everyday business purposes – information about your creditworthiness affiliates from using your information to market to you sharing for nonaffiliates to market to you State laws and individual companies may give you additional rights to limit sharing.

Definitions	
Affiliates	 Companies related by common ownership or control. They can be financial and nonfinancial companies. <i>Tuition Options does not share with our affiliates.</i>
Nonaffiliates	 Companies not related by common ownership or control. They can be financial and nonfinancial companies. Tuition Options does not share with nonaffiliates so they can market to you.
Joint Marketing	 A formal agreement between nonaffiliated financial companies that together market financial products or services to you. <i>Tuition Options does not jointly market.</i>

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Student Reference Guide

May 28, 2020

Dear BRITTANY ROBERSON:

HCI - COLLEGE has partnered with Tuition Options to service your institutional loan.

Your first payment is due on 7/15/2020 in the amount of \$476.42.

Your Account Number is 977930.

Create your Online Account

After your loan documents have been generated, you can create your online account by going to https://www2.tuitionoptions.com/STARBorrower/ and clicking **Register Now**, if you have not already done so.

Once you have created an online account, you can use the secured student site to:

- Make a one-time payment
- Sign up for AutoPay
- View account details
- View payment history
- Check account status

Making a Payment

Once your account is in a 'Repayment' or 'In School' status, you can make your payment online, by phone, by mail or by auto-debit from an account of your choice.

- Online: Go to https://www2.tuitionoptions.com/STARBorrower/ and log in with your User ID and Password. Once you have logged in, click on the Make a Payment link on the left side of the home page and follow the prompts.
- **Phone:** Call (800) 423-5513 to make a payment, check account status 24/7 or if you have any questions regarding your account.
- **Mail:** Mail payments to the address indicated on your billing statement and indicate account # <u>977930</u> on the check.

If you would like to mail your payment and have not received your payment invoice:

Make check payable to TUITION OPTIONS LLC and mail to:

TUITION OPTIONS LLC PO Box 387 MARLTON, NJ 08053-0387

• Autopay: A pre-populated AutoPay Form is available in your loan packet. To get a blank copy of the form, please visit our website or call our customer service department. Once completed, the form should be submitted to Tuition Options by fax to (856) 222-3935 or returned to your school.

Please make your payments directly to Tuition Options by using one of the payment options above. Good luck with your education!



AUTHORIZATION AGREEMENT FOR PREAUTHORIZED PAYMENTS

Case 9:22-cv-81883-RAR Document 141-2 Entered on FLSD Docket 12/19/2023 Page 714 of To make payments automatically, please complete this form and your payment will be deducted each month from your bank account or credit card.

Please return this form to:

TUITION OPTIONS TUITION OPTIONS Fax PO BOX 387 MARLTON, NJ 08053-0387 Phot

Fax Completed Forms to: 856-222-3935

Phone: 800-423-5513

I (we) hereby authorize TUITION OPTIONS to initiate a debit or charge entry to my (our) bank/financial institution account or credit card indicated below for the amount of each monthly payment, when due, as indicated on my installment contract or promissory note. The bank/financial institution or credit card named below, hereinafter called FINANCIAL INSTITUTION, is hereby authorized to debit or charge such amounts to the account indicated on this form. I (we) understand that such automatic debits or charges to my (our) account will commence on or after the Next Payment Due Date shown on this form.

I (we) understand that the monthly payment amount as shown on my (our) installment contract or promissory note will be automatically debited or charged to the designated account and on the date specified below. If the payment date falls on a non-banking business day, the amount will be debited on the following banking business day.

I (we) understand that it is my responsibility to make sure funds are available in my account to ensure that the transfer occurs. If funds are unavailable, the transaction will be considered a returned or Non-Sufficient Funds ("NSF") check and NSF charges will become due and payable. I (we) have the right to stop payment on a debit entry by notifying FINANCIAL INSTITUTION prior to charging my (our) account. I am (we are) authorized to sign on this account.

I (we) understand that (5) business days are required to set up this authorization following receipt of this authorization form by Tuition Options and no amount may be debited or charged until set up is complete. If you receive a late notice or call regarding payment during this process, please advise Tuition Options that you have recently enrolled in the automated payment plan.

My TUITION OPTIONS account number is: _____ 977930

My monthly payment amount is: <u>\$476.42</u> My next payment due is: <u>7/15/2020</u>

YOUR BANK/FINANCIAL INSTITUTION or CREDIT CARD INFORMATION (choose only one)

Bank Name:Account Number:	ABA (Routing Number):
CREDIT CARD Exact Name on Credit Card: Credit Card Number:	Evaluation Data:
Visa Mastercard	Expiration Date: / / / American Express

SIGNATURE OF PERSON TO WHOSE ACCOUNT PAYMENT IS TO BE APPL ED	SIGNATURE OF PERSON TO WHOSE NAME APPEARS ON THE BANK ACCOUNT OR CREDIT CARD
BRITTANY ROBERSON	
NAME (PLEASE PR NT)	NAME (PLEASE PR NT)
9506 MINORCA WAY	
ADDRESS	ADDRESS
PALM BEACH GARDENS FL 33418	
CITY ST Z P	CITY ST Z P
(561) 234 - 6603	
TELEPHONE	TELEPHONE

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EXHIBIT 36

Case 9:22-cv-81883-RAR Document 141-2 Entered on FLSD Docket 12/19/2023 Page 716 of 1026

Rebecca Eisenbrey

From:	Booth, Jason C <jason.booth@flofr.gov></jason.booth@flofr.gov>
Sent:	Wednesday, July 12, 2023 4:19 PM
То:	Rebecca Eisenbrey
Subject:	Subpoena - Request for Production - Health Career Institute LLC
Attachments:	Subpoena - Health Career Institute.pdf

Public Records Request #: 116766 Reference #: 1512210

Dear Rebecca Eisenbrey,

We are in receipt of the attached subpoena for certain records relating to Civil Action No. 9:22-cv-81883-RAR

A diligent search of the records of the Office reveals no documents to be responsive to the subpoena.

If you have any questions, I can be reached at 850-410-9685.

Jason Booth Government Analyst II Division of Consumer Finance Office of Financial Regulation 200 E. Gaines Street Tallahassee, FL 32399-0376 850-410-9685



Promoting a safe marketplace for financial success

Please note that pursuant to chapter 119, Florida Statutes, correspondence with the Office of Financial Regulation is considered public record. This correspondence is available to the public upon request unless exempt from disclosure.

EXHIBIT 37 (filed under seal)

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EXHIBIT 38

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF FLORIDA WEST PALM BEACH DIVISION

CASE NO.: 9:22-cv-81883- RAR

BRITTANY ROBERSON, REBECCA FREEMAN, BIANCA VIÑAS, TIFFANY KING, and TRESHA THOMPSON, individually and on behalf of others similarly situated,

Plaintiffs,

v.

HEALTH CAREER INSTITUTE LLC (dba HCI COLLEGE LLC and HCI ACQUISITION LLC), FLORIAN EDUCATION INVESTORS LLC, and STEVEN W. HART,

Defendant(s)

DEFENDANT, HEALTH CAREER INSTITUTE, LLC'S, ANSWERS TO PLAINTIFFS' ADDITIONAL INTERROGATORIES SERVED BY EMAIL DATED JULY 10, 2023

Defendant, HEALTH CAREER INSTITUTE LLC (dba HCI COLLEGE LLC and HCI

ACQUISITION LLC), ("HCI"), by and through the undersigned counsel, hereby serves its

Answers to Plaintiffs' Additional Interrogatories Served by Email dated July 10, 2023.

<u>/S/ Michael J. Carney</u> MICHAEL J. CARNEY (FBN 44326) BARBARA FOX (FBN155608) <u>MJC-KD@kubickidraper.com</u> BF-KD@kubickidraper.com **KUBICKI DRAPER** 110 East Broward Boulevard, Suite 1400 Ft. Lauderdale, Florida 33301 Direct Line: (954) 713-2323 Attorneys for Defendants Case 9:22-cv-81883-RAR Document 141-2 Entered on FLSD Docket 12/19/2023 Page 720 of 1026

Certificate of Service

We hereby certify that on this <u>4th</u> day of August 2023, a true and correct copy of the foregoing was served via email on counsel of record for Plaintiffs.

<u>/S/ Michael J. Carney</u> MICHAEL J. CARNEY (FBN 44326)

DEFENDANT, HCI'S, ANSWERS TO PLAINTIFFS' ADDITIONAL INTERROGATORIES SERVED BY EMAIL DATED JULY 10, 2023

19. Using the same name or unique identifier used for Interrogatory 18, please provide a list of every person who enrolled in the HCI RN Program under NCLEX Code 70416 or NCLEX Code 704135 who entered into a Retail Installment Contract (RIC) with HCI and describe the relevant RIC(s), including:

- a. Date the RIC was entered into,
- b. Amount the individual financed through the RIC, and
- c. Total amount paid by the individual to date towards the amount listed in response to 19(b).

Answer to Additional Interrogatory No. 19: HCI objects on the grounds and to the extent that this interrogatory and its subparts request private and/or confidential information about students contained in educational records and such information may be subject to statutes such as the Family Education Rights and Privacy Act (20 U.S.C. Sec. 1232, 34 CFR Part 99, s. 1002.22-1002-221, F.S., and Rule 6A-1.0955, F.A.C.). The students' interest in keeping their personal information and academic records private far outweighs any need the Plaintiffs may have for the requested information.

Nonetheless, in response to Additional Interrogatory No. 19 and subject to the foregoing, HCI states as follows:

See HCI009111-009138. Each numbered row starting with 2 represents a person and for each such person, Column "B" indicates NCLEX Code of program, Column "C" provides the information requested by 19(a) above, Column "D" provides the information requested by 19(b), and Column "E" provides the information requested by 19(c).

20. If a unique identifier was used to response to Interrogatories 18 and 19, please provide the identifier assigned to each Named Plaintiff.

Answer to Additional Interrogatory No. 20: HCI objects on the grounds and to the extent that this interrogatory and its subparts request private and/or confidential information about students contained in educational records and such information may be subject to statutes such as the Family Education Rights and Privacy Act (20 U.S.C. Sec. 1232, 34 CFR Part 99, s. 1002.22-1002-221, F.S., and Rule 6A-1.0955, F.A.C.). The students' interest in keeping their personal information and academic records private far outweighs any need the Plaintiffs may have for the requested information.

Nonetheless, in response to Additional Interrogatory No. 20 and subject to the foregoing, HCI states based on the row numbers in the document provided in response to Additional Interrogatory No. 20 as follows:

Tiffany King – Row #272

Rebecca May Freeman – Row #588 Brittany Roberson – Row #354 Tresha Thompson – Row #767 Bianca Viñas – Row #610

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	В	С	D	E
1	NPRN#	19a.	19b.	19 c.
2	US70413500	9/3/2019	\$ 191.26	\$ 191.26
3	US70413500	9/3/2019	\$ 1,298.50	\$ 2,597.00
4	US70413500	9/3/2019		\$ 200.00
5	US70413500	9/3/2019	\$ 500.00	\$ 500.00
6	US70413500	9/3/2019	\$ 13,119.97	\$ 2,200.00
7	US70413500	9/3/2019	\$ 18,229.94	\$ 13,321.70
8	US70413500	9/3/2019		\$ 400.00
9	US70413500	9/3/2019	\$ 593.25	\$ 593.25
10	US70413500	9/3/2019		\$ 13,059.09
11	US70413500	9/3/2019	\$ 3,416.00	\$ 3,416.00
12	US70413500	9/3/2019	\$ 4,114.00	\$ 4,114.00
13	US70413500	9/3/2019	\$ 5,000.00	\$ 5,000.00
14	US70413500	9/3/2019	\$ 28,116.00	\$ 2,000.00
15	US70413500	9/3/2019		\$ 4,508.65
16	US70413500	9/3/2019	\$ 160.00	\$ 160.00
17	US70413500	9/3/2019	\$ 5,936.00	\$ 5,936.00
18	US70413500	9/3/2019	\$ 4,903.20	\$ 4,903.65
19	US70414600	9/3/2019	\$ 8,964.00	\$ 768.00
20	US70414600	9/3/2019	\$ 3,071.83	\$ 2,119.93
21	US70414600	9/3/2019	\$ 5,921.58	\$ 4,569.12
22	US70414600	9/3/2019	\$ 4,306.80	\$ 2,328.00
23	US70414600	9/3/2019	\$ 4,207.32	\$ 2,311.88
24	US70414600	9/3/2019		\$ 8,001.40
25	US70414600	9/3/2019	\$ 8,480.00	\$ 1,517.92
26	US70414600	9/3/2019	\$ 14,413.48	\$ 13,292.67
27	US70414600	9/3/2019		\$ 1,083.04
28	US70414600	9/3/2019		\$ 1,563.72
	US70414600	9/3/2019		
30	US70414600	9/3/2019		\$ 2,092.00
31	US70414600	9/3/2019		\$ 10,927.00
32	US70414600	9/3/2019		\$ 199.26
33	US70414600	9/3/2019	\$ 14,711.00	\$ 8,898.90
34	US70414600	9/3/2019	\$ 5,761.89	\$ 4,714.20
35	US70414600	9/3/2019	\$ 356.15	\$ 356.15
36	US70414600		\$ 13,177.55	\$ 1,435.15
37	US70414600	9/3/2019	\$ 14,169.44	\$ 1,416.96
38	US70414600	9/3/2019	\$ 6,936.56	\$ 7,399.00
39	US70414600	9/3/2019	\$ 404.39	\$ 404.39
40	US70414600	9/3/2019	\$ 8,208.00	\$ 631.41
41	US70414600	9/3/2019	\$ 15,394.00	\$ 10,723.50
42	US70414600	9/3/2019	\$ 1,696.90	\$ 1,696.90
43	US70414600	9/3/2019	\$ 230.00	\$ 230.00
44	US70414600	9/3/2019	\$ 3,620.44	\$ 1,502.26
45	US70414600	9/3/2019	\$ 10,061.00	\$ 4,534.12

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	В	С		D	E
46	US70414600	9/3/2019	\$	403.00	\$ 403.00
47	US70414600	9/3/2019	\$	1,500.00	\$ 1,500.00
48	US70414600	9/3/2019	\$	10,030.48	\$ 5,584.52
49	US70414600	9/3/2019	\$	2,579.19	\$ 2,340.00
50	US70414600	9/3/2019	\$	8,224.91	\$ 6,372.48
51	US70414600	9/3/2019		8,422.94	\$ 7,799.25
52	US70414600	9/3/2019	\$	16,033.82	\$ 3,364.26
53	US70414600	9/3/2019	\$	14,946.87	\$ 1,917.26
54	US70414600	9/3/2019	\$	16,365.00	\$ 4,080.24
55	US70414600	9/3/2019	\$	4,757.76	\$ 4,757.76
56	US70414600	9/3/2019		9,221.00	\$ 6,899.00
57	US70414600	9/3/2019	\$	9,485.89	\$ 993.52
58	US70414600	9/3/2019	\$	16,893.24	\$ 2,311.35
59	US70414600	9/3/2019		4,374.08	\$ 2,535.92
60	US70414600	9/3/2019		3,606.34	\$ 3,116.94
61	US70414600	9/3/2019	\$	2,906.00	\$ 1,453.04
62	US70414600	9/3/2019	\$	3,500.00	\$ 6,500.00
63	US70414600	9/3/2019	\$	1,865.00	\$ 9,121.19
64	US70413500	9/4/2019	\$ \$	4,697.81	\$ 4,697.81 \$ 318.48
65 66	US70413500 US70413500	9/4/2019 9/4/2019	ې \$	318.48 3,012.78	\$ 318.48 \$ 129.70
67	US70413500	9/4/2019	ې \$	4,020.52	\$ 807.74
68	US70413500	9/4/2019	ې \$	200.00	\$ 200.00
69	US70413500	10/28/2019	\$	1,184.96	\$ 170.00
70	US70413500	10/28/2019	\$	558.00	\$ 558.00
71	US70413500	10/28/2019	\$	929.25	\$ 1,973.80
72	US70413500	10/28/2019	\$	892.24	\$ 1,492.38
73	US70413500	10/28/2019	\$	497.85	\$ 497.85
74	US70413500	10/28/2019	\$	1,200.00	\$ 1,200.00
75	US70413500	10/28/2019		3,961.65	\$ 2,731.90
76	US70413500	10/28/2019		16,241.04	\$ 100.00
77	US70413500	10/28/2019	\$	1,699.06	\$ 2,042.32
78	US70413500	10/28/2019		1,000.50	\$ 1,000.50
79	US70413500	10/28/2019	\$	5,363.75	\$ 4,710.00
80	US70413500	10/28/2019	\$	15,377.80	\$ 10,292.40
81	US70413500	10/28/2019	\$	5,763.61	\$ 1,552.73
82	US70413500	10/28/2019		5,095.00	\$ 5,095.00
83	US70413500	10/28/2019	\$	888.75	\$ 1,785.00
84	US70413500		\$	1,377.19	\$ 120.00
85	US70413500	10/28/2019	\$	664.88	\$ 664.88
86	US70413500	10/28/2019	\$	11,796.54	\$ 1,200.32
87	US70413500	10/28/2019	\$	5,304.65	\$ 4,417.00
88	US70413500	10/28/2019	\$	13,253.59	\$ 777.00
89	US70413500	10/28/2019	\$	738.50	\$ 738.50
90	US70413500	10/28/2019	\$ ¢	2,791.25	\$ 738.50
91	US70413500	10/28/2019	\$	2,152.48	\$ 5,230.00

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	В	С		D	E
92	US70413500	10/28/2019	\$	3,111.01	\$ 7,999.74
93	US70413500	10/28/2019		1,934.25	\$ 3,729.02
94	US70413500	10/28/2019	\$	5,199.19	\$ 4,963.00
95	US70413500	10/28/2019	\$	8,757.42	\$ 3,558.23
96	US70413500	10/28/2019	\$	1,186.50	\$ 2,831.50
97	US70414600	10/28/2019		14,336.00	\$ 5,388.19
98	US70414600	10/28/2019	\$	25,910.00	\$ 6,800.00
99	US70414600	10/28/2019	\$	5,414.00	\$ 1,933.48
100	US70414600	10/28/2019	\$	3,956.00	\$ 3,956.00
101	US70414600	10/28/2019	\$	9,205.00	\$ 9,205.00
102	US70414600	10/28/2019		1,160.16	\$ 3,018.00
103	US70414600	10/28/2019	\$	5,027.27	\$ 100.00
104	US70414600	10/28/2019	\$	10,457.00	\$ 2,037.80
105	US70414600	10/28/2019	\$ \$	5,414.00	\$ 150.39
106	US70414600	10/28/2019	_	6,334.60	\$ 5,001.00
107	US70414600 US70414600	10/28/2019	\$ \$	10,404.00	\$ 1,850.11 \$ 1,626.50
108 109	US70414600	10/28/2019 10/28/2019	ې \$	7,420.00	\$ 1,626.50 \$ 785.00
109	US70414600	10/28/2019	\$	9,101.94	\$
110	US70414600	10/28/2019		7,244.00	\$
112	US70414600	10/28/2019	ې \$	2,500.00	\$ 2,500.00
113	US70414600	10/28/2019	\$	290.05	\$ 290.05
114	US70413500	1/6/2020	\$	862.90	\$ 690.36
115	US70413500	1/6/2020		1,976.50	\$ 1,170.60
116	US70413500	1/6/2020		1,477.04	\$ 369.26
117	US70413500	1/6/2020		2,837.00	\$ 2,837.00
118	US70413500	1/6/2020	\$	6,627.19	\$ 1,270.50
119	US70413500	1/6/2020	\$	270.70	\$ 1,073.50
120	US70413500	1/6/2020		100.00	\$ 641.40
121	US70413500	1/6/2020	\$	1,000.00	\$ 1,000.00
122	US70413500	1/6/2020		38.19	\$ 200.00
123	US70413500	1/6/2020		7,449.00	\$ 7,449.00
124		1/6/2020		7,385.00	\$ 7,385.00
125	US70413500	1/6/2020		313.20	\$ 313.20
126	US70413500	1/6/2020		2,192.40	\$ 2,192.40
127	US70413500	1/6/2020		2,678.05	\$ 1,754.00
128	US70413500	1/6/2020		419.32	\$ 419.32
129	US70413500	1/6/2020		10,483.00	\$ 1,048.64
130	US70413500	1/6/2020		13,172.38	\$ 3,912.76
131	US70413500	1/6/2020		142.56	\$ 142.56
132	US70414600	1/6/2020		9,707.00	\$ 1,489.36
133	US70414600	1/6/2020	_	17,782.32	\$ 5,824.40 \$ 6,993.06
134 135	US70414600 US70414600	1/6/2020 1/6/2020		14,316.00 5,782.28	\$ 6,993.06 \$ 710.32
135	US70414600	1/6/2020		5,782.28	\$ 710.32 \$ 1,687.11
136	US70414600	1/6/2020	ې \$	222.38	\$ 1,087.11 \$ 222.38
137	0370414000	1/0/2020	Ş	222.38	ې <u>۲</u> ۲۲.38

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	В	С		D	E
138	US70414600	1/6/2020	\$	8,895.00	\$ 222.38
139	US70414600	1/6/2020	\$	13,114.00	\$ 6,042.72
140	US70414600	1/6/2020	\$	7,235.47	\$ 927.65
141	US70414600	1/6/2020		5,148.00	\$ 100.00
142	US70414600	1/6/2020		7,422.00	\$ 213.88
143	US70414600	1/6/2020		11,618.23	\$ 1,066.08
144	US70414600	1/6/2020		17,768.00	\$ 3,908.96
145	US70414600	1/6/2020	\$	8,464.00	\$ 2,645.00
146	US70414600	1/6/2020	\$	1,592.75	\$ 1,592.76
147	US70414600	1/6/2020		17,041.00	\$ 17,041.00
148	US70414600	1/6/2020		7,763.11	\$ 4,344.84
149	US70414600	1/6/2020		9,655.00	\$ 3,862.08
150	US70414600	1/6/2020	\$	23,049.34	\$ 4,684.68
151	US70414600	1/6/2020	\$	22,171.83	\$ 886.88
152	US70414600	1/6/2020	\$	6,273.44	\$ 1,502.01
153	US70414600	1/6/2020		2,692.60	\$ 1,082.80
154	US70414600	1/6/2020		5,414.00	\$ 4,331.20
155	US70414600	1/6/2020		11,150.22	\$ 1,666.47
156	US70413500	3/2/2020	-	100.00	\$ 100.00
157	US70413500	3/2/2020	\$	150.00	\$ 150.00
158	US70413500	3/2/2020		235.00	\$ 235.00
159	US70413500	3/2/2020	\$	6,079.09	\$ 5,820.91
160	US70413500	3/2/2020		1,367.45	\$ 781.40
161	US70413500	3/2/2020		200.00	\$ 200.00
162	US70413500	3/2/2020		1,508.15	\$ 215.45
163	US70413500	3/2/2020	\$ \$	1,281.21	\$ 1,382.12
164 165	US70413500 US70413500	3/2/2020 3/2/2020	\$ \$	7,400.98	\$ 1,177.27 \$ 7,944.19
165	US70413500			10,193.00 632.37	\$ 7,944.19 \$ 632.37
	US70413500	3/2/2020 3/2/2020		683.78	\$ 2,995.77
168	US70413500	3/2/2020		1,521.66	\$ 3,260.70
169	US70413500	3/2/2020		15,151.00	\$ 3,200.70
170	US70413500	3/2/2020		4,671.50	\$ 790.00
171	U\$70413500	3/2/2020		100.00	\$ 100.00
172	U\$70413500	3/2/2020		473.50	\$ 473.50
173	U\$70413500	3/2/2020		9,082.18	\$ 3,475.20
174	US70413500	3/2/2020	-	999.18	\$ 999.18
175	US70413500	3/2/2020		10,525.00	\$ 329.00
176	US70413500	3/2/2020		5,266.00	\$ 928.86
177	US70413500	3/2/2020		11,056.00	\$ 1,935.40
178	US70413500	3/2/2020		982.13	\$ 889.56
179	US70413500	3/2/2020		7,478.00	\$ 2,788.87
180	US70413500	3/2/2020		6,995.14	\$ 6,562.19
181	US70413500	3/2/2020		7,195.00	\$ 395.00
182	US70413500	3/2/2020		7,254.00	\$ 150.00
183	US70413500	3/2/2020	\$	10,813.52	\$ 1,965.92

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	В	С		D		E
184	US70413500	3/2/2020	\$	11,065.00	\$	251.48
185	US70413500	3/2/2020		333.06	\$	333.06
186	US70413500	3/2/2020		10,977.24	\$	2,508.70
187	US70413500	3/2/2020		6,404.40	\$	2,908.80
188	US70413500	3/2/2020		1,232.40	\$	1,077.70
189	US70413500	3/2/2020		6,837.00	\$	3,061.60
190	US70413500	3/2/2020		3,849.00	\$	2,450.00
191	US70413500	3/2/2020		12,502.00	\$	5,692.75
192	US70413500	3/2/2020	-	2,145.52	\$	3,754.66
193	US70413500	3/2/2020		4,492.75	\$	3,200.00
194	US70413500	3/2/2020		11,469.15	\$	4,718.33
195	US70413500	3/2/2020		9,320.50	\$	1,624.00
196	US70413500	3/2/2020		17,989.00	\$	359.78
197	US70414600	3/2/2020	-	4,407.00	\$	1,633.47
198	US70414600	3/2/2020		2,702.00	\$	1,403.35
199	US70414600	3/2/2020		2,702.00	\$	919.16
200	US70414600	3/2/2020		16,714.00	\$	8,682.76
201	US70414600	3/2/2020		33,240.00	\$	831.00
202	US70414600	3/2/2020		334.05	\$	334.05
203	US70414600	3/2/2020		7,264.00	\$	7,394.00
204	US70414600	3/2/2020		2,782.80	\$	6,184.00
205	US70414600	3/2/2020		2,453.00	\$ \$	136.55
206 207	US70414600 US70414600	3/2/2020		11,453.00	\$ \$	229.06
207	US70414600	3/2/2020 3/2/2020		8,520.00 12,230.28	\$ \$	8,220.00 800.00
208	US70414600	3/2/2020		37,956.00	\$	4,554.72
205	US70414600	3/2/2020		13,873.00	\$	5,406.18
210	US70414600	3/2/2020		2,899.00	\$	948.66
212	US70414600	3/2/2020		4,243.00	\$	212.16
	US70414600	3/2/2020		5,414.00	\$	190.00
214	US70414600	3/2/2020		12,830.00	\$	2,441.00
215	US70414600	3/2/2020		22,488.00	\$	13,264.00
216	US70414600	3/2/2020		1,893.76	\$	1,666.38
217	US70414600	3/2/2020		6,427.83	\$	5,945.37
218	US70414600	3/2/2020	\$	9,469.00	\$	4,066.06
219	US70414600	3/2/2020	\$	20,753.00	\$	2,442.69
220	US70414600	3/2/2020	\$	9,857.00	\$	9,857.00
221	US70414600	3/2/2020		12,271.00	\$	2,878.49
222	US70413500	5/4/2020		-	\$	370.14
223	US70413500	5/4/2020		304.00	\$	304.00
224	US70413500	5/4/2020		4,535.46	\$	1,592.00
225	US70413500	5/4/2020		1,596.00	\$	4,389.00
226	US70413500	5/4/2020		6,235.15	\$	8,543.00
227	US70413500	5/4/2020		496.19	\$	496.19
228	US70413500	5/4/2020		3,969.44	\$	4,465.71
229	US70413500	5/4/2020	\$	2,330.45	\$	932.20

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	В	С		D	E
230 US7	0413500	5/4/2020	\$	3,728.72	\$ 5,127.10
231 US7	0413500	5/4/2020	\$	2,794.72	\$ 6,888.94
232 US7	0413500	5/4/2020	\$	580.15	\$ 580.15
233 US7	0413500	5/4/2020	\$	8,843.35	\$ 9,938.09
234 US7	0413500	5/4/2020		1,455.30	\$ 5,239.00
235 US7	0413500	5/4/2020	\$	815.70	\$ 1,015.70
236 US7	0413500	5/4/2020	\$	901.40	\$ 368.00
237 US7	0413500	5/4/2020		6,130.72	\$ 6,024.46
238 US7	0413500	5/4/2020	\$	1,022.06	\$ 1,006.08
239 US7	0413500	5/4/2020		2,369.30	\$ 1,521.58
240 US7	0413500	5/4/2020		1,468.18	\$ 2,320.54
241 US7	0413500	5/4/2020		838.90	\$ 838.90
242 US7	0413500	5/4/2020		9,691.00	\$ 807.60
243 US7	0413500	5/4/2020		1,000.25	\$ 800.20
L	0413500	5/4/2020		816.60	\$ 326.64
245 US7	0413500	5/4/2020		1,732.15	\$ 2,903.84
246 US7	0413500	5/4/2020		117.03	\$ 117.03
247 US7	0413500	5/4/2020		199.28	\$ 316.31
L	0413500	5/4/2020		585.15	\$ 585.15
	0413500	5/4/2020		959.51	\$ 959.51
	0413500	5/4/2020		4,417.05	\$ 6,871.00
	0413500	5/4/2020	\$	815.70	\$ 489.42
	0413500	5/4/2020		1,099.30	\$ 3,078.00
	0413500	5/4/2020		2,389.93	\$ 3,318.90
	0413500	5/4/2020		3,142.15	\$ 978.72
	0414600	5/4/2020		1,688.32	\$ 3,404.69
L	0414600	5/4/2020	\$	1,125.00	\$ 1,125.00
L	0414600	5/4/2020		1,471.20	\$ 2,452.00
	0414600	5/4/2020		114.53	\$ 114.53
259 US7		5/4/2020		4,581.00	\$ 2,290.60
	0414600	5/4/2020		10,253.88	\$ 4,306.24
L	0414600	5/4/2020		152.95	\$ 152.95
	0414600	5/4/2020		1,223.60	\$ 1,070.65
	0414600	5/4/2020		5,039.00	\$ 2,393.76
	0414600	5/4/2020		2,730.84	\$ 400.00
	0414600	5/4/2020		20,583.00	\$ 6,573.48
L	0414600	5/4/2020		42,270.00	\$ 5,988.63
	0414600	5/4/2020 5/4/2020		12,412.00	\$ 9,308.76 \$ 2,624.20
	0414600 ·P260570414600			2,624.20	
	:B269S70414600 0414600	5/4/2020		2,721.60	\$ 388.80 \$ 3,577.35
L		5/4/2020 5/4/2020		5,621.55	
	0414600 0414600			6,697.00 3,252.00	
	0414600	5/4/2020 5/4/2020		1,339.60	\$ 3,112.35 \$ 1,172.15
	0414600	5/4/2020		7,553.85	\$ 1,172.15 \$ 787.25
	0414600	5/4/2020		7,394.00	\$ 787.25 \$ 594.04
215 05/	0414000	5/4/2020	Ş	7,394.00	ə 594.04

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	В	С	D	E
276	US70414600	5/4/2020	\$ 3,232.95	\$ 733.65
277	US70414600	5/4/2020	\$ 7,532.32	\$ 12,554.00
278	US70414600	5/4/2020	\$ 3,020.00	\$ 3,020.00
279	US70414600	5/4/2020	\$ 18,264.00	\$ 11,915.00
280	US70414600	5/4/2020	1,751.04	\$ 1,693.40
281	US70414600	5/4/2020	\$ 7,739.00	\$ 140.48
282	US70414600	5/4/2020	2,041.69	\$ 2,041.69
283	US70414600	5/4/2020	\$ 2,172.10	\$ 1,730.60
284	US70414600	5/4/2020	3,020.00	\$ 3,020.00
285	US70414600	5/4/2020	2,325.47	\$ 1,879.47
286	US70414600	5/4/2020	8,720.00	\$ 6,840.53
287	US70414600	5/4/2020	6,711.00	\$ 1,677.20
288	US70414600	5/4/2020	379.70	\$ 379.70
289	US70414600	5/4/2020	379.88	\$ 379.88
290	US70414600	5/4/2020	1,830.52	\$ 2,542.02
291	US70414600	5/4/2020	\$ 115.00	\$ 115.00
292	US70414600	5/4/2020	343.60	\$ 344.00
293	US70413500	7/6/2020	1,605.84	\$ 1,806.57
294	US70413500	7/6/2020	2,518.43	\$ 2,518.43
295	US70413500	7/6/2020	1,346.66	\$ 285.10
296	US70413500	7/6/2020	1,041.74	\$ 279.00
297	US70413500	7/6/2020	\$ 915.00	\$ 915.00
298	US70413500	7/6/2020	4,575.00	\$ 228.75
299	US70413500	7/6/2020	1,177.33	\$ 1,439.02
300	US70413500	7/6/2020	1,589.52	\$ 2,516.74
301	US70413500	7/6/2020	2,997.75	\$ 2,569.50
302	US70413500	7/6/2020	\$ 993.45	\$ 2,400.00
303	US70413500	7/6/2020	\$ 1,159.06	\$ 625.00
304	US70413500	7/6/2020	698.00	\$ 271.00
305	US70413500	7/6/2020	3,664.65	\$ 2,355.00
306	US70413500	7/6/2020	1,037.64	\$ 566.76
307	US70413500	7/6/2020	9,210.18	\$ 2,221.49
308	US70413500	7/6/2020	1,458.17	\$ 416.62
309	US70413500	7/6/2020	5,511.17	\$ 251.94
310	US70413500	7/6/2020	251.12	\$ 251.12
311	US70413500	7/6/2020	5,087.00	\$ 1,156.15
312	US70413500	7/6/2020	8,225.70	\$ 6,698.00
313	US70413500	7/6/2020	2,304.19	\$ 837.96
314	US70413500	7/6/2020	1,339.80	\$ 300.00
315	US70413500	7/6/2020	820.23	\$ 2,552.80
316	US70413500	7/6/2020	937.60	\$ 1,875.20
317	US70413500	7/6/2020	10,747.70	\$ 4,139.40
318	US70413500	7/6/2020	3,850.00	\$ 4,831.00
319	US70413500	7/6/2020	1,159.06	\$ 220.00
320	US70413500	7/6/2020	2,563.00	\$ 75.00
321	US70413500	7/6/2020	\$ 4,948.84	\$ 7,798.00

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	В	С		D	E
322	US70414600	7/6/2020	\$	2,722.40	\$ 4,423.90
323	US70414600	7/6/2020		1,715.40	\$ 1,078.02
324	US70414600	7/6/2020	\$	222.50	\$ 222.50
325	US70414600	7/6/2020	\$	4,450.00	\$ 4,272.50
326	US70414600	7/6/2020		1,580.06	\$ 3,462.53
327	US70414600	7/6/2020		3,554.44	\$ 9,857.47
328	US70414600	7/6/2020		13,354.00	\$ 3,413.48
329	US70414600	7/6/2020		1,226.48	\$ 1,839.74
330	US70414600	7/6/2020		4,614.20	\$ 197.00
331	US70414600	7/6/2020		11,869.20	\$ 1,055.04
332	US70414600	7/6/2020		3,737.42	\$ 839.86
333	US70414600	7/6/2020		2,455.00	\$ 1,335.36
334	US70414600	7/6/2020		300.00	\$ 300.00
335	US70414600	7/6/2020		11,000.00	\$ 500.00
336	US70414600	7/6/2020		2,455.00	\$ 2,454.88
337	US70414600	7/6/2020		1,777.22	\$ 1,777.22
338	US70414600	7/6/2020		2,553.78	\$ 661.36
339	US70414600	7/6/2020		20,004.00	\$ 14,358.62
340	US70414600	7/6/2020		11,676.00	\$ 250.00
341	US70414600	7/6/2020		6,858.00	\$ 100.00
342	US70414600	7/6/2020		28,168.00	\$ 5,280.16
343	US70414600	7/6/2020		1,523.00	\$ 253.86
344	US70414600	7/6/2020		5,403.00	\$ 5,403.00
345	US70414600	7/6/2020		1,613.03	\$ 107.00
346	US70414600	7/6/2020		7,032.00	\$ 351.60
347	US70414600	7/6/2020		2,452.00	\$ 2,452.00
348	US70414600	7/6/2020		3,020.00	\$ 3,020.00
349	US70414600	7/6/2020		1,863.00	\$ 1,863.00
350	US70414600	7/6/2020 7/6/2020		3,020.00	\$ 906.00
	US70414600			11,173.00	\$ 3,133.76
352	US70414600	7/6/2020		469.15	\$ 469.15
353	US70414600	7/6/2020		2,814.90	\$ 8,444.70
354	US70414600	7/6/2020 7/6/2020		23,821.00	\$ 8,575.56 \$ 1,483.00
355 356	US70414600	7/6/2020		4,715.00	
356	US70414600 US70414600	7/6/2020		3,885.85 15,027.00	\$ 3,885.85 \$ 9,558.37
357	US70414600	7/6/2020		9,366.00	
358	US70414600	7/6/2020		5,645.00	\$ 1,123.92 \$ 3,200.23
360	US70414600	7/6/2020		3,245.00	\$ 3,200.23 \$ 2,433.84
361	US70413500	8/31/2020		2,452.00	\$ 2,453.84 \$ 305.00
362	US70413500	8/31/2020		4,312.16	\$ 6,468.24
363	US70413500	8/31/2020		323.68	\$ 0,408.24
364	US70413500	8/31/2020		551.97	\$ 2,345.32
365	US70413500	8/31/2020		9,639.00	\$ 1,939.37
366	US70413500	8/31/2020		592.50	\$ 1,085.00
367	US70413500	8/31/2020		1,576.30	\$ 2,276.95
507	0070410000	0/ 51/ 2020	Ļ	1,570.30	<i>د</i> ,210.35

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	В	С		D	E
368	US70413500	8/31/2020	\$	150.44	\$ 150.44
369	US70413500	8/31/2020	\$	838.86	\$ 3,118.46
370	US70413500	8/31/2020		1,351.88	\$ 1,353.88
371	US70413500	8/31/2020		6,319.95	\$ 9,831.08
372	US70413500	8/31/2020		1,057.00	\$ 2,378.60
373	US70413500	8/31/2020		6,948.00	\$ 792.80
374	US70413500	8/31/2020		1,099.65	\$ 549.85
375	US70413500	8/31/2020		7,900.00	\$ 7,900.00
376	US70413500	8/31/2020		3,054.56	\$ 2,087.40
377	US70413500	8/31/2020		13,030.60	\$ 1,486.64
378	US70413500	8/31/2020		766.25	\$ 302.00
379	US70413500	8/31/2020		1,736.55	\$ 347.31
380	US70413500	8/31/2020		1,551.35	\$ 932.00
381	US70413500	8/31/2020		11,469.44	\$ 5,871.20
382	US70413500	8/31/2020		2,035.10	\$ 1,514.00
383	US70413500	8/31/2020		11,741.71	\$ 41,625.00
384	US70413500	8/31/2020		5,009.15	\$ 1,607.84
385	US70413500	8/31/2020		2,854.45	\$ 4,011.88
386	US70413500	8/31/2020		1,039.50	\$ 2,631.46
387	US70413500	8/31/2020		2,499.25	\$ 336.25
388	US70413500	8/31/2020		7,777.00	\$ 667.00
389	US70413500	8/31/2020		1,979.45	\$ 791.78
390	US70413500	8/31/2020		14,700.00	\$ 14,700.00
391	US70413500	8/31/2020		1,831.38	\$ 305.24
392	US70413500	8/31/2020		285.03	\$ 285.03
393	US70413500	8/31/2020		6,286.53	\$ 1,186.00
394	US70413500	8/31/2020		13,966.50	\$ 867.00
395	US70413500	8/31/2020		1,576.95	\$ 2,973.36
396	US70413500	8/31/2020		3,040.95	\$ 2,702.00
	US70414600	8/31/2020		1,737.84	\$ 850.00
398	US70414600	8/31/2020 8/31/2020		18,589.00	\$ 4,552.46 \$ 1,579.52
399	US70414600 US70414600	8/31/2020 8/31/2020		1,504.72	
400 401	US70414600	8/31/2020		7,086.48 2,221.61	\$ 1,074.80 \$ 2,221.61
401	US70414600	8/31/2020		3,074.00	\$ 2,221.01
402	US70414600	8/31/2020		501.00	\$ 501.00
403	US70414600	8/31/2020		3,559.50	\$ 3,010.50
404	US70414600	8/31/2020		2,006.24	\$ 3,010.30 \$ 250.78
405	US70414600	8/31/2020		9,067.22	\$ 250.78 \$ 501.78
400	US70414600	8/31/2020		2,014.00	\$ 3,020.50
407	US70414600	8/31/2020		3,467.10	\$ 5,020.30 \$ 4,233.00
408	US70414600	8/31/2020		1,060.15	\$ 605.80
409	US70414600	8/31/2020		12,695.76	\$ 5,441.04
410	US70414600	8/31/2020		30,660.00	\$ 30,660.00
411	US70414600	8/31/2020		2,466.00	\$ 50,000.00 \$ 2,466.00
413	US70414600	8/31/2020	ې \$	30,660.00	\$ 27,379.00
413	0370414000	0/51/2020	٦	50,000.00	ې 21,319.00

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	В	С		D	E
414	US70414600	8/31/2020	\$	11,247.00	\$ 7,122.25
415	US70414600	8/31/2020		18,861.00	\$ 4,179.42
416	US70414600	8/31/2020	\$	4,644.00	\$ 5,885.50
417	US70414600	8/31/2020		2,452.00	\$ 2,452.00
418	US70414600	8/31/2020		2,452.00	\$ 2,618.00
419	US70414600	8/31/2020		14,980.00	\$ 399.61
	US70414600	8/31/2020	\$	3,040.08	\$ 313.48
421	US70414600	8/31/2020	\$	12,539.00	\$ 1,253.92
422	US70414600	8/31/2020	\$	22,052.00	\$ 1,323.12
423	US70414600	8/31/2020		3,020.00	\$ 3,020.00
424	US70414600	8/31/2020		46,140.00	\$ 46,140.00
425	US70414600	8/31/2020		3,020.00	\$ 503.34
426	US70414600	8/31/2020	\$	4,940.66	\$ 4,940.66
427	US70414600	8/31/2020	\$	4,014.78	\$ 900.00
428	US70414600	8/31/2020	\$	22,487.00	\$ 2,249.22
429	US70414600	8/31/2020		8,516.30	\$ 5,015.60
430	US70414600	8/31/2020		10,532.76	\$ 3,761.70
	US70414600	8/31/2020		1,761.69	\$ 1,006.68
432	US70414600	8/31/2020		250.00	\$ 250.00
433	US70414600	8/31/2020		350.00	\$ 350.00
434	US70414600	8/31/2020		350.00	\$ 350.00
	US70414600	8/31/2020	\$	10,510.96	\$ 6,028.00
436	US70414600	8/31/2020		3,695.00	\$ 1,152.26
437	US70414600	8/31/2020		339.12	\$ 339.12
438	US70414600	8/31/2020		339.12	\$ 339.12
439	US70414600	8/31/2020		339.12	\$ 339.12
440	US70414600	8/31/2020	-	921.72	\$ 6,258.64 \$ 199.10
441 442	US70414600	8/31/2020		199.10	
	US70414600 US70414600	8/31/2020 8/31/2020		1,208.00	\$ 803.10 \$ 310.28
445	US70414600	8/31/2020		310.28	
444	US70414600	8/31/2020		9,928.76 13,353.00	\$ 10,549.52 \$ 10,843.26
445	US70414600	8/31/2020		1,226.00	\$ 1,043.25
447	US70414600	8/31/2020		140.28	\$ 200.00
448	US70414600	8/31/2020		773.92	\$ 100.00
449	US70414600	8/31/2020		3,020.00	\$ 3,020.00
	US70414600	8/31/2020		10,071.00	\$ 5,874.75
	US70413500	10/26/2020		3,915.91	\$ 5,028.00
	US70413500	10/26/2020		3,590.00	\$ 718.00
453	US70413500	10/26/2020		22,523.00	\$ 1,842.38
454	US70413500	10/26/2020		24,016.44	\$ 3,966.71
	US70413500	10/26/2020		2,690.16	\$ 5,838.20
	US70413500	10/26/2020		15,714.76	\$ 4,938.28
	US70413500	10/26/2020	\$	7,764.64	\$ 5,424.36
458	US70413500	10/26/2020		5,362.58	\$ 300.00
459	US70413500	10/26/2020	\$	6,651.47	\$ 1,900.42

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	В	С		D	E
460	US70413500	10/26/2020	\$	2,786.00	\$ 100.00
461	US70413500	10/26/2020		3,085.52	\$ 100.00
462	US70413500	10/26/2020		380.85	\$ 380.85
463	US70413500	10/26/2020	\$	380.85	\$ 380.85
464	US70413500	10/26/2020		6,855.00	\$ 6,855.30
465	US70413500	10/26/2020		1,257.48	\$ 2,222.80
466	US70413500	10/26/2020	\$	6,299.64	\$ 522.00
467	US70413500	10/26/2020	\$	1,006.64	\$ 3,020.00
468	US70413500	10/26/2020	\$	19,506.00	\$ 4,682.00
469	US70413500	10/26/2020		248.00	\$ 248.00
470	US70413500	10/26/2020		1,621.00	\$ 5,192.00
471	US70413500	10/26/2020		2,309.00	\$ 512.00
472	US70413500	10/26/2020	\$	42,270.00	\$ 13,209.40
473	US70413500	10/26/2020		20,142.92	\$ 11,641.75
474	US70413500	10/26/2020		500.00	\$ 500.00
475	US70413500	10/26/2020		477.48	\$ 477.48
476	US70413500	10/26/2020		923.10	\$ 1,040.00
477	US70413500	10/26/2020		3,464.00	\$ 216.50
478	US70413500	10/26/2020		4,664.00	\$ 1,240.25
479	US70413500	10/26/2020		2,196.24	\$ 3,019.83
480	US70413500	10/26/2020		212.97	\$ 212.97
481	US70413500	10/26/2020		3,423.03	\$ 100.00
482	US70413500	10/26/2020		3,806.73	\$ 1,313.11
483	US70413500	10/26/2020		2,013.36	\$ 251.68
484	US70413500	10/26/2020		17,357.60	\$ 5,073.60
485	US70414600	10/26/2020		162.35	\$ 162.35
486	US70414600	10/26/2020		2,110.25	\$ 1,689.65
487	US70414600	10/26/2020	\$	2,340.00	\$ 890.00
488	US70414600	10/26/2020		9,580.00	\$ 240.00
	US70414600	10/26/2020		294.94	\$ 294.94
490	US70414600	10/26/2020		589.88	\$ 589.88
491	US70414600	10/26/2020		13,862.18	\$ 4,769.04
492	US70414600	10/26/2020		9,147.19	\$ 6,410.73
493	US70414600	10/26/2020		1,576.90	\$ 2,453.00
494	US70414600	10/26/2020		7,753.00	\$ 2,996.14
495	US70414600	10/26/2020		242.65	\$ 242.65
496	US70414600	10/26/2020		242.65	\$ 242.65
497	US70414600	10/26/2020		856.64	\$ 999.42 \$ 1,984.38
498	US70414600	10/26/2020		1,551.65	
499	US70414600	10/26/2020		1,147.30	
500	US70414600	10/26/2020		7,418.00	
501 502	US70414600 US70414600	10/26/2020 10/26/2020		149.26 149.26	\$ 149.26 \$ 149.26
502	US70414600	10/26/2020		7,015.22	\$ 149.26 \$ 746.30
503	US70414600	10/26/2020		285.65	\$ 746.30 \$ 285.65
504	US70414600	10/26/2020	ې \$	285.65	\$ 285.65 \$
505	0370414000	10/20/2020	Ş	203.05	ې 285.05

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	В	С	D	E
506	US70414600	10/26/2020	\$ 285.65	\$ 285.65
507	US70414600	10/26/2020	\$ 2,996.69	\$ 7,604.94
508	US70414600	10/26/2020	\$ 3,430.00	\$ 3,430.00
509	US70414600	10/26/2020	\$ 6,700.00	\$ 502.50
510	US70414600	10/26/2020	499.72	\$ 499.72
511	US70414600	10/26/2020	7,495.68	\$ 1,249.28
512	US70414600	10/26/2020	30,869.00	\$ 9,610.46
513	US70414600	10/26/2020	\$ 9,790.00	\$ 6,461.40
514	US70414600	10/26/2020	\$ 16,682.00	\$ 1,000.00
515	US70414600	10/26/2020	16,214.00	\$ 225.00
516	US70414600	10/26/2020	7,416.00	\$ 371.40
517	US70414600	10/26/2020	2,725.00	\$ 851.60
518	US70414600	10/26/2020	3,020.00	\$ 2,761.28
519	US70414600	10/26/2020	4,250.60	\$ 425.00
520	US70414600	10/26/2020	21,170.00	\$ 635.40
521	US70414600	10/26/2020	18,617.00	\$ 14,396.00
522	US70414600	10/26/2020	7,415.00	\$ 370.73
523	US70414600	10/26/2020	2,014.66	\$ 1,678.90
524	US70414600	10/26/2020	6,921.00	\$ 6,921.00
525	US70414600	10/26/2020	6,477.00	\$ 1,133.51
526	US70414600	10/26/2020	5,814.60	\$ 4,847.00
527	US70414600	10/26/2020	\$ 1,182.75	\$ 1,182.75
528	US70414600	10/26/2020	2,563.85	\$ 2,602.05
529	US70414600	10/26/2020	4,456.25	\$ 2,602.05
530	US70413500	1/11/2021	\$ 1,829.79	\$ 2,113.00
531	US70413500	1/11/2021	3,660.00	\$ 257.00
532	US70413500	1/11/2021	\$ 1,107.20	\$ 902.00
533	US70413500	1/11/2021	\$ 938.95	\$ 563.37
534	US70413500	1/11/2021	1,178.90	\$ 1,178.90
	US70413500	1/11/2021	1,886.24	\$ 1,319.10
536		1/11/2021	1,276.45	\$ 2,455.29
537	US70413500	1/11/2021	1,732.80	\$ 350.00
538	US70413500	1/11/2021	839.15	\$ 1,174.88
539	US70413500	1/11/2021	\$ 5,656.62	\$ 3,857.18
540	US70413500	1/11/2021	\$ 1,755.55	\$ 1,053.33
541	US70413500	1/11/2021	\$ 5,104.67	\$ 5,104.67
542	US70413500	1/11/2021	993.55	\$ 993.55
543	US70413500	1/11/2021	1,876.77	\$ 268.12
544	US70413500	1/11/2021	\$ 2,453.00	\$ 175.00
545	US70413500	1/11/2021	167.89	\$ 167.89
546	US70413500	1/11/2021	\$ 170.00	\$ 170.00
547	US70413500	1/11/2021	1,376.36	\$ 2,485.11
548	US70413500	1/11/2021	862.56	\$ 2,429.00
549	US70413500	1/11/2021	\$ 3,026.00	\$ 2,185.56
550	US70413500	1/11/2021	1,792.50	\$ 5,976.25
551	US70413500	1/11/2021	\$ 1,572.72	\$ 524.24

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	В	С	D	E
552	US70413500	1/11/2021	2,068.76	\$ 75.00
553	US70413500	1/11/2021	\$ 8,062.30	\$ 9,650.00
554	US70413500	1/11/2021	4,532.00	\$ 4,708.00
555	US70413500	1/11/2021	498.18	\$ 269.16
556	US70413500	1/11/2021	1,338.00	\$ 1,895.50
557	US70413500	1/11/2021	3,295.60	\$ 3,295.60
558	US70413500	1/11/2021	3,723.20	\$ 12,100.40
559	US70413500	1/11/2021	1,057.00	\$ 3,020.00
560	US70413500	1/11/2021	929.20	\$ 1,277.65
561	US70413500	1/11/2021	5,551.25	\$ 3,999.00
562	US70413500	1/11/2021	1,599.00	\$ 232.00
563	US70413500	1/11/2021	2,088.00	\$ 464.00
564	US70413500	1/11/2021	5,835.76	\$ 786.48
565	US70413500	1/11/2021	9,831.00	\$ 393.24
566	US70413500	1/11/2021	2,325.55	\$ 2,823.00
567	US70413500	1/11/2021	340.84	\$ 340.84
568	US70413500	1/11/2021	1,022.52	\$ 681.68
569	US70413500	1/11/2021	514.00	\$ 514.00
570	US70414600	1/11/2021	1,934.60	\$ 1,934.60
571	US70414600	1/11/2021	6,085.85	\$ 23,215.20
572	US70414600	1/11/2021	11,011.84	\$ 8,964.26
573	US70414600	1/11/2021	231.23	\$ 231.23
574	US70414600	1/11/2021	8,785.77	\$ 232.00
575	US70414600	1/11/2021	4,239.00	\$ 2,225.58
576	US70414600	1/11/2021	6,656.40	\$ 2,958.40
577	US70414600	1/11/2021	2,762.80	\$ 1,289.35
578	US70414600	1/11/2021	1,159.20	\$ 1,159.20
579	US70414600	1/11/2021	1,527.40	\$ 436.40
580	US70414600	1/11/2021	1,969.84	\$ 1,969.92
	US70414600	1/11/2021	 1,262.48	\$ 1,266.92
582	US70414600	1/11/2021	1,918.00	\$ 274.00
583	US70414600	1/11/2021	2,887.85	\$ 2,262.40
584	US70414600	1/11/2021	3,245.00	\$ 1,273.00
585	US70414600	1/11/2021	14,116.00	\$ 418.58
586	US70414600	1/11/2021	6,624.00	\$ 5,113.36
587	US70414600	1/11/2021	28,364.00	\$ 26,682.00
588	US70414600	1/11/2021	 12,539.00	\$ 12,288.00
589	US70414600	1/11/2021	6,588.00	\$ 1,976.40
590	US70414600	1/11/2021	2,291.66	\$ 7,571.00
591	US70414600	1/11/2021	 2,343.95	\$ 1,674.25
592	US70414600	1/11/2021	12,047.00	\$ 2,406.28
593	US70414600	1/11/2021	805.36	\$ 100.67
594	US70414600	1/11/2021	8,816.56	\$ 1,831.72
595	US70414600	1/11/2021	12,712.50	\$ 6,070.25
596	US70414600	1/11/2021	2,730.98	\$ 4,462.82
597	US70414600	1/11/2021	\$ 2,272.40	\$ 1,136.20

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	В	С		D	E
598	US70414600	1/11/2021	\$	3,827.67	\$ 3,280.92
599	US70414600	1/11/2021		4,326.00	\$ 100.00
600	US70414600	1/11/2021	\$	2,399.04	\$ 3,598.56
601	US70414600	1/11/2021	\$	7,620.44	\$ 7,620.44
602	US70414600	1/11/2021	\$	4,187.60	\$ 116.50
603	US70414600	1/11/2021		17,630.00	\$ 3,173.40
604	US70414600	1/11/2021	\$	1,674.40	\$ 1,673.14
605	US70414600	1/11/2021	\$	517.66	\$ 260.00
606	US70414600	1/11/2021	\$	3,020.00	\$ 503.34
607	US70414600	1/11/2021	\$	2,795.80	\$ 200.00
608	US70414600	1/11/2021		7,234.56	\$ 4,939.51
609	US70414600	1/11/2021	\$	4,144.40	\$ 4,463.20
610	US70414600	1/11/2021	\$	5,744.90	\$ 7,315.32
611	US70414600	1/11/2021	\$	450.00	\$ 450.00
612	US70414600	1/11/2021	\$	3,597.92	\$ 4,547.40
613	US70414600	1/11/2021	\$	7,345.34	\$ 4,847.30
614	US70413500	3/8/2021	\$	14,831.25	\$ 5,210.00
615	US70413500	3/8/2021	\$	200.00	\$ 200.00
616	US70413500	3/8/2021		3,664.68	\$ 650.00
617	US70413500	3/8/2021	\$	1,338.19	\$ 240.00
618	US70413500	3/8/2021		1,070.48	\$ 2,274.94
619	US70413500	3/8/2021	\$ \$	2,816.73	\$ 702.10
620	US70413500	3/8/2021		3,099.60	\$ 2,847.64
621 622	US70413500 US70413500	3/8/2021		1,412.76	\$ 1,412.76 \$ 1,925.55
622	US70413500	3/8/2021		1,332.24 1,115.66	\$ 1,925.55 \$ 160.00
624	US70413500	3/8/2021 3/8/2021	\$ \$	1,003.50	\$ 3,010.50
625	US70413500	3/8/2021	ې \$	2,089.72	\$ 4,078.06
626	US70413500	3/8/2021	\$	5,292.30	\$ 14,933.00
	US70413500	3/8/2021		8,356.35	\$ 17,043.00
628	US70413500	3/8/2021		1,570.10	\$ 2,811.44
629	US70413500	3/8/2021		2,260.00	\$ 3,665.25
630	US70413500	3/8/2021		8,656.00	\$ 6,762.51
631	US70413500	3/8/2021	\$	1,304.72	\$ 1,793.99
632	US70413500	3/8/2021	\$	200.00	\$ 200.00
633	US70413500	3/8/2021	\$	200.00	\$ 200.00
634	US70413500	3/8/2021	\$	250.00	\$ 250.00
635	US70413500	3/8/2021		298.45	\$ 3,882.50
636	US70413500	3/8/2021	\$	307.50	\$ 307.50
637	US70413500	3/8/2021	\$	2,305.28	\$ 6,916.00
638	US70413500	3/8/2021	\$	917.35	\$ 1,037.60
639	US70413500	3/8/2021	\$	303.20	\$ 303.20
640	US70413500	3/8/2021		7,003.80	\$ 700.00
641	US70413500	3/8/2021	\$	1,757.42	\$ 3,661.46
642	US70413500	3/8/2021		5,993.41	\$ 2,676.00
643	US70413500	3/8/2021	\$	191.25	\$ 191.25

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	В	С	D	E
644	US70413500	3/8/2021	956.25	\$ 765.00
645	US70413500	3/8/2021	\$ 1,968.19	\$ 542.50
646	US70413500	3/8/2021	\$ 278.75	\$ 278.75
647	US70413500	3/8/2021	\$ 1,672.50	\$ 6,411.25
648	US70413500	3/8/2021	1,015.84	\$ 145.12
649	US70413500	3/8/2021	3,519.88	\$ 200.00
650	US70414600	3/8/2021	3,499.75	\$ 700.00
651	US70414600	3/8/2021	681.19	\$ 9,185.17
652	US70414600	3/8/2021	\$ 7,148.65	\$ 2,069.83
653	US70414600	3/8/2021	7,134.72	\$ 9,513.00
654	US70414600	3/8/2021	27,795.00	\$ 13,080.00
655	US70414600	3/8/2021	232.25	\$ 3,518.25
656	US70414600	3/8/2021	5,339.75	\$ 4,518.25
657	US70414600	3/8/2021	8,275.90	\$ 4,088.63
658	US70414600	3/8/2021	3,431.89	\$ 3,431.89
659	US70414600	3/8/2021	4,007.11	\$ 1,658.34
660	US70414600	3/8/2021	878.50	\$ 1,000.00
661	US70414600	3/8/2021	2,158.68	\$ 1,736.00
662	US70414600	3/8/2021	9,826.74	\$ 8,188.95
663	US70414600	3/8/2021	9,612.75	\$ 12,440.00
664	US70414600	3/8/2021	1,407.00	\$ 1,407.00
665	US70414600	3/8/2021	\$ 1,913.12	\$ 550.00
666	US70414600	3/8/2021	4,579.76	\$ 2,747.88
667	US70414600	3/8/2021	9,124.75	\$ 9,347.25
668	US70414600	3/8/2021	8,020.35	\$ 10,131.00
669	US70414600	3/8/2021	1,032.66	\$ 938.48
670	US70414600	3/8/2021	\$ 2,661.60	\$ 2,396.53
671	US70414600	3/8/2021	1,360.44	\$ 453.48
672	US70413500	5/10/2021	605.65	\$ 605.65
	US70413500	5/10/2021	646.81	\$ 2,420.00
674	US70413500	5/10/2021	797.60	\$ 1,009.98
675	US70413500	5/10/2021	1,375.69	\$ 3,056.92
676	US70413500	5/10/2021	6,233.24	\$ 4,090.00
677	US70413500	5/10/2021	\$ 14,238.76	\$ 9,885.50
678	US70413500	5/10/2021	611.48	\$ 611.48
679	US70413500	5/10/2021	764.30	\$ 764.35
680	US70413500	5/10/2021	 700.00	\$ 700.00
681	US70413500	5/10/2021	700.00	\$ 700.00
682	US70413500	5/10/2021	5,018.89	\$ 4,523.11
683	US70413500	5/10/2021	 14,700.00	\$ 1,800.00
684	US70413500	5/10/2021	\$ 19,800.00	\$ 14,400.00
685	US70413500	5/10/2021	1,836.48	\$ 2,984.15
686	US70413500	5/10/2021	2,167.10	\$ 6,465.40
687	US70413500	5/10/2021	 4,688.40	\$ 4,493.05
688	US70413500	5/10/2021	2,746.64	\$ 910.00
689	US70413500	5/10/2021	\$ 1,880.90	\$ 885.13

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	В	С	D	E
690	US70413500	5/10/2021	\$ 29,129.70	\$ 13,142.30
691	US70413500	5/10/2021	\$ 2,293.33	\$ 2,580.00
692	US70413500	5/10/2021	\$ 2,711.04	\$ 3,819.84
693	US70413500	5/10/2021	\$ 389.78	\$ 3,313.13
694	US70413500	5/10/2021	\$ 1,302.00	\$ 500.00
695	US70413500	5/10/2021	\$ 2,240.45	\$ 2,500.00
696	US70413500	5/10/2021	\$ 5,547.14	\$ 7,766.00
697	US70413500	5/10/2021	\$ 159.60	\$ 957.60
698	US70413500	5/10/2021	\$ 1,070.10	\$ 4,924.00
699	US70413500	5/10/2021	\$ 593.20	\$ 593.20
700	US70413500	5/10/2021	3,030.70	\$ 6,494.04
701	US70413500	5/10/2021	\$ 798.75	\$ 600.00
702	US70413500	5/10/2021	\$ 152.91	\$ 152.91
703	US70413500	5/10/2021	\$ 1,070.65	\$ 3,539.64
704	US70414600	5/10/2021	\$ 1,510.24	\$ 2,076.58
705	US70414600	5/10/2021	\$ 330.04	\$ 330.04
706	US70414600	5/10/2021	\$ 330.04	\$ 2,640.32
707	US70414600	5/10/2021	\$ 8,157.95	\$ 3,093.80
708	US70414600	5/10/2021	\$ 719.95	\$ 617.10
709	US70414600	5/10/2021	\$ 1,170.82	\$ 1,338.00
710	US70414600	5/10/2021	\$ 2,011.36	\$ 2,015.26
711	US70414600	5/10/2021	\$ 3,475.64	\$ 3,226.25
712	US70414600	5/10/2021	\$ 1,842.19	\$ 1,052.68
713	US70414600	5/10/2021	\$ 1,570.85	\$ 1,776.40
714	US70414600	5/10/2021	278.75	\$ 278.75
715	US70414600	5/10/2021	\$ 278.75	\$ 278.75
716	US70414600	5/10/2021	\$ 278.75	\$ 278.75
717	US70414600	5/10/2021	\$ 278.75	\$ 278.75
718	US70414600	5/10/2021	\$ 6,690.00	\$ 5,575.00
	US70414600	5/10/2021	1,662.00	\$ 1,662.00
720	US70414600	5/10/2021	1,662.00	\$ 1,662.00
721	US70414600	5/10/2021	1,662.00	\$ 1,662.00
722	US70414600	5/10/2021	1,662.00	\$ 1,662.00
723	US70414600	5/10/2021	\$ 13,296.00	\$ 26,592.00
724	US70414600	5/10/2021	\$ 1,625.00	\$ 1,625.00
725	US70414600	5/10/2021	22,138.36	\$ 21,404.18
726	US70414600	5/10/2021	396.12	\$ 396.12
727	US70414600	5/10/2021	396.12	\$ 396.12
728	US70414600	5/10/2021	\$ 396.12	\$ 396.12
729	US70414600	5/10/2021	\$ 19,082.36	\$ 8,715.52
730	US70414600	5/10/2021	\$ 3,374.70	\$ 1,928.40
731	US70414600	5/10/2021	\$ 3,756.62	\$ 7,335.45
732	US70414600	5/10/2021	2,872.20	\$ 4,708.00
733	US70414600	5/10/2021	\$ 1,992.34	\$ 869.62
734	US70414600	5/10/2021	\$ 2,144.80	\$ 612.80
735	US70414600	5/10/2021	\$ 2,321.45	\$ 4,500.00

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	В	С		D	E
736	US70414600	5/10/2021	\$	13,781.25	\$ 25,000.00
737	US70414600	5/10/2021	\$	3,590.16	\$ 2,991.40
738	US70414600	5/10/2021	\$	203.30	\$ 203.30
739	US70414600	5/10/2021	\$	203.30	\$ 203.30
740	US70414600	5/10/2021	\$	3,252.60	\$ 2,033.00
741	US70414600	5/10/2021	\$	5,403.95	\$ 2,611.08
742	US70414600	5/10/2021	\$	825.25	\$ 825.25
743	US70414600	5/10/2021	\$	4,951.50	\$ 825.25
744	US70414600	5/10/2021	\$	6,602.00	\$ 19,806.00
745	US70414600	5/10/2021	\$	2,772.84	\$ 2,772.84
746	US70414600	5/10/2021	\$	7,175.16	\$ 396.12
747	US70414600	5/10/2021	\$	1,873.76	\$ 1,606.08
748	US70413500	7/12/2021	\$	2,110.15	\$ 904.35
749	US70413500	7/12/2021	\$	2,331.39	\$ 6,316.00
750	US70413500	7/12/2021	\$	3,325.81	\$ 364.15
751	US70413500	7/12/2021	\$	2,277.80	\$ 2,277.80
752	US70413500	7/12/2021	\$	5,228.31	\$ 7,389.61
753	US70413500	7/12/2021	\$	1,600.18	\$ 3,034.78
754	US70413500	7/12/2021	\$	8,162.71	\$ 7,255.92
755	US70413500	7/12/2021	\$	20,845.35	\$ 15,678.89
756	US70413500	7/12/2021	\$	2,444.52	\$ 5,166.46
757	US70413500	7/12/2021	\$	473.70	\$ 473.70
758	US70413500	7/12/2021	\$	5,151.02	\$ 735.86
759	US70413500	7/12/2021	\$	1,273.23	\$ 2,897.68
760	US70413500	7/12/2021	\$	563.28	\$ 563.28
761	US70413500	7/12/2021	\$	4,945.22	\$ 4,810.69
762	US70413500	7/12/2021	\$	1,842.19	\$ 526.00
763	US70413500	7/12/2021	\$	2,067.80	\$ 1,181.60
764	US70413500	7/12/2021 7/12/2021	\$	1,579.02	\$ 3,421.21
	US70413500			12,667.90	\$ 8,695.52
766 767	US70413500	7/12/2021 7/12/2021		5,090.57	\$ 6,750.50 \$ 5,894.25
	US70413500			2,418.60	
768 769	US70413500 US70413500	7/12/2021 7/12/2021	ې \$	626.48 1,952.52	
769	US70413500	7/12/2021	ې \$	6,688.65	\$ 114.86 \$ 11,447.75
771	US70413500	7/12/2021	ې \$	1,094.34	\$ 11,447.75 \$ 2,579.57
772	US70413500	7/12/2021	ې \$	1,094.34	\$ 2,579.57 \$ 276.20
773	US70414600	7/12/2021	ې \$	2,303.80	\$ 276.20
774	US70414600	7/12/2021	ې \$	2,303.80	\$ 500.00 \$ 7,186.55
775	US70414600	7/12/2021	ې \$	2,183.24	\$ 1,650.00
776	US70414600	7/12/2021	ې \$	739.50	\$ 1,650.00 \$ 147.90
777	US70414600	7/12/2021	ې \$	4,943.80	\$ 8,818.12
778	US70414600	7/12/2021	ې \$	2,577.40	\$ 5,155.00
779	US70414600	7/12/2021	ې \$	27,919.00	\$ 29,163.25
780	US70414600	7/12/2021	ې \$	7,077.04	\$ 29,103.23 \$ 10,119.00
780	US70414600	7/12/2021	ې \$	841.02	\$ 10,119.00
101	0370414000	//12/2021	ې	041.02	۲40.17 I

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	В	С	D	E
782	US70414600	7/12/2021	3,021.00	\$ 863.16
783	US70414600	7/12/2021	\$ 5,858.00	\$ 7,072.00
784	US70414600	7/12/2021	\$ 1,001.40	\$ 1,242.72
785	US70414600	7/12/2021	\$ 1,206.60	\$ 1,206.60
786	US70414600	7/12/2021	\$ 1,980.60	\$ 1,980.60
787	US70414600	7/12/2021	6,919.81	\$ 9,049.78
788	US70414600	7/12/2021	2,709.15	\$ 2,580.00
789	US70414600	7/12/2021	\$ 2,392.72	\$ 2,793.51
790	US70414600	7/12/2021	\$ 521.40	\$ 521.40
791	US70414600	7/12/2021	\$ 12,027.52	\$ 15,567.00
792	US70414600	7/12/2021	2,592.72	\$ 1,944.54
793	US70413500	9/7/2021	3,555.30	\$ 4,355.53
794	US70413500	9/7/2021	\$ 1,786.60	\$ 2,598.79
795	US70413500	9/7/2021	4,811.40	\$ 3,742.20
796	US70413500	9/7/2021	\$ 1,380.24	\$ 2,495.20
797	US70413500	9/7/2021	\$ 2,151.28	\$ 4,484.48
798	US70413500	9/7/2021	25.52	\$ 2,430.00
799	US70413500	9/7/2021	2,734.64	\$ 4,380.24
800	US70413500	9/7/2021	1,232.00	\$ 1,985.00
801	US70413500	9/7/2021	1,766.60	\$ 1,766.60
802	US70413500	9/7/2021	5,379.74	\$ 6,051.40
803	US70413500	9/7/2021	\$ 5,674.60	\$ 5,108.68
804	US70413500	9/7/2021	\$ 816.86	\$ 2,267.72
805	US70413500	9/7/2021	4,100.00	\$ 3,481.10
806	US70413500	9/7/2021	8,198.10	\$ 12,652.38
807	US70413500	9/7/2021	490.30	\$ 98.06
808	US70413500	9/7/2021	\$ 764.30	\$ 192.18
809	US70413500	9/7/2021	\$ 878.15	\$ 377.00
810	US70413500	9/7/2021	1,001.46	\$ 1,953.62
	US70413500	9/7/2021	4,981.00	\$ 4,725.00
812	US70414600	9/7/2021	1,058.70	\$ 354.00
813	US70414600	9/7/2021	2,470.30	\$ 704.70
814	US70414600	9/7/2021	5,474.30	\$ 1,011.60
815	US70414600	9/7/2021	519.18	\$ 357.88
816	US70414600	9/7/2021	1,252.58	\$ 536.82
817	US70414600	9/7/2021	1,431.48	\$ 2,863.00
818	US70414600	9/7/2021	2,040.95	\$ 2,044.25
819	US70414600	9/7/2021	11,569.63	\$ 3,263.37
820	US70414600	9/7/2021	3,136.63	\$ 1,344.30
821	US70414600	9/7/2021	 14,921.25	\$ 21,686.75
822	US70414600	9/7/2021	\$ 993.25	\$ 3,973.00
823	US70414600	9/7/2021	10,723.30	\$ 6,127.60
824	US70414600	9/7/2021	1,261.53	\$ 2,803.40
825	US70414600	9/7/2021	400.00	\$ 400.00
826	US70414600	9/7/2021	1,196.82	\$ 399.47
827	US70414600	9/7/2021	\$ 2,823.20	\$ 2,520.30

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	В	С	D	E
828	US70414600	9/7/2021	762.70	\$ 1,058.40
829	US70414600	9/7/2021	\$ 815.20	\$ 407.60
830	US70414600	9/7/2021	\$ 1,723.92	\$ 424.56
831	US70414600	9/7/2021	\$ 5,816.16	\$ 3,421.73
832	US70414600	9/7/2021	161.24	\$ 161.24
833	US70414600	9/7/2021	179.00	\$ 179.00
834	US70414600	9/7/2021	1,431.52	\$ 715.76
835	US70414600	9/7/2021	1,844.80	\$ 4,612.00
836	US70414600	9/7/2021	\$ 3,438.00	\$ 747.40
837	US70414600	9/7/2021	\$ 2,106.08	\$ 2,895.86
838	US70414600	9/7/2021	217.52	\$ 217.52
839	US70414600	9/7/2021	1,548.19	\$ 2,142.92
840	US70414600	9/7/2021	2,069.84	\$ 2,252.56
841	US70413500	11/1/2021	2,105.36	\$ 2,105.36
842	US70413500	11/1/2021	\$ 175.00	\$ 175.00
843	US70413500	11/1/2021	400.83	\$ 400.83
844	US70413500	11/1/2021	1,554.90	\$ 3,593.85
845	US70413500	11/1/2021	500.00	\$ 500.00
846	US70413500	11/1/2021	800.00	\$ 800.00
847	US70413500	11/1/2021	2,207.10	\$ 2,207.50
848	US70413500	11/1/2021	12,503.84	\$ 4,167.99
849	US70413500	11/1/2021	\$ 1,408.30	\$ 467.66
850	US70413500	11/1/2021	\$ 861.05	\$ 2,662.47
851	US70413500	11/1/2021	748.92	\$ 1,449.57
852	US70413500	11/1/2021	11,696.07	\$ 9,149.37
853	US70413500	11/1/2021	9,800.70	\$ 5,600.40
854	US70413500	11/1/2021	\$ 1,972.67	\$ 1,550.92
855	US70413500	11/1/2021	\$ 2,061.92	\$ 294.57
856	US70413500	11/1/2021	993.50	\$ 3,974.00
	US70413500	11/1/2021	8,088.50	\$ 6,076.50
858	US70413500	11/1/2021	841.76	\$ 841.76
859	US70413500	11/1/2021	1,050.00	\$ 600.00
860	US70413500	11/1/2021	5,096.50	\$ 5,096.50
861	US70413500	11/1/2021	\$ 4,805.00	\$ 3,227.20
862	US70413500	11/1/2021	2,527.56	\$ 1,453.89
863	US70413500	11/1/2021	2,105.32	\$ 3,421.21
864	US70413500	11/1/2021	 800.00	\$ 800.00
865	US70413500	11/1/2021	1,985.52	\$ 400.00
866	US70413500	11/1/2021	3,880.85	\$ 8,624.20
867	US70413500	11/1/2021	 5,421.00	\$ 100.00
868	US70414600	11/1/2021	\$ 2,375.36	\$ 1,534.60
869	US70414600	11/1/2021	7,757.28	\$ 4,310.12
870	US70414600	11/1/2021	157.41	\$ 157.41
871	US70414600	11/1/2021	787.05	\$ 314.82
872	US70414600	11/1/2021	1,774.92	\$ 300.00
873	US70414600	11/1/2021	\$ 1,495.60	\$ 1,308.72

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	В	С	D	E
874	US70414600	11/1/2021	\$ 1,270.00	\$ 2,540.00
875	US70414600	11/1/2021	\$ 1,783.02	\$ 3,450.00
876	US70414600	11/1/2021	\$ 1,535.00	\$ 2,918.53
877	US70414600	11/1/2021	\$ 2,149.26	\$ 2,810.78
878	US70414600	11/1/2021	\$ 14,838.48	\$ 5,919.24
879	US70414600	11/1/2021	\$ 2,291.45	\$ 1,760.56
880	US70414600	11/1/2021	\$ 7,151.90	\$ 7,922.52
881	US70414600	11/1/2021	\$ 4,810.05	\$ 3,228.55
882	US70414600	11/1/2021	\$ 1,401.18	\$ 2,382.21
883	US70413500	1/10/2022	\$ 3,825.80	\$ 2,311.28
884	US70413500	1/10/2022	\$ 6,356.02	\$ 5,778.20
885	US70413500	1/10/2022	\$ 2,373.67	\$ 2,110.24
886	US70413500	1/10/2022	\$ 2,375.68	\$ 5,345.28
887	US70413500	1/10/2022	\$ 458.46	\$ 1,222.56
888	US70413500	1/10/2022	\$ 924.25	\$ 924.25
889	US70413500	1/10/2022	\$ 2,105.70	\$ 421.14
890	US70413500	1/10/2022	\$ 250.60	\$ 3,759.00
891	US70413500	1/10/2022	\$ 764.30	\$ 1,682.00
892	US70413500	1/10/2022	\$ 1,081.04	\$ 1,351.30
893	US70413500	1/10/2022	\$ 30,119.40	\$ 11,055.60
894	US70413500	1/10/2022	\$ 4,162.36	\$ 7,892.92
895	US70413500	1/10/2022	\$ 4,598.53	\$ 3,840.35
896	US70413500	1/10/2022	\$ 335.11	\$ 2,900.33
897	US70413500	1/10/2022	\$ 864.67	\$ 864.67
898	US70413500	1/10/2022	\$ 1,050.00	\$ 623.19
899	US70413500	1/10/2022	\$ 1,869.57	\$ 1,869.57
900	US70413500	1/10/2022	\$ 7,316.11	\$ 2,975.94
901	US70413500	1/10/2022	\$ 5,420.90	\$ 649.20
902	US70414600	1/10/2022	\$ 178.90	\$ 2,863.00
903	US70414600	1/10/2022	6,411.76	\$ 200.00
904	US70414600	1/10/2022	24,126.44	\$ 8,555.24
905	US70414600	1/10/2022	\$ 100.00	\$ 100.00
906		1/10/2022	\$ 8,387.00	\$ 150.00
907	US70414600	1/10/2022	\$ 6,088.80	\$ 7,300.00
908	US70414600	1/10/2022	\$ 2,421.12	\$ 4,842.24
909	US70414600	1/10/2022	\$ 1,471.33	\$ 735.57
910	US70414600	1/10/2022	\$ 659.66	\$ 2,548.02
911	US70414600	1/10/2022	\$ 1,551.68	\$ 1,550.56
912		1/10/2022	\$ 2,863.00	\$ 2,863.00
913	US70414600	1/10/2022	\$ 1,606.00	\$ 3,212.00
914	US70414600	1/10/2022	\$ 600.95	\$ 2,905.30
915	US70414600	1/10/2022	\$ 3,692.64	\$ 6,317.60
916	US70414600	1/10/2022	\$ 2,355.60	\$ 2,355.60
917	US70414600	1/10/2022	\$ 2,130.87	\$ 4,448.38
918	US70414600	1/10/2022	\$ 6,845.96	\$ 12,533.80
919	US70414600	1/10/2022	\$ 178.94	\$ 178.94

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	В	С		D	E
920	US70414600	1/10/2022	\$	178.94	\$ 178.94
921	US70414600	1/10/2022	\$	178.94	\$ 178.94
922	US70414600	1/10/2022	\$	1,431.52	\$ 178.94
923	US70414600	1/10/2022	\$	157.90	\$ 157.90
924	US70414600	1/10/2022	\$	157.90	\$ 157.90
925	US70414600	1/10/2022	\$	1,263.80	\$ 1,578.40
926	US70414600	1/10/2022	\$	1,971.20	\$ 1,720.80
927	US70414600	1/10/2022	\$	1,772.27	\$ 1,576.90
928	US70413500	3/14/2022	\$	668.85	\$ 387.55
929	US70413500	3/14/2022	\$	1,386.70	\$ 594.33
930	US70413500	3/14/2022	\$	109.45	\$ 766.15
931	US70413500	3/14/2022	\$	2,684.85	\$ 767.10
932	US70413500	3/14/2022	\$	4,017.32	\$ 6,740.20
933	US70413500	3/14/2022	\$	1,044.96	\$ 1,343.52
934	US70413500	3/14/2022	\$	2,580.41	\$ 737.26
935	US70413500	3/14/2022	\$	873.20	\$ 1,637.25
936	US70413500	3/14/2022	\$	100.00	\$ 1,198.35
937	US70413500	3/14/2022	\$	1,455.04	\$ 2,118.80
938	US70413500	3/14/2022	\$	3,860.80	\$ 289.00
939	US70413500	3/14/2022	\$	11,557.50	\$ 7,396.80
940	US70413500	3/14/2022	\$	1,273.16	\$ 363.76
941	US70413500	3/14/2022	\$	491.93	\$ 1,528.48
942	US70413500	3/14/2022	\$	5,842.37	\$ 4,194.30
943	US70413500	3/14/2022	\$	2,037.84	\$ 3,566.22
944	US70413500	3/14/2022	\$	1,780.92	\$ 1,554.24
945	US70413500	3/14/2022	\$	286.59	\$ 286.59
946	US70413500	3/14/2022	\$	1,584.40	\$ 2,178.55
947	US70413500	3/14/2022	\$	1,708.91	\$ 732.39
948	US70413500	3/14/2022	\$	3,049.83	\$ 435.69
	US70413500	3/14/2022		1,897.00	\$ 1,253.00
950	US70413500	3/14/2022		830.19	\$ 830.19
951	US70413500	3/14/2022		1,455.04	\$ 2,910.08
952	US70413500	3/14/2022		2,338.04	\$ 876.64
953	US70413500	3/14/2022	\$	1,847.80	\$ 923.90
954	US70413500	3/14/2022	\$	6,175.00	\$ 2,428.54
955	US70414600	3/14/2022	\$ \$	2,473.68	\$ 3,547.35
956	US70414600	3/14/2022	\$ \$	157.41	\$ 157.41 \$ 1,027.36
957 958	US70414600 US70414600	3/14/2022 3/14/2022	ې \$	2,487.07	\$ 1,027.36 \$ 2,193.00
958	US70414600	3/14/2022	ې \$	780.90	\$ 2,193.00 \$ 785.00
959	US70414600	3/14/2022	\$ \$	3,921.20	\$ 3,878.00
960	US70414600	3/14/2022	\$ \$	10,930.00	\$ 8,744.00
962	US70414600	3/14/2022	\$ \$	1,215.84	\$ 1,233.08
963	US70414600	3/14/2022	\$ \$	4,946.78	\$ 2,553.28
964	US70414600	3/14/2022	\$ \$	2,048.00	\$ 2,333.28
965	US70414600	3/14/2022	\$ \$	1,751.75	\$ 2,580.25
505	0370414000	5/ 14/ 2022	Ļ	1,/31./3	z,300.23

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	В	С		D	E
966	US70414600	3/14/2022	\$	4,053.00	\$ 4,863.60
967	US70414600	3/14/2022		22,018.92	\$ 524.26
968	US70413500	5/9/2022		8,106.00	\$ 5,674.20
969	US70413500	5/9/2022		1,701.60	\$ 830.64
970	US70413500	5/9/2022		6,256.95	\$ 6,257.81
971	US70413500	5/9/2022		873.40	\$ 174.68
972	US70413500	5/9/2022		4,089.10	\$ 3,500.00
973	US70413500	5/9/2022	\$	2,766.67	\$ 3,345.81
974	US70413500	5/9/2022	\$	311.95	\$ 254.39
975	US70413500	5/9/2022		1,498.09	\$ 2,620.99
976	US70413500	5/9/2022		5,660.55	\$ 2,929.98
977	US70413500	5/9/2022		1,975.25	\$ 1,185.15
978	US70413500	5/9/2022		1,352.10	\$ 2,520.80
979	US70413500	5/9/2022		9,406.00	\$ 300.00
980	US70413500	5/9/2022		2,639.90	\$ 4,289.65
981	US70413500	5/9/2022		13,439.51	\$ 245.00
982	US70413500	5/9/2022		1,954.40	\$ 2,533.95
983	US70414600	5/9/2022		4,193.21	\$ 599.00
984	US70414600	5/9/2022		1,650.72	\$ 2,888.76
985	US70414600	5/9/2022		100.00	\$ 100.00
986	US70414600	5/9/2022		3,860.78	\$ 551.54
987	US70414600	5/9/2022		563.00	\$ 563.00
988	US70414600	5/9/2022		1,200.00	\$ 1,200.00
989	US70414600	5/9/2022		1,941.04	\$ 3,118.93
990	US70414600	5/9/2022		3,635.36	\$ 6,361.88
991 992	US70414600	5/9/2022	ې \$	2,005.15	\$ 300.00 \$ 207.00
992	US70414600 US70414600	5/9/2022 5/9/2022		773.64 3,049.11	\$ 207.00 \$ 853.06
993 994	US70414600	5/9/2022		3,412.21	\$ 5,544.89
	US70414600	5/9/2022		3,686.18	\$ 3,950.00
996	US70414600	5/9/2022		2,264.05	\$ 3,113.33
997	US70414600	5/9/2022		3,878.42	\$ 1,108.14
998	US70414600	5/9/2022		3,223.15	\$ 3,465.40
999	US70414600	5/9/2022		2,925.16	\$ 1,253.67
	US70414600	5/9/2022		740.98	\$ 1,482.00
	US70414600	5/9/2022		2,238.56	\$ 1,999.48
	U\$70413500	7/11/2022		2,430.96	\$ 1,736.40
	US70413500	7/11/2022		554.47	\$ 2,191.56
	US70413500	7/11/2022		1,195.04	\$ 1,792.56
	US70413500	7/11/2022		1,048.11	\$ 1,048.11
	US70413500	7/11/2022		2,015.04	\$ 3,274.44
	US70413500	7/11/2022		2,005.50	\$ 290.00
	US70413500	7/11/2022		2,513.60	\$ 2,964.90
	US70413500	7/11/2022		795.92	\$ 1,940.78
1010	US70413500	7/11/2022		916.58	\$ 523.76
1011	US70413500	7/11/2022	\$	4,709.25	\$ 2,691.00

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	В	С		D	E
1012	US70413500	7/11/2022	\$	9,769.20	\$ 2,791.20
1013	US70413500	7/11/2022		73.05	\$ 73.05
1014	US70413500	7/11/2022		1,991.68	\$ 4,000.00
1015	US70413500	7/11/2022	\$	3,144.75	\$ 150.00
1016	US70413500	7/11/2022	\$	1,344.42	\$ 1,792.56
1017	US70413500	7/11/2022	\$	497.92	\$ 400.00
1018	US70413500	7/11/2022	\$	1,077.58	\$ 1,581.52
1019	US70413500	7/11/2022	\$	3,877.75	\$ 3,900.00
1020	US70413500	7/11/2022	\$	1,585.20	\$ 1,585.20
1021	US70413500	7/11/2022	\$	823.06	\$ 587.90
1022	US70413500	7/11/2022		589.54	\$ 3,797.29
1023	US70413500	7/11/2022		750.00	\$ 150.00
1024	US70413500	7/11/2022		4,159.04	\$ 6,238.56
1025	US70413500	7/11/2022		1,039.15	\$ 300.00
	US70414600	7/11/2022		1,583.82	\$ 1,583.82
	US70414600	7/11/2022		1,620.54	\$ 1,483.44
1028	US70414600	7/11/2022		9,006.92	\$ 1,306.72
1029	US70414600	7/11/2022	\$	500.17	\$ 1,000.34
_	US70414600	7/11/2022		2,415.36	\$ 2,449.00
	US70414600	7/11/2022		14,205.75	\$ 5,499.00
	US70414600	7/11/2022		3,107.30	\$ 4,039.49
	US70414600	7/11/2022	\$	2,701.56	\$ 3,001.69
	US70414600	7/11/2022	\$	2,539.50	\$ 3,047.40
	US70414600	7/11/2022	\$	1,367.20	\$ 1,325.40
	US70414600	7/11/2022		14,575.68	\$ 2,200.00
	US70414600	7/11/2022		2,456.20	\$ 4,529.85
_	US70414600	7/11/2022		1,395.60	\$ 1,860.80
	US70414600	7/11/2022		1,399.83	\$ 1,399.92
	US70414600	7/11/2022		2,365.44	\$ 1,728.40
	US70414600	7/11/2022		1,554.75	\$ 1,554.80
-	US70414600	7/11/2022		1,555.50	\$ 1,399.95
	US70414600	7/11/2022		2,259.25	\$ 2,905.02
	US70414600	7/11/2022		4,660.04	\$ 5,039.14
	US70414600	7/11/2022		3,226.50	\$ 2,035.90
	US70414600	7/11/2022		855.48	\$ 525.18
	US70413500	9/6/2022		3,133.84	\$ 4,309.03
-	US70413500	9/6/2022		200.00	\$ 311.05
	US70413500	9/6/2022		5,532.35	\$ 100.00
	US70413500	9/6/2022		1,178.80	\$ 500.00 \$ 4.657.44
	US70413500 US70413500	9/6/2022 9/6/2022		754.60	\$ 4,657.44 \$ 326.56
-	US70413500 US70413500			2,163.48 771.39	
	US70413500	9/6/2022 9/6/2022		900.00	\$ 771.60 \$ 450.00
-	US70413500	9/6/2022		900.00 998.19	\$ 450.00 \$ 1,425.90
	US70413500	9/6/2022		2,160.84	\$ 1,425.90 \$ 720.14
	US70413500	9/6/2022		411.54	\$ 720.14 \$ 274.36
1021	0370413300	9/0/2022	Ş	411.54	ې 2/4.30

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В	С	D	E
1058 US70413500	9/6/2022	\$ 1,410.30	\$ 1,645.35
1059 US70413500	9/6/2022	\$ 892.90	\$ 250.00
1060 US70413500	9/6/2022	\$ 1,044.75	\$ 1,328.00
1061 US70413500	9/6/2022	\$ 1,024.96	\$ 2,182.72
1062 US70413500	9/6/2022	\$ 1,545.36	\$ 2,185.60
1063 US70413500	9/6/2022	\$ 1,637.92	\$ 1,913.55
1064 US70413500	9/6/2022	\$ 398.00	\$ 398.00
1065 US70413500	9/6/2022	\$ 933.00	\$ 933.00
1066 US70413500	9/6/2022	\$ 763.63	\$ 795.45
1067 US70413500	9/6/2022	\$ 591.50	\$ 1,186.30
1068 US70414600	9/6/2022	\$ 1,539.45	\$ 1,565.26
1069 US70414600	9/6/2022	\$ 3,225.04	\$ 2,821.91
1070 US70414600	9/6/2022	\$ 951.35	\$ 1,308.23
1071 US70414600	9/6/2022	\$ 2,812.00	\$ 3,866.50
1072 US70414600	9/6/2022	\$ 4,051.60	\$ 878.80
1073 US70414600	9/6/2022	\$ 3,969.32	\$ 5,546.72
1074 US70414600	9/6/2022	\$ 8,229.60	\$ 8,880.90
1075 US70414600	9/6/2022	\$ 1,384.20	\$ 2,174.70
1076 US70414600	9/6/2022		\$ 1,295.04
1077 US70414600	9/6/2022	\$ 1,000.60	\$ 375.90
1078 US70414600	9/6/2022	\$ 8,378.84	\$ 8,250.00
1079 US70414600	9/6/2022	\$ 4,390.00	\$ 6,336.25
1080 US70414600	9/6/2022	\$ 1,748.36	\$ 1,745.84
1081 US70414600	9/6/2022	\$ 1,836.00	\$ 2,524.50
1082 US70414600	9/6/2022		\$ 928.02
1083 US70414600	9/6/2022	\$ 1,096.83	\$ 1,566.90
1084 US70414600	9/6/2022	\$ 4,344.90	\$ 3,733.55
1085 US70414600	9/6/2022	\$ 1,642.06	\$ 1,600.00
1086 US70414600	9/6/2022	\$ 6,288.80	\$ 2,915.52
1087 US70414600	9/6/2022		\$ 280.00
1088 US70414600	9/6/2022		\$ 6,272.00
1089 US70414600	9/6/2022		\$ 249.55
1090 US70414600	9/6/2022		\$ 2,250.00
1091 US70414600	9/6/2022		\$ 3,075.88
1092 US70414600 1093 US70414600	9/6/2022	\$ 2,430.96 \$ 1,115.60	\$ 2,100.00 \$ 1,533.95
1093 US70414600	9/6/2022		
	9/6/2022		
1095 US70414600 1096 US70414600	9/6/2022 9/6/2022	\$ 1,461.04 \$ 1,991.68	\$ 2,922.00 \$ 329.36
1098 US70414600	10/31/2022	\$ 1,991.08 \$ 1,200.00	\$ 329.30 \$ 1,350.00
1097 0370413500 1098 US70413500	10/31/2022	\$ 1,200.00 \$ 7,287.60	\$ 7,287.60
1098 US70413500	10/31/2022	\$ 2,937.41	\$ 2,258.89
1100 US70413500	10/31/2022	\$ 2,937.41 \$ 3,318.89	\$ 2,238.89
1100 U\$70413500	10/31/2022	\$ 1,642.71	\$ 1,462.00
1101 US70413500	10/31/2022		\$ 2,578.50
1102 US70413500	10/31/2022	\$ 998.06	\$ 570.36
1103 037 0413300	10/31/2022	٥٥.00 ک	Y 570.50

Case 9:22-cv-81883-RAR Document 141-2 Entered on FLSD Docket 12/19/2023 Page 747 of 1026

	В	С		D	E
1104	US70413500	10/31/2022	\$	1,570.00	\$ 1,415.61
1105	US70413500	10/31/2022	\$	1,050.00	\$ 450.00
1106	US70413500	10/31/2022	\$	685.65	\$ 450.00
1107	US70413500	10/31/2022	\$	748.58	\$ 427.00
	US70413500	10/31/2022	\$	5,803.21	\$ 5,158.56
	US70413500	10/31/2022		1,190.24	\$ 893.95
	US70413500	10/31/2022		488.25	\$ 434.00
	US70413500	10/31/2022	\$	1,187.89	\$ 1,104.00
	US70413500	10/31/2022	\$	1,222.16	\$ 1,716.36
	US70414600	10/31/2022	\$	2,792.56	\$ 2,659.38
	US70414600	10/31/2022		1,837.70	\$ 1,286.39
	US70414600	10/31/2022		2,600.00	\$ 1,560.00
	US70414600	10/31/2022	\$	2,114.50	\$ 2,844.00
	US70414600	10/31/2022	\$	2,302.50	\$ 1,535.00
	US70414600	10/31/2022	\$	5,153.00	\$ 4,638.06
	US70414600	10/31/2022	\$	2,613.37	\$ 2,240.22
	US70414600	10/31/2022		3,800.22	\$ 3,378.24
	US70414600	10/31/2022	\$	3,207.60	\$ 4,276.60
	US70414600	10/31/2022		3,558.90	\$ 1,812.00
	US70414600	10/31/2022		10,256.00	\$ 3,745.28
	US70414600	10/31/2022		2,535.90	\$ 1,714.18
	US70414600	10/31/2022	\$	1,722.48	\$ 430.64
	US70414600	10/31/2022	\$	1,841.53	\$ 2,806.00
	US70414600	10/31/2022		1,200.00	\$ 1,050.00
	US70414600	10/31/2022		3,090.00	\$ 3,856.00
	US70414600	10/31/2022		1,771.25	\$ 1,645.00
	US70414600	10/31/2022	\$	3,211.19	\$ 3,375.00
_	US70414600	10/31/2022	\$	2,392.80	\$ 1,914.24
	US70414600	10/31/2022 1/9/2023		1,588.83	\$ 1,485.95
	US70413500			563.19	\$ 1,714.11
	US70413500	1/9/2023 1/9/2023		5,154.74	\$ 4,295.80
	US70413500			3,445.87	\$ 2,871.65
	US70413500 US70413500	1/9/2023 1/9/2023		2,644.35 1,066.59	\$ 622.20 \$ 617.11
	US70413500				
	US70413500	1/9/2023 1/9/2023		528.05 742.75	\$ 173.00 \$ 445.51
	US70413500	1/9/2023	-	742.73	\$ 600.00
	US70413500	1/9/2023			
	US70413500	1/9/2023		1,020.00 3,660.00	\$ 850.00 \$ 2,745.00
	US70413500	1/9/2023		765.95	\$ 2,745.00 \$ 919.14
	US70413500	1/9/2023		2,091.59	\$ 919.14 \$ 2,100.00
	US70413500	1/9/2023		2,091.59	\$ 2,100.00 \$ 160.00
	US70413500	1/9/2023		759.65	\$ 620.00
	US70413500	1/9/2023		2,187.75	\$ 540.00
	US70413500	1/9/2023		750.00	\$ 540.00 \$ 750.00
	US70413500	1/9/2023		750.00	\$
1149	03/0413300	1/9/2023	Ş	/50.00	ə 750.00

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	В	С		D	E
1150	US70413500	1/9/2023	\$	1,553.85	\$ 500.00
1151	US70413500	1/9/2023	\$	765.60	\$ 765.60
1152	US70413500	1/9/2023	\$	777.75	\$ 777.75
1153	US70413500	1/9/2023	\$	6,687.00	\$ 760.00
1154	US70413500	1/9/2023	\$	1,022.07	\$ 2,384.83
1155	US70413500	1/9/2023	\$	850.00	\$ 960.00
1156	US70413500	1/9/2023	\$	853.05	\$ 803.05
1157	US70413500	1/9/2023	\$	750.00	\$ 150.00
1158	US70413500	1/9/2023	\$	750.00	\$ 450.00
1159	US70413500	1/9/2023	\$	2,525.35	\$ 745.65
1160	US70413500	1/9/2023	\$	2,003.05	\$ 321.00
1161	US70413500	1/9/2023	\$	4,661.12	\$ 3,282.00
1162	US70413500	1/9/2023	\$	10,243.87	\$ 1,500.00
1163	US70413500	1/9/2023	\$	968.20	\$ 400.00
	US70413500	1/9/2023	\$	647.80	\$ 647.80
	US70413500	1/9/2023	\$	3,921.12	\$ 3,295.10
	US70413500	1/9/2023	\$	750.00	\$ 750.00
	US70413500	1/9/2023	\$	1,500.00	\$ 700.00
	US70413500	1/9/2023	\$	891.28	\$ 517.20
	US70413500	1/9/2023	\$	777.75	\$ 631.10
	US70413500	1/9/2023	\$	2,958.35	\$ 800.00
	US70413500	1/9/2023	\$	311.10	\$ 311.10
	US70414600	1/9/2023	\$	2,295.30	\$ 655.80
	US70414600	1/9/2023		4,824.99	\$ 1,473.90
	US70414600	1/9/2023		928.80	\$ 812.70
_	US70414600	1/9/2023	\$	3,392.69	\$ 3,392.69
_	US70414600	1/9/2023	\$	6,002.40	\$ 4,051.20
	US70414600	1/9/2023	\$	1,400.00	\$ 1,000.00
	US70414600	1/9/2023		1,278.41	\$ 1,095.78
	US70414600	1/9/2023		1,600.00	\$ 600.00
	US70414600	1/9/2023		6,289.50	\$ 5,391.00
	US70414600	1/9/2023		2,143.19	\$ 1,400.00
	US70414600	1/9/2023		1,359.05	\$ 581.60
	US70414600	1/9/2023	\$	5,147.06	\$ 5,147.10
	US70414600	1/9/2023	\$ ¢	4,053.04	\$ 3,546.41
-	US70414600	1/9/2023	\$ ¢	2,855.04	\$ 356.88
-	US70414600	1/9/2023	\$ ¢	5,342.33	\$ 1,526.19 \$ 2,160.00
	US70414600	1/9/2023	\$ \$	2,461.20	\$ 2,160.90 \$ 1,176.44
	US70414600	1/9/2023	\$ \$	2,352.88	
	US70414600	1/9/2023	\$ \$	1,874.60	\$ 1,339.00 \$ 400.00
	US70414600 US70414600	1/9/2023	\$ \$	700.00	\$ 400.00 \$ 2,774.45
	US70414600 US70414600	1/9/2023	\$ \$	3,170.80	\$ 2,774.45 \$ 1,024.32
	US70414600	1/9/2023	\$ \$	1,194.97	
	US70414600	1/9/2023	\$ \$	3,137.36	\$ 2,745.26 \$ 589.74
	US70414600	1/9/2023 1/9/2023	ې \$	1,572.56	\$ 589.74 \$ 2,748.97
1192	0370414000	1/9/2023	Ş	3,141.68	ې 2,748.97

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	В	С	D	E
1196	US70414600	1/9/2023	\$ 639.40	\$ 639.40
1197	US70414600	1/9/2023	\$ 1,560.00	\$ 1,560.00
1198	US70414600	1/9/2023	\$ 3,577.44	\$ 759.94
1199	US70414600	1/9/2023	\$ 5,257.36	\$ 3,288.68
1200	US70414600	1/9/2023	4,044.40	\$ 3,538.85
1201	US70414600	1/9/2023	1,497.16	\$ 1,283.28
1202	US70414600	1/9/2023	5,939.78	\$ 4,242.70
1203	US70413500	3/6/2023	\$ 1,200.00	\$ 750.00
1204	US70413500	3/6/2023	\$ 870.00	\$ 348.00
1205	US70413500	3/6/2023	1,229.44	\$ 922.08
1206	US70413500	3/6/2023	1,200.00	\$ 300.00
1207	US70413500	3/6/2023	2,973.14	\$ 749.72
1208	US70413500	3/6/2023	\$ 1,365.70	\$ 780.40
1209	US70413500	3/6/2023	\$ 1,445.14	\$ 1,180.00
	US70413500	3/6/2023	\$ 1,596.91	\$ 1,140.65
	US70413500	3/6/2023	4,483.50	\$ 3,202.50
	US70413500	3/6/2023	6,283.38	\$ 1,047.23
	US70413500	3/6/2023	\$ 6,620.00	\$ 602.38
	US70413500	3/6/2023	2,588.67	\$ 1,479.24
	US70413500	3/6/2023	\$ 6,289.50	\$ 3,594.00
-	US70413500	3/6/2023	2,174.40	\$ 936.00
	US70414600	3/6/2023	\$ 2,026.50	\$ 405.30
	US70414600	3/6/2023	\$ 1,515.36	\$ 1,262.80
	US70414600	3/6/2023	5,864.46	\$ 4,887.05
	US70414600	3/6/2023	1,864.38	\$ 1,242.92
	US70414600	3/6/2023	1,523.95	\$ 1,124.00
-	US70414600	3/6/2023	\$ 7,239.55	\$ 6,033.00
-	US70414600	3/6/2023	\$ 4,486.56	\$ 3,738.80
	US70414600	3/6/2023	3,724.80	\$ 1,120.80
	US70414600	3/6/2023	2,893.30	\$ 2,314.66
-	US70414600	3/6/2023	751.65	\$ 150.34
	US70414600	3/6/2023	1,819.60	\$ 1,455.68
	US70414600	3/6/2023	2,909.60	\$ 2,327.68
	US70413500	5/8/2023	1,269.75	\$ 253.96
-	US70413500	5/8/2023	2,342.50	\$ 937.00
	US70413500	5/8/2023	1,000.00	\$ 400.00
	US70413500	5/8/2023	1,269.75	\$ 250.00
	US70413500	5/8/2023	733.65	\$ 293.46
	US70413500	5/8/2023	507.92	\$ 507.92
	US70413500	5/8/2023	3,726.15	\$ 2,235.69
	US70413500	5/8/2023	3,100.70	\$ 620.14
	US70413500	5/8/2023	603.24	\$ 201.08
	US70414600	5/8/2023	2,568.86	\$ 736.98
	US70414600	5/8/2023	2,013.55	\$ 287.65
-	US70414600	5/8/2023	3,234.40	\$ 1,212.90 \$ 1,157.07
1241	US70414600	5/8/2023	\$ 3,085.52	\$ 1,157.07

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	В	С	D	E
1242	US70414600	5/8/2023	\$ 1,567.93	\$ 223.99
1243	US70414600	5/8/2023	\$ 1,630.00	\$ 204.00
1244	US70414600	5/8/2023	\$ 3,458.91	\$ 988.26
1245	US70414600	5/8/2023	\$ 1,359.54	\$ 582.66
1246	US70413500	7/10/2023	\$ 1,591.84	\$ 198.98
1247	US70413500	7/10/2023	\$ 3,993.36	\$ 500.00
1248	US70413500	7/10/2023	\$ 1,378.16	\$ 196.88
1249	US70413500	7/10/2023	\$ 2,627.84	\$ 328.48
1250	US70413500	7/10/2023	\$ 3,258.40	\$ 407.30
1251	US70413500	7/10/2023	\$ 1,200.00	\$ 150.00
1252	US70414600	7/10/2023	\$ 415.00	\$ 415.00

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EXHIBIT 39

12/8/2 **CaseP9**:22-cv-81883-RAR Document 141-&ssoEnteredeon FileDHD coolege 12/19/2023 Page 752 of 1026 The Wayback Machine - https://web.archive.org/web/20201126044213/https://www.hci.edu/programs/...

COVID-19 UPDATES

HCI College continues to monitor the situation Question? Chat with Us more



Desuretinformation	West Palm Beach (561) 586-0121
Request information	Ft. Lauderdale (954) 626-0255

Please select a campus

First Name

Last Name

Phone

Email

Zip Code

Could not connect to the reCAPTCHA service. Please check your internet connection and reload to get a reCAPTCHA challenge.

REQUEST INFORMATION

Clicking the button above constitutes your express written consent, MORE

Associate Degree in Nursing

Associate Degree in Nursing

The Associate Degree in Nursing program is a 72-credit hour course that can be completed in as little as 20 months. HCI College offers students the opportunity to complete a portion of the coursework online for the non-clinical portion of this degree program.

Is a Career in Nursing Right for You? Find Out!

Take the "HCI Healthcare Career Training Readiness Quiz"

Question? Chat with Us

The fun, online quiz takes 3 minutes to complete and you'll get a personalized report. Identify your strengths and social style plus the training and positions you're best suited for. **Get Your Healthcare Career Training Readiness Score Now** »

ASSOCIATE DEGREE IN NURSING DESCRIPTION

The Nursing program at HCI College is committed to providing training for students seeking an Associate of Science Degree (A.S.) in Nursing. This program is designed to provide educational and clinical experiences preparing students for employment positions as a Registered Nurse (RN) in hospitals or comparable facilities.

PROGRAM HIGHLIGHTS

- No Waiting List
- 20-Month Program
- Flexible Day & Evening Classes
- Tutoring Preparation for TEAS Exam
- Eligible to take NCLEX Exam

PROGRAM GOALS AND OBJECTIVES

12/8/2 Casep 9:22-cv-81883-RAR Document 141-Asso Eintering DHD coolege 12/19/2023 Page 754 of

- Utilize critical thinking, the nursing process, and evidence-based practice to deliver best practice for optimal patient outcomes.
- Provide quality, safe, evidence-based, patient-centered care through teamwork and with Us collaboration. Use knowledge, skills, and attitude/emotional intelligence to assure coordination and continuity of care for patients across the lifecycle in a variety of healthcare settings from preventive- to end-of-life care. Understand the application of quality data and metrics as an opportunity to benchmark care delivery.
- Integrate culturally competent decision making accomplished through communication, collaboration, and mutual respect for patients, significant others, and the interprofessional care management team.
- Incorporate legal and ethical guidelines into practice and promote lifelong learning and professionalism through consensus building and conflict resolution.
- Use technology to reduce error, remain current, educate patients and nurses, communicate essential information and document care.

This nursing degree program focuses on: wellness of self and others; technical nursing skills across the life span in acute care facilities, long-term care facilities and the community environment; critical care concepts; and professional development.

Upon graduation, the student is awarded an Associate in Science Degree (A.S.) and is eligible to take the National Council Licensing Exam (NCLEX) to become a Registered Nurse (RN).

If you are considering becoming a Registered Nurse (RN), **contact HCI College** admissions today to schedule a visit and find out how you can earn your Associate of Science Degree in Nursing.

AVAILABLE AT THE FOLLOWING LOCATIONS

1764 North Congress Ave.

1201 W. Cypress Creek Rd., Suite 101.

West Palm Beach, FL 33409

Ft. Lauderdale, FL 33309

Question? Chat with Us

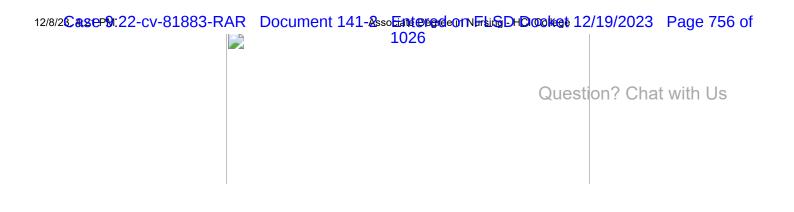


West Palm Beach (561) 586-0121

1764 North Congress Ave. West Palm Beach, FI 33409 (Corner of Congress Ave. and Westgate Ave.)

Ft. Lauderdale (954) 626-0255

1201 W. Cypress Creek Rd. Suite 101. Ft. Lauderdale, FL 33309



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PRIVACY POLICY

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EXHIBIT 40

Case 9:22-cv-81883-RAR Document 141-2 Entered on FLSD Docket 12/19/2023 Page 758 of 1026

ARLETTE PETERSSON ROBERSON vs HEALTH CAREER INSTITUTE

December 04, 2023

1

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF FLORIDA WEST PALM BEACH DIVISION CASE NO.: 9:22-CV-81883- RAR

BRITTANY ROBERSON, REBECCA FREEMAN, BIANCA VIÑAS, TIFFANY KING, and TRESHA THOMPSON, individually and on behalf of others similarly situated,

Plaintiffs,

-vs-

HEALTH CAREER INSTITUTE LLC (dba HCI COLLEGE LLC and HCI ACQUISITION LLC), FLORIAN EDUCATION INVESTORS LLC, and STEVEN W. HART,

Defendants.

DEPOSITION OF ARLETTE PETERSSON

Monday, December 4, 2023 10:03 - 7:03 p.m.

1601 Forum Place Suite 505 West Palm Beach, Florida 33401

Reported By: Wendy Beath Anderson, RDR, CRR, CRC Notary Public, State of Florida Esquire Deposition Services West Palm Beach Office Job #J10606808



Case 9:22-cv-81883-RAR Document 141-2 Entered on FLSD Docket 12/19/2023 Page 759 of 1026 ARLETTE PETERSSON December 04, 2023 **ROBERSON vs HEALTH CAREER INSTITUTE** 2 1 **APPEARANCES:** 2 On behalf of Plaintiffs: 3 JENNIFER THELUSMA, ESQUIRE REBECCA EISENBREY, ESQUIRE (VIA ZOOM) PROJECT OF PREDATORY STUDENT LENDING 4 769 Centre Street, Suite 166 5 Jamaica Plain, Massachusetts 02130 6 and 7 NICOLE MAYER, ESQUIRE MAYER LAW 8 171 Dommerich Drive Maitland, Florida 32751 9 On behalf of the Defendants: 10 MICHAEL J. CARNEY, ESQUIRE 11 KUBICKI DRAPER 12 110 East Broward Boulevard, Suite 1400 Fort Lauderdale, Florida 33301 13 On behalf of the Witness: 14 GREGORY S. WEISS, ESQUIRE 15 MRACHEK, FITZGERALD, ROSE, KONOPKA, THOMAS & WEISS, P.A. 16 505 South Flagler Drive, Suite 600 West Palm Beach, Florida 33401 17 18 PRESENT AT TIMES VIA ZOOM: 19 Steven Hart 20 Bob Harris 21 Lily Wong Pedro DeGuzman Barbara Fox 22 23 24 25 🖉 ESOI 800.211.DEPO (3376)

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ARLETTE PETERSSON ROBERSON vs HEALTH CAREER INSTITUTE

A. Since I stopped working there as -- since I
 became a consultant.

Q. What are some of the subject areas that, like, you might want to testify on? So when you say that it would depend on like subject areas, are you saying that there's a subject area that you want to have more coverage in or are there certain subject areas that you just prefer to have more faculty with background in? Can you tell me more about that?

A. Not necessarily. But let's say in an event where we would need a faculty member to teach, I'm trying to think of a specific area. The pharmaceutical part of nursing program, it would be beneficial to have somebody who has, you know, more knowledge in that area, or who have taught that class before, pharmacology, for example, before.

Q. About how many faculty would you say HCI maintains at any given time, nursing faculty, in the West Palm Beach campus?

A. I can't really speak to that now because I'm not involved in that daily -- again, the daily routine of HCI.

Q. And when you were involved, how many facultywould you say were at the West Palm Beach campus?

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A. Are we talking about full-time or part-time?



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	ARLETTE PETERSSON ROBERSON vs HEALTH CAREER INSTITUTE 60
1	Q. Let's do both.
2	A. Oh, well, part-time, I would say and again,
3	it varied. So I would say maybe ten to fifteen, maybe.
4	Full-time, I would say could be around five. It varied,
5	so, you know, I can't speak to it.
6	Q. And what about the Fort Lauderdale campus?
7	A. Part-time would probably be around the same,
8	ten to fifteen, and full-time, about maybe four; three,
9	four. Of course, that's when I was there. So I don't
10	know what it is now.
11	Q. What's the difference between a full-time and
12	part-time faculty?
13	A. Full-time faculty, they sign, you know,
14	paperwork that, you know, they're hired as a full-time
15	faculty, so they are responsible for a certain number of
16	hours of teaching and being there to advise the
17	students, have an active participation in faculty
18	meetings, graduation and so forth.
19	Q. About how often do faculty meetings take
20	place?
21	A. Again, I can't speak to that now, but when I
22	was there it was, I would say, at least once a month.
23	Q. What you said that they're responsible for
24	a certain number of hours teaching and advising. When
25	you were there, do you recall how many hours those would



Case 9	:22-cv-81883-RAR Document 141-2 Entered on FLSD Docket 12/19/2023 Page 762 of 1026
	ARLETTE PETERSSON December 04, 2023 ROBERSON vs HEALTH CAREER INSTITUTE 122
1	A. It's a few months ago. Maybe somewhere July.
2	Q. And I know that you mentioned earlier that
3	prior to implementing the change in curriculum, there
4	was a nursing or when I say change in curriculum, I'm
5	now talking about the 2021 change, percentage based. I
6	know you said you wouldn't characterize it as a
7	50 percent rule. Have you ever heard it called a
8	50 percent rule before?
9	A. I have.
10	Q. So when I say 50 percent rule when I'm
11	referencing for ease, you know what I'm talking about?
12	A. Yes.
13	Q. You mentioned there was a nursing curriculum
14	meeting. Do you recall who else was present at that
15	meeting?
16	A. I don't recall everyone that was present. I
17	know Pedro De Guzman was there. I just know the nursing
18	director and faculty were there, but I can't recall, you
19	know, who it was at the time.
20	Q. Do you recall how the idea like if there
21	was anyone in particular who floated the idea to move to
22	a 50 percent rule?
23	MR. CARNEY: Object to the form.
24	THE WITNESS: I would say when we talked
25	about when we had that meeting and we talked



Case 9	22-cv-81883-RAR Document 141-2 Entered on FLSD Docket 12/19/2023 Page 763 of 1026
	ARLETTE PETERSSON December 04, 2023 ROBERSON vs HEALTH CAREER INSTITUTE 123
1	not the curriculum meeting, the one that I said I
2	called.
3	BY MS. THELUSMA:
4	Q. Okay. The one you called was after the
5	meeting?
6	A. Yes, correct. I would say at that meeting, we
7	were trying, again, to see what would be a good
8	measurement and how we would ensure that the students
9	are mastering the content. I would say I was the one to
10	really initiate that we do that.
11	Q. Why did you think I guess like what was
12	your reasoning for wanting to initiate that?
13	A. So as I stated, when Alecia Dennis went back
14	and looked at what was you know, try to figure out
15	why it is the students aren't performing well in
16	Capstone when they should have mastered all this
17	information throughout the other semesters, when we went
18	back and looked at each semester and, again, it was a
19	sample when we went back and we looked, it was so
20	we noticed that the students weren't mastering certain
21	areas and that's what they carry through with them.
22	So the question was, how can we make sure that
23	the students are mastering each content area. And I
24	think it was Alecia who went and looked up what the
25	national average was for each of those particular



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ARLETTE PETERSSON ROBERSON vs HEALTH CAREER INSTITUTE

1 components and from that we gauged that maybe at around 2 50 percent or whatever it was that the national average 3 was, we would use that as our measurement.

4 0. Ouestion. For -- I quess we're looking at the national average for each of those components and seeing that HCI students were performing below the national 7 average, I assume?

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Α. For each of those components.

Ο. How were we tracking how they were performing before this rule was implemented in each component? Like how do we know?

So the levels that you were asking about, the Α. Level 1, Level 2, Level 3, there was a required level that the student must achieve prior to this going into effect before they can move on to the next semester.

> 0. Okay.

What was happening is, let's say a student 17 Α. 18 achieved a Level 2, which was what they were supposed to 19 achieve, certain aspects of that -- certain areas they 20 were doing really well in and certain ones they were not and that boosted them to that particular Level 2 overall 21 22 and we needed to go in and dig in to see okay, even 23 though it says it's a Level 2, that they're obtaining a 24 Level 2, why are they still moving forward like this, 25 you know, and not passing.



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ARLETTE PETERSSON ROBERSON vs HEALTH CAREER INSTITUTE

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1	catalog. It contains the enrollment agreement and the
2	application. And basically it's a training to go over
3	all of that with the admission staff so they understand
4	exactly, you know, what needs how these documents
5	work and what needs to be completed.
6	There's also an ACCSC component with certain
7	disclosures that we are required to have our admission
8	staff review and be trained on. That's the gist of it.
9	Q. And so every year each admission staff goes
10	through this training even if they already participated?
11	A. Yes.
12	Q. Okay. Do you know who Tammy Montero is?
13	A. Yes.
14	Q. Who is she?
15	A. She previously served as the director of
16	nursing at the Fort Lauderdale campus.
17	Q. What happened to her?
18	A. What happened to her?
19	Q. You said she previously served.
20	A. She resigned.
21	Q. Do you know why she resigned?
22	A. I do not know the exact reason why she
23	resigned, no.
24	Q. Do you have any idea?
25	A. I do not.



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1	program to be successful in achieving the required	
2	metrics of its oversight bodies and to operate	
3	profitability with single digit revenue growth."	
4	Do you have any information as to why there	
5	would be any planned decline in population as opposed to	
6	another measure?	
7	A. I'm sorry, where is this again?	
8	Q. So this is at the last paragraph of the first	
9	page. Sorry.	
10	A. Following that statement there seems to be	
11	discussion on admissions short staffing shortfalls,	
12	Covid issues, employee turnovers. There were some	
13	students who were withdrawing from the school at a	
14	certain period of time, as we discussed earlier, but I	
15	don't I'm not a part of these meetings. I don't	
16	provide information to it. So I don't really know to	
17	the extent what was meant by "planned decline."	
18	MS. THELUSMA: Okay. Nicole, did you have any	
19	other questions?	
20	MS. MAYER: Exhibit H, is that the one I gave	
21	you?	
22	MS. THELUSMA: Which one is Exhibit H?	
23	BY MS. THELUSMA:	
24	Q. Sorry, one more question about Petersson	
25	Investments.	



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	ARLETTE PETERSSON ROBERSON vs HEALTH CAREER INSTITUTE 237
1	CERTIFICATE OF OATH
2	STATE OF FLORIDA
3	COUNTY OF PALM BEACH
4	
5	I, the undersigned authority, certify that ARLETTE
6	PETERSSON personally appeared before me and was duly
7	sworn on the 4th day of December, 2023.
8	
9	Witness my hand and official seal this 12th day of
10	December, 2023.
11	
12	1 Juni. Nicka
13 14	There Willing
15	
16	Wendy Beath Anderson, RDR, CRR, CRC Notary Public State of Florida
17	My Commission Expires: 9/23/2025 My Commission No.: HH 178324
18	Job #J10606808
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ARLETTE PETERSSON **ROBERSON vs HEALTH CAREER INSTITUTE**

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1	CERTIFICATE OF REPORTER
2	STATE OF FLORIDA
3	COUNTY OF PALM BEACH
4	
5	I, Wendy Beath Anderson, Certified Realtime
6	Reporter and Notary Public in and for the State of Florida at Large, do hereby certify that I was
7	authorized to and did stenographically report said deposition of ARLETTE PETERSSON; that a review of the
8	transcript was requested; and that the foregoing transcript is a true record of my stenographic notes.
9	I FURTHER CERTIFY that I am not a relative,
10	employee, or attorney, or counsel of any of the parties, nor am I a relative or employee of any of the parties'
11	attorney or counsel connected with the action, nor am I financially interested in the action.
12	The foregoing certification of this transcript
13	does not apply to any reproduction of the same by any means unless under the direct control and/or direction
14	of the certifying reporter.
15	it is a second second
16	Dated this 12th day of Dicember 2023.
17	and Walk
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19	Wendy Beath Anderson, RDR, CRR, CRC
20	Job #J10606808
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EXHIBIT 41

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UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF FLORIDA West Palm Beach Division

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Brittany Roberson Brittany Roberson (Dec 19, 2023 12:07 EST)

E d Dec 19, 2023

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EXHIBIT 42

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UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF FLORIDA West Palm Beach Division

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Bianca Vinas (Dec 18, 2023 21:20 EST)

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UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF FLORIDA West Palm Beach Division

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E d Dec 19, 2023 Tiffany King (Dec 19, 2023 09:51 EST)

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UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF FLORIDA West Palm Beach Division

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Tresha Thompson (Dec 19, 2023 14:04 EST)

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EXHIBIT 46

FW: Affiliation Agreement with HCI

Gonzalez, Ahuby Wed 10/10/2018 1:06 PM To:Major, Kerry Hi Kerry: Please see the email below. We have created an affiliation agreement for the EMT program, but will not be creating an agreement for the nursing program because it is not regionally accredited. If you have any questions, please do not hesitate to contact me. Take care, Ahuby M. González, MSN, RN, CNE, CHES **Director, Staff Development & Clinical Informatics Cleveland Clinic** . Florida 3100 Weston Road Weston, FL 33331 "Individual commitment to a group effort--that is what makes a team work, a company work, a society work, a civilization work." -- Vince Lombardi The information in this communication is confidential and is directed only to the intended recipient. Please do not forward this communication without my permission. If you have

The information in this communication is confidential and is directed only to the intended recipient. Please do not forward this communication without my permission. If you have received this communication in error, please notify me immediately and delete/destroy this communication.

From: Anderson, Jillian Sent: Friday, September 28, <u>2018 8:03 AM</u>

To: Gonzalez-Kanfer, Marta

Subject: Affiliation Agreement with HCI

Good morning Marta,

The Health Career Institute wants Dr. Roach to be their new medical director and allow their students to rotate in the ED as Paramedics, EMT, Nurses, ETC. Dr. Roach has already approached Ozzie and Dr. Blandon for the ok to do this. However we do not have affiliation agreement in place as of yet. Is this something you would like to take over as I know that area is more in your wheelhouse than mine. If not just let me know and I will move forward with getting an agreement together.

Thanks,

Jill



Jill Anderson | Administrative Program Coordinator | Education Center Cleveland Clinic Florida | 2950 Cleveland Clinic Blvd. | Weston, FL 33331

Possible Affiliation Agreement

Gonzalez, Ahuby

Sun 4/21/2019 3:26 PM

To:Greene@hci.edu <Greene@hci.edu> Cc:Gonzalez-Kanfer,

🚺 1 attachments (223 KB)

Affliation Agreement Fort Lauderdale.pdf;

Hello Ms. Green:

Per Cleveland Clinic Nursing Institute policy, affiliation agreements may be created with schools accredited by one of the following United

States regional accrediting organizations:

- Middle States Association of Colleges and Schools
- New England Association of Schools and Colleges
- North Central Association of Colleges and Schools
- Northwest Commission on Colleges and Universities
- Southern Association of Colleges and Schools
- Western Association of Schools and Colleges

If the Nursing program at Health Career Institute – Fort Lauderdale currently holds one of the aforementioned accreditations, please let me know and I'll be happy to set-up a meeting to discuss the opportunity for an affiliation.

Thank you for your interest in Cleveland Clinic.

Take care, Ahuby M. González, MSN, RN, CNE, CHES Dir., Staff Development & Clinical Informatics Cleveland Clinic Florida 3100 Weston Road Weston, FL 33331

"Individual commitment to a group effort--that is what makes a team work, a company work, a society work, a civilization work." --Vince Lombardi

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EXHIBIT 47

From: K Moore <kmmwpb@gmail.com> To: Jessica Dermody <JDermody@acenursing.org> Subject: Re: Accreditation of my school Date: Mon, 27 Jun 2016 20:42:20 -0400 Importance: Normal Inline-Images: image001.jpg; image002.jpg

Thank you very much for this information. Wish I had known sooner!

Best,

Keisha Mootr

On Fri, Jun 24, 2016 at 10:48 AM, Jessica Dermody <<u>JDermody@acenursing.org</u>> wrote:

Good morning Ms. Moore,

I am sorry you not been given correct information from the program, but Health Career Institute is not currently an ACEN candidate. Furthermore, before a program begins the candidacy process, they must be reviewed and approved as eligible for ACEN accreditation. So, it's possible confusion has occurred due the use of these terms and understanding the initial steps in the accreditation process. The ACEN website lists programs currently in candidacy and is updated once a program has been officially approved as a candidate, not just as eligible for ACEN accreditation.

It may be helpful for you to review information on the ACEN website regarding candidacy at <u>http://www.acenursing.org/about-candidacy/</u> and the list of programs that are currently ACEN candidates may be found at <u>http://www.acenursing.us/candidates/candidacy.asp</u>.

In order for an individual to be considered a graduate of an ACEN-accredited nursing program, the nursing program must have been accredited at the time of graduation. Accreditation is not retroactive. If the nursing program a student graduated from was not accredited by our agency at the time of the student's graduation, they have not graduated from an ACEN-accredited program. As I stated previously, since candidacy is not an accreditation status, a student graduating from a program in candidacy status also does not mean the student has graduated from an ACEN accredited program.

Please let me know if you have more questions.

Best regards,

Jessica Dermody

Operations Assistant

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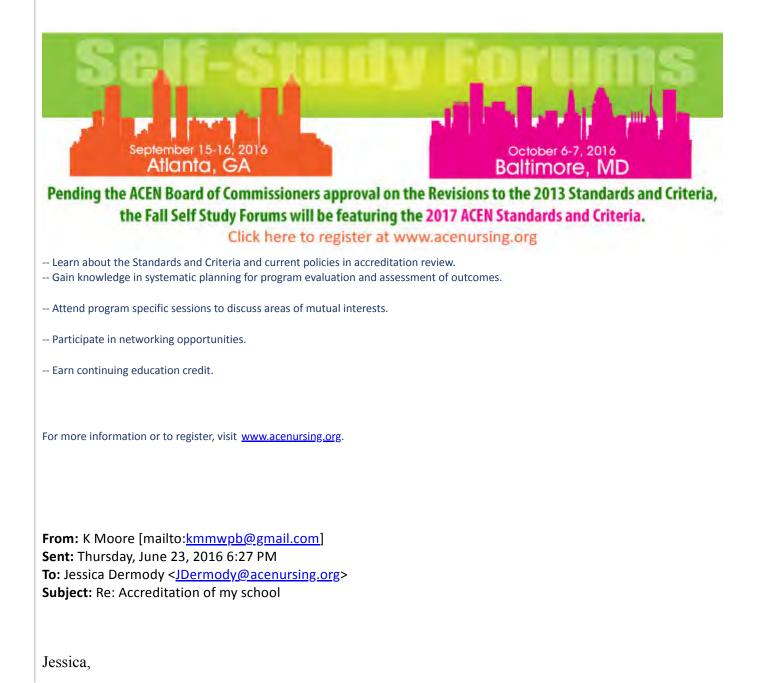


Accreditation Commission for Education in Nursing, Inc.

3343 Peachtree Road NE, Suite 850 | Atlanta, Georgia 30326

- P. (404) 975-5000 | F. (404) 975-5020
- E. jdermody@acenursing.org

www.acenursing.org



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Thank you so much. The head of HCI told me that as of February, they ARE candidates. I am having some trouble since I am hearing one thing from them telling me and other students they are fully accredited and then I hear this from you and find out I can't be considered to consider my Nursing education at other public schools.

If they receive their ACEN accredation, does that mean it would be back logged for students who graduated before they applied for ACEN candidacy or not?

Any help is really appreciated as I am trying to understand all of this.

All the best,

Keisha Moore

On Thu, Jun 23, 2016 at 3:57 PM, Jessica Dermody <<u>JDermody@acenursing.org</u>> wrote:

Good afternoon Ms. Moore,

Thank you for contacting the Accreditation Commission for Education in Nursing (ACEN).

In regards to your inquiry, Health Career Institute is not currently an ACEN candidate.

Candidacy is the first step toward ACEN Accreditation. A nursing education unit seeking initial accreditation must apply for candidacy. A program that has achieved candidate status must complete the accreditation process within two years. If the program does not complete the process in two years, the program must reapply for candidacy. ACEN candidate status is not an accreditation status and does not guarantee initial accreditation. The timelines for achieving initial accreditation is specific to each program and these timelines are determined by the program. The nursing program should be contacted directly regarding their timelines for seeking initial accreditation.

For more information on Candidacy, please refer to the ACEN Accreditation Manual available for download at <u>www.acenursing.org</u>. Our website also lists programs that are currently ACEN candidates.

Accreditation is a voluntary peer review process. Not all nursing programs are accredited. The ACEN provides specialized accreditation for programs of nursing education, both postsecondary and higher degree, which offer either a certificate, a diploma, or a recognized professional degree (clinical doctorate, master's, baccalaureate, associate, diploma, and practical). We do not accredit the governing organization (schools/institutions), we accredit the nursing program. Program accreditation and institutional accreditation are two separate and different accreditations.

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Some employers do require applicants to have graduated from an accredited nursing program as part of their hiring practices. The Veterans Administration requires applicants to be graduates of an accredited nursing program. If you plan to continue your education, you will find that some nursing programs may require that you have graduated from an accredited nursing program as part of their admissions policies. These policies are specific to the employers, agencies, and nursing programs.

I hope this information has been helpful. Please let me know if I may be of further assistance.

Best regards,

Jessica Dermody

Operations Assistant



Accreditation Commission for Education in Nursing, Inc.

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- P. (404) 975-5000 | F. (404) 975-5020
- E. jdermody@acenursing.org

www.acenursing.org



Pending the ACEN Board of Commissioners approval on the Revisions to the 2013 Standards and Criteria, the Fall Self Study Forums will be featuring the 2017 ACEN Standards and Criteria.

Click here to register at www.acenursing.org

-- Learn about the Standards and Criteria and current policies in accreditation review.

-- Gain knowledge in systematic planning for program evaluation and assessment of outcomes.

-- Attend program specific sessions to discuss areas of mutual interests.

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-- Participate in networking opportunities.

-- Earn continuing education credit.

For more information or to register, visit <u>www.acenursing.org</u>.

From: K Moore [mailto:kmmwpb@gmail.com] Sent: Friday, June 17, 2016 9:02 AM To: Matthew Middlebrooks <<u>MMiddlebrooks@acenursing.org</u>> Subject: Accreditation of my school

Hello,

I am trying to get more information on the ACEN candidacy of the school I graduated from. It's HCI (Health Career Institute).

They tell the students they are accredited but leave out the fact that they are not ACEN accredited (yet).

I tried applying to 2 other programs for my BSN and they won't take my credits.

Can anyone tell me more about this?

Thank you!

Keisha Moore

561-319-0146

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EXHIBIT 48

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From: "Jessica Gibson" <JGibson@acenursing.org>

To: "Nell Ard" <NArd@acenursing.org>

Subject: RE: HCI College (Florida)

Date: Mon, 16 Nov 2020 16:04:04 -0000

Importance: Normal

Inline-Images: image001.png; image002.jpg; image003.jpg; image004.jpg; image005.jpg; image015.jpg; image016.jpg; image017.jpg; image018.jpg; image019.jpg; image006.jpg; image007.jpg

Ok, got it!

Jessica Gibson Executive Assistant to the CEO Accreditation Commission for Education in Nursing, Inc. 3343 Peachtree Road NE, Suite 850 | Atlanta, Georgia 30326 P. (404) 975-5000 | F. (404) 975-5020 E. jgibson@acenursing.org | www.acenursing.org



the leading authority for nursing education accreditation



From: Nell Ard <NArd@acenursing.org> Sent: Monday, November 16, 2020 11:01 AM To: Jessica Gibson <JGibson@acenursing.org> Subject: RE: HCI College (Florida)

Welcome! If they do not remove it then, we may have to get Pat involved – but hopefully not... time will tell.

From: Jessica Gibson <<u>JGibson@acenursing.org</u>> Sent: Monday, November 16, 2020 11:00 AM To: Nell Ard <<u>NArd@acenursing.org</u>> Subject: RE: HCI College (Florida) Ok, thank you for the update!

Jessica

Jessica Gibson **Executive Assistant to the CEO** Accreditation Commission for Education in Nursing, Inc. 3343 Peachtree Road NE, Suite 850 | Atlanta, Georgia 30326 P. (404) 975-5000 | F. (404) 975-5020 E. jgibson@acenursing.org | www.acenursing.org



the leading authority for nursing education accreditation



From: Nell Ard <<u>NArd@acenursing.org</u>> Sent: Monday, November 16, 2020 10:55 AM To: Jessica Gibson < JGibson@acenursing.org> Subject: RE: HCI College (Florida)

Just to keep you updated. Neither the NA for the associate or baccalaureate nursing programs are still there. I have called and spoken to the VP of Administration. She is supposed to be taking the messaging down and will send me verification of it by close of business today. If not, I will let you know.

Have a good day! Nell

From: Jessica Gibson <<u>JGibson@acenursing.org</u>> Sent: Friday, November 13, 2020 4:05 PM To: Nell Ard <<u>NArd@acenursing.org</u>> Subject: RE: HCI College (Florida)

Hi Dr. Ard,

I can contact the program, but wanted to check with you first to see if that was ok to do or if you prefer to reach out to them.

Jessica

Jessica Gibson Executive Assistant to the CEO Accreditation Commission for Education in Nursing, Inc. 3343 Peachtree Road NE, Suite 850 | Atlanta, Georgia 30326 P. (404) 975-5000 | F. (404) 975-5020 E. jgibson@acenursing.org | www.acenursing.org



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From: Christine Favole <<u>CFavole@acenursing.org</u>>
Sent: Friday, November 13, 2020 1:50 PM
To: Nell Ard <<u>NArd@acenursing.org</u>>; Matt Middlebrooks <<u>MMiddlebrooks@acenursing.org</u>>
Cc: Jessica Gibson <<u>JGibson@acenursing.org</u>>
Subject: FW: HCl College (Florida)

Good afternoon,

I just spoke with a prospective student of HCI College (Ft. Lauderdale FL). She related to me that she spoke with a rep at the college who told her that the associate nursing program is in Candidacy with us and is just awaiting a site visit to become accredited; she also pointed out that the website says they are in Candidacy with us: <u>https://www.hci.edu/about/accreditation-scns</u>

I checked Salesforce and with Matt and as far as we can tell, this program is only eligible at the moment. I think someone at the college is confused, and the students are being given the wrong information. Can someone please contact the program and ask that the website be updated, and maybe clarify where they are in the process...?

Thank you!!

Christine Favole Process Lead Case 9:22-cv-81883-RAR Document 141-2 Entered on FLSD Docket 12/19/2023 Page 814 of

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- P. (404) 975-5000 | F. (404) 975-5020
- E. <u>cfavole@acenursing.org</u>
- www.acenursing.org



From: Brianna Jones <jonebd1@mail.broward.edu>
Sent: Friday, November 13, 2020 12:59 PM
To: Christine Favole <<u>CFavole@acenursing.org</u>>
Subject: Re: ACEN Accreditation Verification

Good Morning can I get a phone call to disguise my concerns 6789342277. i left two voice messages and haven't got a response. On the HCI website is states, "This nursing education program is a Candidate for accreditation by the Accreditation Commission for Education in Nursing", but I don't see it on the candidacy list on the ACEN website. Please give me a call.

From: Christine Favole <<u>CFavole@acenursing.org</u>>
Sent: Thursday, November 12, 2020 10:35 AM
To: Brianna Jones <jonebd1@mail.broward.edu
Subject: ACEN Accreditation Verification</pre>

CAUTION: This email originated from outside of Broward College. DO NOT click links or open attachments unless are expecting the information and you recognize the sender.

Good morning Ms. Jones,

Thank you for contacting the Accreditation Commission for Education in Nursing (ACEN) regarding verification of programmatic accreditation.

Our system does not show an accreditation record for an associate nursing program at HCI College (Health Care Institute) in Coconut Creek, Florida, in 2020; the associate program at HCI – Coconut Creek was not accredited by our agency in April 2020.

I hope this information can be helpful. Please let me know if you have any questions or require further assistance.

Best regards,

Christine Favole Process Lead

Accreditation Commission for Education in Nursing, Inc.

- 3343 Peachtree Road NE, Suite 850 | Atlanta, Georgia 30326
- P. (404) 975-5000 | F. (404) 975-5020
- E. <u>cfavole@acenursing.org</u> | <u>www.acenursing.org</u>

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EXHIBIT 49



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BARRY GOLDSTEIN, PHD Consultant Roswell, Georgia

ROBERT A. SINTICH, EDD Hancock, New York October 21, 2022

David Shelpman Campus President HCI College – West Palm Beach

Catrina Leandre, MSN, RN Director of Nursing HCI College – West Palm Beach 1764 North Congress Avenue West Palm Beach, FL 33409

Dear Mr. Shelpman and Ms. Leandre:

The Accreditation Commission for Education in Nursing (ACEN) has been notified that HCI College is erroneously indicating that the associate nursing program at HCI College – West Palm Beach is eligible for ACEN accreditation. This information is posted on the HCI College website here.

As you are aware, the program was deemed eligible to pursue the candidacy process on September 23, 2021. The program had until September 23, 2022 to submit a Candidacy presentation as the next step in the process to potentially achieve a Candidate status. The program did not submit a candidacy presentation by that date; therefore, the eligibility to pursue the candidacy process has expired. The associate nursing program can elect to restart the process beginning with submitting a new Candidacy Eligibility Application.

In the interim, HCI College must immediately remove the information from its website regarding eligibility to participate in the ACEN Candidacy process. Upon removal of the information from the website, please provide the ACEN evidence demonstrating that the site no longer has information about eligibility to participate in the ACEN Candidacy process by 5pm EDT on October 24, 2022.

Please contact me if you have any questions.

Sincerely,

Mosal Rshel

Marsal P. Stoll, EdD, MSN Chief Executive Officer

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EXHIBIT 50



Accreditation Commission for Education in Nursing

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JOY COLE, PhD, RN, SFHEA Associate Professor of Nursing Utah Valley University Orem, Utah

CLAUDIA ESTRADA-HICKMAN, MSN, RN, CNE Nursing Faculty Pueblo Community College Pueblo. Colorado

DIANE EVANS-PRIOR, DNP, RN Dean, School of Nursing and Patient Support Central New Mexico Community College Albuquerque, New Mexico

SHARI GHOLSON, DNP, RN, CNE Dean of Nursing and Allied Health Division West Kentucky Community & Technical College Paducah, Kentucky

AMY M. HALL, PHD, RN, CNE Dean, School of Nursing Franciscan Missionaries of Our Lady University Baton Rouge, Louisiana

MONICA KIDDER, DNP, MEDSURG-BC, NPD-BC, CNE Curriculum Coordinator, Covenant School of Nursing Covenant Medical Center Lubbock. Texas

SHERRI LINDSEY, DNP, MSNED, RN Program Director, Practical Nursing/ Interim Nursing Department Chair College of Southern Nevada Las Vegas, Nevada

CHERYL OSLER, EoD, MS, MA, MSL, RN, CNE Associate Dean of Nursing Spokane Community College Spokane, Washington

CHERYL SHAFFER, PhD, RN, PNP, ANP Associate Dean, School of Nursing Suffolk County Community College Sayville, New York

NURSING SERVICE REPRESENTATIVES

CAROLYN JO McCORMIES, MS, RN, APRN, FNP-BC Family Nurse Practitioner - Family Practice Primary Care Clinic San Carlos Apache Healthcare Corporation Peridot, Arizona

DEMICA WILLIAMS, DNP, RN, CNE Director of Allied Health and Nursing Piedmont of Augusta Augusta, Georgia

LISA YOUNG, DNP, APRN, FNP-BC Nurse Practitioner A Better Weigh, Inc. Schererville, Indiana

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STEVE ECKMAN, DMIN Chancellor York College York, Nebraska

BARRY GOLDSTEIN, PHD Consultant Roswell, Georgia

ROBERT A. SINTICH, EDD Hancock, New York November 10, 2022

David Shelpman, MHRM Campus President HCI College – West Palm Beach

Arlette Petersson, EdD Accreditation Advisor HCI College – West Palm Beach

Catrina Leandre, MSN, RN Director of Nursing HCI College – West Palm Beach 1764 North Congress Avenue West Palm Beach, FL 33409

Dear Mr. Shelpman, Dr. Petersson, and Ms. Leandre:

Thank you for your recent correspondence to the Accreditation Commission for Education in Nursing (ACEN). Your correspondence confirmed the information related to the associate nursing program's eligibility status with ACEN was removed from the HCI College – West Palm Beach website as requested in a letter from ACEN dated October 21, 2022 to HCI College – West Palm Beach. Thank you for ensuring this information was removed from the HCI College – West Palm Beach website. Your attention to this matter is greatly appreciated.

Please contact me if we can be of assistance at any time.

Sincerely,

Mosal Rshel

Marsal P. Stoll, EdD, MSN Chief Executive Officer

EXHIBIT 51 (filed under seal)

EXHIBIT 52 (filed under seal)

EXHIBIT 53 (filed under seal)

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EXHIBIT 54

Case 9:22-cv-81883-RAR Document 141-2 Entered on FLSD Docket 12/19/2023 Page 824 of 1026 1764 N Congress Ave Suite 203



1764 N. Congress Ave. Suite 203 West Palm Beach, FL 33409 Office: 561 586-0121 Fax: 561 471-4010 www.hci.edu

Student Enrollment Agreement

ASSOCIATE OF SCIENCE DEGREE IN NURSING

This Student Enrollment Agreement (Enrollment Agreement) and Program Application (Application) contained in this packet constitutes a binding contract between the Student and HCI College upon completion and acceptance.

READ THIS AGREEMENT CAREFULLY AS THIS IS A LEGAL AND BINDING CONTRACT

Last Name:	First Name:	
Address:	CITY/STATE	ZIP/POSTAL CODE
Telephone:	Email:	
Social Security Number:	DOB:	
(Emergency Contact):		

PROGRAM DESCRIPTION:

The Associate of Science Degree in Nursing Program (ASN Program) is designed to provide educational and clinical experiences leading to employment in entry-level positions as registered nurses in hospitals or comparable facilities.

The ASN Program focuses on technical nursing skills across patients' life span in short and long-term care facilities and in the community environment. The program covers critical care concepts, professional development and wellness of self and others.

Upon satisfactorily completion of the requirements for graduation and NCLEX preparation assessments (including VATI), the student is awarded an ASN Degree and must pass the National Council Licensure Exam (NCLEX-RN) to become a registered nurse.

All shadowed areas need to be filled inor circled.	Approximate Length of Program including Gen Eds: 75 Weeks (20 months)
Start Date: / /	Anticipated End Date: / /
Schedule for the Nursing Core Courses are liste	d below. Please check the days you could attend:
Lecture/Lab Day:MondayTuesday	_WednesdayThursdayFriday Saturday
(AM orPM) Class Time	To(Specify)

PROGRAM SCHEDULE:

Clinical Rotations: Includes a combination of medical facility, simulation lab and other field experience. The Student will receive further details of this schedule at the mandatory orientation which occurs approximately one week before classes begin.

Most Clinical Sites are within 50 miles of the College; however, site(s) can be located up to 100 miles from the College. The Nursing Program will continually strive to provide students with clinical experiences that meet their academic and scheduling needs, but students must be flexible and take these experiences as they become available.



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72 semester credits: approximately 1,485 clock hours, 5 semesters, 20 months

This program is approved by the Florida Board of Nursing (<u>https://floridasnursing.gov/</u>). HCI College is accredited by the Accrediting Commission of Career Schools and Colleges, 2101 Wilson Boulevard, Suite 302, Arlington, Virginia 22201. (703) 247-4212 (<u>www.accsc.org</u>).

Associate of Science Degree in Nursing Program Length

NUR Classes (Core) \$730.00 per credit hour:	42 Credits
Medical Pre-requisite Courses (MPC) \$645 per credit hour:	18 Credits
General Education Pre-Requisite Courses \$645 per credit hour:	12 Credits

Tuition and Applicatio	on Fee
Tuition	\$50,010
Application Fee	\$50
Total Program Cost	\$50,060

Tuition and Fees Breakdown Per Semester:

Semester	Course Number	Course Name	Credits	Tuition
	BSC2085C	Human Anatomy & Physiology I (MPC)	4	\$2,580
Semester	ENC1101	English Composition I	3	\$1,935
	MGF1106	Liberal Arts Mathematics	3	\$1 <i>,</i> 935
1	PSY2012	General Psychology	3	\$1 <i>,</i> 935
		Total for Semester One		\$8,385
	MCB2010C	Microbiology (MPC)	4	\$2 <i>,</i> 580
^	HUN1201	Elements of Nutrition (MPC)	3	\$1,935
Semester	BSC2086	Human Anatomy & Physiology II (MPC)	4	\$2 <i>,</i> 580
2	DEP2004	Human Growth & Development (MPC)	3	\$1,935
2	SPC2608	Speech	3	\$1,935
		Total for Semester Two		\$10,965
	NUR1023	Nursing I, Lecture	5	\$3,650
Semester	NUR1022L	Nursing I, Lab	2	\$1,460
Semester	NUR1023L	Nursing I, Clinical	3	\$2,190
3	NUR2140	Introduction to Pharmacology for Nursing	3	\$2,190
		Total for Semester Three		\$9,490
	NUR1213	Nursing II, Lecture	7	\$5,110
Semester	NUR1213L	Nursing II, Clinical	3	\$2,190
Semester	NUR2520	Psychiatric Nursing, Lecture	3	\$2,190
4	NUR2520L	Psychiatric Nursing, Clinical	1	\$730
		Total for Semester Four		\$10,220
	NUR2261	Nursing III, Lecture	5	\$3,650
Semester	NUR2261L	Nursing III, Clinical	4	\$2,920
	NUR2943L	Nursing Capstone	6	\$4,380
5		Total for Semester Five		\$10,950
		TOTAL	72	\$50,010



In order to begin the admissions process for the Associate of Science Degree in Nursing, an applicant must:

- Complete and sign an application including payment of the application fee
- Pass a criminal background check (within the past 12 months)¹
- Pass and have a current (within the past six months) 10 panel drug screen¹
- Be 18 years of age prior to the start of classes
- Provide a valid Driver's License or government issued photo ID
- Provide proof of High School graduation (Diploma) or successful completion of the General Education Development test (GED), or recognized equivalents of a high school diploma, or provide verification of graduation of an Associate degree or higher from an accredited college or university. Acceptance of any of the documents listed above is at the sole discretion of the College.
- Meet HCI College's technical requirements
- Pass the Smarter Measure Learning Readiness Indicator with a minimum score of 70% in technical competency, 70% in Life Factors, and 60% in Technical Knowledge.
- Pass the Test of Essential Academic Skills (TEAS) with a minimum composite score of 55 (please see the TEAS policy for further information). Applicants must earn a minimum score of 80 on the HESI A2 Exam. The results of the HESI A2 will be accepted for up to one year after the test date of the exam.

¹Certain findings on background checks or drug screen can hinder or prevent a student from clinical/ride placement or pursuing licensure in most program fields offered by HCI College.

METHOD OF PAYMENT:

- Option 1: Payment may be made by credit card or debit card.
- HCI College accepts VISA, MasterCard, Discover and American Express.
- Option 2: Payment may be made by check or money order. No cash is accepted.
 - There is a \$36 fee for checks returned for any reason.
- Option 3: HCI College participates in Florida Prepaid College Fund (www.myfloridaprepaid.com), Bright Futures (http://www.floridastudentfinancialaid.org/ssfad/bf/) and is approved for participation in various funding programs offered through the Veterans' Administration (http://www.benefits.va.gov/gibill/). Note: Program benefits may vary depending on individual eligibility.
- Option 4: Financial Aid available to those who qualify.

The Application Form in this packet plus the Application Fee must be submitted prior to submitting the Enrollment Agreement. All required documents must be submitted before attending class. Tuition and related fees are due in full according to your payment schedule agreed upon at the time of registration and acceptance of the Enrollment Agreement.

ANNUAL PERCENTAGE RATE	FINANCE CHARGE	AMOUNT FINANCED The dollar amount of the credit provided to you or on your behalf.	TOTAL OF PAYMENT The amount you will have paid after you have made all payments as scheduled.	TOTAL SALE PRICE The total cost of your purchase on credit including your down payment
N/A	\$ N/A	\$ N/A	\$ N/A	\$ N/A
	YOUR PAYMENT SCHEDULE WILL BE:			
NUMBER OF PAYMENTS	*AMOUNT OF EACH PAYMENT	WHEN PAYMENTS ARE DUE		
N/A	N/A			the same day each

*Minimum monthly payment exceptions are made if student is fully funded by a third-party agency.

REFUND POLICIES

Refunds for Courses Cancelled

All monies will be refunded within 30 days of the schedule start date if HCI College cancels any class.

HCI College Enrollment Agreement – Nursing (ASN) Program - WPB rev 01/27/2020 Page 3 of 6



Cancellation/Withdrawal Refund Policy

HCI College offers a refund to students who withdraw from the program or to the sources from which the student's prepaid fees came, according to the schedule outlined below. This refund is based on tuition. Any student wishing to cancel and enrollment or withdraw should complete and sign a Cancellation/Withdrawal Form. The Withdrawal Form and procedure may be obtained at HCI College's registration desk in Suite 101 at the West Palm Beach Campus or Suite 101 at the Fort Lauderdale Campus or on HCI College's website: www.HCI.edu.

A Student wishing to cancel an enrollment or withdraw may complete a Withdrawal/Cancellation Form. This form is available at www.HCl.edu or from the Registrar located in Suite 101 at the West Palm Beach Campus or 101 at the Fort Lauderdale Campus.

HCI College will refund monies paid by students in the following manner:

- All monies will be refunded if the applicant is not accepted by the College or if the student cancels within three (3) business days after signing the Enrollment Agreement and making payment.
- Cancellation after the third (3rd) business day, but before the first day of class, will result in a refund of all monies paid except for the non-refundable application fee.
- Refunds will be made within 30 calendar days of date of the cancelation with proper submission of a Withdrawal/Cancellation Form by the student. Written notification may be submitted by email, fax or in person.
- Refunds will be made within 30 calendar days of the first day of class if no written notification is provided by the student.

Withdrawal Procedures

- 1. Notice of withdrawal should be made either in person or through e-mail by submitting a Withdrawal Form to the Registrar, and the date of determination will be the date the student submits the Withdrawal Form. The Withdrawal Form and procedure may be obtained from HCI College's Registrar in Suite 101 at the West Palm Beach Campus or in Suite 101 at the Fort Lauderdale Campus or on HCI College's website: www.HCI.edu.
- If a student is withdrawn by the College for absenteeism based on the attendance policy, the student's last date of attendance 2. will be the withdrawal date. The date of determination will be no later than 14 days after the student's last date of attendance.
- 3. If a student is withdrawn by the College for failure to maintain required grades or passing rate, the date of determination will be no later than 14 days after the student's last date of attendance, which will be the same day as the last failed exam or make-up exam.
- 4. I understand and agree that the College may change locations during my enrollment. Further, I understand that should I decide to discontinue my enrollment on or after the date of that relocation, that my refunds (if any) will be calculated using this policy.

Return of Title IV Funds (R2T4) Policv

The requirements for federal financial aid when a student withdraw are separate from the Institutional Refund Policy, as such a student may still owe a balance to the Institution for unpaid institutional charges. Federal regulations specify how the Institution must determine the amount of Federal financial aid the student is entitled to have earned when a student withdraws from the Institution.

The percentage amount of Federal financial aid a student has earned during a semester/pay period is calculated based on the total number of calendar days completed in a semester/payment period divided by the total number of calendar days in the payment period. For students who withdraw during the semester/payment period the College will perform the return calculation on a payment period basis.

The amount of assistance earned is determined on a pro-rata basis, up through the 60% point in each semester/payment period. For example, if you completed 30% of your semester/payment period, you earn 30% of the FSA assistance you were originally scheduled to receive. After the 60% point of the semester/payment period, a student has earned 100% of the Title IV funds he or she was scheduled to receive during the period. Any time a student begins attendance in at least one course but does not begin attendance in all the courses he or she was scheduled to attend, regardless of whether the student is a withdrawal or graduate, the institution must review to see if it is necessary to recalculate the student's eligibility for funding received based on a revised enrollment status and the cost of education.

The Order of the Return of Title IV Funds

The return of Title IV funds under the Federal Refund Policy follows a specific order, as follows:

Unsubsidized Direct Loan, Subsidized Direct Loan, Direct PLUS Loan, Pell Grant, FSEOG, Other Funding.



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Institutional Refund Policy

The refund schedule is as follows:

- 1. Buyers Right to Cancel: All monies paid will be refunded if the applicant is not accepted by the College, or if the student cancels within three (3) business days after signing the Enrollment Agreement and making payment. The applicant that has not visited the College facility prior to signing the Enrollment Agreement will have the opportunity to withdraw without penalty within (three days) following either the regularly scheduled orientation procedures or following a tour of the College facilities and inspection of equipment. The nonrefundable Application fee is fully refundable as it relates to buyers right to cancel only (not to exceed \$50).
- 2. Returned check fees are nonrefundable.
- 3. Withdrawal after the third business day, but before the first day of class, will result in a refund of all monies paid except for the non-refundable application fee (not to exceed \$50).
- 4. Any textbooks, uniforms, and equipment issued must be returned to the College unused to receive full refund for those items.
- 5. Refunds will be made within 30 calendar days of date of the cancelation with proper submission of a Withdrawal/Cancellation Form by the student. Written notification may be submitted by email at <u>tandrews@hci.edu</u>, faxed to (561) 471-4010, or in person to the Business OfficeManager.
- 6. Refunds will be made within 30 calendar days of the first day of class if no written notification is provided by the student.

Refund Schedule:

HCI College will refund tuition paid by a Student in the following manner:

- Students who withdraw during the 14 day add/drop period for core courses and seven day add/drop period for General Education courses will receive a 100% refund of all monies paid for tuition, fees, and supplies (excluding the \$50 nonrefundable application fee). Students who attend beyond the 14 day add/drop period for core courses and seven day add/drop period for General Education courses will be responsible for 100% of the tuition and fee charges for the period of enrollment (semester).
- The Withdrawal Date for refund computation will be one of the following:
 - The date Withdrawal/Cancellation Form signed by Student.
 - The date of withdrawal for unsatisfactory progress.
 - The date of withdrawal for excessive absences will be the last date of attendance.
 - The date of involuntary withdrawal by HCI College for actions that the College may deem to be in violation of its policies and procedures.



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Student must read and initial each of the following sections (I – V).

(VATI), and satisfy all financial obligations to the College.

I. GROUNDS FOR DISMISSAL

I understand and agree that at the discretion of HCI College, I can be dismissed for unsatisfactory progress, non-payment of tuition and fees, or failure to comply with College's policies, rules and regulations as stated in the HCI's Catalog. Initial

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II.GROUNDS FOR CANCELLATION, TERMINATION, or WITHDRAWAL

I agree to comply with all HCI College's the rules and policies and understand that the College shall have the right to terminate this Enrollment Agreement and my enrollment at any time for violation of rules and policies as outlined in the HCI College's Catalog, Addendum, and/or College's Handbooks. I understand that the College reserves the right to modify the rules and policies outlined in the Catalog with or without notification.

III.GRADUATION REQUIREMENTS I understand that in order to graduate from the program and to receive a certificate of completion, diploma or degree I must successfully complete the required number of scheduled credit/clock hours as specified in the Catalog and on the Enrollment Agreement, pass all written and practical examinations with a minimum score of 80%, pass the ATI Predictor with a minimum score of 95% with only two attempts permitted (second attempt is at the sole cost of the student), complete all required clinical hours, achieve "Green Light" status with Virtual ATI

IV. EMPLOYMENT ASSISTANCE I understand that the College has not made and will not make any guarantees of employment or salary upon my graduation. The College will provide me with placement assistance, which will consist of identifying employment opportunities and advising me on appropriate means of attempting to realize these opportunities. I authorize HCI College's representatives to contact potential employers for the purpose of advocating on my behalf and release my name and job application materials, including, but not limited to, my cover letter, resume, and transcript to prospective employers. I authorize HCI College and its third-party vendors to contact my employer to verify pertinent employment information for my graduate record.

V. ACKNOWLEDGEMENT

This Enrollment Agreement contains the entire agreement between HCI College and Student. I, the Student, understand that there is financial aid available to those who gualify, am responsible for payments due prior to class starting per policy and any installment contract scheduled payments until paid in full. I, the Student, also acknowledge that I have received a receipt of payment, as well as been given a copy of this completed Enrollment Agreement for my records. I, the Student, further acknowledge that a copy of the College's Catalog has been provided to me and been reviewed by me prior to signing this Enrollment Agreement.

Initial

I ACKNOWLEDGE THAT I HAVE READ AND UNDERSTAND THIS ENROLLMENT AGREEMENT. I UNDERSTAND THAT THIS IS A LEGAL AND BINDING AGREEMENT BETWEEN THE COLLEGE AND MYSELF. ADDITIONALLY, I HAVE RECEIVED A COPY OF THIS ENROLLMENT AGREEMENT AND HAVE READ THE CURRENT CATALOG.

Signature of Applican	t
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Date

Signature of College Official

Date



Initial

Initial

Initial

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EXHIBIT 55

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF FLORIDA WEST PALM BEACH DIVISION

CASE NO.: 9:22-cv-81883- RAR

BRITTANY ROBERSON, REBECCA FREEMAN, BIANCA VIÑAS, TIFFANY KING, and TRESHA THOMPSON, individually and on behalf of others similarly situated,

Plaintiffs,

v.

HEALTH CAREER INSTITUTE LLC (dba HCI COLLEGE LLC and HCI ACQUISITION LLC), FLORIAN EDUCATION INVESTORS LLC, and STEVEN W. HART,

Defendant(s)

DEFENDANT, HEALTH CAREER INSTITUTE, LLC'S, SUPPLEMENTAL ANSWER TO PLAINTIFFS' FIRST SET OF INTERROGATORIES NUMBERED 9

Defendant, HEALTH CAREER INSTITUTE LLC (dba HCI COLLEGE LLC and HCI

ACQUISITION LLC), ("HCI"), by and through the undersigned counsel, hereby serves its

Supplemental Answer to Plaintiffs' First Set of Interrogatories Numbered 9.

<u>/S/ Michael J. Carney</u> MICHAEL J. CARNEY (FBN 44326) BARBARA FOX (FBN155608) <u>MJC-KD@kubickidraper.com</u> BF-KD@kubickidraper.com **KUBICKI DRAPER** 110 East Broward Boulevard, Suite 1400 Ft. Lauderdale, Florida 33301 Direct Line: (954) 713-2323 Attorneys for Defendants Case 9:22-cv-81883-RAR Document 141-2 Entered on FLSD Docket 12/19/2023 Page 832 of 1026

Certificate of Service

We hereby certify that on this <u>11th</u> day of August 2023, a true and correct copy of the foregoing was served via email on counsel of record for Plaintiffs.

<u>/S/ Michael J. Carney</u> MICHAEL J. CARNEY (FBN 44326)

DEFENDANT, HCI'S, SUPPLEMENTAL ANSWER TO PLAINTIFFS' FIRST SET OF INTERROGATORIES NUMBERED 9

9. For each campus and each semester (January, May, and September) during the Relevant Period, state:

- a. the total number of students who were enrolled in the RN Program;
- b. the total number of students who enrolled in the RN Program for the first time;
- c. the number of students who (i)were enrolled in Nursing I at the beginning of the semester, (ii)advanced from Nursing I to Nursing II at the end of the semester, and (iii)reenrolled in Nursing I at the end of the semester;
- d. the number of students who (i)were enrolled in Nursing II at the beginning of the semester, (ii)advanced from Nursing II to Nursing III at the end of the semester, and (iii)reenrolled in Nursing II at the end of the semester;
- e. the number of students who (i)were enrolled in Nursing III at the beginning of the semester, (ii)advanced from Nursing III to Capstone at the end of the semester, and (iii)reenrolled in Nursing III at the end of the semester;
- f. the number of students who (i)were enrolled in Capstone at the beginning of the semester, (ii)had their names forwarded by HCI to the BON to sit for the NCLEX-RN within six months of the end of the semester, and (iii)reenrolled in Capstone at the end of the semester.

<u>Answer to Interrogatory No. 9</u>: HCI objects on the grounds that the term "RN Program" is not sufficiently defined. The "Definitions" section, paragraph M., provides that "RN Program" means "the Associate of Science in Nursing program offered by Defendant at either the West Palm Beach of Ft. Lauderdale HCI campus." HCI objects to the extent that neither the interrogatory nor definition provided for "RN Program" does not specify, by the NCLEX code issued or other identifying details, the particular Associate Degree in Nursing program(s) to which the interrogatory refers and HCI is unable to determine same based on the interrogatory and definition. However, in the response to Interrogatory No. 9 below, solely for the purposes of this Supplemental Answer to Interrogatory No. 9, "Associate Degree in Nursing program" means the Associate Degree in Nursing programs offered by HCI College during the Relevant Period.

HCI further objects on the grounds that Interrogatory No. 9, subparts c.,d.,e. and f. are not sufficiently defined, ambiguous, vague, unclear and confusing such that HCI is unable to determine what specific information is being requested and therefore cannot formulate a response. The terms "Nursing I," "Nursing II," "Nursing III," and Capstone are not sufficiently defined. The interrogatory does not even specify whether these terms are in reference to a class or course or otherwise. Further, the Associate in Nursing degree program consists of multiple classes and/or courses each semester. It is unclear which specific course(s) or class(es) these terms may refer to or whether they refer to an individual class or course or a collective group of classes or courses. As to the term

"reenrolled", it is not defined and insufficient context has been provided such that HCI is unable to determine the specific information being requested so that it cannot formulate a response.

Since HCI served its answer and objections to Interrogatory No. 9 on May 26, 2023, Plaintiffs have clarified that "Nursing I" referenced in Interrogatory No. 9 refers to course NUR1023; "Nursing II" refers to NUR1213; "Nursing III" refers to NUR2261; and "Nursing Capstone" refers to NUR2943L. Plaintiffs further clarified that the term "reenrolled" refers to instances in which a student enrolls in Nursing I, Nursing III or Capstone in a semester and due to not completing the course successfully at the completion of that semester, enrolls in the same course again the following semester. Accordingly, pursuant to these clarifications, HCI supplements its Answer to Interrogatory No. 9 to additionally include as follows:

a. HCI College West Palm Beach campus:

Semester beginning September 2019 and ending December 2019:	244
Semester beginning January 2020 and ending April 2020:	308
Semester beginning May 2020 and ending August 2020:	305
Semester beginning August 2020 and ending December 2020:	306
Semester beginning January 2021 and ending May 2021:	295
Semester beginning May 2021 and ending August 2021:	283
Semester beginning September 2021 and ending December 2021:	257
Semester beginning January 2022 and ending April 2022:	220
Semester beginning May 2022 and ending August 2022:	221
Semester beginning September 2022 and ending December 2022:	275
Semester beginning January 2023 and ending April 2023:	142
HCI College's Fort Lauderdale campus:	
Semester beginning July 2019 and ending October 2019:	59
Semester beginning October 2019 and ending February 2020:	150
Semester beginning March 2020 and ending June 2020:	189
Semester beginning July 2020 and ending October 2020:	233
Semester beginning October 2020 and ending February 2021:	249
Semester beginning March 2021 and ending June 2021:	258

Semester beginning July 2021 and ending October 2021:	230
Semester beginning November 2021 and ending February 2022:	242
Semester beginning March 2022 and ending June 2022:	236
Semester beginning July 2022 and ending October 2022:	223
Semester beginning October 2023 and ending February 2023:	229
Semester beginning March 2023 and ending June 2023:	192

Since HCI served its answer and objections to Interrogatory No. 9 on May 26, 2023, Plaintiffs requested that HCI provide clarification as to whether the responses for the West Palm Beach campus in 9a. is for students who enrolled in programs under NCLEX code 70755 and/or NCLEX code 707146. To clarify, HCI's answer to 9a. for West Palm Beach campus is inclusive of students enrolled in programs under NCLEX codes 70755 and 707146.

b. HCI College West Palm Beach campus:

Semester beginning September 2019 and ending December 2019:	64
Semester beginning January 2020 and ending April 2020:	56
Semester beginning May 2020 and ending August 2020:	73
Semester beginning August 2020 and ending December 2020:	81
Semester beginning January 2021 and ending May 2021:	72
Semester beginning May 2021 and ending August 2021:	53
Semester beginning September 2021 and ending December 2021:	48
Semester beginning January 2022 and ending April 2022:	40
Semester beginning May 2022 and ending August 2022:	56
Semester beginning September 2022 and ending December 2022:	71
Semester beginning January 2023 and ending April 2023:	75
HCI College's Fort Lauderdale campus:	
Semester beginning July 2019 and ending October 2019:	14
Semester beginning October 2019 and ending February 2020:	40
Semester beginning March 2020 and ending June 2020:	63
Semester beginning July 2020 and ending October 2020:	70

Semester beginning October 2020 and ending February 2021:	61
Semester beginning March 2021 and ending June 2021:	59
Semester beginning July 2021 and ending October 2021:	54
Semester beginning November 2021 and ending February 2022:	49
Semester beginning March 2022 and ending June 2022:	54
Semester beginning July 2022 and ending October 2022:	53
Semester beginning October 2023 and ending February 2023:	64
Semester beginning March 2023 and ending June 2023:	22

Since HCI served its answer and objections to Interrogatory No. 9 on May 26, 2023, Plaintiffs requested that HCI provide clarification as to whether the responses for the West Palm Beach campus in 9b. is for students who enrolled in programs under NCLEX code 70755 and/or NCLEX code 707146. To clarify, HCI's answer to 9b. for West Palm Beach campus is inclusive of students enrolled in programs under NCLEX codes 70755 and 707146.

c.(i) HCI College's West Palm Beach campus:

Semester beginning September 2019 and ending December 2019:	26
Semester beginning January 2020 and ending April 2020:	42
Semester beginning May 2020 and ending August 2020:	39
Semester beginning August 2020 and ending December 2020:	72
Semester beginning January 2021 and ending May 2021:	78
Semester beginning May 2021 and ending August 2021:	59
Semester beginning September 2021 and ending December 2021:	70
Semester beginning January 2022 and ending April 2022:	48
Semester beginning May 2022 and ending August 2022:	52
Semester beginning September 2022 and ending December 2022:	53
Semester beginning January 2023 and ending April 2023:	64
HCI College's Fort Lauderdale campus:	
Semester beginning October 2019 and ending February 2020:	14
Semester beginning March 2020 and ending June 2020:	33

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	Semester beginning July 2020 and ending October 2020:	36
	Semester beginning October 2020 and ending February 2021:	50
	Semester beginning March 2021 and ending June 2021:	66
	Semester beginning July 2021 and ending October 2021:	43
	Semester beginning November 2021 and ending February 2022:	66
	Semester beginning March 2022 and ending June 2022:	63
	Semester beginning July 2022 and ending October 2022:	66
	Semester beginning October 2023 and ending February 2023:	59
	Semester beginning March 2023 and ending June 2023:	37
c.(ii)	HCI College's West Palm Beach campus:	
	Semester beginning September 2019 and ending December 2019:	19
	Semester beginning January 2020 and ending April 2020:	37
	Semester beginning May 2020 and ending August 2020:	35
	Semester beginning August 2020 and ending December 2020:	40
	Semester beginning January 2021 and ending May 2021:	43
	Semester beginning May 2021 and ending August 2021:	20
	Semester beginning September 2021 and ending December 2021:	27
	Semester beginning January 2022 and ending April 2022:	18
	Semester beginning May 2022 and ending August 2022:	37
	Semester beginning September 2022 and ending December 2022:	24
	Semester beginning January 2023 and ending April 2023:	20
	HCI College's Fort Lauderdale campus:	
	Semester beginning October 2019 and ending February 2020:	11
	Semester beginning March 2020 and ending June 2020:	22
	Semester beginning July 2020 and ending October 2020:	14
	Semester beginning October 2020 and ending February 2021:	18
	Semester beginning March 2021 and ending June 2021:	43

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	Semester beginning July 2021 and ending October 2021:	28
	Semester beginning November 2021 and ending February 2022:	36
	Semester beginning March 2022 and ending June 2022:	18
	Semester beginning July 2022 and ending October 2022:	33
	Semester beginning October 2023 and ending February 2023:	36
	Semester beginning March 2023 and ending June 2023:	16
c.(iii)	HCI College's West Palm Beach campus:	
	Semester beginning September 2019 and ending December 2019:	5
	Semester beginning January 2020 and ending April 2020:	0
	Semester beginning May 2020 and ending August 2020:	0
	Semester beginning August 2020 and ending December 2020:	22
	Semester beginning January 2021 and ending May 2021:	14
	Semester beginning May 2021 and ending August 2021:	8
	Semester beginning September 2021 and ending December 2021:	8
	Semester beginning January 2022 and ending April 2022:	18
	Semester beginning May 2022 and ending August 2022:	8
	Semester beginning September 2022 and ending December 2022:	13
	Semester beginning January 2023 and ending April 2023:	12
	HCI College's Fort Lauderdale campus:	
	Semester beginning October 2019 and ending February 2019:	2
	Semester beginning March 2020 and ending June 2020:	0
	Semester beginning July 2020 and ending October 2020:	5
	Semester beginning October 2020 and ending February 2021:	7
	Semester beginning March 2021 and ending June 2021:	8
	Semester beginning July 2021 and ending October 2021:	5
	Semester beginning November 2021 and ending February 2022:	12
	Semester beginning March 2022 and ending June 2022:	21

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	Semester beginning July 2022 and ending October 2022:	10
	Semester beginning October 2023 and ending February 2023:	5
	Semester beginning March 2023 and ending June 2023:	10
d.(i)	HCI College's West Palm Beach campus:	
	Semester beginning September 2019 and ending December 2019:	2
	Semester beginning January 2020 and ending April 2020:	23
	Semester beginning May 2020 and ending August 2020:	46
	Semester beginning August 2020 and ending December 2020:	63
	Semester beginning January 2021 and ending May 2021:	52
	Semester beginning May 2021 and ending August 2021:	53
	Semester beginning September 2021 and ending December 2021:	27
	Semester beginning January 2022 and ending April 2022:	32
	Semester beginning May 2022 and ending August 2022:	22
	Semester beginning September 2022 and ending December 2022:	43
	Semester beginning January 2023 and ending April 2023:	32
	HCI College's Fort Lauderdale campus:	
	Semester beginning October 2019 and ending February 2020:	0
	Semester beginning March 2020 and ending June 2020:	13
	Semester beginning July 2020 and ending October 2020:	29
	Semester beginning October 2020 and ending February 2021:	29
	Semester beginning March 2021 and ending June 2021:	34
	Semester beginning July 2021 and ending October 2021:	49
	Semester beginning November 2021 and ending February 2022:	31
	Semester beginning March 2022 and ending June 2022:	40
	Semester beginning July 2022 and ending October 2022:	30
	Semester beginning October 2023 and ending February 2023:	35
	Semester beginning March 2023 and ending June 2023:	46

d.(ii) HCI College's West Palm Beach campus:

	Semester beginning September 2019 and ending December 2019:	1
	Semester beginning January 2020 and ending April 2020:	21
	Semester beginning May 2020 and ending August 2020:	27
	Semester beginning August 2020 and ending December 2020:	43
	Semester beginning January 2021 and ending May 2021:	44
	Semester beginning May 2021 and ending August 2021:	37
	Semester beginning September 2021 and ending December 2021:	16
	Semester beginning January 2022 and ending April 2022:	23
	Semester beginning May 2022 and ending August 2022:	11
	Semester beginning September 2022 and ending December 2022:	25
	Semester beginning January 2023 and ending April 2023:	22
	HCI College's Fort Lauderdale campus:	
	Semester beginning October 2019 and ending February 2020:	0
	Semester beginning March 2020 and ending June 2020:	8
	Semester beginning July 2020 and ending October 2020:	21
	Semester beginning October 2020 and ending February 2021:	15
	Semester beginning March 2021 and ending June 2021:	16
	Semester beginning July 2021 and ending October 2021:	45
	Semester beginning November 2021 and ending February 2022:	25
	Semester beginning March 2022 and ending June 2022:	20
	Semester beginning July 2022 and ending October 2022:	20
	Semester beginning October 2023 and ending February 2023:	17
	Semester beginning March 2023 and ending June 2023:	38
d.(iii)	HCI College's West Palm Beach campus:	
	Semester beginning September 2019 and ending December 2019:	0
	Semester beginning January 2020 and ending April 2020:	1

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	Semester beginning May 2020 and ending August 2020:	14
	Semester beginning August 2020 and ending December 2020:	9
	Semester beginning January 2021 and ending May 2021:	2
	Semester beginning May 2021 and ending August 2021:	6
	Semester beginning September 2021 and ending December 2021:	3
	Semester beginning January 2022 and ending April 2022:	4
	Semester beginning May 2022 and ending August 2022:	7
	Semester beginning September 2022 and ending December 2022:	9
	Semester beginning January 2023 and ending April 2023:	9
	HCI College's Fort Lauderdale campus:	
	Semester beginning October 2019 and ending February 2020:	0
	Semester beginning March 2020 and ending June 2020:	1
	Semester beginning July 2020 and ending October 2020:	3
	Semester beginning October 2020 and ending February 2021:	7
	Semester beginning March 2021 and ending June 2021:	4
	Semester beginning July 2021 and ending October 2021:	1
	Semester beginning November 2021 and ending February 2022:	2
	Semester beginning March 2022 and ending June 2022:	9
	Semester beginning July 2022 and ending October 2022:	3
	Semester beginning October 2023 and ending February 2023:	10
	Semester beginning March 2023 and ending June 2023:	3
e.(i)	HCI College's West Palm Beach campus:	
	Semester beginning September 2019 and ending December 2019:	0
	Semester beginning January 2020 and ending April 2020:	1
	Semester beginning May 2020 and ending August 2020:	21
	Semester beginning August 2020 and ending December 2020:	26
	Semester beginning January 2021 and ending May 2021:	45

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	Semester beginning May 2021 and ending August 2021:	46
	Semester beginning September 2021 and ending December 2021:	42
	Semester beginning January 2022 and ending April 2022:	16
	Semester beginning May 2022 and ending August 2022:	26
	Semester beginning September 2022 and ending December 2022:	13
	Semester beginning January 2023 and ending April 2023:	26
	HCI College's Fort Lauderdale campus:	
	Semester beginning October 2019 and ending February 2020:	0
	Semester beginning March 2020 and ending June 2020:	0
	Semester beginning July 2020 and ending October 2020:	8
	Semester beginning October 2020 and ending February 2021:	24
	Semester beginning March 2021 and ending June 2021:	14
	Semester beginning July 2021 and ending October 2021:	22
	Semester beginning November 2021 and ending February 2022:	52
	Semester beginning March 2022 and ending June 2022:	29
	Semester beginning July 2022 and ending October 2022:	27
	Semester beginning October 2023 and ending February 2023:	20
	Semester beginning March 2023 and ending June 2023:	17
e.(ii)	HCI College's West Palm Beach campus:	
	Semester beginning September 2019 and ending December 2019:	0
	Semester beginning January 2020 and ending April 2020:	1
	Semester beginning May 2020 and ending August 2020:	20
	Semester beginning August 2020 and ending December 2020:	24
	Semester beginning January 2021 and ending May 2021:	28
	Semester beginning May 2021 and ending August 2021:	33
	Semester beginning September 2021 and ending December 2021:	34
	Semester beginning January 2022 and ending April 2022:	13

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Semester beginning May 2022 and ending August 2022:	24
Semester beginning September 2022 and ending December 2022:	12
Semester beginning January 2023 and ending April 2023:	24
HCI College's Fort Lauderdale campus:	
Semester beginning October 2019 and ending February 2020:	0
Semester beginning March 2020 and ending June 2020:	0
Semester beginning July 2020 and ending October 2020:	5
Semester beginning October 2020 and ending February 2021:	24
Semester beginning March 2021 and ending June 2021:	10
Semester beginning July 2021 and ending October 2021:	20
Semester beginning November 2021 and ending February 2022:	52
Semester beginning March 2022 and ending June 2022:	24
Semester beginning July 2022 and ending October 2022:	26
Semester beginning October 2023 and ending February 2023:	20
Semester beginning March 2023 and ending June 2023:	15

HCI notes that some students took Nursing III (NUR2261) and Capstone (NUR2943L) at the same time.

e.(iii) HCI College's West Palm Beach campus:

Semester beginning September 2019 and ending December 2019:	0
Semester beginning January 2020 and ending April 2020:	0
Semester beginning May 2020 and ending August 2020:	1
Semester beginning August 2020 and ending December 2020:	1
Semester beginning January 2021 and ending May 2021:	1
Semester beginning May 2021 and ending August 2021:	3
Semester beginning September 2021 and ending December 2021:	0
Semester beginning January 2022 and ending April 2022:	1
Semester beginning May 2022 and ending August 2022:	1

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	Semester beginning September 2022 and ending December 2022:	1
	Semester beginning January 2023 and ending April 2023:	2
	HCI College's Fort Lauderdale campus:	
	Semester beginning October 2019 and ending February 2020:	0
	Semester beginning March 2020 and ending June 2020:	0
	Semester beginning July 2020 and ending October 2020:	0
	Semester beginning October 2020 and ending February 2021:	0
	Semester beginning March 2021 and ending June 2021:	4
	Semester beginning July 2021 and ending October 2021:	2
	Semester beginning November 2021 and ending February 2022:	0
	Semester beginning March 2022 and ending June 2022:	5
	Semester beginning July 2022 and ending October 2022:	0
	Semester beginning October 2023 and ending February 2023:	0
	Semester beginning March 2023 and ending June 2023:	2
f.(i)	HCI College's West Palm Beach campus:	
	Semester beginning September 2019 and ending December 2019:	0
	Semester beginning January 2020 and ending April 2020:	1
	Semester beginning May 2020 and ending August 2020:	21
	Semester beginning August 2020 and ending December 2020:	29
	Semester beginning January 2021 and ending May 2021:	44
	Semester beginning May 2021 and ending August 2021:	42
	Semester beginning September 2021 and ending December 2021:	64
	Semester beginning January 2022 and ending April 2022:	53
	Semester beginning May 2022 and ending August 2022:	12
	Semester beginning September 2022 and ending December 2022:	31
	Semester beginning January 2023 and ending April 2023:	17
	HCI College's Fort Lauderdale campus:	

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Semester beginning October 2019 and ending February 2020:	0
Semester beginning March 2020 and ending June 2020:	0
Semester beginning July 2020 and ending October 2020:	8
Semester beginning October 2020 and ending February 2021:	25
Semester beginning March 2021 and ending June 2021:	23
Semester beginning July 2021 and ending October 2021:	25
Semester beginning November 2021 and ending February 2022:	48
Semester beginning March 2022 and ending June 2022:	32
Semester beginning July 2022 and ending October 2022:	25
Semester beginning October 2023 and ending February 2023:	23
Semester beginning March 2023 and ending June 2023:	28

f.(ii) Record data for number of names forwarded to FBON within six months of end of semester is not kept and the numbers listed below reflect number of graduates only.

HCI College's West Palm Beach campus:

Semester beginning September 2019 and ending December 2019:	0
Semester beginning January 2020 and ending April 2020:	1
Semester beginning May 2020 and ending August 2020:	20
Semester beginning August 2020 and ending December 2020:	26
Semester beginning January 2021 and ending May 2021:	27
Semester beginning May 2021 and ending August 2021:	18
Semester beginning September 2021 and ending December 2021:	8
Semester beginning January 2022 and ending April 2022:	27
Semester beginning May 2022 and ending August 2022:	7
Semester beginning September 2022 and ending December 2022:	17
Semester beginning January 2023 and ending April 2023:	8
HCI College's Fort Lauderdale campus:	
Semester beginning October 2019 and ending February 2020:	0

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	Semester beginning March 2020 and ending June 2020:	0
	Semester beginning July 2020 and ending October 2020:	4
	Semester beginning October 2020 and ending February 2021:	9
	Semester beginning March 2021 and ending June 2021:	13
	Semester beginning July 2021 and ending October 2021:	18
	Semester beginning November 2021 and ending February 2022:	23
	Semester beginning March 2022 and ending June 2022:	17
	Semester beginning July 2022 and ending October 2022:	9
	Semester beginning October 2023 and ending February 2023:	14
	Semester beginning March 2023 and ending June 2023:	19
f.(iii)	HCI College's West Palm Beach campus:	
	Semester beginning September 2019 and ending December 2019:	0
	Semester beginning January 2020 and ending April 2020:	0
	Semester beginning May 2020 and ending August 2020:	1
	Semester beginning August 2020 and ending December 2020:	1
	Semester beginning January 2021 and ending May 2021:	8
	Semester beginning May 2021 and ending August 2021:	14
	Semester beginning September 2021 and ending December 2021:	35
	Semester beginning January 2022 and ending April 2022:	11
	Semester beginning May 2022 and ending August 2022:	1
	Semester beginning September 2022 and ending December 2022:	5
	Semester beginning January 2023 and ending April 2023:	5
	HCI College's Fort Lauderdale campus:	
	Semester beginning October 2019 and ending February 2020:	0
	Semester beginning March 2020 and ending June 2020:	0
	Semester beginning July 2020 and ending October 2020:	1
	Semester beginning October 2020 and ending February 2021:	15

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Semester beginning March 2021 and ending June 2021:	2
Semester beginning July 2021 and ending October 2021:	4
Semester beginning November 2021 and ending February 2022:	12
Semester beginning March 2022 and ending June 2022:	11
Semester beginning July 2022 and ending October 2022:	0
Semester beginning October 2023 and ending February 2023:	8
Semester beginning March 2023 and ending June 2023:	8

EXHIBIT 56 (filed under seal)

EXHIBIT 57 (filed under seal)

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EXHIBIT 58

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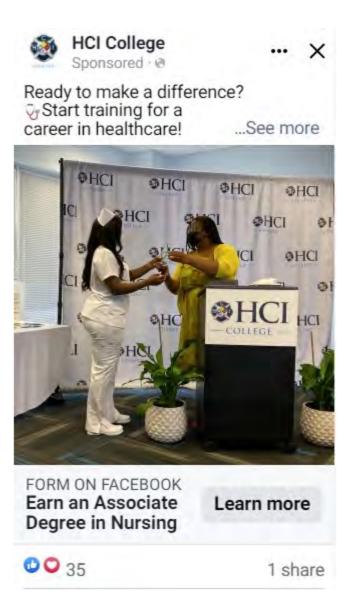
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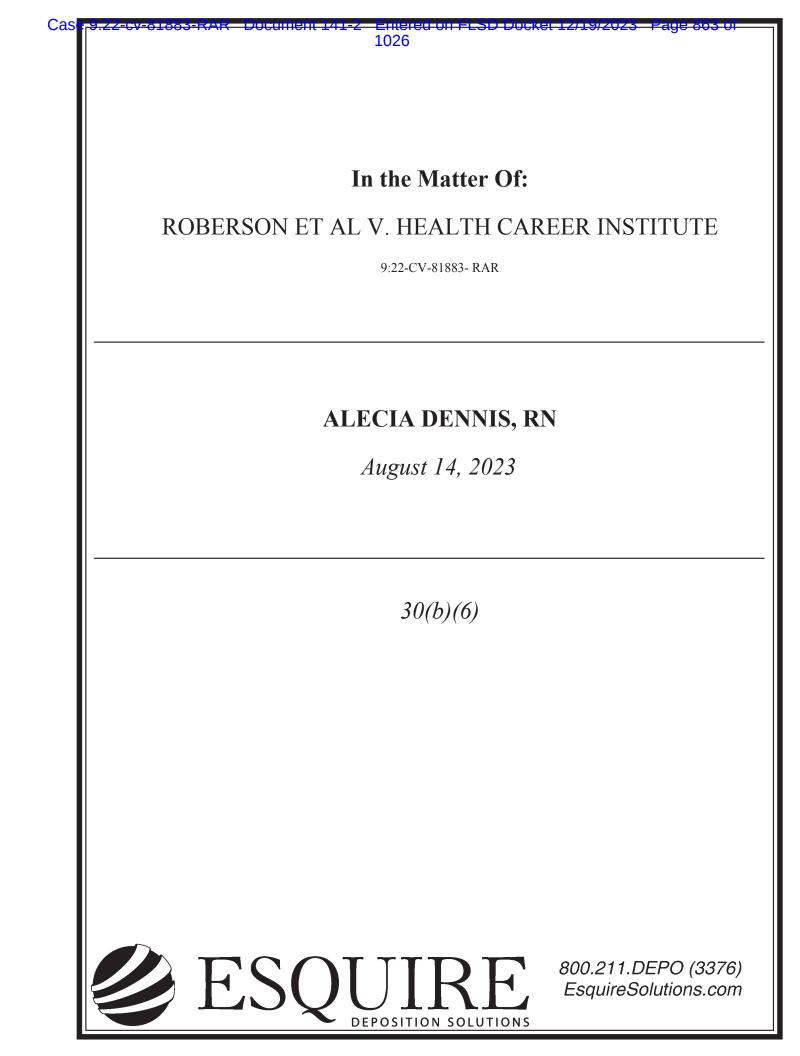
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EXHIBIT 59



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ALECIA DENNIS, RN 30(b)(6) ROBERSON ET AL V. HEALTH CAREER INSTITUTE

August 14, 2023

1

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF FLORIDA WEST PALM BEACH DIVISION CASE NO.: 9:22-CV-81883- RAR

BRITTANY ROBERSON, REBECCA FREEMAN, BIANCA VIÑAS, TIFFANY KING, and TRESHA THOMPSON, individually and on behalf of others similarly situated,

Plaintiffs,

-vs-

HEALTH CAREER INSTITUTE LLC (dba HCI COLLEGE LLC and HCI ACQUISITION LLC), FLORIAN EDUCATION INVESTORS LLC, and STEVEN W. HART,

Defendants.

DEPOSITION OF ALECIA DENNIS, RN AS HCI COLLEGE, LLC'S 30(b)(6) REPRESENTATIVE

> Monday, August 14, 2023 10:22 - 6:52 p.m.

1601 Forum Place, Suite 505 West Palm Beach, Florida 33401

Reported By: Wendy Beath Anderson, RDR, CRR, CRC Notary Public, State of Florida Esquire Deposition Services West Palm Beach Office Job #J10151358



Case 9:22-cv-81883-RAR Document 141-2 Entered on FLSD Docket 12/19/2023 Page 865 of 1026 ALECIA DENNIS, RN 30(b)(6) August 14, 2023 ROBERSON ET AL V. HEALTH CAREER INSTITUTE 2 1 **APPEARANCES:** 2 On behalf of Plaintiffs: REBECCA EISENBREY, ESQUIRE 3 VICTORIA ROYTENBERG, ESQUIRE PROJECT OF PREDATORY STUDENT LENDING 4 769 Centre Street, Suite 166 5 Jamaica Plain, Massachusetts 02130 6 and 7 NICOLE MAYER, ESQUIRE MAYER LAW 8 171 Dommerich Drive Maitland, Florida 32751 9 On behalf of the Defendants: 10 11 MICHAEL J. CARNEY, ESQUIRE BARBARA FOX, ESQUIRE KUBICKI DRAPER 12 110 East Broward Boulevard, Suite 1400 13 Fort Lauderdale, Florida 33301 14 and BOB L. HARRIS, ESQUIRE (VIA ZOOM) 15 MESSER CAPARELLO 16 2618 Centennial Place Tallahassee, Florida 32308 17 18 19 20 21 22 23 24 25 ESQU 800.211.DEPO (3376)

	22-cv-81883-RAR Document 141-2 Entered on FLSD Docket 12/19/2023 Page 866 1026 LECIA DENNIS, RN 30(b)(6) August 14, 2023
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1	in, a learning platform. And so when you became
2	associate director of nursing, was there another system
3	you might log in to to do things you didn't do as a
4	faculty member?
5	A. So in the associate director of nursing role,
6	no, I didn't have additional systems that I was trained
7	on beyond your software, Excel, you know, your suite of
8	office that you were using.
9	Q. And what about in your current role?
10	A. In my current role, so I do have exposure to
11	run some reports that I would not have been privy to
12	previously related to student attendance and that sort
13	of thing.
14	Q. In what system?
15	A. So that is in the Campus Nexus system that's
16	used by the school.
17	Q. And what might you go to Campus Nexus for?
18	A. Verification of a student's attendance, start
19	dates, student ID number, specific just student
20	particulars, student identifying information, their
21	addresses, that sort of thing that would be needed.
22	Transcripts would be housed there as well.
23	Q. In terms of curriculum, is the curriculum the
24	same at the West Palm Beach campus and the Fort
25	Lauderdale campus of HCI?
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1	A. Yes.
2	Q. And has that always been the case?
3	A. While the transition to a conceptual approach
4	and the timing of that transition, those dates could be
5	provided, but both campuses were conceptually based.
6	Q. And are you saying they may have transitioned
7	to conceptual-based at different times?
8	A. Well, we don't have a semester start that's at
9	the same time. So one starts at one time of the year
10	another one starts our semesters don't have a
11	synchronized start. So that would necessitate a
12	different time.
13	Q. Understood. So is it correct to say that when
14	there was this transition to conceptual-based learning,
15	if the West Palm Beach semester started sooner, they
16	would start the conceptual-based learning and then the
17	next Fort Lauderdale semester, the Fort Lauderdale
18	campus would start the conceptual-based?
19	A. I can get you the exact dates if you need
20	those.
21	Q. And in terms of the evaluation tools, are
22	those the same at both campuses?
23	A. Yes, mm-hmm. That would be your objective
24	evaluations, just to clarify. So your exams, that sort
25	of thing.



Case 9:22-cv-81883-RAR Document 141-2 Entered on FLSD Docket 12/19/2023 Page 868 of 1026 ALECIA DENNIS, RN 30(b)(6) August 14, 2023 ROBERSON ET AL V. HEALTH CAREER INSTITUTE 155 So it's based on national data? 1 0. 2 Α. That influence, like I said, all those things I just listed play a role. That's one of them. 3 National data, what kind of national data? 4 0. 5 Α. So if you look at performance on those 6 concepts nationally, you get some numbers on where 7 students are overall. That gives us a window as well as 8 a program. 9 0. So Fort Lauderdale -- I want to jump down to 10 response to Interrogatory No. 8. Earlier I thought you had said that the exams are done the same at both 11 12 campuses, but I'm looking here and it looks a bit 13 different. So I wanted you to talk me through that. 14 I know the first five rows here are similar to 15 the five rows at the West Palm Beach campus and then 16 when we get down to March 2021, the semester beginning 17 March 2021, I see there's a Kaplan Predictor A and a 18 Kaplan Predictor B and I see nothing for an exit exam. 19 And so I'm wondering why there was no exit exam? 20 Α. So with our blank spots on those, I think 21 that's information that we need to go back and look at 22 because that process would have remained the same for 23 that both institutions. 24 So are you saying these should be -- the 0. 25 answers for West Palm --



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1	A. That's knowable information, so I would need			
2	to refer back and I could find out for you.			
3	Q. Should it be identical			
4	A. So not identical. So you want to always			
5	give even though semesters are staggered, with the			
6	issue okay. South Florida is a challenge in terms of			
7	testing security. Nursing programs are plagued by			
8	concerns with testing security. So when you have sister			
9	campuses this way, even though they have staggered			
10	semesters, you don't always want to give the identical			
11	assessment. So content is the same. Concepts covered			
12	are the same, but if I gave A in West Palm Beach in			
13	December, Fort Lauderdale is going to take it the			
14	following March. I don't want to give A there or I at			
15	least want to scramble it so that it's not predictable			
16	for the student. Meaning, when you scramble them, after			
17	a while they're like, well, I'm not really sure which of			
18	the exams they're going to give and I'd better spend my			
19	time studying as opposed to trying to fish for the exact			
20	exam that was deployed at West Palm.			
21	Q. So we were talking about with the response to			
22	the West Palm Beach campus, there's that Kaplan adaptive			

in August 2021 that was given and you said there were concerns about integrity with that Kaplan adaptive, right?



23

24

25

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1	A. Mm-hmm.
2	Q. And so that was August 2021. So then I looked
3	down at Fort Lauderdale and I see that in October 2021,
4	they're taking a Kaplan adaptive.
5	A. Right, because if you look at the staggering
6	of the campuses, when you look back at the timeline for
7	the breach in West Palm Beach, it was mid semester that
8	we became aware of that. So that would have been, I
9	believe, right there mid-October, near the end of
10	October by the time that all rolled out. It may have
11	been even the first week of November potentially that
12	that issue occurred with West Palm Beach.
13	So that HESI in West Palm Beach was given that
14	December. So it was immediately leading up to that
15	December assessment that we became aware of the concerns
16	with the Kaplan.
17	Q. Okay. So then
18	A. And again, don't quote me on the exact dates,
19	but I know it was a late semester concern in West Palm
20	Beach that led to the change.
21	Q. Do you know if West Palm Beach was on track to

22 use the Kaplan adaptive again before they learned that 23 there might be some security problems?

24 25 A. I believe so, yes.

MS. MAYER: Okay. If you want to take about



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1	A. I'm sorry, say that one more time.
2	Q. Yeah. So the Capstone course, as it was when
3	you arrived at HCI, did it have VATI throughout the
4	semester and then the ATI predictor at the end as the
5	exit exam?
6	A. So there are two things happening
7	concurrently. You have the core course, which is called
8	Capstone. That's a leadership in community health
9	course with its own textbook and instructor-led process,
10	a traditional fourth semester nursing course. In tandem
11	to that there is an add-on of VATI which is our series
12	of review modules. That VATI component has a testing
13	process at the end of it that is included for the
14	students. But that would be separate from the actual
15	end-of-semester exam
16	Q. And so
17	A that's taken.
18	Q is the VATI helping students prepare for
19	the ATI exam, the final one?
20	A. So VATI is designed to help the students
21	overall. So as we're moving through the program, we're
22	identifying specifically when you get to Capstone you're
23	doing ongoing assessment and review that is specifically
24	student-targeted. So we associate them with a coach,
25	separate and apart from their course itself, Capstone.



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1 In tandem with that, we say two things need to 2 occur at once. You need to be in this leadership 3 community health course which is a necessary thing to do, but we also recognize that you have the burden of 4 preparation for this comprehensive exit as well as your 5 6 NCLEX examination. So when you are outside of the 7 classroom with us, in addition to your homework and your 8 classroom assignments, we want you to work alongside 9 this coach to address deficits. So assessments, review 10 modules and the coach is giving feedback, remediation. But that's on one track and then they're in class and 11 12 in-class time learning leadership community health.

13 At the end of the process with the coach there 14 is a summative exam that takes place and we want to see evidence of that. We expect them to meet a certain 15 16 benchmark with that. That's running in tandem, that's 17 happening with the nursing leadership community health 18 which has its own assessments and you saw in that 19 snippet we referenced earlier, there's a final exam and 20 other grading that's happening within the course itself.

21 Q. And the coach you're referring to, is that the 22 HCI employee?

A. So no. The HCI employee is added on on top of
that. This coach works remotely with the students and
is provided through the VATI module. So we approach



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student preparation from multiple angles to ensure -because, again, every student is unique. They have individual deficits. You can't identify and address everything within the context of the class.

5 So what we do is there's an NCLEX coach that 6 is a group coach doing general review, but you also have 7 your instructor for the class who's, you know, making 8 sure you leverage the class to the best of your ability. 9 But then on top of that, when you get home and you're on 10 your own, we want to make sure that your individual deficits, you're working with -- that's what VATI is --11 12 on your time with that coach. But we structure it so 13 that the student is not in a vacuum by themselves, but 14 that coach is mandated to communicate back to the NCLEX 15 coach and back to the instructor to say I'm working with 16 students so-and-so, here's how they're tracking, here's 17 some concerns, here's how they're progressing.

And the accountability piece for us is at the end of that, in addition to us looking at the remediation and input, we want to see at the end of that that you understand that there's accountability at the end of that with your performance on that exam that ends VATI.

24 Q. So the coach is an ATI employee; is that 25 right?



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1 A. They are an ATI employee, but they have
2 accountability to HCI in terms of communication and
3 updates related to student performance and all of the
4 metrics that the student has.
5 Q. Do you know if Elsevier, the publisher of
6 HESI, makes anything similar to VATI?
7 A. So there are products that Elsevier offers. I
8 can't speak specifically to how close it is to VATI, but
9 multiple publishers offer some form of, you know,
10 external support that you can provide to students.
11 Q. So overall, did less students pass HESI than
12 passed the ATI comprehensive exit exam?
13 A. I'd have to go back and look at the numbers to
14 see how many are in a cohort in the past, but that's
15 something we can look at for sure.
16 Q. Is it something you have looked at?
17 A. I've looked at the numbers semester over
18 semester and I can speak to every specific semester. I
19 just don't have them memorized, but that's something we
20 can definitely have for you. That's not a challenge to
21 have that number.
Q. But you're not, sitting here right now, aware
23 if that's the case?
A. I just don't want to tag you with a specific
25 number.
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1	frustrated as we moved into that fall, as we were in the		
2	midst of Covid.		
3	I think we worked through that beautifully		
4	given what we were facing. But beyond that, they still		
5	delivered on those supplies and delivered for the		
6	students pretty effectively during that time.		
7	Q. Okay. And this is going back to the		
8	50 percent rule. I wanted to ask a question I forgot to		
9	ask earlier.		
10	A. Sure.		
11	Q. Was that rolled out at the same time at the		
12	Fort Lauderdale campus and West Palm Beach campus?		
13	A. So we're staggered semester-wise, so it would		
14	not have been a synchronized rollout of the rule.		
15	Q. Would it have been, you know, the semester it		
16	was rolled out at the West Palm Beach campus and then		
17	the next chronological semester at the Fort Lauderdale		
18	campus?		
19	A. I can't say with certainty, but that's		
20	information we can proffer for the exact date of the		
21	rollout.		
22	Q. Would that be written down somewhere?		
23	A. So you would be able to look back at the data		
24	from the testing. You'd be able to tell, yeah, when the		
25	rollout was.		



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Q. How would you be able to tell?
A. Because you would see the application of that
rule in terms of grading for the student and all the
rest of it, so that it would influence everything the
student is doing from the ground up once that was
implemented.

7 Because like I said, from the curriculum side, 8 when you move to 50 percent, in looking at those 9 faculty/student engagement, everybody are honing in now on each of those areas of deficits. So across that 10 semester, it's not just a static end-of-semester test, 11 12 but there's multiple processes through the semester that 13 we would be working with to get students, you know, 14 where they need to be with that rule.

Q. So talk me through, if I asked you to find out when it was rolled out, the 50 percent rule, at Fort Lauderdale campus and you go to your computer, what do you pull up?

19 Α. So my first stop would be the director of 20 nursing there, honestly, because they would be the 21 keeper of implementation of whatever the policy and I would 22 procedure is and rollout to the faculty. 23 definitely go and source the information at the campus 24 level through the director of nursing's office to find that information. If I wanted to look at assessments 25



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1	myself, I could reach down into the assessments
2	themselves and run those reports.
3	Q. Can you talk me through that? That's what I
4	want to understand.
5	A. So you can pull in the ATI system itself,
6	for each cohort you can run exam reports each semester.
7	Q. And does it tell you pass or fail?
8	A. It gives you the numbers. It gives you all
9	the numbers there.
10	Q. And how would that tell you when the
11	50 percent rule started?
12	A. Well, for us, we also migrate that information
13	over on to a spreadsheet. And so you would start to see
14	indications there where we're tracking how the student
15	is doing and advising students on that as well. And at
16	the director level there's certainly communication to
17	the faculty related to the deployment. That would be an
18	ongoing conversation.
19	Q. And so when you say you would pull it over to
20	a spreadsheet, is it correct, then, to say if you pull
21	that ATI data over to a spreadsheet and listed everybody
22	who failed, you could then look and say, okay, this
23	person failed, but they still got over 80 percent, so
24	therefore, it must have been that darn 50 percent rule?
25	MR. CARNEY: Object to form.



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1THE WITNESS: So yeah, when you pull the data,2it shows you everything per student.

3 BY MS. MAYER:

Q. And so you said you could pull a list, right? A. But you're going to have to go step by step. You're not going to just hit a button and pull that, but you can extract from ATI ultimately what you need. If you have enough time and enough resources, you can get from the data what you need, but you're going to spend some time doing that.

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Q. You said you can run a report?

A. Correct, but when you run that report and export it, you then have to dig into the data. So when you do a data dump, then you have to go into the data and find what you need. It's not necessarily going to spell out what you need for your campus.

Q. Who's the ATI data guru? You know, there's always that IT person that's like you want the report, I got you the report.

A. So ATI is our guide. So depending on what you're looking for, how you're looking for it, ATI provides faculty support to us. But again, sometimes when you're asking for things, each campus is individual in terms of what we may be looking for, what we're asking for, they can pull for you, but again, it could



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1	be if it's an Excel spreadsheet, then you're going to
2	have to work your way through that and sort it the way
3	you need to.
4	Q. Is there anyone that you know at HCI who runs
5	reports regularly?
6	A. All of the faculty have a are required to
7	run reports for their course.
8	Q. And I'm meaning more from the administration
9	side. Like, so for example, when it's annual time to
10	turn in some numbers, you know, the IT person who goes
11	and maybe Campus Nexus is the system?
12	A. So there's not an IT person that just runs
13	reports for us. It's going to be based on the
14	department in which you're looking for. So each
15	department would function within their department and
16	sort of run what's required for them. But it would be
17	whoever is working in the department at the dean's
18	office. If we're asked to look at, for example,
19	faculty, like we were discussing evaluations, then from
20	the dean's office we would need to go in and do that.
21	Q. And so you were saying ATI, you could reach
22	out to ATI and they could also help pull stuff?
23	A. They could give you again a data dump. If
24	you're asking for X cohort, they could give you
25	everything related to that cohort, but it literally
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1	looks like just numbers and letters on a spreadsheet
2	until you make sense of it the way you need to. But
3	it's all knowable, I guess is what I'm trying to say, if
4	you're willing to spend enough time and hours and
5	manpower.
6	Q. And when something is in the ATI system, like
7	a grade, does HCI have the ability to change it in the
8	ATI system?
9	A. No.
10	MR. CARNEY: Just object to the scope. A
11	couple more, but I don't know that she, Ms. Dennis,
12	is the right person to talk about the technological
13	capabilities of those things, but
14	BY MS. MAYER:
15	Q. As part of reviewing of teachers we were
16	talking about, reviewing of professors, do you ever go
17	into ATI to help evaluate a teacher?
18	A. I'm not sure.
19	Q. And I mean we talked about you could go in and
20	look at students by cohort. So would you ever have
21	you ever gone into ATI to say okay, I'm going to
22	evaluate this teacher, I'm going to pull up their
23	cohort's scores or concepts, see how they're doing on
24	those?
25	A. Not just scores and concepts but how the



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1	CERTIFICATE OF OATH
2	STATE OF FLORIDA
3	COUNTY OF PALM BEACH
4	
5	I, the undersigned authority, certify that ALECIA
6	DENNIS, RN personally appeared before me and was duly
7	sworn on the 14th day of August, 2023.
8	
9	Witness my hand and official seal this 27th day of
10	August, 2023.
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12	
13 14	Leady allem
15	
16	Wendy Beath Anderson, RDR, CRR, CRC Notary Public State of Florida
17	My Commission Expires: 9/23/2025 My Commission No.: HH 178324
18	Job #J10151358
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	ESQUIRE Boo.211.DEPO (3376) EsquireSolutions.com

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1	CERTIFICATE OF REPORTER
2	STATE OF FLORIDA
3	COUNTY OF PALM BEACH
4	
5	I, Wendy Beath Anderson, Certified Realtime
6	Reporter and Notary Public in and for the State of Florida at Large, do hereby certify that I was
7	authorized to and did stenographically report said deposition of ALECIA DENNIS, RN; that a review of the transcript was requested; and that the foregoing
8	transcript is a true record of my stenographic notes.
9	I FURTHER CERTIFY that I am not a relative, employee, or attorney, or counsel of any of the parties,
10	nor am I a relative or employee of any of the parties, attorney or counsel connected with the action, nor am I
11	financially interested in the action.
12	The foregoing certification of this transcript does not apply to any reproduction of the same by any
13	means unless under the direct control and/or direction of the certifying reporter.
14	or the certifying reporter.
15	Dated this 27th day of August, 2023.
16	I house August, 2020.
17	Alan alla-
18	Wendy Beath Anderson, RDR, CRR, CRC
19	Job #J10151358
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EXHIBIT 60

UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF FLORIDA West Palm Beach Division

BRITTANY ROBERSON, REBECCA FREEMAN, BIANCA VIÑAS, TIFFANY KING, and TRESHA THOMPSON, individually and on behalf of others similarly situated,	Civil Action No. 9:22-cv-81883-RAR
Plaintiffs,	
V.	
HEALTH CAREER INSTITUTE LLC (dba HCI COLLEGE LLC and HCI ACQUISITION LLC), FLORIAN EDUCATION INVESTORS LLC, and STEVEN W. HART,	
Defendants.	

DECLARATION OF REBECCA EISENBREY

In accordance with 28 U.S.C. § 1746, I, Rebecca Eisenbrey, declare:

1. I am one of the attorneys for Plaintiffs in the above-captioned Matter. I submit this

declaration in support of Plaintiffs' Motion for Class Certification.

2. The facts contained in this declaration are within my personal knowledge; I could

testify to those facts if called upon to do so under oath.

3. My organization, the Project on Predatory Student Lending ("the Project"), and our co-counsel, Nicole Mayer, are qualified to serve as class counsel in this Matter.

4. The Project has represented and/or advised thousands of student borrowers. The

Project's services to students have included advice on their rights and options with respect to debt incurred at for-profit schools. The Project has helped hundreds of students submit federal loan

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discharge applications.

5. The Project has extensive experience in class action litigation on behalf of student borrowers in state and federal court. For example, attorneys at the Project have represented certified classes of, collectively, over one million student borrowers in multiple actions including: *Pratt v. Cardona*, No. 20-cv-01501 (D.D.C., filed on June 9, 2020); *Vara v. Cardona*, No. 19-cv-12175 (D. Mass., filed on Oct. 22, 2019); *Sweet v. Cardona*, No. 19-cv-03674 (N.D. Cal, filed on June 25, 2019); *Calvillo Manriquez v. Cardona*, No. 17-cv-07210 (N.D. Cal., filed on Dec. 20, 2017), Case No. 18-16375 (9th Cir., filed July 24, 2018); and *In re ITT Educational Services*, No. 16-07207-JMC- 7A (S.D. Ind. Bankr., class action adv. proceeding filed on Jan. 3, 2017).

6. The Project's President and Director, Eileen Connor, has extensive litigation and regulatory experience that directly relates to the issues in this case. Ms. Connor is a graduate of New York University School of Law (J.D.) and Brown University (B.A.). Ms. Connor was a law clerk to the Honorable Martha Craig Daughtrey on the United States Sixth Circuit Court of Appeals. Following her clerkship, Ms. Connor advocated on behalf of student borrowers as a Senior Staff Attorney at New York Legal Assistance Group, including by representing a certified class of student borrowers in *Salazar v. King*, No. 1:14-cv-01230 (S.D.N.Y., filed on Feb. 24, 2014). Ms. Connor has represented student borrowers at the Project since 2016.

7. I have been an Attorney at the Project since 2021. I was first admitted to practice law in Texas in 2015 (Bar No. 24097646) and I was admitted to practice law in Massachusetts in 2021 (Bar No. 708699).

8. I am a graduate of Michigan Law School (J.D.) and Yale University (B.A.). Prior to joining the Project, I clerked for the Honorable James L. Dennis on the United States Fifth Circuit Court of Appeals in New Orleans, Louisiana, and spent four years representing low-wage

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workers in collective and class actions at the Equal Justice Center in Austin, Texas.

9. Victoria Roytenberg is a Senior Attorney at the Project. Ms. Roytenberg was first admitted to practice law in Massachusetts in 2012 (Bar No. 685283) and was admitted to practice law in New York in 2016 (Bar No. 5385638).

10. Ms. Roytenberg is a graduate of City University of New York School of Law (J.D.) and the University of Massachusetts-Amherst (B.A.). She has been advocating on behalf of student borrowers at the Project, and the Project's predecessor at Harvard Law School, since 2016.

11. Jennifer Thelusma is an Attorney at the Project. Ms. Thelusma was first admitted to practice law in Florida in 2019 (Bar No. 1019776) and was admitted to practice law in the District of Columbia in 2020 (Bar No. 1719426).

12. Ms. Thelusma is a graduate of Duke University School of Law (J.D.) and the University of Florida (B.A.). Prior to joining the Project in 2023, Ms. Thelusma advocated on behalf of consumers as a Public Interest Fellow at Tycko & Zavareei LLP.

13. Eric Schmidt is an Attorney at the Project. Mr. Schmidt was first admitted to practice law in New Jersey in 2015 (Bar No. 167232015). Mr. Schmidt was admitted to practice law in New York in 2016 (Bar No. 5395371) and in Massachusetts in 2018 (Bar No. 703915).

14. Mr. Schmidt is a graduate of Brooklyn Law School (J.D.) and Lehigh University (B.A.). Prior to joining the project in 2019, Mr. Schmidt litigated and investigated consumer protection cases on behalf of the New Jersey Attorney General's Office.

15. The Project's co-counsel, Nicole Mayer, is a solo practitioner and the owner of Mayer Law PLLC. Ms. Mayer was first admitted to practice law in Florida in 2005 (Bar No. 12035).

16. Ms. Mayer is a graduate of Stetson University College of Law (J.D.) and the

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University of Florida (B.S.). Between 2013 and 2016, Ms. Mayer was an Enforcement Attorney at the Consumer Financial Protection Bureau's Office of Supervision, Enforcement, and Fair Lending. Following her time at the CFPB, Ms. Mayer spent four years as in-house counsel overseeing the consumer lending and servicing division of a major hospitality company. Earlier in her career, Ms. Mayer spent six years litigating nationwide and statewide consumer class actions at James Hoyer P.A, where she represented student borrowers in matters such as *Rodriguez v. SLM Corp. and Sallie Mae, Inc.* No. 07-cv-1866 (D. Conn., filed 2007), and *Walker v. Alta Colleges, Inc.*, No. A-09-cv-894-LY (W.D. Tex., filed 2009). Since opening her solo practice in August 2020, Ms. Mayer's work has centered around consumer advocacy.

17. The Project's attorneys and Ms. Mayer have knowledge of and familiarity with the relevant laws and regulations concerning the claims alleged in this case.

18. The Project's attorneys and Ms. Mayer are not aware of any potential conflicts of interest between themselves and members of the proposed class.

19. The Project's attorneys and Ms. Mayer are prepared and well-equipped to vigorously prosecute this case.

20. The Project's attorneys and Ms. Mayer have engaged frequently with the Named Plaintiffs regarding the progress and strategy of this case.

21. The Project's attorneys and Ms. Mayer have invested significant time in identifying and investigating the potential claims in this Matter and are committed to advancing this litigation.

Dated: December 19, 2023

Signed:

REBECCA EISENBREY (pro hac vice)

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reisenbrey@ppsl.org Project on Predatory Student Lending 769 Centre Street, Suite 166 Jamaica Plain, MA 02130 (617) 322-2808

Counsel for Plaintiffs

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EXHIBIT 61

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HEALTH CAREER INSTITUTE LLC

SECOND AMENDED AND RESTATED LIMITED LIABILITY COMPANY AGREEMENT

THIS SECOND AMENDED AND RESTATED LIMITED LIABILITY COMPANY

AGREEMENT (this "<u>Agreement</u>") is made and entered into as of April 23, 2018 by Florian Education Investors LLC (the "<u>Member</u>"), as the sole member of HEALTH CAREER INSTITUTE LLC, a Delaware limited liability company (the "<u>Company</u>").

PRELIMINARY STATEMENT

WHEREAS, a Certificate of Formation (the "<u>Certificate</u>") was filed with the Secretary of State of the State of Delaware on May 3, 2013 to form the Company under and pursuant to the Delaware Limited Liability Company Act (the "<u>Act</u>");

WHEREAS, in accordance with the Act, the initial members of the Company adopted the Limited Liability Company Agreement of the Company dated as of May 3, 2013, as amended and restated by that certain Amended and Restated Limited Liability Company Agreement dated as of December 18, 2013 (the "<u>Prior Agreement</u>"); and

WHEREAS, as of the date hereof, the Member is the sole member of the Company; and

WHEREAS, the Member desires to amend and restate the Prior Agreement in accordance with the terms and conditions set forth below; and

NOW, THEREFORE, in consideration of the mutual promises and agreements made herein and other good and valuable consideration, the receipt and sufficiency of which are hereby acknowledged, the parties hereto hereby agree as follows:

ARTICLE I

ORGANIZATION

1.1. <u>Formation</u>. The Company was formed as a Delaware limited liability company under and pursuant to the Act by the filing of a Certificate of Formation with the Secretary of State of Delaware as required by the Act on May 3, 2013.

1.2. Name. The name of the Company is Health Career Institute LLC.

1.3. <u>Purpose</u>. The purposes of the Company shall be to (a) own and operate, directly or indirectly, one or more post-secondary schools, education content and service providers, and/or training companies, and (b) engage in any other lawful business permitted under the Act or the laws of any jurisdiction in which the Company may do business. The Company shall have the authority to do all things necessary or advisable in order to accomplish such purposes.

1.4. <u>Duration</u>. The Company shall continue in existence until the Company shall be dissolved and its affairs wound up in accordance with the Act or this Agreement.

1.5. Registered Office and Registered Agent; Principal Office. (a) The registered office of the Company required by the Act to be maintained in the State of Delaware shall be the initial registered office named in the Certificate of Formation or such other office (which need not be a place of business of the Company) as the Member may designate from time to time in the manner provided by the Act.

(b) The registered agent of the Company in the State of Delaware shall be the initial registered agent named in the Certificate of Formation or such other person or entity as the Member may designate in the manner provided by the Act.

(c) The principal office of the Company shall be 1764 N. Congress Ave., West Palm Beach, Florida 33409, or at such place as the Member may designate from time to time, which need not be in the State of Delaware, and the Company shall maintain records there for inspection as required by the Act. The Company may have such other offices as the Member may designate from time to time.

1.6. No State Law Partnership. No provisions of this Agreement shall be deemed or construed to constitute the Company a partnership (including, without limitation, a limited partnership), for any purposes other than federal and state tax purposes.

ARTICLE II

MEMBERS; SHARES

2.1. Sole Member; Shares. (a) The Member is the sole member of the Company. As of the date hereof, there are no other Members of the Company and no other person or entity has any right to take part in the ownership of the Company. The Company has authorized the creation of one (1) class of membership interests, the Class A Shares. As of the date hereof, the Company has issued to the Member the number of Class A Shares set forth on Exhibit A. No persons or entities other than the Member hold any membership interests of the Company. The Member shall have the right to cause the Company to create and/or issue additional membership interests, including other classes, groups or series thereof having such relative rights, powers, and/or obligations as may from time to time be established by the Member, in which event, the Managing Member shall have the power to amend this Agreement to reflect such additional issuances and to make any such other amendments as they deem necessary or desirable to reflect such additional issuances.

As of the date hereof, the Company has adopted its Equity (b) Appreciation Rights Plan (the "Plan") in order to provide non-equity compensation to certain of its key employees, consultants and advisors ("Participants") upon a Liquidation Event (as defined below). As more fully described in the Plan, the Company may issue Appreciation Rights Shares to the Participants. However, such Appreciation Rights Shares do not constitute membership interests in the Company, and in no case shall any Participant be deemed a member of the Company. As of the date hereof, the Company has allocated the number of Appreciation Rights Shares for issuance under the Plan as set forth on <u>Exhibit A</u>.

As used herein, "Liquidation Event" shall mean the occurrence, in a (c) single transaction or series of related transactions, of any one or more of the following events: (i) any dissolution or winding up undertaken in accordance with Section 11.1(b) or (c) below; (ii) there is consummated a merger, consolidation or similar transaction involving, directly or indirectly, the Company if, immediately after the consummation of such merger, consolidation or similar transaction, the Member or an affiliate thereof no longer owns, directly or indirectly, (A) outstanding voting securities representing more than fifty percent (50%) of the combined outstanding voting power of the surviving entity in such merger, consolidation or similar transaction or (B) more than fifty percent (50%) of the combined outstanding voting power of the parent of the surviving entity in such merger, consolidation or similar transaction; provided, however, that in no event shall a bona fide capital raising transaction conducted by or on behalf of the Company constitute a "Liquidation Event"; or (iii) there is consummated a sale, lease, license or other disposition of all or substantially all of the consolidated assets of the Company and its subsidiaries, other than a sale, lease, license or other disposition of all or substantially all of the consolidated assets of the Company and its subsidiaries to an affiliate of the Member.

2.2. <u>Liability to Third Parties</u>. The Member shall not be liable for the debts, obligations or liabilities of the Company, including under a judgment, decree or order of a court.

ARTICLE III

CAPITAL CONTRIBUTIONS

The Member has contributed to capital of the Company the contributions set forth in the Company's books and records of account. The Member shall have the right, at any time and from time to time, to make additional contributions to the capital of the Company in the form of cash, property or services, or any combination thereof. No interest shall be paid by the Company on capital contributions.

ARTICLE IV

ALLOCATIONS

Because the Company is a business entity that has a single owner and is not a corporation, it is intended to be disregarded as an entity separate from its owner for federal income tax purposes under Section 301.7701-2(c)(2)(i) of the U.S. Treasury Regulations. Accordingly, all items of income, gain, loss, deduction and credit of the Company for all taxable periods will be treated for federal income tax purposes, and for state and local income and other tax purposes to the extent permitted by applicable law, as realized or incurred directly by the Member.

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ARTICLE V

DISTRIBUTIONS

Distributions shall be made to the Member at the times and in the aggregate amounts determined by the Member.

ARTICLE VI

MANAGEMENT OF THE COMPANY

The powers of the Company shall be exercised by or under the authority of, and the business and affairs of the Company shall be managed under the direction of, the Member. Subject to the foregoing: (i) the Member shall possess all power, on behalf of the Company, to do any and all acts necessary or convenient to, including all powers, statutory or otherwise, possessed by members under the laws of the State of Delaware, and (ii) the Member is hereby authorized, empowered and directed, in the name and on behalf of the Company, to approve, execute and deliver any and all agreements, certificates or any other documents in furtherance of the purposes described herein.

In addition to the performance of services on behalf of the Company, the Member may engage in other activities, including without limitation investments, transactions, business ventures, contractual, strategic or other business relationships, prospective economic advantages or other opportunities, some of which may be competitive or complementary with the Company or any of its affiliates. Such activities may be for the Member's own account or for the account of persons or entities other than the Company and/or its affiliates. The Member will have conflicts of interest in allocating management time, services and functions, as well as potential investment opportunities, between various existing enterprises and future enterprises, and will resolve such conflicts as reasonably determined by the Member in its sole discretion. The Member shall not be required to offer to any person or entity any interest in any future entities or business ventures formed or developed by the Member or any of its affiliates.

The Member may appoint officers to carry out the business of the Company. The Member may, by agreement or otherwise, appoint and/or replace individuals with such titles as they may elect, including but not limited to the titles of Co-Chief Executive Officer, President, Chief Operating Officer, Vice President, Treasurer and Secretary, to act on behalf of the Company, with such power and authority as the Member may delegate.

There shall be two Co-Chief Executive Officers of the Company. Each Co-Chief Executive Officer shall, subject to the direction of the Member, have general supervision and control of the Company's business. The Co-Chief Executive Officers of the Company shall be Steven W. Hart and Lawrence E. Brown.

ARTICLE VII

MEETINGS OF MEMBERS

Member meetings shall not be required as long as the Member remains the sole member of the Company.

ARTICLE VIII

OWNERSHIP OF COMPANY PROPERTY

The Company's assets shall be deemed to be owned by the Company as an entity, and the Member shall not have an ownership interest in such assets or any portion thereof. Title to any or all such Company assets may be held in the name of the Company or one or more nominees, as the Member may determine.

ARTICLE IX

TAX STATUS; FISCAL MATTERS; BOOKS AND RECORDS

9.1. <u>Tax Status</u>. As long as the Company has only one member, it is the intention of the Company and the Member that the Company be treated as a disregarded entity for federal and all relevant state tax purposes and neither the Company nor the Member shall take any action or make any election which is inconsistent with such tax treatment. All provisions of this Agreement are to be construed so as to preserve the Company's tax status as a disregarded entity.

9.2. <u>Bank Accounts; Investments</u>. Capital contributions, revenues and any other Company funds shall be deposited by the Company in a bank account established in the name of the Company, or shall be invested by the Company, at the direction of the Member, in furtherance of the purposes of the Company.

9.3. <u>Records</u>. The Company shall maintain all records required to be kept pursuant to the Act, including, without limitation, copies of federal, state and local information or income tax returns for each of the Company's tax years, copies of this Agreement and the Certificate of Formation, including all amendments or restatements, and correct and complete books and records of account of the Company. The Company shall maintain adequate books and records of account that shall be maintained on the accrual method of accounting and on a basis consistent with appropriate provisions of the Internal Revenue Code of 1986, as amended.

ARTICLE X

INDEMNIFICATION

10.1. <u>Performance of Duties; Liability of Managing Member</u>. The Member, its affiliates, and their respective directors, officers, principals, employees, agents and representatives, as well as the officers of the Company and their affiliates, agents and

representatives (in such capacity, each a "Covered Person"), shall not be liable to the Company for any loss or damage sustained by the Company, unless the loss or damage shall have been the result of fraud, bad faith or willful misconduct by the Covered Person. To the fullest extent permitted under the Act, no Covered Person shall have any liability by reason of being or having been a member, manager, officer, employee or other agent of the Company and shall be indemnified by the Company as provided in Section 10.2. The Company hereby waives any right to bring any claim or cause of action against the Covered Persons for breaches of fiduciary duties or similar duties to the Company and/or the Members.

10.2. Indemnification. The Company shall defend and indemnify any Covered Person and may indemnify any other person who was or is a party or is threatened to be made a party to any threatened, pending or completed action, suit or proceeding by reason of the fact that it, he or she is or was a member, manager, officer, employee or other agent of the Company or that, being or having been such a member, manager, officer, employee or agent, it, he or she is or was serving at the request of the Company as a manager, director, officer, employee or other agent of another limited liability company, corporation, partnership, joint venture, trust or other enterprise (all such persons being referred to hereinafter as an "agent"), to the fullest extent permitted by applicable law in effect on the date hereof and to such greater extent as applicable law may hereafter from time to time permit, provided that such person's conduct was not the result of bad faith or willful misconduct. The Member shall be authorized, on behalf of the Company, to enter into indemnity agreements from time to time with any person entitled to be indemnified by the Company hereunder, upon such terms and conditions as the Member deems appropriate in its business judgment.

10.3. Reliance by Third-Party Creditors. This Agreement is entered into among the Company and the Member for the exclusive benefit of the Company, the Member, and their successors and assigns. This Agreement is expressly not intended for the benefit of any creditor of the Company or any other person. Except and only to the extent provided by applicable statute, no such creditor or third party shall have any rights under this Agreement or any agreement between the Company and the Member with respect to any contributions or otherwise.

ARTICLE XI

DISSOLUTION AND WINDING UP

11.1. Events Causing Dissolution. The Company shall be dissolved upon the first of the following events to occur: (a) a Liquidation Event; (b) the election of the Member at any time to dissolve and wind up the affairs of the Company; or (c) the occurrence of any other event that causes the dissolution of a limited liability company under the Act.

11.2. Winding Up. If the Company is dissolved pursuant to Section 11.1, the Company's affairs shall be wound up as soon as reasonably practicable as determined by the Member.

11.3. Distributions on Liquidation. (a) Upon receipt of all proceeds from such dissolution event, and after payment of all selling costs and expenses, the net proceeds of such dissolution event, including any assets that are to be distributed in kind, will be distributed to the following groups in the following order of priority: (i) to satisfy Company liabilities to creditors; (ii) to satisfy Company obligations to the Member and the Participants; and (iii) to the Member. All distributions required under this Section 11.3 shall be made to the Member by the end of the taxable year in which the liquidation occurs or, if not practicable, within 90 days after the date of such liquidation.

(b) The claims of each priority group specified above shall be satisfied in full before satisfying any claims of a lower priority group.

ARTICLE XII

MISCELLANEOUS PROVISIONS

12.1. Entire Agreement. This Agreement constitutes the entire agreement among the parties hereto and contains all of the agreements among such parties with respect to the subject matter hereof. Except as otherwise provided herein, this Agreement supersedes any and all other agreements, either oral or written, between such parties with respect to the subject matter hereof, including without limitation the Prior Agreement.

12.2. Amendments, Modifications, Waivers. Amendments to or modifications or waivers of any provisions of this Agreement may be made only with the written consent of the Member.

12.3. Partial Invalidity. Wherever possible, each provision hereof shall be interpreted in such manner as to be effective and valid under applicable law, but in case any one or more of the provisions contained herein shall, for any reason, be held to be invalid, illegal or unenforceable in any respect, such provision shall be ineffective to the extent, but only to the extent, of such invalidity, illegality or unenforceability without invalidating the remainder of such invalid, illegal or unenforceable provision or provisions or any other provisions hereof, unless such a construction would be unreasonable.

12.4. Governing Law. This Agreement shall be governed by and construed in accordance with the local, internal laws of the State of Delaware. To the extent permitted by law, if this Agreement conflicts with the Act, this Agreement shall control and govern. Furthermore, if (a) this Agreement addresses a matter for which the Act provides a default rule, (b) the Act permits a limited liability company agreement to modify such default rule, and (c) this Agreement so modifies such default rule (even if such modification does not explicitly reference such rule), this Agreement shall control.

[Signature to appear on following page]

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IN WITNESS WHEREOF, the undersigned sole member, Florian Education Investors LLC, has executed this Second Amended and Restated Limited Liability Company Agreement to be effective on the date first above written.

FLORIAN EDUCATION INVESTORS LLC By: Florian GP LLC, its managing member

By:

Name: Lawrence E. Brown Title: Member FLORIAN EDUCATION INVESTORS LLC By: Florian GP LLC, its managing member

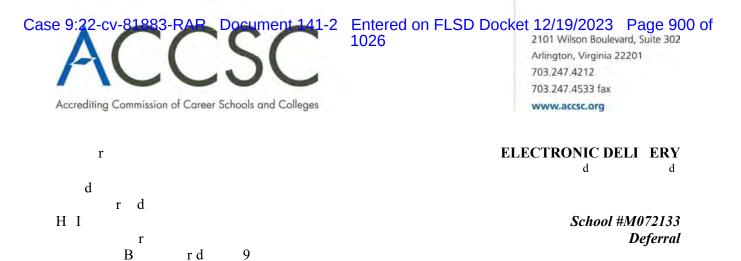
Bv:

Name: Steven W. Hart Title: Member

EXHIBIT 62 (filed under seal)

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EXHIBIT 63



r d r r and Colleges ("ACCSC" or "the Commission") considered the r d d r d H I d B r d

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rr and the school's response to that r r r rdrrd d d r r r dd r d d rd T r d r r r Commission's decision and the Commission's requirements for H I d r r r

ΗI d d r d d r d d r r r E B Section VII (B)(1), Substantive Standards, Standards of Accreditation T r r r d rd rrr r d r E r d Т d r ΕΒ

I r rr, the school indicated that "[a] d d d E T r r T d r r r form in the near future" (ΗI Т d d d r r d dd r r r r r rd r r r

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Deferral

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's response included

The Nursing-DE (BSN) program struggled with enrollment and retention. This program started its first enrollment in September of 2016 with one student. There were no enrollments in 2017. In 2018, the College made a strong effort to promote the program to its alumni. In 2018, the enrollment increased. Currently, there are no enrollments in this program. There were two issues that may have caused the low enrollment and poor retention. One reason was financial; this program at the time was not eligible to participate in Federal Student Aid funding. Additionally, the program is not programmatically accredited. The College paused enrollment in 2020 to better assess the program and determine its viability. During that time, the College has been approved to offer Federal Student Aid funds for this program. The College plans to begin enrollment in the program starting in January 2024. Upon enrolling students, the College plans to apply for programmatic accreditation. The College does not plan on altering the admissions requirements at this time.

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HCI College – West Palm Beach, Florida School #M072133 October 2, 2023 Page 3 of 8 Deferral

r r r r d r r d r r d r r states that the school "plans to continue using the distance education learning format." The response d d d d r r r d r r r r

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HCI College – School #M072 October 2, 202 Page 4 of 8		e, Florida	10)26			Deferral
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- An evaluation of the effectiveness of the school's orientation to the distance education r r d
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 - r rd rr rd rrd d rr r r d r d r d r d r r r employment/licensure, and the school's reason for not seeking the progra r d r
 - d rr d d d rr d r r r r r r r dd d r r
 - school's compliance with accrediting standards.

ΗI d d r r d r r d d rr d d d r d r d r r d Section VII (B)(3), Substantive Standards, Standards of Accreditation rd r r Т r rd d d r rr r d r r d r r r r d r d d r d r r d r d d rd r d rr r d r r d d d "Employed in Field" T r d d d r d d r d

The school's analysis d r rd r r r r r d rd r r r I r rr H I r r r r d d r r drdr T d r a graduate is considered placed when working a "[s] d r r r r " The r r r d r r r d r r d r d r r d d r d d r r Ι dd d r r r r r d r

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school's compliance with accrediting standards.

ΗI d d r r r d Εr r d d r r r d d Section IV(C)(2), Substantive Standards, Standards of Accreditation d r d r r r According to the school's January 5, 2023 response d r r r to the Commission's November 18, 2022 letter, the school d r r d r r r

- General Education courses must be taken in their course sequencing and must be taken prior to the nursing courses. In some cases, the Vice President of Academic and Regulatory Affairs may make an exception.
- The Student must maintain a "B" grade in all nursing core courses and a "C" grade in general education courses for program continuation and graduation.
- The student must complete 100% of all required clinical/simulation hours.
- Complete the proctored Specialty Exam for each semester as required with only two (2) attempts per semester permitted (a second attempt with remediation process completed).
- Complete Dosage Calculation Tests per the program's requirement.
- Achieve a 95% on the Comprehensive Predictor. If a student does not achieve a 95%, they will have one opportunity to retake the Comprehensive Predictor after completing two weeks of prescribed remediation.
- Achieve "Green Light" status with Virtual ATI (VATI). Students must achieve "Green Light" status by the last day of the final term in the Nursing program. Students who fail to achieve "Green Light" status within that timeframe will be dismissed from the nursing program. Students who are dismissed may be eligible to re-take the Capstone if they have not exhausted the course repeat policy. Any student who receives anomaly warnings based on the Predictor test or during enrollment in Virtual ATI (VATI) must retake a Predictor on campus and achieve a minimum score of 95% as well as complete additional remediation as recommended by the Director of Nursing prior to release of the student name and transcript to the Florida Board of Nursing.
- The student must complete a minimum of 72 credit hours.
- Meet all financial obligations to the school.

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HCI College – West I School #M072133 October 2, 2023 Page 6 of 8	Palm Beach, F	Florida	1	1026					Deferral
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I understand that in order to graduate from the program and to receive a certificate of completion, diploma or degree I must successfully complete the required number of scheduled credit/clock hours as specified in the Catalog and on the Enrollment agreement. In the final semester, students are required to achieve a minimum raw score of 72.7 on the Predicted Probability of Passing NCLEX-RN ATI Proctored Exam – the Comprehensive Predictor Test (CPT). Students who score below a 72.7 on the CPT will be permitted one retake upon completing the two-week remediation program. Failure to achieve a raw score of 72.7 for the second time will result in repeating the Nursing Capstone (NUR2943L). If a student fails to meet the required score at the end of the second attempt of NUR2943L, the student will be dismissed. H I

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	school's compliance with accrediting standards.																

ΗI rd HI d d d rd r r В d r Section I d r r (G)(2)(d), Rules of Process and Procedure, Standards of Accreditation T d d rd I r rd r d d d r r the school's a general response to ACCSC's letter. Given the lack of specific d d d r d r r r r d r d d d r r rd

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r r r r d H I with determining the school's compliance with accrediting standards in this regard.

ΗI d r d r r r r r r r Section I(C)(1), Substantive d d d r r Standards, Standards of Accreditation A review of HCI College's fiscal year ended December 31, d d d d

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its review of the school's financial position.

RESPONSE RE UIRE ENTS

By applying for accreditation, a school accepts the obligation to demonstrate continuous compliance with the Standards of Accreditation. While the Commission employs its own methods to determine a school's compliance with accrediting standards, the burden rests with the school to establish that it is meeting the standards. The Commission's deliberations and decisions are made on the basis of the written record and 1026

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thus a school must supply the Commission with complete documentation of the school's compliance with accrediting standards.

ΗI r d r r d r d r dd d r d r r r If the school's response contains documentation that includes r d d rd personal or confidential student or staff information that is not required for the Commission's review r d r rr d r r r

ΗI must upload the school's electronic response directly to ACCSC's College 360 Database. Т d d rd r d r r d Т r E I r r d r d d d r d r

Keep in mind, the school's response must be prepared in accordance with ACCSC's Instructions for Submission (e.g., prepared as one Portable Document Format ("PDF") file that has been Е r r r d d r r r d d r r r Т d r r r r

Trddrrdreceived in the Commission's office**on oe o e Decem e**IrrdCommission's office**on oe o e Decem e**drrrr

rd rd r r r r r r r r r d d r_ r rd r d d r r d d r member of the school's management t

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EXHIBIT 64

State Board of Education

Ben Gibson. Chair Ryan Petty, Vice Chair Members Monesia Brown Esther Byrd Grazie Pozo Christie Kelly Garcia MaryLynn Magar

May 5, 2023

Arlette Petersson HCI College ID# 5625 1201 W. Cypress Creek Road, Suite 101 Ft. Lauderdale, FL 33309

Dear Dr. Petersson:

The Commission for Independent Education has received your package containing documents required for licensure. In order for your request to be considered by the Commission, all documentation must be complete and accurate.

I have completed an initial review of your package and the following documentation will need to be submitted and/or corrections made to your package. Please provide documentation to correct or complete these items no later than May 12, 2023 by email (preferred method) or mail.

Standard 4 - Educational programs and curricula

6E-2.004(4) (k) Any clinical experience, internship, externship, practicum, and other such formal arrangement for which an institution offers credit toward completion of a program, shall be under the supervision of the institution. Written agreements shall be executed between the institution and the entity providing the experience prior to obtaining program approval, delineating each responsibilities, the number of hours to be worked by the student, the types of work to be done by the student, the supervision to be given the student, and the method of evaluating the student's work and certifying it to the institution as satisfactory. If such experiences are required for the completion of a program, it is the responsibility of the institution to make prior arrangements for each student enrolled in the program to participate in the necessary experience within the agreed and documented length of time required for completion of and graduation from the program; and the institution's enrollments shall be based upon the availability of qualified clinical experiences, internships, externships, or practicums to serve all students.

Error, omission, or additional information required:

1. Submission of executed Externship Agreements for the Emergency Medical Technician (Diploma), and Paramedic (Diploma) programs.

Standard 5 – Recruitment and Admissions

6E-1.0032(13) It shall be the responsibility of an institution to require a training program for all staff who recruit prospective students or who participate in the admission of prospective students, at the institution. The training program shall be submitted to the Commission for approval with each application for a provisional license, an annual license or a license by means of accreditation, and with each annual review of a license by means of accreditation. Institutions that choose to employ a training provider for its training program may, if the program provided by the contractor has been approved by the Commission, provide the program without additional approval. Training shall include information to familiarize staff who recruit prospective students, or who participate in the admission of prospective students, with Chapter 1005, F.S., and with the institution's programs, services, costs, terms of payment, financial aid available for qualified students, refund policy, transferability of credits to other institutions, reasonable employment projections and accurate placement data, status of the institution regarding licensure and accreditation, facts regarding the eligibility of graduates to sit for licensure examinations or fulfill other requirements to practice in Florida the career or profession for which the prospective student wishes to be trained, and other relevant facts. The training program shall reflect the fair consumer practices outlined in Sections 1005.04 and 1005.34, F.S., and this rule.

Tiffany Hurst, Executive Director Commission for Independent Education 325 W. Gaines Street, Suite 1414 | Tallahassee, FL 32399-0400 | 850-245-3200 | www.fldoe.org/cie



Manny Diaz. Jr. **Commissioner of Education**

Error, omission, or additional information required:

1. Submission of a statement of confirmation that all staff who recruit prospective students or who participate in the admission of prospective students have completed an approved admissions training program.

<u> Standard 6 – Finances</u>

6E-2.004(6) (b) Annual License, Extension of Annual License, or Annual Review:

6E-2.004(6) (b) 1. Licensed nondegree schools shall provide annually a review or audit, prepared in accordance with Generally Accepted Accounting Principles by an independent certified public accountant. Licensed colleges and universities shall provide annually an audit, prepared in accordance with Generally Accepted Accounting Principles by an independent certified public accountant. This annual financial statement shall demonstrate that the current assets of the institution exceed the current liabilities, and that there was a positive net working capital and a profit or surplus for the prior year. If an institution does not meet the above requirements, the Commission shall require an explanation of the financial condition of the institution including a financial improvement plan or teachout plan or form of surety guaranteeing that the resources are sufficient to protect the current students. If the Commission determines that the institution does not have sufficient resources, it shall take actions up to and including revocation of licensure.

6E-2.004(6) (b) 3. Non-Florida corporations having one or more Florida location shall provide a profit and loss statement for each location in order to assess the financial stability of each individual location.

6E-2.004(6) (d) In addition to the financial information required above, institutions shall submit CIE Form 604, entitled Selected Financial Data (http://www.flrules.org/Gateway/reference.asp?No=Ref-03092), effective October 2013. This form is incorporated by reference and may be obtained without cost from the Commission's website at www.fldoe.org/cie or by writing to the Commission for Independent Education at 325 West Gaines Street, Suite 1414, Tallahassee, FL 32399-0400.

Error, omission, or additional information required:

- 1. Submission of a more detailed financial improvement plan, due to the net loss of the December 31, 2022 fiscal year, to include the following:
 - a. A cover letter on school letterhead detailing the institution's situation, plan for improvement, and elements found in Form 605, Business Plan, and Form 606, Projected or Actual Budget.
 - b. Form 605, Business Plan
 - c. Form 606, Projected or Actual Budget
- 2. Resubmission of a completed form 604 selected financial data. The form needs to be completed and signed by a Certified Public Accountant and School Administrator and match the financial statements for this application.
 - a. The signature for the institutional representative is missing.
- 3. Submit a Profit and Loss statement for the Ft. Lauderdale campus. The statement can be completed by a campus administrator.

Accreditation

Error, omission, or additional information required:

1. Submission of accreditation renewal documentation with the Accrediting Commission of Career Schools and Colleges (ACCSC).

Nursing

6E-2.004(4) (k) Any clinical experience, internship, externship, practicum, and other such formal arrangement for which an institution offers credit toward completion of a program, shall be under the supervision of the institution. Written agreements shall be executed between the institution and the entity providing the experience prior to obtaining program approval, delineating each responsibilities, the number of hours to be worked by the student, the types of work to be done by the student, the supervision to be given the student, and the method of evaluating the student's work and certifying it to the institution as satisfactory. If such experiences are required for the completion of a program, it is the responsibility of the institution to make prior arrangements for each student enrolled in the

Tiffany Hurst, Executive DirectorCommission for Independent Education325 W. Gaines Street, Suite 1414 | Tallahassee, FL 32399-0400 | 850-245-3200 | www.fldoe.org/cie

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program to participate in the necessary experience within the agreed and documented length of time required for completion of and graduation from the program; and the institution's enrollments shall be based upon the availability of qualified clinical experiences, internships, externships, or practicums to serve all students.

Error, omission, or additional information required:

- Submission of a clinical matrix containing all required competencies to include accurate contact information for each clinical site including contact person, phone number, and address.
 a. The following competencies are missing from the clinical matrix: Surgical, Obstetrics.
- Submission of signed and executed clinical agreements for the clinical sites missing from the clinical matrix.
 - a. Submit in PDF format clearly labeled in the order appearing on the clinical matrix.
- 3. Submission of the number of the graduates and testers for all of the Nursing related programs for the calendar year.
- 4. Submission of the Nursing Disclosure form for each Nursing related program accurately containing the information provided for the most recent calendar year published by the Board of Nursing.
- 5. Submission of an updated Nursing Milestones form to show the institution's progress on achieving programmatic accreditation.
 - a. Submit copies of communication with any accrediting agency.
- 6. Submission of a Remediation Plan for all programs on probation with the Florida Board of Nursing or with scores greater than 10 percentage points below the quarterly or yearly average as posted on the Florida Board of Nursing website.

Current Enrollments

- 1. Submission of the following information, which is requested on a voluntary basis. In order to better prepare you for this question at the meeting, we are requesting institutions voluntarily provide this information so staff can provide it to the Commissioners ahead of the meeting. Again, this is strictly voluntary and will not affect your ability to obtain or renew your license.
 - a. Current enrollment for each program.
 - b. Total tuition for each diploma program
 - c. Tuition per credit hour for each degree program.

<u>Nursing</u>

6E-2.004(4) (k) Any clinical experience, internship, externship, practicum, and other such formal arrangement for which an institution offers credit toward completion of a program, shall be under the supervision of the institution. Written agreements shall be executed between the institution and the entity providing the experience prior to obtaining program approval, delineating each responsibilities, the number of hours to be worked by the student, the types of work to be done by the student, the supervision to be given the student, and the method of evaluating the student's work and certifying it to the institution as satisfactory. If such experiences are required for the completion of a program, it is the responsibility of the institution to make prior arrangements for each student enrolled in the program to participate in the necessary experience within the agreed and documented length of time required for completion of and graduation from the program; and the institution's enrollments shall be based upon the availability of qualified clinical experiences, internships, externships, or practicums to serve all students.

Error, omission, or additional information required:

- 7. Submission of a clinical matrix for the Practical Nursing program containing all required competencies to include accurate contact information for each clinical site including contact person, phone number, and address.
 - b. The following competencies are missing from the clinical matrix: Surgical, Obstetrics.
- 8. Submission of signed and executed clinical agreements for the clinical sites missing from the clinical matrix.
 - b. Submit in PDF format clearly labeled in the order appearing on the clinical matrix.

Your package is pending further review until the above noted discrepancies/omissions have been addressed and returned to the Commission staff. When all of the above required information is received, your package will receive a final review and I will coordinate any additional requirements with you so that your request may be considered by the Commission.

Tiffany Hurst, Executive DirectorCommission for Independent Education325 W. Gaines Street, Suite 1414 | Tallahassee, FL 32399-0400 | 850-245-3200 | www.fldoe.org/cie

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If you are unable to meet the required suspense, your package may not be considered until a later meeting. Should you need additional information or need assistance, please feel free to contact me through the Commission office at (850) 245-3200. If you prefer to utilize email, I may be reached at Christopher.Disalvo@fldoe.org.

Thank you for your interest in providing educational programs for students in Florida.

Sincerely,

Christopher DiSalvo Program Specialist Case 9:22-cv-81883-RAR Document 141-2 Entered on FLSD Docket 12/19/2023 Page 913 of 1026

EXHIBIT 65

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CANDIDACY PRESENTATION REVIEW HCI College – West Palm Beach West Palm Beach, Florida

Program Type:AssociateDate of Review:May 2023

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I. GENERAL INFORMATION

Nursing Education Unit Nursing Department 1764 N. Congress Avenue, Suite 203 West Palm Beach, FL 33409 <u>Governing Organization</u> HCI College – West Palm Beach 1764 N. Congress Avenue, Suite 203 West Palm Beach, FL 33409

Nurse Administrator Homecia St. Clair, MSN, MSHS, CNM, PMHNP-BC Interim Director of Nursing Telephone: (561) 586-0121, ext. 1011 Email: homeciastclair@hci.edu Chief Executive Officer (governing organization)Pedro C. De GuzmanPresident and Chief Executive OfficerTelephone:(561) 586-0121Email:pdeguzman@hci.edu

State Regulator	y Agency Approval Status
Agency:	Florida Board of Nursing
Current Status:	Approved

Accreditation Status (Governing Organization) Agency: Accrediting Commission of Career Schools and Colleges Current Accredited Status:

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II. REVIEWER INFORMATION

Nell Ard, PhD, RN, CNE, ANEF	Marilyn Brady, PhD, RN
Interim CEO, Director	

ACEN Standards and Criteria Used: 2023

Program Demographics:

Program Start Date:	2012
First Graduating Cohort:	2014

Students:

	Nursing Student Enrollment:	
Total Number:	120	
Generic Associate Degree in Nursing –	80	
Day Program Option:		
Generic Associate Degree in Nursing – 40		
Evening Program Option:		

Program Options:

Name of Program Option (as cited in	Generic Associate Degree in Nursing	
the program of study):		
Does the program option use distance education? No		
Official Published Program(s) of	Full-time	
Study:		
Academic Term Type:	Semesters	

Introduction:

The associate nursing program offered at Health Care Institute – West Palm Beach (HCIWPB) offers a full-time generic associate degree in nursing with a day and evening program option. The program admits new cohorts annually in the spring, fall, and winter. The program is offered at one location in West Palm Beach. The reviewers noted that the candidacy presentation provides the beginning of the nursing program as 2019. However, the Florida Board of Nursing (FBON) website indicates that cohorts from HCIWPB began taking the licensure examination in 2014 (NCSBN #7070550); in 2019, a new NCSBN number was given to the program (#7041460). Graduates continue to take the licensure examination using both NCSBN numbers. The faculty should ensure that the Self-Study Report provides accurate and comprehensive information regarding the history of the associate nursing program.

The reviewers also noted that HCI has a second branch campus in Fort Lauderdale, which is referred to in the College Catalog. The Catalog 2023 (p. 4) implies that the associate nursing program offered at the Fort Lauderdale location is a component to West Palm Beach program. However, the presentation does not include this location, and the reviewers noted the FBON has a different NCSBN number (#7041350) for the Fort Lauderdale program. However, the Catalog lists this number for both programs.

The HCI – Fort Lauderdale associate nursing program *is not* a component of this review by the ACEN to be considered for Candidacy or potentially initial accreditation. The faculty must ensure that all documents accurately reflect the differences between the two associate nursing programs.

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III. EVALUATION OF THE STANDARDS AND CRITERIA

STANDARD 1

Administrative Capacity and Resources

The mission and/or philosophy of the nursing program reflects the governing organization's mission, goals, and/or values. The governing organization and nursing program have administrative capacity and resources that support effective delivery of the program and facilitate the achievement of the end-of-program student learning outcomes and program outcomes for each nursing program type, and additionally for graduate programs the role-specific nursing competencies.

- 1.4 The nurse administrator is a nurse who:
 - a. holds educational qualifications as required by the:
 - governing organization and •
 - regulatory agencies; •

According to the narrative for Criterion 1.4, the job description for the Director of Nursing requires that the individual has an earned graduate degree in nursing from an accredited nursing program (p. 8). A copy of the job description was not provided to verify this information. For the initial accreditation visit, a copy of the job description must be accessible in the virtual supporting evidence (ACEN Repository).

The Florida Board of Nursing (FBON) requires that the nurse administrator have a current license as a registered nurse in Florida. The nurse administrator of a professional nursing program is required to have a baccalaureate degree in nursing plus a master's degree or doctoral degree in a related field or a master's degree or doctoral degree in nursing [Florida Rule 64B9-3,009, F.A.C.] (Appendix D, p. 37). The narrative for Criterion 1.4 also indicates that 50% of the program's faculty including the nurse administrator must have a master's degree or higher in nursing or a baccalaureate degree in nursing with a master's or higher degree in a related field (p. 8).

The current nurse administrator has been appointed on an interim basis following the resignation of the previous nurse administrator in March 2023 (p. 8). According to the narrative, the nurse administrator is credentialed with a baccalaureate and master's degree in nursing; however, a copy of her current curriculum vitae (CV) or transcripts was not provided. Therefore, the reviewers are not able to verify the credentials of the nurse administrator. For an initial accreditation visit, the current CV for the nurse administrator must be in the virtual supporting evidence (ACEN Repository) and evidence of her academic degrees must be available either in the virtual supporting evidence or on site.

b. holds nursing licensure, and certification as applicable, consistent with the assigned roles and responsibilities; and

While the Criterion 1.4 narrative indicates that the nurse administrator is a registered nurse and currently holds an unencumbered nursing license, no information was provided regarding the state where she is licensed or her license number. A copy of her license was also not provided. Therefore, the reviewers were unable to verify whether she meets the requirement of the FBON or CIE.

c. is experientially qualified for the assigned roles and responsibilities.

The HCIWPB job description is reported to require that the nursing administrator have at least two years of clinical experience, at least one year of experience in nursing education, and a minimum of one year experience in administration or management (p. 8). However, as noted, a copy of the job description was not provided.

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The narrative indicates that the nurse administrator has experience as a nursing instructor and in direct patient care (p. 8). Specific information regarding the number of years was not provided, and as noted, a current CV was not provided. Therefore, the reviewers were unable to determine how much experience in nursing or nursing education the nurse administrator has, which means the reviewers were unable to verify whether the nurse administrator meets the requirements of HCIWPB for the position.

The reviewers noted that the narrative for Criterion 1.4 (pp. 8–9) provides information about the role responsibilities of the nurse administrator. This information should be moved to the narrative for Criterion 1.5 and not repeated elsewhere in the Self-Study Report.

The reviewers could not verify evidence to support compliance with this Criterion.

1.4a Failure to provide evidence that the nurse administrator holds educational qualifications required by the governing organization and regulatory agencies.

1.4b Failure to provide evidence that the nurse administrator holds nursing licensure consistent with the assigned roles and responsibilities.

1.4c Failure to provide evidence that the nurse administrator is experientially qualified for the assigned roles and responsibilities.

Rationale:

The narrative provided limited information regarding how the nurse administrator meets the various sub-Criteria, and no supporting evidence, including curricula vitae, was provided.

1.8 The nursing program has sufficient and sustainable fiscal resources to support the program at all locations and for all methods of delivery.

The narrative for Criterion 1.8 indicates that the primary source of fiscal funding is tuition (p. 9). HCIWPB is reported to have had a 7% increase in fiscal funding annually (p. 9).

Table 1.1 (p. 10) provides information regarding the associate nursing program's budget for fiscal years (FYs) 2021, 2022, and 2023. The first column delineates the income based upon tuition, while the remaining three columns list expenses for capital/equipment, other expenses, and salaries respectively. While the overall institution reported an increase in fiscal funding, the nursing program demonstrated approximately a 29% decrease in income between FY 2021 and FY 2022, approximately a 27% increase between FY 2022 and FY 2023, with an overall decrease of approximately 3% between FY 2021 and FY 2023.

Table 1.2 (p. 10) provides a comparison of the reported overall institutional budget with the nursing program's budget for FYs 2021–2023. The nursing program is reported to represent 62–76% of the overall HCIWPB budget; the current FY 2023 indicates that the nursing program is 62% of the overall budget. This table indicates that HCIWPB demonstrated a 20% decrease in fiscal funding between FY 2021 and FY 20222, with an increase of approximately 7% between FY 2022 and FY 2023.

Other than indicating that the budget is administered by the Dean and nurse administrator, no additional information was provided regarding the budget process for development and distribution. The narrative implies that faculty had input, but this was not clearly described (p. 10). For the Self-Study Report, additional information must be provided regarding the budget development process as well as the role of the nurse administrator and faculty in the process. Three years of actual budgets for the governing organization and nursing program must be accessible in the virtual supporting evidence (ACEN Repository) or onsite.

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The reviewers identified the following suggestions for improvement:

1.8 Ensure that the nursing program has sufficient and sustainable fiscal resources to support the program.

Rationale:

Information regarding the budgetary process was not provided and no supporting evidence was available related to the budget for the governing organization or nursing program.

1.9 The nursing program has sufficient and sustainable physical resources to support the program at all locations and for all methods of delivery.

The nursing program is reported to have access to offices, classrooms, skills laboratories, and simulation rooms. No information is provided regarding the computer laboratories or the accessibility of computers to the students.

The nurse administrator is reported to have a private office that is fully equipped. The faculty are reported to share offices with two faculty per office; each office is equipped with desks, filing cabinets, and a computer (p. 11). An additional office space is available with four workstations and is reported to be primarily used by part-time faculty. No information is provided regarding the office/workspace for the nursing support staff. According to the narrative, student conferences are held in the faculty offices; however, it was unclear how this provides a private meeting space since all offices except for the nurse administrator's office being shared. Additional clarification must be provided in the Self-Study Report.

Eight classrooms are reported to be available, and three are dedicated to nursing (pp. 10-11). Each classroom is reported to accommodate 20-40 students, and classrooms are equipped with a ceilingmounted projector, desktop computers, Wi-Fi access, a whiteboard, podiums, and student desks/chairs (pp. 10–11).

As noted, no information was provided regarding computer laboratories or how students have access to computers. Additional information must be provided in the Self-Study Report.

The program is reported to have access to two laboratories as well as a hospital simulation center with five stations. An additional two simulation rooms are also reported to be available (p. 11). The reviewers were unclear regarding how many hospital beds or workstations are accessible in each of the skills laboratories or how many students can be accommodated in each laboratory at the same time. The narrative provides limited information regarding the equipment and supplies available in the skills or simulation laboratory areas. Additional clarification must be provided in the Self-Study Report. The laboratories are reported to be accessible during hours of operation, which is 7:00 a.m. to 11:00 p.m. (p. 11).

The reviewers verified evidence to support *minimal* compliance with this Criterion.

The reviewers identified the following suggestions for improvement:

1.9 Ensure that the nursing program has sufficient and sustainable physical resources to		
support the program.		
Rationale:		
	1.	

Limited information was provided regarding several of the physical resources available to faculty, staff, and students.

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Summary of Compliance:

The associate nursing program is not in compliance with Standard 1 as the following Criterion has not been met: Criterion 1.4.

All Criteria for Standard 1 must be met prior to Initial Accreditation.

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STANDARD 2 Faculty

Faculty are educationally and experientially qualified for their assigned roles and responsibilities, maintain expertise, and are regularly evaluated to support the achievement of the end-of-program student learning outcomes and program outcomes for each nursing program type, and additionally for graduate programs the role-specific nursing competencies.

Full- and part-time faculty include those individuals teaching and/or evaluating students in didactic, clinical, and/or laboratory settings.

Full-time faculty are nurses who: 2.1

- a. hold the educational qualifications as required by the:
 - governing organization and
 - regulatory agencies;

The reviewers noted that while the candidacy presentation was written using the ACEN 2023 Standards and Criteria, the faculty used the faculty profile table template for the 2017 Standards and Criteria. For the initial accreditation visit, the faculty must use the appropriate faculty profile table template, which is located in the 2023 Program Guidelines (pp. 69–74). Using the 2023 Standards and Criteria, the faculty profile table coversheet should not have information regarding the requirements of the institutional accrediting agency.

The faculty profile table did not include the HCIWPB requirements for faculty as required (Appendix D, pp. 37-39). Therefore, the reviewers were unable to verify whether the full-time faculty meet the requirements of the governing organization. A copy of the job description must be accessible in the virtual supporting evidence (ACEN Repository) for the initial accreditation visit, and the faculty profile table coversheet must be completed as required.

Table 2.1 (p. 12) indicates that it provides a "sample" of the minimum requirements for HCIWPB regarding faculty. This table indicates that faculty must have a minimum of an earned baccalaureate degree (master's preferred) with a major in nursing (BSN or equivalent) from an accredited nursing program. Faculty are also required to have an unencumbered registered nurse license or advance registered nurse practitioner license issued by the Florida Department of Health. Finally, faculty are required to have a minimum of three years of related practical work experience in the subject area (p. 12).

The FBON requires that 50% or more of the faculty in a professional nursing program hold either a baccalaureate degree in nursing plus a master's or doctoral degree in a related field or a master's or doctoral degree with a major in nursing. Additionally, faculty must have a current license as a registered nurse in Florida. If the person does has a baccalaureate degree in nursing, then the individual must meet one of the following requirements: have the equivalent of two years of full-time experience in clinical practice as a registered nursing, be actively engaged in studies leading to the next highest degree for which eligible in nursing, have the equivalent of two years of full-time academic experience as a teacher in nursing, or have an active ARNP license in Florida [Florida Rule 64B9-3,009, F.A.C.] (Appendix D, p. 37).

The Commission for Independent Education (CIE) requires that all faculty (full- and part-time) have a minimum of a baccalaureate degree. For institutions with exceptions to the baccalaureate degree must be able to justify the exception based upon alternative expertise in the field or subject, such as educational preparation other than the baccalaureate degree in the field or subject taught, professional certification, or significant related work experience. Faculty whose graduates must pass state, federal, or other licensing examinations before being licensed to practice in their vocation must provide evidence that each faculty teaching in the field holds a current and valid Florida occupational license in the occupation taught.

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Additionally, faculty must complete eight continuing hours of training related to their positions annually [Florida Department of Education, Chapter 6E Rules] (Appendix D, pp. 38–39).

According to the faculty profile table (Appendix D, pp. 40–42), the associate nursing program currently has five full-time exclusive faculty teaching in the associate nursing program. Two full-time faculty are credentialed with a master's degree with a major in nursing; two full-time faculty are credentialed with a Doctorate of Nursing Practice (DNP). The final full-time faculty member is credentialed with a baccalaureate degree with a major in nursing (p. 12; Appendix D, pp. 40–42). The presentation does not include information regarding how the faculty member with a baccalaureate degree with a major in nursing meets the requirements of the FBON (Appendix D, p. 37).

b. hold nursing licensure, and certification as applicable, consistent with their assigned roles and responsibilities;

According to the faculty profile table (Appendix D, pp. 40-42), all full-time faculty had a current license; however, two faculty member licenses will expire on April 30, 2023. Two faculty are noted to have APRN licenses; however, one of these is scheduled to expire on April 30, 2023. While the faculty profile table indicated that faculty have current licenses, no supporting evidence was provided. For the initial accreditation visit, the faculty must upload copies of all licenses/certifications into the virtual supporting evidence (ACEN Repository) and faculty should ensure that all are current.

The reviewers noted that while the two faculty are reported to be APRNs, no information was provided regarding the type of APRN or the population foci. Additional clarification must be provided in the Self-Study Report as well as information regarding potential national certifications for each.

c. are experientially qualified for their assigned roles and responsibilities; and

The faculty profile table did not include the Qualification and Professional Development addenda for each full-time faculty member. Therefore, the reviewers were unable to verify whether the faculty are qualified to teach in their assigned course(s) or to verify whether they each have three years of clinical experience. According to the faculty profile table, three full-time faculty appear to have only didactic course assignments, while the remaining two full-time faculty have course assignments in the skills laboratory and clinical learning environments.

Without the Qualification and Professional Development addenda, the reviewers were unable to verify whether each faculty member meets the CIE requirements for eight continuing education hours related to their teaching assignment or the three years of clinical experience required by HCIWPB. Additionally, the reviewers were unable to verify whether each faculty member maintains expertise in their area(s) of responsibility, which may include didactic, skills, simulation, online, and/or clinical learning environments.

d. are sufficient in number.

Full-time Faculty-to-Student Ratios at the Time of the Visit			
Setting	Agency Ratio Regulations (if applicable) (e.g., SBON- 1:10)	Ratios	
Overall Full-time Faculty-to-Student	No information provided.	1:24	
Ratio:			
Classroom:	No information provided.	1:25	
Laboratory:	Narrative implies that the	1:12	
Clinical:	FBON has a maximum 1:12	1:12	
	ratio in clinical and lab (p.		
	13); however, no citation is		
	provided.		
Simulation:	No information provided.	1:12	
Methods used to verify faculty-to-	No specific citations provided	Table 2.2, p. 13	
student ratios:	regarding the FBON; no	_	
	information provided		
	regarding the other agencies		
	(e.g., HCI, CIE)		

The associate nursing program currently has 120 students enrolled (pp. 5, 7). This provides a full-time faculty-student ratio of 1:24. Information was provided regarding the faculty-to-student ratios in the various learning environments depicted in the table above. However, no supporting evidence was provided regarding the actual faculty-to-student ratios in both the day and evening program options.

In the Self-Study Report, the faculty should provide faculty-to-student ratio tables for the current courses/sections being taught in the academic term in which the initial accreditation visit occurs. Additional faculty-to-student ratio tables for previous academic terms/years should be accessible in the virtual supporting evidence available with the Self-Study Report.

According to the Criterion 2.1 narrative, a full-time faculty workload is based upon contact hours. Table 2.3 (p. 13) indicates that faculty are required to have 30 contact hours if a lecture faculty, 30 contact hours as a lab faculty, and 30 contact hours as a clinical/simulation faculty. Faculty are also reported to post an unspecified number of office hours as well as devoting time to professional development, other professional activities such as committee work, course preparation, advising, tutoring, and working on programmatic accreditation (p. 13). The reviewers are not clear whether faculty receive workload allocations for these non-teaching activities or not. Additional clarification must be provided.

As previously noted, some full-time faculty have lecture only assignments however, two have both laboratory and clinical assignments. The reviewers are also not clear how faculty teaching a single didactic course will achieve the 30 contact hours per week since didactic course credits range from three to seven; some faculty have a single course assigned. So, faculty teaching in both the day and evening program option would only have potential 10 to 14 contact hours per week.

The presentation does not provide a workload allocation table for the current academic term/year; therefore, the reviewers are not able to determine whether faculty are at load or in an overload. In the Self-Study Report, a workload allocation table must be provided with information regarding each fulltime faculty member's workload. Additional faculty workload tables for two to three previous academic terms/years should also be accessible as virtual supporting evidence available with the Self-Study Report. Additionally, the Self-Study Report should compare the workload of nursing faculty to the workload of other faculty teaching in the governing organization.

The reviewers could not verify evidence to support compliance with this Criterion.

2.1a Failure to provide evidence that full-time faculty hold the educational requirements required by the governing organization and regulatory agencies.

2.1c Failure to provide evidence that full-time faculty are experientially qualified for their assigned roles and responsibilities.

Rationale:

A Qualification and Professional Development addendum was not provided; therefore, the reviewers were unable verify the area(s) of expertise or the number of years of experience in nursing and/or nursing education.

The reviewers identified the following suggestions for improvement:

2.1b Ensure full-time faculty hold nursing licensure, and certification, consistent with their assigned roles and responsibilities.

2.1c Ensure full-time faculty maintain expertise in their area(s) of responsibility which may include didactic, skills, simulation, online, and/or clinical learning environments.

2.1d Ensure that the number of full-time faculty is sufficient. Rationale[.] Limited evidence was provided to support compliance with the sub-Criterion.

2.2 Part-time faculty are nurses who:

- a. hold the educational qualifications as required by the:
 - governing organization and
 - regulatory agencies; •

The faculty profile table did not include the HCIWPB requirements for faculty as required (Appendix D, pp. 37–39). Therefore, the reviewers are not able to verify that the part-time faculty meet the requirements of the governing organization. The requirements of the FBON and CIE are the same for part-time faculty (Appendix D, pp. 37–39). According to the narrative (p. 14), the part-time faculty have the same requirements as full-time faculty (Table 2.1, p. 12).

According to the faculty profile table (Appendix D, pp. 43–47), there are currently 11 part-time faculty teaching in the associate nursing program. Six part-time faculty are credentialed with a master's degree with a major in nursing; one of these is also credentialed with a Doctor of Philosophy (PhD) in nursing. One part-time faculty member is credentialed with a DNP. The remaining four part-time faculty are credentialed with a baccalaureate degree with a major in nursing (p. 14; Appendix D, pp. 43–47). The presentation did not include information regarding how the faculty member with a baccalaureate degree with a major in nursing meets the requirements of the FBON (Appendix D, p. 37).

b. hold nursing licensure, and certification as applicable, consistent with their assigned roles and responsibilities;

According to the faculty profile table (Appendix D, pp. 43–47), all of part-time faculty had a current license; however, three faculty member's licenses will expire on April 30, 2023. Three faculty are noted to have APRN licenses; however, one of these is also scheduled to expire on April 30, 2023. While the faculty profile table indicated that faculty have current licenses, no supporting evidence was provided. For the initial accreditation visit, the faculty must upload copies of all licenses/certifications into the virtual supporting evidence (ACEN Repository) and faculty should ensure that all are current.

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The reviewers noted that while the three faculty are reported to be APRNs, no information is provided regarding the type of APRN or the population foci. Additional clarification must be provided in the Self-Study Report as well as information regarding potential national certifications for each.

c. are experientially qualified for their assigned roles and responsibilities; and

The faculty profile table did not include the Qualification and Professional Development addenda for each full-time faculty member. Therefore, the reviewers are not able to verify that the faculty are qualified to teach in their assigned course(s). According to the faculty profile table, six part-time faculty appear to have only clinical course assignments, two have only laboratory course assignments, two have only didactic course assignments while the remaining one part-time faculty member has both clinical and laboratory course assignments. One part-time faculty member is noted to be a "substitute clinical instructor" for three clinical courses; it is not clear whether this individual is currently teaching in the associate nursing program. For the initial accreditation visit, only those faculty with current teaching assignments should be included in the faculty profile table.

Without the Qualification and Professional Development addenda, the reviewers are also not able to verify that each faculty member meets the CIE requirements for eight continuing education hours related to their teaching assignment. Additionally, the reviewers are not able to verify that each faculty member maintains expertise in their area(s) of responsibility which may include didactic, skills, simulation, online, and/or clinical learning environments.

d. are sufficient in number.

According to the narrative, part-time faculty can teach up to 20 hours per week (p. 14). Part-time faculty are also required to have one hour of office time per course each week (p. 14).

The presentation does not provide a workload allocation table for the current academic term/year; therefore, the reviewers are not able to determine whether faculty are at load or in an overload. In the Self-Study Report, a workload allocation table must be provided with information regarding each parttime faculty member's workload. Additional faculty workload tables for two to three previous academic terms/years should also be accessible as virtual supporting evidence available with the Self-Study Report. Additionally, the Self-Study Report should compare the workload of nursing faculty to the workload of other faculty teaching in the governing organization.

The reviewers could not verify evidence to support compliance with this Criterion.

2.2a Failure to provide evidence that part-time faculty hold the educational requirements required by the governing organization and regulatory agencies.

2.2c Failure to provide evidence that part-time faculty are experientially qualified for their assigned roles and responsibilities.

Rationale:

A Qualification and Professional Development addendum was not provided; therefore, the reviewers were unable to verify the area(s) of expertise or the number of years of experience in nursing and/or nursing education.

The reviewers identified the following suggestions for improvement:

- 2.2b Ensure part-time faculty hold nursing licensure, and certification, consistent with their assigned roles and responsibilities.
- 2.2 c Ensure part-time faculty maintain expertise in their area(s) of responsibility which may include didactic, skills, simulation, online, and/or clinical learning environments.

2.2d Ensure that the number of part-time faculty is sufficient. Rationale: Limited evidence was provided to support compliance with the sub-Criterion.

Summary of Compliance:

The associate nursing program is not in compliance with Standard 2 as the following Criteria have not been met: Criterion 2.1 and Criterion 2.2

All Criteria for Standard 2 must be met prior to Initial Accreditation.

STANDARD 4 Curriculum

The curriculum supports the achievement of the end-of-program learning outcomes for each nursing program type, and additionally for graduate programs, the role-specific nursing competencies; and is consistent with safe practice in contemporary healthcare environments.

4.1 The nursing curriculum has one set of end-of-program student learning outcomes that: a. are based on contemporary professional nursing standards, guidelines, and/or competencies; and

According to the presentation, the faculty have used a variety of professional nursing standards, guidelines, and competencies to develop the curriculum including the Quality and Safety Education for Nurses (QSEN) Competencies, and the National League for Nursing (NLN) Competencies for Graduates of an Associate Degree Program. From these, the faculty have selected the concepts of safety, legal and ethical, communication, leadership, and critical thinking (p. 15). Table 4.1 (p. 16) provides a side-by-side comparison of the QSEN competencies, the NLN Competencies, and the end-of-program student learning outcomes (EPSLOs) for the associate nursing program offered at HCIWPB.

The faculty have identified five EPSLOs (Table 4.1, p.16; HCI College Student Catalog 2023, p.140). Each EPSLO is aligned with one of the concepts identified above. The reviewers noted that the EPSLO related to the concept of legal and ethical contains to action verbs (incorporate and promote), which will make verifying achievement of the outcome challenging. The faculty should ensure that all objectives/outcomes have a single, measurable action verb.

b. apply to all program options and reflect the educational level at which students are being prepared.

As noted, the associate nursing program has a generic program with day and evening program options. The EPSLOs apply to all program options and reflect the entry-level role responsibilities of a registered nurse prepared at the associate degree level.

The reviewers verified evidence to support compliance with this Criterion.

Course student learning outcomes are organized to demonstrate progression to facilitate the 4.2 students' achievement of:

a. the end-of-program students learning outcomes.

The abbreviated syllabi (Appendix G, pp. 48–70) have four to ten course outcomes each. The reviewers noted that while the courses include the EPLSOs, no information is provided regarding how each is aligned with the course outcomes. Additionally, the reviewers noted that the course outcomes are the same in multiple courses or the only difference is the patient population. This does not reflect consistent progression (e.g., simple to complex). The reviewers also noted that some course outcomes have two action verbs (e.g., create and evaluate) which will make verifying achievement of the outcome challenging. The faculty must ensure that course outcomes consistently progress (e.g., simple to complex) throughout the program of study to facilitate the achievement of the course outcomes and ultimately the EPSLOs.

Appendix H (pp. 71–73) provides a comparison of the EPSLOs to selected course objectives throughout the program of study. The table supports the reviewers' observation that course outcomes are exactly the same in multiple courses. The table also appears to indicate that multiple courses only reflect two of the EPSLOs and none of the courses, including the capstone course, reflect all of the EPSLOs.

For the Self-Study Report, the faculty should revise the table to use a landscape-orientated format. The faculty may also elect to place a small example of the table in the Criterion 4.2 narrative while the overall table is provided in the virtual supporting evidence.

The reviewers verified evidence to support *minimal* compliance with this Criterion.

The reviewers identified the following suggestions for improvement:

4.2 Ensure the course student learning outcomes are organized to demonstrate progression to facilitate the students' achievement of the end-of-program student learning outcomes.

Rationale:

The same course objectives appear in multiple courses, which does not demonstrate consistent progress (e.g., simple-to-complex).

4.3 Teaching/instructional strategies and learning activities in all learning environments are varied, appropriate for the method of delivery, and incorporate learning and technology resources to facilitate the students' achievement of course student learning outcomes.

Table 4.2 (pp. 17–20), which is in the Criterion 4.2 narrative, further supports the same course outcomes in multiple courses. This table also identifies the instructional method(s) and learning activity/activities aligned with each selected course outcome.

The faculty should revise the table to use a landscape-orientated format and then move the table to the Criterion 4.3 narrative. Additionally, the faculty should only provide an example of the table in the narrative while the overall table inclusive of all courses and course outcomes should be accessible in the virtual supporting evidence (ACEN Repository).

The narrative for Criterion 4.3 (pp. 21–22) provides examples of teaching strategies and learning activities in theory, skills, and clinical learning environments. However, the reviewers noted that much of the narrative applies to the evaluation of the student in these areas which should be moved to the Criterion 4.10 narrative. The narrative for Criterion 4.3 should focus on instructional methods, learning activities as well as the integration of learning resources and technology into the curriculum; limited information is provided regarding the learning resources and technology used.

The reviewers verified evidence to support *minimal* compliance with this Criterion.

The reviewers identified the following suggestions for improvement:

4.3 Ensure teaching/instructional strategies and learning activities in all learning environments incorporate learning and technology resources to facilitate the students' achievement of course student learning outcomes.

Rationale:

Limited information is provided regarding the learning resources and technology incorporated into the teaching strategies and learning activities.

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4.6 Course credits and/or clock hours for all nursing courses in the program of study, including ratios for contact hours, comply with requirements of the:

Program Option/Track: Add additional rows as necessary.	Length of Time/Required Number of Academic Terms (including any prerequisite terms prior to entry into the program):	Length of Academic Term:	Total Number of Credits for Entire Program Option:	Total Nursing Credits:	Credits for Prior Learning, if applicable:
Generic Associate	6	15-weeks	72	42	0
Degree Nursing					
Program – Day					
Program Option:					
Generic Associate	6	15-weeks	72	42	0
Degree Nursing					
Program – Evening					
Program Option:					
Methods Used to Verify Program Length: pp. 5-6; Table 4.3, p. 24; HCI College Catalog 2023, p. 143.					

Academic Setting Credit-to-Contact-Hour Ratios Used by the Program at t the Visit		
Didactic:	1:1	
Laboratory:	1:2	
Simulation:	Not specified	
Clinical:	1:3	
Methods Used to Verify Credit-to-Contact Hour Ratios: p. 23.		

a. governing organization and

The narrative for Criterion 4.6 (p. 22) refers the reader to Appendix I (pp. 74–78) which is reported to provide information regarding the requirements of the various agencies related to program length. However, the table does not provide any information regarding the HCIWPB requirements for an associate degree regardless of the discipline. Therefore, the reviewers are not able to verify compliance with the Criterion.

b. regulatory agencies.

The FBON requires that 50% of the program be in the clinical setting and requires that there be clinical experiences in medical, surgical, obstetric, pediatric, psychiatric, and geriatric nursing. Additional concepts required in a professional nursing program curriculum are also delineated (pp. 73–74); however, these are not specific to program length.

The CIE (Appendix, pp. 75–76) requires that an associate degree be a minimum of 60 semester credits, 90 quarter credits or the recognized clock hour equivalent. An associate degree must also include a minimum of 15 semester credits, 22.5 quarter credits, or the clock hour equivalent in general education courses. The table is also noted to provide additional information that does not pertain to program length; this information should be deleted.

Appendix I is noted to include information regarding the requirements of the institutional accrediting agency which are not required using the 2023 Standard and Criteria. Therefore, this section of the table should be deleted for the initial accreditation visit. The faculty should revise the table to use a landscape-oriented format. With the changes, the table should be a one-page table that can be inserted within the Criterion 4.6 narrative, or the reader can be referred to the virtual supporting evidence (ACEN Repository).

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Information regarding the credit-to-contact hour ratios used by the program was found in the narrative (p. 23) and is delineated in the table above. However, the information did not include the credit-to-contact hour ratios specific to the simulation laboratory. Additional clarification must be provided in the Self-Study Report. According to Table 4.3 (p. 24), the overall program has 1485 contact hours with 840 in lecture, 150 in laboratory, and 495 in clinical learning experiences. However, Table 4.5 (p. 28) provides conflicting information regarding the number of laboratory and clinical hours and indicates there are an additional 217 hours of simulation not accounted for in Table 4.3 (p. 24). Consistent and accurate information must be provided throughout the Self-Study Report and all documents. The curriculum must be delivered as published. The reviewers noted multiple inconsistencies between the credit and contact information included in abbreviated syllabi (Appendix G, pp. 48–70) and in Table 4.3 (p. 24). Discrepancies were noted for the following courses: NUR1213, NUR2140, NUR2261, NUR2520, NUR2943. In the Self-Study Report, faculty should ensure that all information is consistent.

The generic associate nursing program (day and evening program options) is 72 semester credits which consists of 30 semester credits in general education courses and 42 semester credits in nursing (Table 4.3, p. 24). The first two semesters are allocated to the general education courses with the students having 15-17 semester credits each term. The final four semesters are allocated to nursing and require the student to take 6–14 semester credits each term.

The reviewers could not verify evidence to support compliance with this Criterion.

4.6a Failure to provide evidence that course credits for all nursing courses in the program
of study, including ratios for contact hours, comply with requirements of the governing
organization.

Rationale:

No information was provided regarding the requirements of the governing organization regarding the program length and requirements for an associate degree to be conferred.

4.9 Clinical/practicum learning environments and experiences:

Program Option/Track	Total Clinical and/or Practicum Hours	
Generic Associate Degree Nursing Program – Day Program Option:	495	
Generic Associate Degree Nursing Program – Evening	495	
Program Option: Methods used to verify clinical and laboratory hours: Table 4.6, p. 24.		

a. have current written agreements that specify expectations for all parties for the protection of the student;

The Criterion 4.9 narrative provides limited information about the affiliation agreements (p. 27). The narrative indicates that the clinical coordinator prepares the agreement for the Chief Operating Officer to sign. However, no information is provided regarding the expectations of all parties or how the agreement includes the protection of the student. In the Self-Study Report, additional information must be provided regarding the various components of the affiliation agreement. Copies of all affiliation agreements must be accessible in the virtual supporting evidence (ACEN Repository).

b. reflect evidence-based nursing practice;

While the narrative implies that all experiences are evidence-based and reflect current nursing practice (p. 27), no information is provided regarding how faculty verify that each agency reflects contemporary, evidence-based practice. The narrative further indicates that faculty and students evaluate the sites (p. 27); however, a copy of the survey tool was not provided, and the narrative did not provide data from this

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assessment. In the Self-Study Report, the narrative for Criterion 4.9 should describe how the faculty ensure that each practice learning environment is evidence-based, reflects contemporary practice as well as how each site facilitates the achievement of the end-of-program SLOs. If the faculty and/or students evaluate the clinical sites, the narrative should also provide information regarding these evaluations and supporting documentation of the process/processes should be accessible in the virtual supporting evidence with the Self-Study Report.

c. meet regulatory agencies' requirements for clinical/practicum learning environments, as applicable; and

The FBON requires that 50% of the program be in the clinical setting and requires that there be clinical experiences in medical, surgical, obstetric, pediatric, psychiatric, and geriatric nursing (Appendix I, pp. 73–74). Additionally, no more than 50% of the clinical training may be in simulation (pp. 28, 74). No information is provided regarding the potential requirements of the CIE related to clinical/practicum learning environments. Additional clarification must be provided in the Self-Study Report.

For Undergraduate Programs:

d. reflect the educational level at which students are being prepared to facilitate the achievement of the course student learning outcomes and end-of-program student learning outcomes.

As noted in the narrative for Criterion 4.6 above, there is conflicting information regarding the number of clinical hours. Table 4.5 delineates the number of hours in laboratory, clinical, and simulation; however, these hours are not the same as those delineated in the Criterion 4.6 narrative. Consistent information must be provided. Additionally, in the Self-Study Report, information about the use of the skills and simulation laboratory, as well as the number of hours in each learning environment, will appear in the Criterion 4.8 narrative while the Criterion 4.9 narrative will be specific to the learning experiences in the clinical agencies providing direct patient care. The associate nursing program is reported to have clinical experience in acute care hospitals, skilled nursing facilities, rehabilitation facilities, and outpatient clinics. Table 4.4 (p. 26) provides a list of eight agencies used. However, the table does not provide specific information about the facility and only identifies the course(s) using the site and the specialty areas used. The faculty should revise the table to include additional columns that provide information about the agency (e.g., 75-bed long-term care facility with Joint Commission Accreditation) as well as the unit(s) within the site used. The sites appear to be appropriate for a prelicensure nursing program preparing registered nurses. The reviewers noted that information about the inclusion of interprofessional collaboration and national patient safety initiatives are included (p. 27). This information should be moved to the Criterion 4.7 narrative in the Self-Study Report and not repeated elsewhere in the report.

The reviewers verified evidence to support *minimal* compliance with this Criterion.

The reviewers identified the following suggestions for improvement:

- 4.9a Ensure clinical/practicum learning environments and experiences have current written agreements that specify expectations for all parties for the protection of the student.
- 4.9b Ensure clinical/practicum learning environments and experiences reflect evidencebased nursing practice.
- 4.9c Ensure clinical/practicum learning environments and experiences meet regulatory agency requirements for clinical/practicum learning environments.

Rationale[.]

Limited information is provided to verify compliance with the sub-Criterion.

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4.10 Formative and summative student evaluation methods:

- a. are utilized throughout the curriculum in all learning environments;
- b. are varied and appropriate for all methods of delivery; and

The narrative for Criterion 4.10 (p. 29) provides limited information about the types of evaluation methods utilized within the curriculum; no information is provided regarding formative versus summative evaluation. The abbreviated syllabi (Appendix G, pp. 48–70) indicates that a variety of evaluation methods are used. Examples include, but are not limited to, guizzes/examinations, reflective papers, standardized testing, third-party vendor modules/assignments, dosage calculation tests, papers, skill checkoffs, and clinical evaluations. The faculty are using evaluation methods in didactic, skills, and clinical learning environments.

c. align with the progression of course student learning outcomes.

The narrative for Criterion 4.10 does not provide information regarding how each evaluation method is aligned with the course outcomes and also does not describe how the evaluation methods progress (e.g., simple to complex) throughout the curriculum. Examples of the various types of evaluation were not provided, and therefore, the reviewers are not able to verify any alignment or progression. The reviewers did note that the program is also using high-stake standardized testing which is not an educational best practice.

In the narrative for Criterion 4.10 of the Self-Study Report, the faculty should describe each type of assessment methodology used in the associate nursing program as well as information regarding how each is aligned with the end-of-program SLOs. Copies of all rubrics and evaluation tools must be provided in the virtual supporting evidence while examples of student work using the rubrics and tools must be accessible during the initial accreditation visit.

The reviewers verified evidence to support *minimal* compliance with this Criterion.

The reviewers identified the following suggestions for improvement:

4.10a Ensure formative and summative evaluation methods are utilized throughout the curriculum in all learning environments.

4.10c Ensure formative and summative evaluation methods align with the progression of course student learning outcomes.

Rationale:

Limited information is provided to verify compliance with the sub-Criterion.

Summary of Compliance:

The associate nursing program is not in compliance with Standard 4 as the following Criterion has not been met: Criterion 4.6.

All Criteria for Standard 4 must be met prior to Initial Accreditation.

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STANDARD 5 Outcomes

Nursing program assessment demonstrates the extent of student learning at or near the end of the program as well as program outcome achievement using a systematic plan for evaluation (SPE).

The faculty create and implement a written SPE* for each nursing program type to determine the extent of the achievement of each end-of-program student learning outcome and program outcome, and additionally for graduate programs the role-specific nursing competencies, to inform program decision-making to maintain or improve student and program performance.

*Programs seeking initial accreditation are required to have data from the time that the nursing program achieves candidacy with the ACEN.

The faculty are reported to have developed a systematic plan of evaluation (SPE) that is reviewed based upon a schedule (p. 30). Appendix J (pp. 79–86) provides a copy of the plan which does include each EPSLO. The section of the plan related to the EPSLOs has two columns (pp. 79-83). The first column has rows that identify the expected level of achievement (ELA) and assessment method as well as providing aggregate data. The second column is for action and analysis of the data; however, the reviewers noted that this column does not clearly indicate the date of the actions and/or analysis. Additionally, the SPE does not identify the frequency upon which faculty will collect, trend and aggregate the data.

The SPE related to program outcomes has six columns labeled "component," "assessment method(s)," expected level(s) of achievement," "data collection and assessment frequency," results of data collection including actual level(s) of achievement" and "analysis and action." The SPE includes program outcomes related to program completion (p. 84), licensure examination pass rate (p. 85), and job placement (p. 86).

5.1 The systematic plan for evaluation describes the process for regular summative nursing program-level assessment of student learning outcome achievement. The faculty will:

a. use a variety of appropriate direct outcome assessment methods to ensure comprehensive summative assessment for each end-of-program student learning outcome:

As indicated, the SPE does include each of the EPSLOs. The faculty have identified a single direct assessment method for each of these. The assessment method uses standardized examinations which assess cognitive achievement. The program appears to be using or has used three different third-party standardized testing vendors and their products. The faculty appear to have changed the third-party vendor each year. The frequent change in the vendor does not allow the faculty to clearly analyze data related to each EPSLO.

The faculty must identify additional direct assessment methods to use to collect data related to each EPSLO. The data should be collected in those courses at or near the end of the program. The faculty should identify appropriate direct assessment methods related to each end-of-program SLO as well as the concepts/competencies within each, and the ELA should be consistent with the assessment method as well as the end-of-program SLO. The assessment methods should include direct methods of assessment (e.g., scores on sub-scales of practicum evaluation tool or rubric) and may include indirect measures such as surveys. If the faculty use surveys to collect data, then the response rates (number of surveys returned divided by the number of surveys distributed/graduates) should be recorded for each survey, whether print, digital, telephone, or other survey method, to ensure sufficient data have been collected to inform program decision-making.

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The faculty have established a single ELA for each EPSLO related to the standardized examination. The ELA for the current standardized examination is "the cohort average will be at or above the category of 'acceptable' which is 16.61 or higher on the HESI Adaptive Assessment" (pp. 79, 80, 81, 82, 83). While the faculty are attempting to collect data, an overall score on a standardized examination will not provide meaningful information for each EPSLO and its imbedded concepts and competencies. The faculty must revise the ELAs to reflect the sub-category(ies) that are aligned with each EPSLO.

c. collect aggregate assessment data at regular intervals (determined by the faculty) to ensure sufficiency of data to inform decision-making and disaggregate the data to promote meaningful analysis; provide justification for data that are not disaggregated;

The faculty have only collected aggregate data for the overall standardized examination. No disaggregate data by program option (e.g., day and evening) or date of completion (e.g., Winter, Spring, Fall) has been provided. No rationale was provided regarding why disaggregating the data would not provide meaningful information.

d. analyze assessment data (aggregate and/or disaggregate) at regular intervals (determined by the faculty) and when necessary, implement actions based on the analysis to maintain and/or improve end-of-program student learning outcome achievement;

As noted, changing the assessment method annually has not provided sufficient data to determine trends or consistent achievement. Four cohorts appear to have taken the current standardized examination with two of the four not meeting the ELA. The SPE implies that a licensure examination coach has been hired to work with students who have identified areas of weakness (pp. 79, 80, 81, 82, 83). Since the data does not provide meaningful information about a specific EPSLO, no actions have been taken that related to the EPSLOs.

e. maintain documentation for the three most recent years of the assessment data (aggregate and/or disaggregate), the analysis of data, and the use of data analysis in program decision-making to maintain and/or improve students' end-of-program student learning outcome achievement; and

Limited documentation is provided in the SPE regarding the assessment of the EPSLO data. No information is provided regarding specific actions taken related to each EPSLO or how actions have improved the achievement of the EPSLO. Data collected and analysis should be recorded in the SPE, or there should be a reference to the location of the raw data and analysis (e.g., meeting minute dates, program reports). If the data and analysis are not recorded in the SPE, copies of this information (e.g., meeting minutes, program reports) should be available as virtual supporting evidence with the Self-Study Report; see the <u>ACEN 2023 Program Guidelines</u> regarding supporting evidence.

f. share the analysis of the end-of-program student learning outcome data with communities of interest.

Neither the narrative for Criterion 5.1 (pp. 30–31) nor the SPE (pp. 79–83) provide any information regarding the plans that faculty have for sharing data related to each EPSLO with communities of interest. Information regarding this should be provided in the Self-Study Report and supporting documentation regarding the data shared should be accessible in the virtual supporting evidence.

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The reviewers could not verify evidence to support compliance with this Criterion.

5.1a Failure to provide evidence that faculty use a variety of appropriate direct outcome assessment methods for each end-of-program student learning outcome.

Rationale:

A single cognitive assessment method was identified to measure each end-of-program SLO.

The reviewers identified the following suggestions for improvement:

- 5.1b Ensure faculty establish a specific, measurable expected level of achievement outcome statement for each summative assessment method.
- 5.1c Ensure faculty collect sufficient aggregate assessment data at regular, facultydetermined intervals.

Ensure faculty disaggregate assessment data for meaningful analysis.

5.1d Ensure faculty analyze aggregated and disaggregated assessment data at regular, faculty-determined intervals.

Ensure faculty implement actions based on data analysis to improve end-of-program student learning outcome achievement.

- 5.1e Ensure there is documentation of assessment data, analysis of data, and/or use of data of data analysis in program decision-making.
- 5.1f Ensure the analysis of end-of-program student learning outcome data is shared with communities of interest.

Rationale:

Limited information is provided in the narrative or SPE to demonstrate the program's potential for compliance with the sub-criteria.

5.2 The written systematic plan for evaluation describes the process for annual assessment of the nursing program completion rate.

a. calculate the on-time program completion rate for each program option from the first nursing course through completion of the courses required for conferral of a certificate, diploma, or degree;

Program Option*	Total Number of Academic Terms to Complete Program Option (including pre-requisites)	Number of Academic Terms for Nursing Coursework
Generic Associate Degree Nursing Program – Day Program Option:	6	4
Generic Associate Degree Nursing Program – Evening Program Option:	6	4

While the candidacy presentation does not require the narrative for Criterion 5.3, the reviewers have provided the following feedback based upon the information available in the SPE (p. 84).

The faculty have established an ELA of "43% of all students who started the ADN program will complete the program at 150% timeframe" (p. 84). This ELA is not consistent with the on-time program completion rate required by the ACEN. The faculty must revise the ELA to be congruent with the ACEN Glossary definition of program completion.

No information is provided regarding the rationale for setting the ELA at such a low rate considering the current ELA reflects 150% timeframe. In the Self-Study Report, the faculty must provide information regarding the rationale for setting the ELA.

c. collect aggregate program completion rate data annually and disaggregate the data to promote meaningful analysis; provide justification for data that are not disaggregated;

	Program Completion – Aggregated for the Entire Program		
Year	Total number of students starting in the first nursing course		Program Completion Rate
2022	N= not clearly delineated	N= not clearly delineated	No aggregate data provided
2021	N= not clearly delineated	N= not clearly delineated	No aggregate data provided
2020	N= not clearly delineated	N= not clearly delineated	No aggregate data provided

Program Completion Rate – Disaggregated by Program Option		
Year	Day Program Option	Evening Program Option
	No data provided	No data provided
2022		
	No data provided	No data provided
2021		
	No data provided	No data provided
2020		

	Program Completion Rate – Disaggregated by Date of Completion		
Year	Winter	Spring	Fall
	No data provided	No data provided	No data provided
2022			
	No data provided	No data provided	No data provided
2021			
	40.91% (N=27 but no	27.5% (N=22 but no information	No data provided
2020	information regarding the # initially admitted)	regarding the # initially admitted)	

While the SPE provides data for Fall 2019, Winter 2020, and spring 2020, the SPE does not provide aggregate data for any year. Additionally, data are not disaggregated by program option (e.g., day and evening) and no information is provided regarding the number of students admitted so that the percentages reported can be verified. For example, data is be reported as 80% (80/100).

The SPE currently only provides data through 2020. The SPE implies that this is secondary to the program beginning in 2019 and taking 24 months (p. 84). However, using an on-time completion rate, the

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program has had graduating cohorts in 2021 as well as 2022 and potentially 2023. The faculty must collect, trend and aggregate program completion data on an annual basis to be compliant with the ACEN requirements.

d. analyze program completion rate data (aggregate and/or disaggregate) annually and when necessary, implement actions based on the analysis to maintain and/or improve program completion rate;

The SPE indicates that the reason for not meeting the ELA of 43% is secondary to the high number of students being unsuccessful with the high-stake tests administered in the final academic term. The only actions indicated were to assess factors contributing to the problem, increase the rigor in earlier semesters in an unspecified way, and to reassess the admission process. No actions specific to student interventions or to remove the high-stake examination were indicated even though high-stake testing is not best practice.

e. maintain documentation for the three most recent years of the data (aggregate and/or disaggregate), the analysis of data, and the use of data analysis in program decisionmaking to maintain and/or improve students' success in completing the program; and

As noted above, the SPE does provide some documentation regarding the situation. However, as noted, the SPE only provides one year of data for 2020 and does not provide data for 2021 or 2022.

f. share the analysis of the program completion rate data with communities of interest.

The SPE does not provide any information regarding the faculty plans to share the data with communities of interest and in accordance with Policy #29. In the Self-Study Report, information must be provided regarding how the faculty plan to share data.

The reviewers verified evidence to support *minimal* compliance with this Criterion.

The reviewers identified the following suggestions for improvement:

- 5.2a Ensure faculty calculate the on-time program completion rate from the first nursing course through completion of the courses required for conferral of a certificate, diploma, or degree for each program option.
- 5.2b Ensure faculty establish a specific, measurable expected level of achievement outcome statement for on-time program completion rate for each program option.

Ensure faculty provide a rationale for each expected level of achievement.

5.2c Ensure faculty collect aggregate program completion rate data annually.

Ensure faculty disaggregate program completion rate data for meaningful analysis.

- 5.2d Ensure faculty analyze aggregated and disaggregated program completion rate data annually.
- 5.2e Ensure there is documentation of program completion rate data, analysis of data, and use of data analysis in program decision-making.
- 5.2f Ensure that the analysis of program completion rate data is shared with communities of interest.

Rationale:

Limited information is provided in the SPE to demonstrate the program's potential for compliance with the sub-criteria.

- 5.3 The written systematic plan for evaluation describes the process for annual assessment of the licensure and/or certification examination pass rate (when required for practice).
 - a. examine aggregate examination pass rate data (licensure and/or certification) secured from regulatory and/or certifying agencies. The most recent annual pass rate OR the mean pass rate for three most recent years must meet at least one of the following based on the total number of test-takers:
 - 80% or greater for all first-time test-takers; or
 - 80% or greater for all first-time test-takers and repeaters; or •
 - at or above the national/territorial mean based on the nursing program type.

First-Time Pass Rate Table – Aggregated for the Entire Program		
Year	First-Time Examination Pass Rate	
2022	#7041460: 89.13% (41/46) #7070550: NONE	
Aggregate: 89.13% (41/46)		
	#7041460: 57.58% (38/66)	
2021	#7070550: 40% (18/45) Aggregate: 50.45% (56/111)	
	#7041460: 68.42% (13/19)	
2020	#7070550: 56.38% (84/149)	
2020	Aggregate: 57.73% (97/168)	
	#7041460: 70.22% (92/131)	
Three-Year Average	#7070550: 52.57% (102/194)	
	Aggregate: 59.69% (194/325)	

While using the ACEN 2023 Standards and Criteria does not require an ELA related to licensure examination pass rates, the faculty have established an ELA. The ELA is "will be 80% or greater for all first-time test-takers" or "80% or greater for all first-time test-takers and repeaters; or at or above the national/territorial mean based" (p. 85). If the faculty elect to retain an ELA, then the ELA(s) should be revised to include a timeframe. Additionally, the final ELA would only be the national mean for associate degree programs.

Using the ACEN 2023 Standards and Criteria, the faculty must be able to demonstrate that the program meets one of the six ways to demonstrate compliance with the Criterion. The faculty should use the decision tree in the ACEN 2023 Program Guidelines (p. 82) until they can answer with YES. Faculty should note that using the 2023 Standards and Criteria will require N values to be provided for all (e.g., 80% [80/100]) and faculty will need to have evidence to support the number of repeat test-takers, if needed (e.g., license numbers).

The SPE indicates that the annual pass rates are 73.68% for 2020, 60.32% for 2021, and 89.13% for 2022. However, this data for 2020 and 2021 is not consistent with the data available on the FBON website.

As previously indicated, the FBON has two NCSBN numbers for the associate nursing program at HCIWPB. The annual pass rates in the table above include both NCSBN numbers and those graduates testing with each number. According to the FBON website, the first quarter 2023 licensure pass rates were 94.12% (16/17 using the #7041460) and 100% (1/1 using the 7070550) for a current overall pass rate of 94.44% (17/18). The most recent aggregate annual pass rate is above 80% for all first-time testtakers.

Performance on Licensure or Certification Examination – Disaggregated by Program Option		
Year	ear Examination Pass Rate	
	Day Program Option	Evening Program Option
	No data provided	No data provided
2022		
	No data provided	No data provided
2021		
	No data provided	No data provided
2020		

Performance on Licensure or Certification Examination – Disaggregated by Date of Completion			
Year		Examination Pass Rate	
	Winter	Winter Spring Fall	
	No data provided	No data provided	No data provided
2022			
	No data provided	No data provided	No data provided
2021			
	No data provided	No data provided	No data provided
2020			

The SPE does not provide disaggregate date by program option or date of completion. Using the 2023 Standards and Criteria, faculty must disaggregate data or provide a reason why disaggregated data would not provide meaningful information. Programs seeking initial accreditation must begin collecting data from the time a candidate status is achieved.

c. analyze program licensure and/or certification examination pass rate data (aggregate and/or disaggregate) annually and when necessary, implement actions based on the analysis to maintain and/or improve students' examination pass rate success;

According to the SPE in response to the 2020 and 2021 rates, the faculty reviewed the curriculum and proctored examinations. The SPE indicates that new benchmarks were set in each course and new proctored examinations were introduced (p. 85). No information is provided regarding student-specific interventions taken.

d. maintain documentation for the three most recent years of the aggregated and/or disaggregated data, the analysis of data, and the use of data analysis in program decision-making to maintain and/or improve students' success in passing the licensure and/or certification examination; and

While the SPE provides some information and documentation, the SPE does not appear to indicate an annual review of the data or actions taken annually. Instead, the SPE appears to reflect a single analysis of the three years of information provided. The faculty must collect, aggregate, trend and analyze data annually; documentation must reflect this annual review.

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The SPE does not provide any information regarding the faculty plans to share the data with communities of interest and in accordance with <u>Policy #29</u>. In the Self-Study Report, information must be provided regarding how the faculty plan to share data.

The reviewers verified evidence to support *minimal* compliance with this Criterion.

The reviewers identified the following suggestions for improvement:

5.3a Ensure if the faculty retain an expected level of achievement that it includes a timeframe.

Ensure faculty aggregate licensure examination pass rate data using all NCSBN numbers assigned to the associate nursing program.

- 5.3b Ensure faculty disaggregate licensure rate data for meaningful analysis.
- 5.3c Ensure faculty analyze aggregated and disaggregated licensure examination pass rate data annually.
- 5.3d Ensure there is documentation of licensure and/or certification examination pass rate data, analysis of data, and use of data of data analysis in program decision-making.

5.3e Ensure the analysis of licensure examination pass rate data is shared with communities of interest.

Rationale:

Limited information is provided in the narrative or SPE to demonstrate the program's potential for compliance with the sub-criteria.

5.4 The written systematic plan for evaluation describes the process for annual assessment of the job placement rate.

	Job Placement Rates – Aggregated for the Entire Program		
Year	Response Rate (Number responding/number graduating)	Job Placement Rate (Number employed/number responding)	
2022	No information provided	No information provided	
2021	No information provided	No information provided	
2020	No information provided	81.81% (N=18 however no information regarding the total number who responded)	

While the candidacy presentation does not require the narrative for Criterion 5.4, the reviewers have provided the following feedback based upon the information available in the SPE (p. 86).

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a. use the appropriate assessment methods to request job placement data from all graduates based on the role for which graduates are prepared. For students who hold licensure/certification as a registered or advanced practice nurse upon admission to the nursing program, assessment may include, but is not limited to, professional/personal growth, career advancement, and/or a new role specialty with degree/certificate achievement;

According to the SPE, the Director of Student Services collects data from graduates, completes a verification form and then verifies employment with the employer (p. 86). The assessment method with the verification appears to ensure that graduates are employed as registered nurses. However, additional clarification regarding the questions asked by the Director should be delineated in the Self-Study Report with supporting evidence available in the ACEN Repository.

b. establish a specific, measurable expected level of achievement outcome statement for job placement in the role for which graduates are prepared and provide a rationale for the expected level of achievement,

The faculty have established an ELA which is "70% of the program's graduates will be placed and verified by the Career services Department" (p. 86). This ELA is not congruent with the ACEN Glossary definition of job placement and does not provide a timeframe. The faculty must revise the ELA to be congruent with the ACEN definition and to include a timeframe.

No information is provided regarding the rationale used by the faculty to set the ELA at 70%. The Self-Study Report must provide information regarding the rationale used.

c. collect sufficient aggregate post-graduation job placement rate data annually including the response rate and disaggregate the data to promote meaningful analysis; provide justification for data that are not disaggregated;

Job Placement Rate – Disaggregated by Program Option		
Year	Day Program Option	Evening Program Option
	No data provided	No data provided
2022		
	No data provided	No data provided
2021		
	No data provided	No data provided
2020		

Job Placement Rate – Disaggregated by Date of Completion			
Year	Winter	Spring	Fall
	No data provided	No data provided	No data provided
2022			
	No data provided	No data provided	No data provided
2021			
	66.67%	81.81%	No data provided
2020			

The SPE does not include disaggregated data by program option (e.g., day and evening) or date of completion (Winter, Spring, Fall). Data is not available for 2021 or 2022. Faculty must provide disaggregate data or provide a rationale regarding why the disaggregate data would not provide meaningful information. Programs seeking initial accreditation must begin collecting the data at the time

a Candidate status is achieved. Data related to job placement must be collected and analyzed on an annual basis.

d. analyze sufficiency of job placement rate data annually and when necessary, implement actions to maintain and/or improve data sufficiency;

No information is provided regarding the response rate/contact rate for obtaining job placement data. The faculty must record the response rates/contact rates to verify that sufficient data have been collected. Attempts must be made to contact all graduates.

e. analyze aggregate job placement rate data (aggregate and/or disaggregate) annually and when necessary, implement actions based on the analysis to maintain and/or improve the job placement rate;

As noted, the faculty have only provided data for 2020 which does not reflect annual collection and analysis. The faculty must begin analyzing aggregate and disaggregated data annually. If the ELA is not met, then actions must be implemented to improve the job placement rates.

f. maintain documentation for the three most recent years of the data (aggregate and/or disaggregate), the analysis of data, and the use of data analysis in program decisionmaking to maintain and/or improve students' success in obtaining a job in a role for which the program prepared them; and

Data collected and analysis should be recorded in the SPE, or there should be a reference to the location of the raw data and analysis (e.g., meeting minute dates, program reports). If the data and analysis are not recorded in the SPE, copies of this information (e.g., meeting minutes, program reports) should be available as virtual supporting evidence with the Self-Study Report; see the ACEN 2023 Program *Guidelines* regarding supporting evidence.

g. share the analysis of the job placement rate data with the communities of interest.

The SPE does not provide any information regarding the faculty plans to share the data with communities of interest. In the Self-Study Report, information must be provided regarding how the faculty plan to share data. Supporting evidence regarding how data are shared should also be accessible in the ACEN Repository.

The reviewers verified evidence to support *minimal* compliance with this Criterion.

The reviewers identified the following suggestions for improvement:

5.4a Ensure faculty use appropriate assessment methods to gather job placement rate data.

5.4b Ensure faculty establish a specific, measurable expected level of achievement outcome statement for job placement including timeframe and the role for which they are prepared (e.g., registered nurse).

Ensure faculty provide a rationale for each expected level of achievement.

5.4c Ensure faculty collect aggregate job placement rate data annually after graduation.

Ensure faculty disaggregate job placement rate data for meaningful analysis.

5.4d Ensure faculty analyze the sufficiency of job placement rate data annually.

5.4e Ensure faculty analyze aggregated and disaggregated job placement rate data annually.

5.4g Ensure the analysis of job placement rate data is shared with communities of interest.

Rationale:

Limited information is provided in the SPE to demonstrate the program's potential for compliance with the sub-criteria.

Summary of Compliance:

The associate nursing program is not in compliance with Standard 5 as the following Criterion has not been met: Criterion 5.1.

All Criteria for Standard 5 must be met prior to Initial Accreditation.

V. RECOMMENDATION FOR CANDIDACY

Based upon the independent analysis of the Candidacy Presentation by each reviewer, the consensus of the reviewers is to recommend:

X Approval

Deferral

Disapproval

30

Summary:

Currently, the program is not in compliance with Standard 1 Administrative Capacity and Resources, Standard 2 Faculty, Standard 4 Curriculum, or Standard 5 Outcomes. The faculty are encouraged to use the feedback provided throughout this review to address the concerns in each Standard. For an initial accreditation visit, the program must demonstrate compliance with all Accreditation Standards. Even though the program is in non-compliance with the aforementioned Standards, the reviewers recommend the program for Candidacy. The program has demonstrated the ability to achieve compliance during the Candidacy period and prior to the initial accreditation visit. An initial accreditation visit should not be scheduled until the program can demonstrate compliance with all ACEN Accreditation Standards. It is highly recommended that the nurse administrator and the faculty attend a Self-Study Forum to facilitate a better understanding of the accreditation process.

Nell Ard, PhD, RN, CNE, ANEF Interim CEO, Director	Marilyn Brady, PhD, RN
Mell and	MaulynoBridg
Date: May 5, 2023	Date: May 5, 2023

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EXHIBIT 66



Florida Department of Revenue General Tax Administration

Jim Zingale Executive Director

5050 West Tennessee Street, Tallahassee, FL 32399

floridarevenue.com

August 22, 2023

The Project on Predatory Student Lending 769 Centre Street Jamaica Plains, MA 02130

Dear Rebecca Eisenbrey:

Subpoena

This is in response to your Subpoena for certified records.

Health Career Institute LLC - 38-3905312

With the information provided, we are unable to locate a Documentary Tax Stamp for the above referenced business.

This confidential state tax information is being provided in accordance with 20 CFR 603 and ss. 443.171(5) and 443.1715(1) and may be used by public employees in performance of their official duties. Public employees receiving this information must maintain the confidentiality of the information.

Pursuant to the authority contained in section 213.071, Florida Statutes, I hereby certify that I am the officially designated Custodian of Records for the Florida Department of Revenue as set forth in Chapter 443, 212, and 220, Florida Statutes respectively. If you need further assistance, please call Records Management at 850-617-8489.

Sincerely,

Records Management

Taya Whitman

Taya Whitman Revenue Specialist I Enclosures by: Email

Ashly Shich

and signature to be affixed this date, August 22, 2023.

IN WITNESS WHEREOF, I hereby set my hand

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EXHIBIT 67

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Candidacy Review – Second Submission

HCI College – Fort Lauderdale

Nursing Department Associate Nursing Program/Pre-licensure Program Option Only Day and Evening Program Options Fort Lauderdale, Florida

This review is <u>only</u> for the HCI College – Fort Lauderdale site in Fort Lauderdale, Florida, and <u>only</u> for the associate nursing program that location.

Standard 2 – Faculty and Staff

Criterion 2.1 and Criterion 2.2

The associate nursing program at HCI College – Fort Lauderdale (HCICFL) has five full-time faculty teaching (p. 9; Appendix C, pp. 64–77). Table 2.1A (p. 12) indicates that two are credentialed with a baccalaureate degree in nursing while the remaining three are credentialed with a master's degree in nursing; this information is replicated in the faculty profile table, which is required. Therefore, the faculty should delete Table 2.1A in the Self-Study Report.

According to the faculty profile table, the associate nursing program has five full-time exclusive faculty teaching in the program. All are credentialed with a baccalaureate degree with a major in nursing. Three are also credentialed with a master's degree with a major in nursing, and one of these full-time faculty is currently enrolled in a doctorate of philosophy (PhD) in nursing program with an anticipated date of completion in June 2020. One of the faculty members is also credentialed with a master's degree in health care administration (MHA).

According to the faculty profile table, one full-time faculty member is the Simulation Coordinator while two full-time faculty members are noted to have the title of Associate Director. No additional information was provided regarding these positions. In the Self-Study Report, these positions must be described in the narrative for Criterion 1.7, including information about the percentage of teaching. If 51% or more of the position is administrative/coordinating duties, then the individual in the position would not be considered faculty by ACEN Glossary definition and the person would not be included in the faculty profile table or faculty numbers. If the position has 51% or more teaching responsibilities, then the position is still described in the narrative for Criterion 1.7, but the individual would be included in the faculty profile table and faculty numbers. See the ACEN Glossary definition of faculty and nursing program coordinator. Copies of all job descriptions should be in the virtual supporting evidence available with the Self-Study Report. See the ACEN Guidelines for Written Reports available on the ACEN website for additional information regarding virtual supporting evidence.

According to the presentation, HCICFL has 19 part-time faculty teaching in the associate nursing program (p. 9; Appendix C, pp. 64-77). Table 2.2A (p. 14) indicates that four are credentialed with a baccalaureate degree, 13 with a master's degree in nursing, and two with a doctorate of clinical practice (DNP); this information is replicated in the faculty profile table, which is required. Therefore, the faculty should delete Table 2.1A in the Self-Study Report.

According to the faculty profile table, the associate nursing program has 19 exclusive part-time faculty teaching. Of these, 16 are credentialed with a baccalaureate degree with a major in nursing. Nine part-time faculty are also credentialed with a master's degree in nursing while one is also credentialed with a master's degree in business administration (MBA). Three part-time faculty are credentialed with a master's degree in nursing as well as a DNP. The remaining three part-time faculty are noted to not have a baccalaureate degree in nursing but are credentialed with a master's degree in nursing.

The reviewers noted that the information in the faculty profile table conflicts with the information in Table 2.2A, which only has two faculty with doctoral degrees. Providing duplicated information in the Self-Study Report increases the program's chances of providing conflicting information. Therefore, as noted above, Table 2.2A should be deleted; faculty should also verify the information in the faculty profile table is accurate.

The reviewers noted that the faculty profile table provided blank tables for full-time shared and part-time shared faculty as well as a non-nurse table (pp. 74–77). If the program does not have full- or part-time shared nursing faculty or non-nurse faculty, then these tables should not be included in the Self-Study Report.

The Florida Board of Nursing (FBON) requires that 50% or more of the faculty be credentialed with a master's degree or higher in nursing or have a baccalaureate degree in nursing with a master's degree or higher in a related field. All faculty are required to have a minimum of a baccalaureate degree in nursing and meet one of the following: at least two years of full-time experience in clinical practice as a registered nursing, be actively engaged in studies leading to the next highest degree in nursing or related field, have the equivalent of at least two full-time academic experience, or have current certification as an APRN in Florida (Appendix C, pp. 64-65).

The reviewers noted that the information regarding the FBON also included the requirements for the nurse administrator and for faculty teaching in a practical nursing program. In the Self-Study Report, information about the requirements for the nurse administrator should be in the narrative for Criterion 1.6 and not in the faculty profile table. Additionally, since the program seeking accreditation is an associate degree program, information about faculty teaching in a practical nursing program should not be provided.

The Commission for Independent Education (CIE) is reported to not have specific educational and experiential requirements for faculty (Appendix C, p. 66). However, the reviewers are aware of state regulations related to faculty credentialing in Florida Rules Chapter 6E, Florida Administrative Code 6E-1.0032 (7), which CIE is required to uphold. The faculty should ensure

that current information regarding all state regulatory agencies is provided in the faculty profile table cover sheet for the Self-Study Report.

HCICFL requires that faculty have an unencumbered registered nurse or advanced registered nurse practitioner license, a minimum of three years of practical work experience in the subject areas taught, and a minimum of a master's degree in nursing from an accredited institution recognized by the U.S. Department of Education (USDE). Faculty who are experientially qualified may hold a baccalaureate degree in nursing or a baccalaureate degree with a concentration in nursing (Table 2.1B, p. 12).

The Accrediting Commission of Career Schools and Colleges (ACCSC), which is the institutional accrediting agency, is reported to require the institution have a sufficient number of faculty to serve the number of students enrolled and maintain a satisfactory working relationship with the students. Faculty must be certified or licensed as required by law and must have the appropriate qualifications and be able to teach in a manner that permits educational objectives to be met. Faculty must also receive training in instructional methods and teaching skills or be experienced teachers. Faulty teaching in a technical or occupationally related course must also have a minimum of four years related practical experience (Table 2.5A, p. 15).

Based upon the information provided, the full- and part-time faculty meet the requirements of each agency with the potential exception of CIE. In the Self-Study Report, the faculty must provide all information regarding faculty requirements related to each agency.

Qualification and Professional Development addenda were provided (Appendix D, pp. 78–101). However, the information was not provided in the same order as the names listed in the faculty profile table. In the Self-Study Report, the faculty must provide the addenda in the same order as the faculty names appear in the faculty profile table. All full-time exclusive faculty should appear in alphabetical order followed by all part-time exclusive faculty in alphabetical order.

The full-time faculty have reported clinical expertise in medical-surgical, geriatrics, pediatrics, and mental health nursing. The part-time faculty have reported clinical expertise in medicalsurgical, geriatrics, women's health, maternal-child, pediatrics, mental health, case management, primary care, and midwifery nursing. Based upon the information provided, each faculty member appears to be qualified to teach in their assigned courses.

The reviewers noted that the addenda indicate that several faculty members are nurse practitioners in various population foci; however, other than reflecting an APRN license, this information was not available in the actual profile table with the APRN license. In the Self-Study Report, the faculty profile table should include the type of APRN and should also provide information regarding current certification of each APRN faculty member.

Table 2.1C (p. 13) provides some information regarding faculty qualifications as well as examples of how expertise is maintained while Table 2.1D (pp. 13–14) provides examples of full-time faculty scholarship activities. Specific information regarding how faculty expertise is maintained should be provided in the narrative for Criterion 2.6 in the Self-Study Report. The Qualification and Professional Development addenda, which are reviewed as a component of

Criterion 2.1 and Criterion 2.2, should provide evidence of each faculty member's expertise as well as maintenance of that expertise. A review of the addenda did not consistently support the information in Table 2.1C and 2.1D; faculty were noted to primarily have only formal education or clinically based professional development.

Faculty must maintain expertise in their areas of responsibility, including didactic, skills, simulation, online, and/or clinical learning environments. The Qualification and Professional Development addenda must also clearly demonstrate how each faculty member has the training in instructional methods and teaching skills required by ACCSC. All faculty must have supporting documentation available during the initial accreditation visit related to the professional development reported.

Three full-time faculty are noted to have assignments in the skills or simulation laboratory, which includes the Simulation Coordinator. The faculty profile table indicates that 15 of the part-time faculty have laboratory assignments.

If additional laboratory personnel are used, then this information should be provided in the narrative for Criterion 2.7 of the Self-Study Report, and a Laboratory Personnel Table should be provided. The credentials for any potential laboratory personnel should be commensurate with the role responsibilities and meet the requirements of the governing organization, its accrediting agency, and any state regulatory agencies. See the ACEN Glossary definitions of faculty and laboratory personnel. Copies of all job descriptions must be accessible in the virtual supporting evidence with the Self-Study Report.

Criterion 2.5

HCICFL currently has 114 students enrolled in nursing courses (p. 9), which provides a fulltime-faculty-to-student ratio of 1:22-23. There are 42 students in the day program option and 72 students in the evening program option (Table 2.5G, p. 19). The faculty-to-student ratios are reported to be a maximum of 1:20 in theory, 1:10 in skills/simulation, and 1:10 in clinical learning experiences (Table 2.5B, p. 16). According to Table 2.5C (p. 16) for the 2018, 2019, and 2020 academic years, the highest faculty-to-student ratios have been 1:30 in lecture and 1:10 in laboratory and clinical learning experiences. The overall faculty-to-student ratio was 1:50 in 2018.

However, Table 2.5C (p. 17) provides conflicting information regarding the ratios reported. This table indicates the faculty-to-student ratios have been 1:7–39 in the courses taught in academic years 2018, 2019, and 2020. This table does not delineate the faculty-to-student ratios specific to didactic, skills, and/or clinical course components. The reviewers are not able to verify which set of faculty-to-student ratios are accurate since inconsistent information has been provided.

In the Self-Study Report, the faculty should identify the maximum faculty-to-student ratios in the didactic, skills, simulation, online, and/or clinical learning environments. Faculty to student ratios tables for each of the courses/sections currently being taught during the academic term/year of the initial accreditation visit. Additional faculty-to-student ratio tables for previous

academic terms/years should be accessible in the virtual supporting evidence available with the Self-Study Report.

Table 2.5A (pp. 15–16) is reported to provide information regarding the ACCSC guidelines related to having a sufficient number of faculty; however, this table only references sufficient faculty and provides information regarding the ACCSC requirements for faculty. Since this information is also provided in the faculty profile table cover sheet, the table should be deleted in the Self-Study Report.

Faculty are reported to have flexible scheduling to provide release time to maintain clinical practice and to participate in professional organizations. According to Table 2.5E (pp. 17–18) faculty responsibilities include direct face time (75%), professional development (10%), and other professional activities such as committee work, course preparation, advising, and tutoring (15%). The average direct face time for teaching by full-time faculty is reported to be 30 contact hours per week (Table 2.5D, p. 17).

Table 2.5F1 is reported to provide the amount of direct face time for full-time faculty in an unspecified academic term. Full-time faculty are noted to have direct face times ranging from 20 to 32 hours; some have assignments in only clinical while others have assignments in didactic, skills/simulation, and clinical. Two faculty members have contact hours in only didactic or skills/simulation. No information is provided regarding the compensation for hours over the 30 required in direct contact time; additional clarification must be provided in the Self-Study Report.

Table 2.5F2 (pp. 18–19) provides information about the direct face time for part-time faculty. The majority are noted to have direct face time in either skills/simulation and/or clinical. However, five part-time faculty have didactic hours, and a sixth part-time faculty member has hours "as needed." The part-time faculty direct contact hours range from 2-20 hours. The reviewers identified that one part-time faculty member has a comparable workload to full-time faculty.

Faculty are also reported to teach in both the day and evening program options. The reviewers are not clear regarding if the direct contact hours are for both the day and evening program option or a combination of those hours. In the Self-Study Report, Table 2.5F1 and Table 2.5F2 should be modified to reflect the number of direct contact hours in didactic, skills/simulation, and clinical in both the day and evening program options.

A workload allocation table should be provided for the current academic term/year. Additional faculty workload tables for two to three previous academic terms/years should also be accessible as virtual supporting evidence available with the Self-Study Report.

The narrative implies that the faculty-to-student ratios are comparable in other programs offered by HCICFL and that those programs also offered with both day and evening program options. However, specific workload information for other departments was not provided. In the Self-Study Report, specific information regarding the direct and indirect contact hours for

other faculty teaching at HCICFL should be provided and compared to the nursing workload for an academic term.

<u>Analysis</u>

The program is currently in compliance with the selected Criteria for Standard 2 with the following areas needing development:

- Ensure the faculty profile table does not include administrators regardless of teaching responsibilities.
- Ensure evidence demonstrates that the full-time nursing faculty meet the educational and experiential qualification requirements of the state, including the Commission for Independent Education.
- Ensure evidence demonstrates that the part-time nursing faculty meet the educational and experiential qualification requirements of the state, including the Commission for Independent Education.
- Ensure the faculty maintain expertise in their areas of responsibility, including didactic, skills, simulation, online, and/or clinical learning environments.
- Ensure the nursing faculty workload is comparable to the workload of other faculty teaching within the governing organization.

All Criteria for Standard 2 must be met prior to Initial Accreditation.

Standard 4 - Curriculum

The faculty are reported to have transitioned to a concept-based curriculum in Fall 2019 and are currently teaching out the former curriculum. No specific information is provided regarding when the teach-out will be completed or when the concept-based curriculum is fully implemented. The narrative for Standard 4 is focusing on the new concept-based curriculum and does not provides specifics regarding the former curriculum with the exception of a program of study (Appendix, Table 4.1A, pp. 102–103). In the Self-Study Report, if both curricula are still being taught, then the narrative must provide information about both.

The reviewers also noted that while the new curriculum is referenced as concept-based, the curriculum model does not reflect a concept-based model. Courses are noted to be the same course rubric and name as the courses in the teach-out curriculum. Based upon narrative, the reviewers concluded that the faculty have tried to shift from a medical focus in the nursing courses to a nursing concept focus. In the Self-Study Report, the faculty should provide additional clarification.

Criterion 4.1

The faculty are reported to have used a variety of professional standards, competencies, and guidelines to develop the curriculum, including the Quality and Safety Education for Nurses (QSEN) Competencies and the licensure examination client needs categories (p. 21). The

presentation does not demonstrate how each of these has been used throughout the curriculum.

The narrative for Criterion 4.1 does not specify the actual end-of-program SLOs that have been identified. In the narrative for Criterion 4.2, the narrative indicates that there are five end-ofprogram SLOs (p. 23). The only place that the end-of-program SLOs are located is in Appendix F, Table 4.1C (pp. 105–114). However, the reviewers noted that end-of-program SLO #2 actually includes three outcome statements (provide, use, understand) and end-of-program SLO #4 has two outcome statements (incorporate and promote). Therefore, the program actually has eight end-of-program SLOs. The action verbs for some (e.g., understand) do not lend themselves to progression from simple to complex throughout the curriculum. The faculty must clearly delineate the separate outcome statements or revise the current information to reflect only five end-of-program SLOs.

Criterion 4.2

The narrative for Criterion 4.2 discusses the recent revision of the curriculum (pp. 22–23). This information needs to be moved to the narrative for Criterion 4.3 in the Self-Study Report. The focus of the narrative for Criterion 4.2 would be to provide evidence regarding how the endof-program SLOs have been used to organize the curriculum, guide the delivery of instruction, and direct learning activities.

According to the narrative for Criterion 4.2, the faculty have mapped course-level student learning outcomes across the curriculum to demonstrate progression (p. 22); the reader is referred to Appendix F, Table 4.1C (pp. 105–114), which is reported to describe how the endof-program SLOs are leveled across the curriculum in each of the courses. However, the reviewers noted that the course-specific information provided in this table do not correlate with the course objectives in the abbreviated syllabi provided. The reviewers are unclear regarding where the information provided in the table is actually within the curriculum.

Appendix F, Table 4.1C is also reported to reflect the course activities. A closer review of the table identified that it references course activities; however, this information does not clearly reflect a specific course learning outcome or end-of-program SLO.

The abbreviated syllabi (Appendix H, pp. 123–148) have 4–12 course student learning outcomes (CSLOs) each, which are content- and population-specific. The reviewers also are not clear whether these are the abbreviated syllabi for the new 'concept-based' curriculum or the teach-out curriculum. The reviewers are not able to determine a direct correlation of the CSLOs to the end-of-program SLOs identified. The reviewers noted that the majority of the CLSO use action verbs appropriate for the level; however, some courses do use lower level action verbs (e.g., identify) that would not be appropriate beyond the first semester of nursing.

In the Self-Study Report, the faculty should revise Appendix F, Table 4.1C into two separate tables that provide clear and distinct information about the curriculum. The first table should compare the end-of-program SLOs to each CSLO throughout the curriculum. The table would allow faculty to demonstrate how the end-of-program SLOs organize the curriculum and how

progression of learning from (e.g., simple to complex) is occurring. A second table should include the specific CSLOs and the identified teaching strategies and learning activities aligned with each. The faculty may also elect to include the evaluation methods used for each CSLO; this aspect of the table can then be referenced in the narrative for Criterion 4.7 related to evaluation methods.

Criterion 4.7

The current narrative for Criterion 4.7 (pp. 23–24) indicates that students are evaluated in didactic, clinical, and laboratory learning environments. Students are required to successfully pass in all areas and must achieve a passing grade of 80% or higher (p. 24).

The narrative provided indicates that the faculty use standardized testing, teacher-made examinations, skills competencies, clinical evaluations, and reflective writing assignments. However, specific information about each type of assessment and how it relates to the end-ofprogram SLOs was not provided.

The abbreviated syllabi also indicate that the faculty use a variety of evaluation methodologies to verify the achievement of the course objectives. Examples include quizzes/examinations, standardized testing, unspecified homework, adaptive quizzing, papers, case studies, skills validations, and clinical evaluations. The reviewers noted that each of these assessment methods were not referenced in the Criterion 4.7 narrative.

Appendix | (pp. 149–152) provides the clinical evaluation form for an unspecified course. The student is assessed using a five-point Likert scale with "5=consistently performs competently, 4=frequency performs competently, 3=usually performs competently, 2=seldom performs competently, I=never performs competently"; the student appears to be evaluated at mid-term and at the end of the rotation. The tool has competency areas related to knowledge, critical thinking, nursing diagnosis, planning, implementation, evaluation, skills performance, collaboration, and caring. Each of these competency areas has 2-9 sub-objectives; the subobjectives appear to be the basis for evaluating the students. The tool does not reflect the endof-program SLOs. Additionally, no information is provided regarding how the clinical evaluation tools progress from simple to complex throughout the curriculum.

Although the faculty are using a variety of assessment methods, no information is provided regarding how each assessment method is aligned with the end-of-program SLOs. In the narrative for Criterion 4.7 of the Self-Study Report, the faculty should describe each type of assessment methodology used in the program as well as information regarding how each is aligned with the end-of-program SLOs. Copies of all rubrics and clinical evaluation tools must be provided in the virtual supporting evidence while examples of student work using the rubrics and tools must be accessible during the initial accreditation visit.

Criterion 4.8

HCICFL uses credit-to-contact-hour ratios of 1:1 in didactic, 1:2 in skills, and 1:3 in clinical learning experiences, which provides 15 contact hours in didactic, 30 contact hours for skills, and 45 contact hours for clinical for each one credit (p. 24). The program of study provided for the teach-out and new "concept-based" curricula (Appendix E, Table 4.1A, pp. 102–103; Table 4.1B, p. 104) both delineated the number of contact hours in each course and the learning environments specific to the course (e.g., didactic, skills and/or clinical). Based upon the information provided, the program of study remains at 72 semester credits, but the didactic hours have increased by 60 hours, the laboratory hours have decreased by 90, and the clinical hours have decreased by 80 hours. There has also been an increase from no hours in simulation to 217 hours of simulation. In the Self-Study Report, additional information is needed in the narrative for Criterion 4.3 regarding the recent change in curriculum; the information should include the rationale for the changes in contact hours in the various learning environments when the courses appear to be the same.

The teach-out pre-licensure program option is 72 semester credits, which consists of 30 semester credits in general education courses and 42 semester credits in nursing courses (Appendix E, Table 4.1A, pp. 102–103)). This program of study can be completed in five semesters of nursing. Although the catalog is dated 2020 and students were admitted to the new curriculum in Fall 2019, it appears that the catalog reflects the previous curriculum as general education courses are listed as co-requisite courses (Catalog, p. 74). There is a lack of clarity about the teach-out and new curriculum in the Candidacy presentation and in the information available to the public.

The "concept-based" pre-licensure program option is 72 semester credits, which consists of 30 semester credits in general education courses and 42 semester credits in nursing courses (p. 9; Appendix E, Table 4.1B, p. 104). The program of study can be completed in five semesters (p. 9; Appendix E, Table 4.1B, p. 104); a semester is defined as 15 weeks (p. 25). All general education courses are required as prerequisites to the nursing courses in this program option.

Appendix G (pp. 115–120) provides information regarding the requirements of the FBON, CIE, and ACCSC related to program length as well as requirements within the curriculum. In the Self-Study Report, the table should only provide information regarding program length. Information regarding curriculum requirements should be provided in the Criterion where this information applies. For example, the use of simulation would be in the narrative for Criterion 4.9, curriculum content would be a component of the curriculum development (Criterion 4.3) and the professional standard upon which it was developed (Criterion 4.1), while information regarding the type of general education or number of credits would appear in the narrative for Criterion 4.4 in the Self-Study Report.

The FBON is reported to not have any requirements related to program length. The CIE is reported to require that an associate degree be a minimum of 60 semester credits or 90 quarter credits or the recognized clock hour equivalent. There should be a minimum of 15 semester hours or 22.5 guarter hours in general education courses in an associate of science 1026

HCI College – Fort Lauderdale PAGE 10

degree or 36 semester credits or 54 quarter credits in an associate of arts degree (pp. 116–117).

ACCSC is reported to require than an associate degree be a minimum of 60 semester credits or 90 quarter credits earned over a period of four semesters or six quarters. Additionally, the program of study should have a minimum of 30 semester hours or 45 quarter hours in the area of concentration (e.g., major/discipline) as well as 15 semester hours or 22.5 quarter hours in general education courses (p. 119). Based upon the information provided, the associate nursing program offered at HCICFL meets the requirements of each agency.

Criterion 4.9

The current narrative for Criterion 4.9 discusses the new reflective writing assignment (p. 26). The reviewers are not clear how this relates to practice learning environments. This information should be moved to the narrative for Criterion 4.7 in the Self-Study Report. Information is provided regarding how the program uses the nursing skills laboratory (pp. 26–27) as well as how clinical learning environments are selected based on the opportunity for students to achieve the CSLOs.

According to the new program of study, the faculty are also using simulation; however, no information is provided regarding this in the narrative for Criterion 4.9. In the Self-Study Report, the faculty must provide information regarding the use of simulation. Information should include the number of hours in each course/semester, the scenarios completed throughout the curriculum, the number of students in each cohort, and any state regulations related to the use of simulation, especially if in lieu of direct patient care. According to Appendix G (p. 115), the FBON allows up to 50% of the clinical hours to be in simulation.

The nursing program is reported to use a variety of practice learning environments, including long-term care facilities, rehabilitation facilities, outpatient pediatric facilities, outpatient clinics, and specialty facilities. Appendix H (pp. 121–122) provides a list of 12 sites used by the program. The table provides limited specific information regarding the sites. The faculty should modify the table to provide specific information about the site, including the type of facility and general information (e.g., 75-bed long-term care facility), the units used at the site, and the courses using the location. Information about the contact person, address, and distance from the college is not needed.

The list of practice learning environments does not appear to include any acute care hospitals. Although the faculty have designated some practice learning environments (e.g., a rehabilitation center) as acute care settings, the reviewers are not clear how the practicum experiences necessary in a pre-licensure registered nursing program can be provided when acute care hospitals are not used. In addition, the catalog (pp. 71–72) states that nursing students will practice technical skills in acute care settings and address critical care concepts and that graduates will be prepared to practice in settings such as hospitals. However, the practice learning environments listed in the Candidacy Presentation to not align with this information published in the catalog. Additional information about the practice learning environments must be provided in the Self-Study Report.

Additionally, specific information regarding how faculty ensure the practice learning environments are evidence-based and reflect nationally established patient health and safety goals was not provided. Faculty and students are reported to evaluate the sites at the end of the rotation; however, information regarding these evaluations was not described and data from the evaluations was not provided.

In the Self-Study Report, the faculty must ensure the narrative for Criterion 4.9 addresses each of the components of the Criterion. Information regarding any evaluation process of the practice learning environments must be provided and the supporting documentation of the process/processes should be accessible in the virtual supporting evidence available with the Self-Study Report.

Criterion 4.11

The presentation does not identify the delivery modality or modalities used by the program (e.g., face-to-face, hybrid, or online). The narrative for Criterion 5.3 indicates that a learning management system (LMS) is accessible (pp. 40-41). The LMS is reported to be used for course materials and communication.

The narrative discusses teaching strategies used by the program but does not indicate how the strategy is appropriate for the delivery modality/modalities used by the program. The current information provided should be moved to the narrative for Criterion 4.2 and also can be incorporated into the narrative for Criterion 4.6 related to educational theories and contemporary practice.

In the Self-Study Report, the narrative for Criterion 4.11 must clearly identify the type of delivery modality/modalities used by the program. The information from the narrative for Criterion 4.2, Criterion 4.6, or Criterion 4.7 should not be duplicated in the narrative for Criterion 4.11. Instead, the narrative for Criterion 4.11 should be specific to how the teaching strategies, learning activities, and evaluation methods are appropriate for the face-to-face, hybrid, and/or online delivery modality in which it is used. The faculty could use a table format to provide this information.

<u>Analysis</u>

The program is not in compliance with Standard 4 as Criteria 4.1, 4.2, and 4.9 are not met at this time, as evidenced by:

- Failure to provide evidence the curriculum incorporates established professional nursing standards, guidelines, and competencies.
- Failure to provide evidence that the end-of-program student learning outcomes are used to organize the curriculum, guide the delivery of instruction, and direct learning activities.
- Failure to provide evidence that there is progression in the course student learning outcomes/course objectives throughout the curriculum in support of the end-ofprogram student learning outcomes.

• Failure to provide evidence student clinical experiences and practice learning environments are evidence-based; reflect contemporary practice and nationally established patient health and safety goals; and support the achievement of the end-of-program student learning outcomes.

With the following areas needing development:

- Ensure evaluation methodologies are varied, reflect established professional and practice competencies, and measure the achievement of the end-of-program student learning outcomes.
- Ensure learning activities, instructional materials, and evaluation methods are appropriate for all delivery formats and consistent with the end-of-program student learning outcomes.

All Criteria for Standard 4 must be met prior to Initial Accreditation.

Standard 5 - Resources

Criterion 5.1

The narrative for Criterion 5.1 provides information about the budgeting process (pp. 31–32). This information should be moved to the narrative for Criterion 1.9 in the Self-Study Report. The narrative for Criterion 5.2 should provide information about the sources of funding for HCIFL and the nursing program as well as information about the budgets for the overall college, the nursing program, and a comparative program/department that is similar in size.

The narrative is also noted to provide information about the default rate for the institution (pp. 30–31). This information should be moved to the narrative for Criterion 3.6 in the Self-Study Report.

The narrative indicates that HCICFL has revenue from tuition and general fees (p. 31). Table 5.1A (p. 30) provides information about the overall operating budget for an unspecified fiscal year (FY). The nursing program is reported to comprise 90% of the college's operating budget (p. 30).

Table 5.1B (p. 31) provides information about the associate nursing program's budget. The table includes the income from tuition as well as expenses related to capital equipment, salaries and other expenses for fiscal FY 2017, FY 2018, and FY 2019. Using the information in the table the reviewers determined that the income has increased approximately 94% since 2017 while the expenses have only increased by approximately 84% resulting in a net profit each year.

Table 5.1 D (p. 31) provides information regarding the budget related to the library's online database system for FY 2018, FY 2019, and FY 2020. The budget for the system is noted to have decreased by 46% from FY 2018 to FY 2020. No explanation is provided regarding the

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decrease in funding for the online system; additional clarification is needed in the Self-Study Report.

In the Self-Study Report, the faculty should also compare the budget of the nursing program to another program similar in size offered at HCICFL. Three years of budgets for HCICFL, the nursing program, and the comparative program must be available for the initial accreditation visit either as virtual supporting evidence with the Self-Study Report or site.

The reviewers noted that the narrative for Criterion 5.2 provides information regarding the monies spent for the nursing program during a recent renovation (pp. 38–39). This information should be moved to the narrative for Criterion 5.1 in the Self-Study Report.

Criterion 5.2

The reviewers noted that the narrative for Criterion 5.2 provides information about the various faculty and student services available as well as the hours of operation (Table 5.2A, pp. 32–35). This information should be moved to the narrative for Criterion 3.4 in the Self-Study Report. The narrative for Criterion 5.2 should focus only those physical resources used by the nursing program to meet the needs of faculty, staff and students. Examples include offices/workspaces, classrooms, computer laboratories, skills and/or simulation laboratories.

HCICFL is reported to have moved into renovated space (p. 35). Table 5.2B (pp. 36–37) provides a list of the various spaces available, including offices, conference room, classrooms, computer laboratory, and skills laboratory.

The nurse administrator is reported to have a private office while the other faculty have a shared faculty workroom with six workstations; each workstation is reported to have a computer, bookshelves, filing cabinets, and a "swing" desk (p. 36). Later, the narrative indicates that two full-time faculty also have private offices (p. 38); however, this is not included in Table 5.2B. Consistent information must be provided throughout the Self-Study Report regarding the faculty offices/workspaces. The presentation is not clear regarding where the workspaces are for the other faculty who teach at HCICFL since the number of workspaces identified will accommodate the current number of full-time faculty with an extra desk/workspace for all 19 of the part-time faculty to share when on campus. Additional information is needed regarding the available faculty offices/workspaces. Information must also be provided regarding the workspace for nursing support personnel.

A conference room is reported to be accessible for "general college use" (p. 36) and can accommodate eight people (Table 5.2D, p. 38). According to the narrative, a vacant office is also available to use if a private meeting space is needed for the faculty to meet with students (p. 36).

Six classrooms are reported to be available with varying square footage (p. 36); these classrooms are reported to be shared with the EMS program. While the square footage in each classroom is provided in Table 5.2B, information regarding the seating capacity is provide in Table 5.2C (p. 38). Classrooms are reported to be equipped with desks, chairs, a faculty desk,

and an LCD projector (p. 36); Table 5.2C also indicates that the classroom have a whiteboard and podium (p. 38). In the Self-Study Report, the faculty should provide the information regarding the seating capacity in Table 5.2B instead of the square footage or in addition to the square footage; this would allow the faculty to delete Table 5.2C.

A computer laboratory is available and provides access to 16 desktop computers; an additional 30 laptop computers are also reported to be available (p. 35). The library is also reported to provide access to four computer workstations (p. 37). Table 5.2B (p. 37) indicates that there is a computer laboratory with 500 square feet and is reported to be available for test taking; however, the narrative indicates that a calendar is created prior to each semester to identify the days and times the computer laboratories are open to students (p. 36). Additional information is needed in the Self-Study Report regarding the accessibility of the computer laboratory to students outside of scheduled class time. Wi-Fi access is reported to be available in the classrooms and common areas (p. 35). The Director of IT is reported to maintain all faculty and student computers. The IT Support Center is reported to be accessible on Mondays through Fridays from 8:00 a.m. until 9:00 p.m. (p. 40).

The narrative for Criterion 5.2 does not provide specific information regarding either the skills laboratory or simulation laboratory. In the narrative for Criterion 4.9, the reviewers noted that the laboratory provides access to low-, medium-, and high-fidelity simulators (p. 25) and that the skills laboratory is used to practice skills using similar equipment found in the actual clinical setting (p. 25). The narrative in Criterion 4.9 also indicates that the skills laboratory has a scheduled lab time for supervised practice as well as open laboratory hours (p. 26). Table 5.2A (p. 35) indicates the laboratory is accessible Mondays through Fridays from 8:30 a.m. until I I:00 p.m. as well as additional hours by appointment.

The only additional information regarding the skills/simulation laboratory is the square footage (Table 5.2B, p. 36), which indicates that there are two laboratories and the information about the recent purchase of capital equipment (p. 38). No information is provided regarding the number of hospital beds/workstations or the number of students that can be accommodated at the same time.

In the Self-Study Report, the faculty must specify the number of hospital beds/work stations available in each laboratory, must clarify whether the skills laboratory and simulation laboratory are separate areas, and must provide information regarding the times that the skills laboratory is accessible to the students outside of scheduled class times.

Criterion 5.3

Limited information is provided regarding the library except to indicate that the librarian is available five days per week on campus as well as virtually (p. 39) and that the library provides access to four computer workstations (p. 37) as well as to the Library and Information Resource Network (LIRN) online database. Table 5.3A (p. 40) provides information regarding the specific databases available through LIRN, which includes, but is not limited to, ProQuest Nursing and Allied Health database, MEDLINE Plus, and PubMed.

No information is provided regarding the hours of operation or whether the online resources are accessible remotely. Additionally, no information is provided regarding potential hard copy resources that may be accessible in the physical library. Additional information must be provided regarding the learning resources available to students in the library as well as the times that these resources are accessible.

The narrative indicates that "the development and management of the collection is governed by the faculty, students, and program leadership" in reference to the library resources. However, specific information regarding the faculty role in the selection and deselection of learning resources used by the program, including those in the library, was not provided. In the Self-Study Report, the narrative for Criterion 5.3 must describe the selection and deselection process for learning resources; the narrative must include information about the faculty role in the process.

<u>Analysis</u>

The program is not in compliance with Standard 5 as Criteria 5.2 and 5.3 are not met at this time, as evidenced by:

- Failure to provide evidence that physical resources are sufficient to ensure the achievement of the end-of-program student learning outcomes and program outcomes and meet the needs of the faculty, staff, and students.
- Failure to provide evidence that the learning resources and technology are comprehensive, current, and accessible to the faculty and students.

With the following areas needing development:

- Ensure all students have sufficient access to the nursing skills laboratories to meet their learning needs.
- Ensure that the learning resources and technology are selected with faculty input.

All Criteria for Standard 5 must be met prior to Initial Accreditation.

Standard 6 - Outcomes

Systematic Plan of Evaluation

The faculty are reported to have developed a systematic plan of evaluation (SPE) using the 2017 ACEN Standards and Criteria. The reviewers noted that the levels headings in the narrative for Standard 6, in some places, reflect the Standards and Criteria for a graduate level program instead of an associate degree program since the level headings reference role-specific professional competency (p. 50). The faculty must ensure that the Standards and Criteria for an associate degree program are used throughout the entire Self-Study Report.

Appendix K (pp. 153–167) provides a copy of the SPE for 2020. The SPE is noted to have two sections labeled "plan" and "evaluation." The plan section has columns labeled "element," "expected level of achievement" (ELA), "frequency responsible person/committee," and "assessment methods and evaluation criteria" while the evaluation section has columns labeled "date evaluated, results of data collection and analysis" and "actions for program development, maintenance, or revision." The SPE is noted to include each end-of-program SLO (pp. 154–163) as well as program outcomes related to licensure examination pass rate (pp. 164-165), program completion rate (p. 166), and job placement rate (p. 167).

Criterion 6.1: End-of-Program Student Learning Outcomes

The narrative for Criterion 6.1 provides information about the general SPE as well as program completion (pp. 43, 55–56; Table 6.1E1, p. 53), job placement (pp. 43, 56–57; Table 6.1E1, p. 54), and licensure examination pass rates (pp. 53-54; Table 6.1E1, p. 53). Information about the program outcomes should not appear in the narrative for Criterion 6.1. Instead, information about licensure examination pass rates should be in the narrative for Criterion 6.2 while program completion appears in Criterion 6.3 and job placement in Criterion 6.4 in the Self-Study Report.

The current narrative for Criterion 6.1 describes the various evaluation methods used throughout the nursing program. This information should be moved to the narrative for Criterion 4.7 in the Self-Study Report. The narrative for Criterion 6.1 in the Self-Study Report should focus on the evaluation methods used at or near the end of the associate nursing program that demonstrate the extent to which the students have achieved the end-of-program SLOs specific to the program prior to graduation. The narrative should focus on those methods, the ELA related to each method, the data collected, the analysis of the data collected, and any actions taken.

Table 6.1A (pp. 45–49) is reported to provide information regarding each end-of-program SLO, as well as the expected levels of achievement (ELA) and measurement methods. The reviewers noted that the measurement methods column has three or more methods identified while the ELA column has a single ELA that is essentially the same for each end-of-program SLO. This ELA is "ATI best practice benchmark of Level 2 measured by the RN Content Mastery Series 2016 Proficiency levels by content area" (p. 45) or "95% predictability on the ATI Comprehensive Predictor (pp. 46-47, 49), or "meet or exceed the national average for the client need categories listed" (pp. 47-49).

The narrative then provides several tables that delineate the standardized testing results throughout the program. Some of the tables are noted to be for the overall standardized examination (Table 6.1C1, p. 51; Table 6.1C4, p. 52) while others appear to reflect sub-scales related to client needs categories (Table 6.1C2, p. 51; Table 6.1C3, p. 52; Table 6.5C5, p. 53).

As noted, the SPE does include each end-of-program SLO (pp. 154–163). The ELAs cited in the SPE are the same as those in Table 6.1A above. In the Self-Study Report, the faculty should delete Table 6.1A and instead refer the reader to the SPE to avoid duplicating the data. As

noted above, faculty are collecting and reporting data across the curriculum instead of at or near the end of the program.

The reviewers also noted that the clinical, laboratory and simulation evaluation tools are also an assessment method (pp. 155, 157, 159, 161-162). However, there is no ELA related to any of these tools and no data is provided.

While the faculty are attempting to measure the achievement of the end-of-program SLOs, the faculty identified overall standardized testing scores with some use of "client needs" category scores for some identified end-of-program SLOs. An overall standardized testing score will not measure achievement of an individual end-of-program SLO and its embedded concepts/competencies. In addition, although some of the identified methods of assessment describe the use of "client needs" category scores for evaluation of selected end-of-program SLOs, the reviewers noted that the same client need category (i.e., psychosocial integrity) is used for end-of-program SLO #2 related to the provision of quality, safe, and evidence-based patient-centered care as well as end-of-program SLO #3 related to integration of culturally competent care (pp. 156, 158). Further, end-of-program SLO #5 related to the use of technology to reduce error will be evaluated using comprehensive predictor sub-scores for safety and infection control, pharmacological and parenteral therapies, and reduction of risk potential (p. 162). There is a lack of congruence between the identified end-of-program SLOs and the selected assessment methods, which will result in data that are not useful for program decision-making and program improvement.

The faculty should ensure that the SPE includes each end-of-program SLO with an ELA and data specific to each; the data should be collected in those courses at or near the end of the program. The faculty should identify appropriate direct assessment methods related to each end-of-program SLO as well as the concepts/competencies within each, and the ELA should be consistent with the assessment method as well as the end-of-program SLO. The assessment methods should include direct methods of assessment (e.g., scores on sub-scales of clinical evaluation tool or standardized examination) and may include indirect measures (e.g., surveys). If the faculty use surveys to collect data, then the response rates (number of surveys returned divided by the number of surveys distributed/graduates) should be recorded for each survey, whether print, digital, telephone, or other survey method to ensure sufficient data has been collected to inform program decision-making.

The faculty are currently proposing to analyze the data annually. Although assessment of student achievement of the end-of-program SLOs may be performed every semester or annually, faculty may elect to analyze the data results every 2-5 years to ensure sufficient data are collected. For example, the first two end-of-program SLOs are reviewed in the first year, the second two are evaluated in the second year, and so on until all have been evaluated, at which point the process starts over. The faculty must identify a data collection and analysis cycle for each PSLO. Data collected and analysis should be recorded in the SEP, or there should be a reference to the location of the raw data and analysis (e.g., meeting minute dates, program reports). If the data and analysis are not recorded in the SPE, copies of this information (e.g., meeting minutes, program reports) should be available as virtual supporting evidence with the Self-Study Report; see the ACEN Guidelines for Written Reports regarding supporting evidence.

Criterion 6.2: Licensure Examination Pass Rate

The outcome for licensure examination pass rate has an ELA of "greater than or equal to 80% for all first-time test takers within the first year" (p. 164); Table 6.1E1 (p. 53) only has "greater than or equal to 80%." The program reports licensure examination pass rates of 80% in 2019 (Table 6.1E2, p. 54); Table 6.1F1 (p. 54) indicates 80% (12/15), which is replicated in Table 6.1F2 (p. 55). Table 6.2A (p. 58) provides information regarding the quarterly pass rates during 2019. A review of the FBON website indicated that the program did not have licensure examination pass rates for 2017 or 2018. The licensure examination pass rate for 2019 was 80% (12/15).

Disaggregated data by date of completion or program option (day and evening) were not provided. The faculty should provide disaggregated data by date of completion and program option in addition to the aggregated data for the entire.

Program Outcomes

While the Candidacy Presentation does not require the faculty to provide a narrative related to Criterion 6.3 and Criterion 6.4, the reviewers have provided the following feedback. This is based upon the information available in the SPE and narrative as described above.

The outcome for program completion has an ELA of "greater than or equal to 43% (program completion rate is calculated at 150% timeframe)" (p. 166); Table 6.1E1 (p. 53) has only "greater than or equal to 43%." No information is provided in the SPE regarding the rationale used to establish the ELA at 43%; the narrative for Criterion 6.1 (p. 43) implies the rationale is based upon historical performance of the college graduates and those of comparable institutions. However, no specific information was provided regarding the historical data or the comparable institutions. In the Self-Study Report, specific information regarding the rationale used by faculty must be provided and should reflect student demographics.

The program reports program completion rates of 46% in 2019 (Table 6.1E2, p. 5); Table 6.1G1 (p. 55) indicates that students who started in 2017 had a 46% completion rate while Table 6.1G2 (p. 56) indicates a completion rate of 50% for the cohort that began in February 2017 and 43% for the cohort who began in March 2017. Table 6.2H2 appears to indicate additional cohorts in 2017.

Comprehensive disaggregated data by date of completion and program option were not provided. The faculty should provide disaggregated data by date of completion and program option in addition to aggregated data for the entire program.

The outcome for job placement has an ELA of "greater than or equal to 65% will be placed within six months of licensure" (p. 167); Table 6.1E1 (p. 54) has only "greater than or equal to 65%" but also indicates in 2019 the rate was "greater than or equal to 60%." This ELA does not reflect the ACEN definition of job placement since it only considers those graduates who successfully pass the licensure examination. No information is provided regarding the rationale used to establish the ELA at 43% in the SPE. The narrative for Criterion 6.1 (p. 43) indicates the rationale is based upon the needs in the general area of Broward County; however, the

presentation indicates that the program not being programmatically accredited has prevented some graduates from obtaining employment. In the Self-Study Report, specific information regarding the rationale used by faculty must be provided and should reflect program demographics.

The program reports job placement rates of 68.75% in 2019 (Table 6.1H1, p. 57), and Table 6.2H2 (p. 57) provides data related to cohorts that began in February 2017, March 2017, July 2017, October 2017, January 2018, March 2018, May 2018, and July 2018. Data related to job placement do not need to be disaggregated, but all graduates need to be accounted for. No information was provided regarding the response rates; therefore, the reviewers are not able to verify that sufficient data have been collected to inform program decision-making.

<u>Analysis</u>

The program is not in compliance with Standard 6 as Criterion 6.1 is not met at this time, as evidenced by:

- Failure to establish that there is ongoing assessment of the extent to which students attain the end-of-program student learning outcomes.
- Failure to establish that assessment data are consistently analyzed and used in program decision-making for the maintenance and improvement of students' attainment of the end-of-program student learning outcomes.

With the following areas needing development:

- Ensure the program demonstrates that there are specific, measurable expected levels of achievement for each end-of-program student learning outcome.
- Ensure the program demonstrates that there are appropriate assessment methods that result in meaningful data for each end-of-program student learning outcome.
- Ensure the program demonstrates evidence of licensure examination pass rate data disaggregated by date of program completion, program option, and aggregated for the program as a whole.
- Ensure there are specific, measurable expected level(s) of achievement for program completion that are determined by the faculty and reflecting student demographics.
- Ensure the program demonstrates evidence of program completion data and that data are aggregated for the nursing program as a whole as well as disaggregated by date of program completion or entering cohort and program option.
- Review and revise the expected level of achievement for job placement to be congruent with the ACEN definition of job placement.
- Ensure there are specific, measurable expected level(s) of achievement for job placement that are determined by the faculty and reflecting program demographics.
- Ensure that job placement data are sufficient to inform program decision-making.

Criteria for Standard 6 must be met prior to Initial Accreditation.

All Criteria for all six Standards must be met to achieve Initial Accreditation.

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Recommendation for Candidacy Action:

Based upon the independent analysis of the Candidacy Presentation by each reviewer, the consensus of the reviewers is to recommend:

Approval

Deferral

X Disapproval

Summary:

In the Self-Study Report, tables should appear at the top of the next page after being referenced in the narrative unless the entire table will fit in the remaining white space available on the page. Tables should ideally appear on the same page; the faculty should consider using a landscape format and a slightly smaller font size to facilitate this. If a table is larger than a single page, then the faculty should ensure that column headers appear on each subsequent page of the table. For tables larger than 1-2 pages, the faculty should consider including them as virtual supporting evidence with the Self-Study Report or providing only an example of the table with the overall table being available as virtual supporting evidence during the initial accreditation visit.

Currently, the program is not in compliance with Standard 4 Curriculum, Standard 5 Resources, or Standard 6 Outcomes. The program also has multiple areas needing development. The faculty are encouraged to use the feedback provided throughout this review to address the concerns in each Standard.

The reviewers noted minimal to no progress since the submission of the first Candidacy Presentation in July 2019. At that time, the program was not in compliance with Standard 2, Standard 4, and Standard 6 while being in minimal compliance with Standard 5. As noted above, the program remains in non-compliance with Standard 4 and Standard 6 and is now in noncompliance with Standard 5. The program demonstrated improvement with Standard 2. The issues in Standard 4 Curriculum have worsened, and the program has regressed into noncompliance with Standard 5 Resources. The reviewers also noted that many of the same areas needing development were cited in the original submission as compared to the current presentation.

Therefore, the reviewers recommend a disapproval. The program may restart the Candidacy process when the program can realistically be in compliance with all Standards in preparation for the initial site visit and the program has an opportunity to address the areas needing development. An initial accreditation visit must not be scheduled until the program has been consistently at or above an 80% licensure examination pass rate for all first-time test-takers within the same 12-month period. It is highly recommended that the nurse administrator and the faculty attend an upcoming ACEN Self-Study Forum to facilitate a better understanding of the accreditation process. The program should use the feedback provided in both reviews to make changes.

Reviewers' Names & Signatures:

Nell Ard, PhD, RN, CNE, ANEF Director	Suzette Farmer, PhD, RN Director

Date: _____

Date: _____

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EXHIBIT 68

HCI TIMES

STUDENT NEWSLETTER

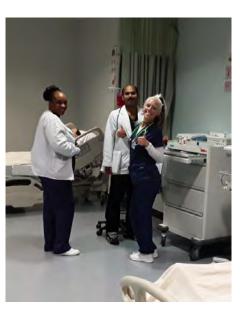


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Case 8:32102 81883-RAR Document 141-2 Entered on FLSD Docket 12/19/2823 temper 97019f 1026



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- VA benefits and tuition assistance.
- Educational planning.
- Credit consideration for military training.
- Career assistance post graduation.
- Small classes with individualized attention.
- Flexible class scheduling with 24/7 online access.

Case 8:32 Ceret 81883-RAR Document 141-2 Entered on FLSD Docket 12/19/2823 temper 97019f 1026

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HCI will be hosting a free review.

Fort Lauderdale

RSVP to: Lorna Edwards at LEdwards@HCI.edu

954-626-0255

Please plan to attend both days as different content will be covered each day.

When: September 21st and 22nd

Where: 1201 W. Cypress Creek Road Suite 101

Fort Lauderdale, FL 33309

9am - 6pm

West Palm Beach RSVP to Rshelpman@hci.edu

When: October 5th and 6th

Where: 1764 North Congress Ave.

West Palm Beach, FL 33409

7am – 5pm

All HCI Students Welcome

HCI Is proud to announce Professor Dianne Nissen will be facilitating at our WPB campus.

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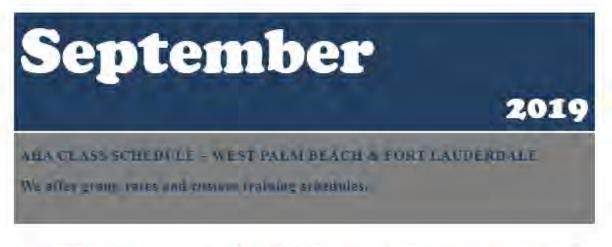


The Associate Degree in Nursing program, Ft. Lauderdale has been deemed eligible to participate in the Candidacy process. This process is the prerequisite step toward formal review for ACEN initial accreditation and is neither a status of accreditation nor a guarantee that accreditation will be granted

The RN to BSN program, West Palm Beach, has been deemed eligible to participate in the Candidacy process. This process is the prerequisite step toward formal review for ACEN initial accreditation and is neither a status of accreditation nor a guarantee that accreditation will be granted.

If you have questions, please see an HCI staff member as we would all be happy to assist!

Case 8:32 CH & Base Page 97419f









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*BLS – Basic Life Support *ACLS – Advance Cardiac Life Support *PALS – Pediatric Advanced Life Support * Inst – Instructor Course *HSaver--Heart Saver FA AED (For K-12 Please call)





Sunday October 27th 8am - 11am

Email Mpeterson@hci.edu if you're interested in participating!



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2. communicate with your instructor! If you have a question, idea, or concern, let us know.

3. Set earlier due dates for yourself. If an assignment is due Sunday at 11:59 p.m., tell yourself it is due the day before. You won't miss a due date this way!



Technological Support

ATI 24-hour Support Contact (800) 667-7531

Evolve 24-hour Support located under the Help tab on the Evolve site

Mobius 24-hour Support hotline located under the Help tab on the Mobius site

Technological support on campus for HCI College assets through the Director of IT

HCI College

1764 N Congress Ave West Falm Beach, FL 33409 (561) 586-0121 www.hci.edu Case 8:22-02-81883-RAR Document 141-2 Entered on FLSD Docket 12/19/2823 Ender 97819f 1026

If something needs to be Cleaned or Fixed! Let us know! Email Clean@HCI.edu Just send us the Location and Room



HCI College is invested in investing in you!

We have recently purchased new equipment to add to the labs at our Fort Lauderdale, and West Palm Beach campus to make learning experiences better for you as students. In Fort Lauderdale, students now have a new birthing bed, additional hospital beds, 3 new simulation manikins, IV pumps, and more! Check out these students enjoying their new lab experience!







Students,

I want to ensure that each student is equipped to graduate and prepared to enter into the work force.

To help ensure we are providing the best possible outcomes for all students, as of <u>January 1st, 2020</u> students will not be allowed to enter HCI College if they are past due on their tuition options payment plan. This means that all students will need to be current on their payment plans starting <u>January 1st, 2020</u>.

Please feel free to contact me with any questions, comments, or concerns.

Regards,

Ryan Miller Vice President of Finance

HCI College 1764 N Congress Ave Suite 203 West Palm Beach, FL 33409 561-586-0121 Direct Have Questions About Finacial Aid?

Skip the Line!

Email us HCIFA@hci.edu







NURSING TUTORING AVAILABLE

WPB

Mondays	Suite 203	Med Surg	8:00am-9:00am	Professor Goodwin-Esola
Mondays	Room 205	General	9:00am-2:30pm	Professor Leandre (Now-Oct 19th)
Tuesdays	Suite 203	Med Surg	8:00am-9:00am	Professor Goodwin-Esola
Wednesday	s Room 204	General	9:00am-5:00pm	Professor Leandre (Now-Oct 19th)
Thursdays	Room 204	General	9:00am-2:30pm	Professor Leandre (Now-Oct 19th)
Thursdays	Library	General	2:00pm-5:30pm	Professor Colia
Fridays	Room 106	Dosage and Cal	1:00pm-5:00pm	Dr. Berneche
Fridays	Room 106	Pharmacology	5:00pm-9:00pm	Dr. Berneche
Saturdays	Room 114	Pharmacology	9:00am-4:00pm	Dr. Berneche
By Email	Writing Skil	Is/Reflective Paper	contact dni	ssen@hcl.edu
Every Day		Tutor.com throug	h Moodle	
FTL				

FTL				
Monday	Room TBA	General	5pm-8pm	Professor Timme
Monday	Room TBA	A&P/ Micro	6pm-9pm	Professor Timme
Tuesdays	Room TBA	General	4pm-7pm	Professor Timme
Tuesdays	Room TBA	Algebra	6pm – 9pm	Professor Timme
Wednesday	Room TBA	General	4pm-7pm	Professor Timme
Wednesday	Room TBA	A&P/Micro	6pm-9pm	Professor Timme
Thursday	Room TBA	General	4pm-7pm	Professor Timme
Thursday	Room TBA	Algebra	6pm -9pm	Professor Timme
Friday	Room TBA	General	4pm-6pm	Professor Timme
Friday	Room TBA	Med Math	4pm-8pm	Professor Timme

EMT tutoring and open labs now available on request. Fridays and Saturdays are available. Please contact <u>nwallace@hci.edu</u> to schedule your tutor!

Additional tutoring days will be announced as they start. If you need tutoring services, please see your instructor.



Melanie Willingham - A Fort Lauderdale Graduate Success Story

Melanie Willingham came to HCI College as an LPN. She worked in the pediatric home health area for a while then moved on to the VA clinic in Boca Raton. She decided to transform her story by moving to the next step of becoming a Registered Nurse. Between family and work she knew it would be a challenge but was confident that she could do it, even though it would be tough. Her new journey began in October of 2017. Despite her family moving 3 hours away Melanie stayed in Ft. Lauderdale to finish up her degree. Her last 6 months consisted of work, class, clinicals and driving to take care of family (even for an overnight trip and back).

In the end it was all worth it she graduated and passed her NCLEX on the first attempt. She knew she wanted to work in a hospital, so she targeted Advent Medical Center in Sebring, close to her home and got accepted into their yearlong nurse residency program, specifically in the ER. She reports that the ER is challenging and honestly like nothing she has done before. No two days are the same and she enjoys the challenge and the fast-paced atmosphere.

When asked what advice she would give current HCI College students she said, "Study hard, and know, that even after graduation, there is still so much more to learn!"

The faculty and staff at HCI College Ft. Lauderdale salute Melanie as she weathered the storms and makes us proud every day.



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EMS Clinical Site Locations



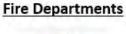






















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EXHIBIT 69

HCI TIMES

STUDENT NEWSLETTER



HCI COLLEGE LOCATIONS West Palm Beach (561) 586-0121 1764 N. Congress Ave. 33409

Fort Lauderdale (954) 626-0255 1201 W. Cypress Creek Rd. 33309



Save the date!

HCI Graduation Park Vista Community Auditorium September 6th, 2019 5:00 p.m.

See Career Services for more information

DID YOU KNOW???

HCI COLLEGE is proud to announce that we have become a college-wide National League for Nurses member! We are very excited about the perks that comes from being a member of the NLN and how this will benefit our students, school and faculty.

For more than 100 years the NLN has been the premier organization for nurse faculty, schools of nursing, and leaders in nursing education. NLN advances the field of nursing education through professional development, research, student exam services, nurse educator certification, public policy, and networking (taken from the website). Great things are happening at HCI!

<u>#HCIGrows</u> <u>#HCI</u> <u>#Nursing</u> <u>#Advancing#Advancement</u> <u>#Online</u> <u>#FortLauderdale#WestPalmBeac</u> <u>h</u> <u>#Florida</u>





August



AHA CLASS SCHEDULE – WEST PALM BEACH & FORT LAUDERDALE

We offer group rates and custom training schedules.





To reserve your spot today go to <u>WWW.HCI.EDU</u> or call 561-586-0121 We are located at 1764 North Congress Ave West Palm Beach, FL 33409 And 1201 West Cypress Creek Rd. Suite 101 Ft. Lauderdale, FL 33309

Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
				1	2	BLS 9am
4	PALS 9am	6 BLS 6pmWPB BLS 6pm FTL	ACLS 9am	8	9 BLS 9am	ACLS 9am WPB ACLS 9amFTL
11	PALS 9am	ACLS 6pm	PALS 9am	15 BLS ACLS PALS INST 9am WPB	ACLS 9am	BLS 9am
18	19 PALS 9am WPB BLS 6pm FTL	20 BLS 6pm	ACLS 9am	22 HSaver FA/AED 9am	BLS 9am ²³	2 ACLS 9am WPB BLS 9amFTL
25	26 PALS 9am	ACLS 6pm	28 PALS 9am	29	ACLS 9am	BLS 9am

*BLS – Basic Life Support *ACLS – Advance Cardiac Life Support *PALS – Pediatric Advanced Life Support * Inst – Instructor Course *HSaver--Heart Saver FA AED (For k-12 Please call) Case 8:32-02-62-81-883-RAR Document 141-2 Entered on FLSD Docket 12/19/2023 August 98819f 1026

HCI Tutoring is available

24/7 on tutor.com





DID YOU GET YOUR NEW STUDENT EMAIL? Contact the front desk to obtain yours today. "Education is the passport to the future, for tomorrow belongs to those who prepare for it today. " Malcolm X









Moodle Mobile is the Official Mobile App for HCI Students.

You can learn wherever you are, whenever you want! Go to your App Store or Google Play You will be asked for the site URL: Courses.HCl.edu Log-in as you normally would on our website





NURSING TUTORING AVAILABLE

WPB

Mondays	Room TBA	Med Surg	8:00am-9:00am	Professor Goodwin-Esola
Tuesdays	Room TBA	Med Surg	8:00am-9:00am	Professor Goodwin-Esola
Wednesday	s Room 204	General	12:00pm-3:00pm	Professor Barthold
Wednesday	s Room TBA	Fundamentals	2:00pm-4:00pm	Professor DeVevo
Thursdays	Room TBA	Fundamentals	2:00pm-4:00pm	Professor DeVevo
Thursdays	Room 105	Pre-Med-Surg exam	n 6:30pm-8:00pm	Professor Dennis
Thursdays	Room 105	Med-Surg	by appointment	Contact adennis@hci.edu
Fridays	Room 106	Dosage and Cal	1:00pm-5:00pm	Dr. Berneche
Fridays	Room 106	Pharmacology	9:00am-1:00pm	Dr. Berneche
Fridays	Room 106	Pharmacology	5:00pm-9:00pm	Dr. Berneche
Saturdays	Room 106	Dosage and Cal	10:00am-2:00pm	Dr. Berneche
By Appointn	nent	Lab Skills	contact vsmith@h	<u>ci.edu</u>

Every Day

Tutor.com through Moodle

FTL

Tuesdays	Room TBA	General	4pm-6pm	Professor Timme
Wednesday	Room TBA	General	4pm-6pm	Professor Timme
Thursday	Room TBA	General	4pm-6pm	Professor Timme
Friday	Room TBA	General	4pm-6pm	Professor Timme
Friday	Room TBA	General	6pm-8pm	Professor Timme

EMT tutoring and open labs now available on request. Fridays and Saturdays are available. Please contact <u>rwallace@hci.edu</u> to schedule your tutor!

Additional tutoring days will be announced as they start. If you need tutoring services, please see your instructor.

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MCI	
- COLLEGE -	

NCLEX REVIEW

HCI will be hosting a free review.

Fort Lauderdale

RSVP to: Lorna Edwards at LEdwards@HCI.edu

954-626-0255

Please plan to attend both days as different content will be covered each day.

When: August 10th and 11th,

Where: 1201 W. Cypress Creek Road Suite 101

Fort Lauderdale, FL 33309

9am - 6pm

West Palm Beach

RSVP to Rshelpman@hci.edu

When: August 24th and 25th

Where: 1764 North Congress Ave.

West Palm Beach, FL 33409

7am – 5pm All HCI Students Welcome



Our WPB Campus is happy to announce our new NCLEX instructor Dianne Nissen!

Great things are happening at HCI!



HCI College is officially a member of the National Council for State Authorization Reciprocity Agreements!

For more information go to www.nc-sara.org



Students, here's what you should know!

The Associate Degree in Nursing program, Ft. Lauderdale has been deemed eligible to participate in the Candidacy process. This process is the prerequisite step toward formal review for ACEN initial accreditation and is neither a status of accreditation nor a guarantee that accreditation will be granted

The RN to BSN program, West Palm Beach, has been deemed eligible to participate in the Candidacy process. This process is the prerequisite step toward formal review for ACEN initial accreditation and is neither a status of accreditation nor a guarantee that accreditation will be granted.

If you have questions, please see an HCI staff member as we would all be happy to assist!

A MESSAGE FROM THE PRESIDENT:

"I am proud to announce that our ACEN mock visit went very well this past week. A huge thank you to all the students, faculty and staff who helped make this a success. The visit is less than 90 days away, and we are excited to show off HCI College." - Robert Bonds 7-25-2019

MASS CASUALTY INCIDENT TRAINING

Nursing and EMS students, along with faculty, can participate in a Mass Casualty Incident Training at HCI College.

August 8th, 2019

9:00am-5:00pm

Questions: Email CSheffiled@hci.edu-Nursing

pbotting@hci.edu- EMS



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A special thank you to our students and staff for providing the supplies needed for the Westgate Elementary School students Kindergarten class! All of your donations were greatly appreciated ©



We care!

Our vending machines on campus, both for drinks and snacks, take credit cards ©

Have you met your School President?

NEWSMAKERS SHAKERS

ROBERT BONDS

Robert Bonds is the President and Chief Operating Officer of Health Career Institute. He is a U.S. Army veteran with 10 years of higher education experience. After serving a tour in Operation Iraqi Freedom, Robert went on to earn his



bachelor's degree from West Virginia University. He started his career in higher education as an admissions representative at South University, which is where he received his master's degree. Robert then went on to lead a school system in Nashville that had five campuses and a growing online division. He currently serves as a Trustee of the Chamber of Commerce of the Palm Beaches.



The BRENT BRAUNWORTH SCHOLARSHIP



Brent is a 30-year Paramedic and Firefighter who achieved the rank of Battalion Chief of West Palm Beach Fire Rescue.

Each year eight paramedics in the area are awarded the Brent Braunworth Scholarship that allows paramedics to receive their associate's degree tuition-free. At HCI we are proud to have this award named after our very own Fire Science Program Director and friend Brent Braunworth.

CURRENT TITLE: Director of Fire Science, HCI FORMERLY: Battalion Chief of EMS, WPBFR LENGTH OF TIME IN THE ABOVE POSITION: 5.1 years FORMER TITLES OF NOTE: Operations Captain (4 yrs), WPBFR, Co-coordinator at PBCC for ACLS (Continuing Education)- for 6 years, SWAT/Medic-Officer from (1990-2004), Haz Mat Tech, Fire Instructor 1. Union Rep for 12 years, Pension rep for 7.

EDUCATION: BS in Public Affairs (FAU), AS in Emergency Management (PBJC), Minor in Communications (FAU)

AWARDS: Employee of the Month (City of West Palm Beach and Kiwanas Club), Firetighter of the Quarter (WPBFR), Firetighter of the Year (WPBFR), Paramedic of the Year (County EMS), two SWAT Team Commendations, Nominated for Teacher of the Year PBC.

OTHER:

Author of two books: Street Scenarios for the EMT and Paramedic and Blood, Guts and Tears: Stories of Courage. Written over 100 articles and short stories, most related to Fire and EMS (including Reader's Digest, TROPIC magazine, Emergency Magazine, EMS World, the Palm Beach-Post and the Sun Sentinel.

The STEVEN KEEHN WORKING NURSE SCHOLARSHIP





The Working Nurse Scholarship is dedicated to Health Career Institute's Medical Director, Dr. Steven Keehn. Dr. Keehn's current roles include the Assistant Medical Director of JFK Emergency, Assistant Medical Director for West Palm Beach Fire Rescue, Assistant Medical Director for the Town of Palm Beach, and, of course, the Medical Director for Health Career Institute

Dr. Keehn's past truly shows his passion for helping other people. After graduating from George Washington University with his bachelor's degree in Emergency Health Services, Dr. Keehn started his career as a paramedic and firefighter. Due to an injury on the job, Dr. Keehn had to figure out what to do next. In true form, he was not done helping people, so he decided to further his medical knowledge and head off to medical school in south Florida at Nova Southeastern University.

For more than 20 years, Dr. Keehn has been a true leader in his profession and never passes up the opportunity to teach a new student. Here at HCI we are proud to call him our Medical Director and, more importantly, our friend. Dr. Keehn looks forward to a long career in giving back to his students, his staff, and his community which is why we named this scholarship after him.

FORMERLY:	Assistant Medical Director of the Emergency Room
LENGTH OF TIME IN THE ABOVE POSITION:	4.5 years
FORMER TITLES OF NOTE:	
EDUCATION:	Nova Southeaster University College of Osteopathic Medicine





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If something needs to be Cleaned or Fixed! Let us know!

Email Clean@HCI.edu Just send us the Location and Room



ATTENTION STUDENTS!

HCI College @ West Palm Beach Is going to start renovations AUGUST 16th - SEPTEMBER 9th

Please be patient with us while we improve our site.



Have Questions About Finacial Aid?



Skip the Line! Email us HCIFA@hci.edu



Financial Aid - Things to Remember:

- Go to <u>https://solutions.campusivy.com</u>, to register for an online financial aid portal that allows you to: view and submit required documents, view financial aid funding, and receive notifications to keep you informed.
- After you submit a FAFSA, the Financial Aid Office might need additional information or documentation from the student. We will notify you on your HCI Financial Aid Student Portal, by email or by phone if we need additional information and/or documentation. Respond promptly to any requests to avoid delay in your financial aid process.
- If there is any missing or incorrect information, then you should complete or correct your FAFSA as soon as possible.
- Re-apply for Financial Aid on October 1st of every year. In order to attend your next semester, your 1920 FAFSA must be on file.
- Inform Financial Aid about any changes in your schedule.
- Federal Direct Student Loans must be paid back.
- Tuition Options monthly payments must be paid each month to avoid being dismissed from your program.
- HCI partners with IonTuition. IonTuition is an online student loan management platform that helps you
 make, and act on, smart borrowing and repayment choices. As an IonTuition user, you get access to
 three different modules: Ion Manage, Ion Learn and Ion Refinance. IonTuition pulls in all your loans so
 you know how much you borrowed, and who to contact in case you need
 assistance. <u>www.iontuition.com</u>.

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HCCILEGE CAREER

FAIR Wednesday, August 14th

Wednesday, August 14⁴⁴ From 11:30am-2pm Thursday, August 15th From 11:30am-2pm & 4:30pm-6:30pm Bring your resume!

If you need resume assistance, please contact Jennifer Pike at jpike@hci.edu Or call 561-586-0121



HCI College is invested in investing in you!

We have recently purchased new equipment to add to the labs at our Fort Lauderdale, and West Palm Beach campus to make learning experiences better for you as students. In Fort Lauderdale, students now have a new birthing bed, additional hospital beds, 3 new simulation manikins, IV pumps, and more! Check out these students enjoying their new lab experience!



IMPORTANT ANNOUNCEMENT!



TO ALL OF OUR GRADUATES! GOODLUCK ON YOUR BOARDS!

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EMS Clinical Site Locations















Fire Departments









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EXHIBIT 70 (filed under seal)

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EXHIBIT 71

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Candidacy Review – Second Submission

Health Career Institute – West Palm Beach

School of Nursing Associate Nursing Program/Pre-licensure Option Only; Day and Evening Options West Palm Beach, Florida

This review is <u>only</u> for the Health Career Institute – West Palm Beach site in West Palm Beach, Florida and <u>only</u> for the associate nursing program at that location.

The review of this Candidacy presentation was completed based upon the 2017 ACEN Standards and Criteria. <u>ALL</u> programs scheduling visits <u>beginning in January 1, 2018</u> must utilize the 2017 Standards and Criteria in writing the Self-Study Report and will need to demonstrate compliance with this set of Standards.

Please note that the ACEN is implementing an online Accreditation Management System (AMS). Once the AMS is operational, all Self-Study Reports will be submitted online. All nonconfidential documents presented in the on-campus evidence room during a site visit will be uploaded in the AMS at the time the Self-Study Report is submitted online. However, until notified by the ACEN to submit the Self-Study Report online, the nurse administrator and faculty should prepare an on-campus evidence room for the site visit.

Faculty

The associate nursing program at Health Career Institute – West Palm Beach (HCIWPB) has 12 full-time faculty teaching (Table 1A, p. 6; Table 2.1A, p. 7; Appendix A, pp. 50-77). The narrative also indicates that the program has been approved to hire an additional four (4) full-time faculty members (p. 9). All are reported to be exclusive to the associate nursing program. All are credentialed with a baccalaureate degree with a major in nursing; eight (8) are also credentialed with a master's degree with a major in nursing and one (1) of these is also credentialed with a master's of business administration (MBA); one (1) is credentialed as a medical doctor (MD); and one (1) is currently enrolled in a master's nursing program with an anticipated date of completion in February 2019.

According to the presentation, HCIWPB has three (3) part-time faculty teaching in the associate nursing program (Table IA, p. 6; Appendix A, pp. 50-77). All are credentialed with a baccalaureate degree with a major in nursing and two (2) are currently enrolled in a master's nursing program with anticipated dates of completion in August 2018 and July 2019.

The Florida Board of Nursing (FBON) is reported to require that 50% or more of the faculty in a professional nursing program have a master's or doctoral degree in nursing or a baccalaureate

degree in nursing with a master's or doctoral degree in a related field. Minimally a nursing faculty should have a baccalaureate degree in nursing with two (2) years of experience or be actively engaged in heading to the next highest degree. Faculty are also required to be currently licensed to practice professional nursing in Florida. Faculty are also required to have clinical expertise and competence in the area in which he/she is serving as a clinical instructor (pp. 50-51). Currently, 53.33% of the full- and part-time faculty have a master's degree with a major in nursing.

The Commission for Independent Education (CIE) is reported to not have any educational or experiential requirements (Appendix A, p. 51). The faculty should review the requirements carefully since the CIE minimally requires the faculty to meet the requirements of the FBON.

HCIWPB requires that faculty have a master's degree in nursing or a master's degree with a concentration in nursing from an accredited institution whose accrediting agency is recognized by the U.S. Department of Education. Experientially qualified faculty may hold a baccalaureate degree in nursing or a baccalaureate degree with a concentration in nursing. The college requires that faculty hold an unencumbered registered nurse license or advance registered nurse practitioner license issued by the Florida Department of Health; and the faculty member should have a minimum of four (4) years of experience (Table 2.1B, p. 7; Appendix A, pp. 51-52).

The Accrediting Commission of Career Schools and Colleges (ACCSC), which is the accrediting body for HCIWPB, requires the institution to have all of the necessary authorization from the state (Appendix A, p. 52). The faculty profile table did not delineate information related to the requirements for faculty. However, Table 2.5A (p. 10) indicates that the faculty must have a minimum of four (4) years practical work experience in the subject areas taught. In the Self-Study Report, additional information is needed regarding the requirements of ACCSC in the faculty profile table. Based upon the information provided the faculty meet the requirements of each agency.

In the Self-Study Report, all information regarding the requirements specific to faculty credentials and/or experience should be in the faculty profile table coversheet. Information should also not be duplicated in the narrative which could result in conflicting information or omission of information in the faculty profile table.

The full-time faculty have reported clinical expertise in community health, medical-surgical, geriatric, emergency room, mental health, family, maternal-child, pediatric, and long-term care nursing; the part-time faculty have reported clinical expertise in medical-surgical, critical care, maternal-child, and pediatric nursing. A Qualification and Professional Development Form is provided for each full- and part-time faculty member as well as a non-nurse faculty member (Appendix A, pp. 61-77). This reviewer noted that the majority of the professional development is related to the clinical environment. The faculty should ensure that expertise is maintained in their area(s) of responsibilities which may include didactic, skills, simulation, online, and/or clinical learning environments. Each full- and part-time faculty member must maintain documentation to support their professional development; this documentation should

be accessible to peer evaluators during the initial accreditation visit. Based upon the information provided the faculty are qualified to teach in their assigned course(s).

Table 2.1D (p. 8) is reported to provide evidence of how faculty meet their qualification and maintain expertise. Table 2.1E (p. 8) is reported to be a sample of faculty scholarly activities; however, this reviewer did not note any of these examples in the Qualification and Professional Development forms provided. The information in both tables is generic and does not support that each full- and part-time faculty member meet the qualifications and maintain their expertise. In fact, the information cannot be supported with the faculty-specific information provided. Therefore, the faculty should delete these tables from the Self-Study Report and ensure that each Qualification and Professional Development form have the specifics that apply to each individual.

The narrative of the presentation is not specific regarding which faculty members are assigned to skills and/or simulation laboratory experiences. Table 2.5F1 (p. 12) indicates that five (5) full-time faculty have time assigned in the skills laboratory and none of the part-time faculty are assigned in the skills laboratory. The table is not specific with regards to the simulation laboratory. In the Self-Study Report, the faculty profile table should clearly delineate whether faculty are assigned to didactic, skills, and/or clinical learning experiences in each course.

The narrative in Criterion 4.9 indicates that the program has been approved to have a Skills and Simulation Laboratory Coordinator who will begin in May 2018 (p. 20). This position will be considered a faculty position with the majority of the time teaching in the skills/simulation laboratory areas. Copies of all job descriptions should be accessible in the evidence room for the initial accreditation visit.

Currently HCIWPB has 302 students enrolled with 223 in the day option and 79 in the evening option (Table IB and Table IC, p. 6); this provides a full-time faculty-to-student ratio of 1:25-26 which is the upper limits of best practices for a pre-licensure nursing program of 1:20-25. Table 2.5G (p. 13) provides information regarding the student enrollment by academic term and in the day versus evening options. The faculty-to-student ratios are reported to be 1:30 in theory, 1:10 in skills, and 1:9 in clinical/simulation learning experiences (p. 9; Table 2.5B, p. 10). Table 2.5C (p. 10) demonstrates a significant decrease in the overall faculty-to-student ratios since 2015 which is down from 1:80. The table indicates that the other faculty-to-student ratios in the various learning activities has remained constant. Table 2.5C2 (p. 11) provides specific faculty-to-student ratios for nursing courses from 2015 through 2018.

A full-time faculty workload is reported to be 60% direct face time, 10% professional development, and 30% for other activities such as committee work, course preparation, advising, tutoring, and other (Table 2.5D, p. 11). Table 2.5E (p. 11) provides information about the direct face time for lecture, laboratory, and clinical faculty; the faculty with lecture has 24 contact hours compared to the 32 for both laboratory and clinical. Nursing faculty are reported to teach in both the day and evening options to assure consistency (p. 12). The presentation indicates that general education faculty have comparable workloads with the exception of English faculty that have a 1:20 (p. 12).

<u>Analysis</u>

The program is currently in compliance with the selected Criteria for Standard 2 with the following areas needing development:

- Ensure evidence demonstrates that the full-time nursing faculty meet the educational and experiential qualification requirements of the state and the governing organization's accrediting agency.
- Ensure evidence demonstrates that the part-time nursing faculty meet the educational and experiential qualification requirements of the state and the governing organization's accrediting agency.
- Ensure the faculty maintain expertise in their area(s) of responsibilities including didactic, skills, simulation, clinical, and/or online learning environments.
- Ensure the number of full-time faculty is sufficient to facilitate the achievement of the end-of-program student learning outcomes and program outcomes.

All Criteria for this Standard must be met prior to Initial Accreditation.

Curriculum

The narrative for Criterion 4.1 provides increased information regarding the use of Bloom's Taxonomy within the curriculum (pp. 14-15). Since Bloom's is an educational theory, this information should be moved to the narrative for Criterion 4.6 in the Self-Study Report. The narrative for Criterion 4.1 also has information regarding the mission and philosophy (Table 4.1C, p. 15) which should be moved to the narrative for Criterion 1.1 in the Self-Study Report.

The narrative for Criterion 4.1 also includes information regarding program length and how it meets the requirements of the governing organization, the accrediting body of the governing organization, and state regulatory agencies (p. 17). This information should be moved to the narrative for Criterion 4.8 in the Self-Study Report.

The faculty are reported to have utilized a variety of professional standards, competencies, and guidelines to develop the curriculum including the Quality and Safety Education for Nurses (QSEN) Competencies and the client needs categories from the licensure examination blueprint (Table 4.1E, p. 17). While these professional competencies are reported to have been utilized, Table 4.1E does not delineate the relationship of the professional standards and competencies to the end-of-program student learning outcomes (SLOs) for the associate program offered at HCIWPB. Appendix C (pp. 78-79) provides information regarding the relationship between the end-of-program SLOs, the QSEN Competency categories, the integrated processes, and the client needs categories. The faculty should consider deleting Table 4.1E and instead only have Appendix C; the faculty should also consider using a landscape format for this table.

The faculty are reported to have identified pervasive concepts including person, nursing, health, and healthcare systems as well as progressive concepts which include caring, collaboration, critical reflection professionalism, and life-long learning (Table 4.1C, p. 15) as components of its mission/philosophy. However, there is no clear demonstration of how these concepts have been integrated within the curriculum or a correlation to the identified professional competencies and standards that have been used by the faculty to develop the curriculum; additional information should be provided in the Self-Study Report concerning the relationship.

The faculty have identified 10 end-of-program SLOs (p. 18). The faculty are reported to be currently in the process of revising the course level SLOs and updating the courses to align better with the end-of-program SLOs (p. 18). Information about curriculum development and review should be in the narrative for Criterion 4.3 in the Self-Study Report.

The abbreviated syllabi (Appendix E, pp. 85-96) have 10 course SLOs each. The course SLOs have a tendency to be content- and population-specific; however, progression (e.g. simple to complex) is noted. However, a clear relationship between the course SLOs and the end-of-program SLOs is not noted. The faculty are encouraged to continue to review and revise the course SLOs.

Appendix F (pp. 97-99) is an example of curriculum mapping of the course SLOs to the end-ofprogram SLOs. However, this table includes a single course (NUR 1213 Nursing II). The faculty should revise the table to a landscape format and should have the first column delineate the end-of-program SLO with subsequent columns demonstrating the course SLO(s) that align with it; this table should include all courses. The second component of Appendix F (pp. 99-100) lists the course SLOs for NUR 1213 and all of the course activities and evaluation methods; however, there is not a clear relationship between the individual course SLOs and the learning activities or evaluation methods. The faculty should revise this table to identify the course activities and evaluation methodology specific to each course SLO. The faculty should also ensure that additional tables for each of the courses within the curriculum are also developed and available in the evidence room for the initial accreditation visit.

The abbreviated syllabi do not delineate the evaluation methodologies utilized by the faculty to verify the achievement of the course objectives. This reviewer is not able to verify that the evaluation methodologies align with the course SLOs and/or the end-of-program SLOs; additionally, this reviewer cannot verify that the evaluation methodologies progress (e.g. simple to complex) throughout the curriculum. The faculty should review the required elements of the abbreviated syllabi delineated in the *Guidelines for Writing a Self-Study Report* on the ACEN website. All course syllabi and abbreviated syllabi must include these elements.

According to Appendix F, NUR 1213 utilizes quizzes/examinations, clinical evaluations, and standardized testing assignments and examinations within the course. Appendix H (pp. 109-114) provides a copy of the clinical evaluation tool for NUR 1214 Nursing II Medical/Surgical Nursing. The student is assessed using a 5-point Likert scale with "1=Dependent", "2=Novice", "3=Assisted", "4=Supervised", and "5=Self-Directed". The student should achieve a minimum of 3.8 to successfully complete the course. The tool has areas related to knowledge, critical thinking, nursing diagnosis, planning, implementation, evaluation, skills performance,

collaboration, caring, and professionalism. Each area has two (2) to nine (9) sub-objectives for a total of 41 objectives. The tool does not clearly reflect each of the end-of-program SLOs and no information is provided regarding how the clinical evaluation tools progress (e.g. simple to complex) throughout the curriculum. Additional information is needed in the Self-Study Report regarding the evaluation of the student in the clinical setting and how this aligns with the end-of-program SLOs.

HCIWPB utilizes credit-to-contact hour ratios of 1:1 in didactic, 1:2 in skills, and 1:3 in clinical learning experiences which provides 15 contact hours in didactic, 30 contact hours for skills, and 45 contact hours for clinical for each one (1) credit (p. 19). The curriculum is 72 semester credits which consists of 30 semester credits in general education courses and 42 semester credits in nursing courses (Table 1D, p. 6). The program of study can be completed in five (5) semesters (Table 1D, p. 6); a semester is defined as 15 weeks (p. 19).

Appendix D (pp. 80-84) provides information regarding the requirements of the FBON, the CIE and ACCSC related to program length. The table does not include information regarding the requirements of HCIWPB. The primary requirement of the FBON related to program length is that at least 50% of the curriculum consists of clinical training (p. 80); additional information is provided regarding the use of simulation and the content/concepts required within the curriculum (pp. 80-81).

CIE is reported to require that a minimum of 15 semester credits (22.5 quarter credits) for an associate degree be in general education courses. An associate of arts degree should also be a minimum of 36 semester credits (54 quarter credits) in length (pp. 81-82). Additional information is also provided regarding the need to have a basic skills examination, acceptable admission scores, and clearly defined objectives and performance outcomes (pp. 81-82).

ACCSC is reported to require that an associate degree be a minimum of 60 semester hours (90 quarter hours) and be achieved normally over four (4) semesters or six (6) quarters. The program of study is required to have a minimum of 15 semester credits (22.5 quarter hours) in general education and 30 semester credits (45 quarter hours) in the area of concentration (pp. 82-84). The table also provides information regarding certain general education content areas required. Based upon the information provided, the associate nursing program at HCIVVPB meets the requirements of each agency.

The nursing program is reported to utilize a variety of practice learning environments including the skills/simulation laboratory, acute care facilities, specialty facilities, long-term care facilities, outpatient clinics, and rehabilitation facilities. Appendix G (pp. 101-108) provides a list of 27 sites utilized by the program. In the Self-Study Report, the faculty should use a landscape format for this table and single spacing. Additionally instead of listing the address of the facility, the faculty should provide basic information about the site, its accreditation, and number of beds. Faculty and students are reported to have the opportunity to evaluate the sites at the end of each clinical rotation (p. 21). Data related to these assessment processes should be accessible in the evidence room for the initial accreditation visit.

While the narrative for Criterion 4.9 indicates skills/simulation is utilized as a practice learning environment, specific information regarding the percentage of simulation used is not provided. Appendix D (p. 80) indicates that the FBON only allows up to 50% simulation. Additional information must be provided in the Self-Study Report regarding the use of simulation at HCIWPB to verify compliance with the state regulations.

The presentation indicates that the associate program offered at HCIWPB does not utilize distance education (p. 21); all classes are offered in a face-to-face format. The narrative for Criterion 4.11 refers back to Appendices C, E, and F for information about the instructional methods, learning activities, and evaluation methodologies. However, none of these provide information regarding how they are appropriate for a face-to-face delivery format. Additional information is needed in the Self-Study Report regarding how the teaching strategies, learning activities and evaluation methodologies are appropriate for a face-to-face delivery format.

<u>Analysis</u>

The program is currently in <u>minimal</u> compliance with the selected Criteria for Standard 4 with the following areas needing development:

- Ensure the end-of-program student learning outcomes are used to organize the curriculum, guide the delivery of instruction, and direct learning activities.
- Ensure the course student learning outcomes/course objectives consistently progress throughout the curriculum in support of the end-of-program student learning outcomes.
- Ensure evaluation methodologies measure the achievement of the end-of-program student learning outcomes.
- Ensure the total number of credit hours required to complete the defined nursing program of study is consistent with the policies of the governing organization.
- Ensure student clinical experiences and practice learning environments are evidencebased and support the achievement of the end-of-program student learning outcomes.
- Ensure learning activities, instructional materials, and evaluation methods] are appropriate for all delivery formats and consistent with the end-of-program student learning outcomes.

All Criteria for this Standard must be met prior to Initial Accreditation.

Resources

The narrative for Criterion 5.1 provides information regarding the default rates for HCIWPB (Table 5.1A, p. 22). This information should be moved to the narrative for Criterion 3.6 in the Self-Study Report. Additionally, the narrative for Criterion 5.1 also provides information regarding the budgeting process (p. 25). This information should be moved to the narrative for Criterion 1.9 in the Self-Study Report. The narrative for Criterion 5.1 should be specific to the budget.

HCIWPB is reported to obtain fiscal funding from student tuition and fees with the nursing program contributing approximately 40.93%. Table 5.1B (p. 22) provides the operating budget for HCIWPB as well as the nursing program and various other department/programs. The table does not specify the fiscal year but does indicate that the associate nursing program received 40.93% of the overall budget in comparison to the 13.89% to 24.12% of the other departments/programs included. Specific information regarding the size of these other programs/departments was not provided; therefore, this reviewer is not able to clearly verify the sufficiency of funding for the nursing program. The table indicates there are line allocations for books, administrative, depreciation and amortization, payroll and related costs, operating expenses, and occupancy.

Table 5.1C (p. 23) provides information regarding the nursing program's revenue as well as budgetary expenses related to capital equipment, other expenses, and salaries for fiscal years 2014-2018. This reviewer noted that the revenue exceeds the expenses by 64-74%. This reviewer is not clear where the additional monies are spent related to the nursing program. Table 5.1D (p. 25) provides information regarding the library budget. This reviewer noted that the budgeted monies have been static from 2014-2018.

In the Self-Study Report, additional information must be provided regarding the differences in the revenue for nursing compared to the expenses. Three (3) years of budgets for both the governing organization and the nursing program must be accessible in the evidence room for the initial accreditation visit.

The nursing program is reported to have access to offices/workspaces, classrooms, computer laboratories, and a skills laboratory. Table 5.2A (p. 26) provides information about these resources as well as other student support services. The information about the student support services (e.g., Student Support Center, Admissions and Enrollment Services, Financial Aid, Bursar, Academic Affairs, Registrar, Career Services, Academic Advising/Support, and Program Leadership) should be moved to the narrative for Criterion 3.4 in the Self-Study Report.

The nurse administrator is reported to have a private office on the first floor (p. 27). The Administrative Assistant and Clinical Coordinator are reported to share an office space. The faculty and support staff are also reported to have offices; however, it is not clear to this reviewer whether these are private offices or a shared office space (p. 27). The offices are reported to be equipped with a desk, chairs, computer, telephone, lockable file cabinets, and bookcases. The narrative also references faculty workrooms on the first and second floors each are reported to provide access to three (3) computer workstations, storage for personal belongings, bookshelves, filing cabinets, and a "swing" desk. Table 5.2D (p. 28) indicates two (2) private offices and a shared office for six (6) people. This reviewer is not clear whether this table also reflects the faculty workroom(s) or not. Currently, there appears to be office/workspace for eight (8) people unless the shared office space is actually the shared office for the Administrative Assistant and the Clinical Coordinator; consistent information must be provided throughout the Self-Study Report.

Additional information is needed regarding the office/workspace for faculty and staff. If shared office space is utilized, then information is also needed regarding private spaces to meet with students. A conference room is available for faculty meetings (p. 28). Table 5.2C (p. 28) indicates the availability of two (2) conference rooms that can accommodate 5-6 people each

The first floor is reported to have four (4) dedicated classrooms for nursing students (p. 27). However, Table 5.2B (p. 28) indicates the availability of five (5) classrooms but only three (3) are on the first floor; consistent information must be provided throughout the Self-Study Report. Each classroom is reported to accommodate between 22 and 45 students. Each classroom is equipped with a ceiling-mounted project, computer and monitor, Wi Fi access, whiteboard, podium, student desks or tables and chairs.

Two (2) computer laboratories are also reported to be accessible and provide access to 20 desktop or laptop computers (p. 27). Both computer laboratories are reported to be utilized for computerized testing but are then accessible to students when not in use. A calendar is reported to be posted at the beginning of each academic term regarding the accessibility of the computer laboratories. The library is also reported to provide access the three (3) computer workstations (p. 28). The Information Technology Department provides technical support to students via a help desk. The help desk is available 7:00 a.m. to 9:00 p.m. Monday through Friday (p.30); however, Table 5.2A (p. 26) indicates the hours are from 8:30 a.m. until 6:00 p.m. with 24 hour online support. Consistent information must be provided. A hotline is also reported to be available for after hours and hours are extended during examination times.

The nursing skills laboratory is reported to be accessible Monday through Friday from 8:00 a.m. until 11:00 p.m. with additional hours by appointment (p. 26). The skills laboratories are reported to include two (2) fundamental laboratories, a medical-surgical laboratory, and a maternity/pediatric laboratory (p. 27). No additional information is provided regarding the skills laboratories with regards to the number of stations/hospital beds, number of students that can be accommodated at the same time, or information about the basic equipment and supplies available. Additional information is needed in the Self-Study Report regarding the skills/simulation laboratories.

The Learning Resource Center (LRC)/library is available from 8:00 a.m. until 9:00 p.m. on unspecified days (Table 5.2A, p. 26). The library provides access to computers as noted above, three (3) bookshelves with textbooks and resources as well as desks and chairs (p. 28). The librarian is reported to collaborate with students and faculty in the selection, maintenance, and updates to the library (p. 29); however, specific information regarding the processes was not provided and should be included in the Self-Study Report.

The library provides access to the Library and Information Resources Network (LIRN). This network provides access to online databases including MEDLINE Plus, PubMed, and ProQuest (Table 5.3A, pp. 29-30). The presentation is not clear whether these online resources are accessible remotely or only in the LRC. Additional information is needed in the Self-Study Report.

<u>Analysis</u>

The program is currently in compliance with the selected Criteria for Standard 5 with the following areas needing development:

- Ensure fiscal resources are sustainable and sufficient to ensure the achievement of the end-of-program student learning outcomes and program outcomes and commensurate with the resources of the governing organization.
- Ensure physical resources are sufficient to ensure the achievement of the end-ofprogram student learning outcomes and program outcomes and meet the needs of the faculty, staff, and students.
- Ensure private spaces are available for faculty-student conferences.
- Ensure learning resources and technology are comprehensive, current, and accessible to the faculty and students.

All Criteria for this Standard must be met prior to Initial Accreditation.

Outcomes – Criterion 6.1

The faculty are reported to have developed a systematic evaluation plan (SEP) utilizing the 2017 ACEN Standards and Criteria. A copy of the plan is provided (22 pages not paginated beginning on page 115). The SEP has two (2) sections labeled "plan" and "evaluation". The plan section has columns labeled "element", "expected level of achievement" (ELA), "frequency, responsible person/committee", and "assessment methods and evaluative criteria" while the evaluation section has columns labeled "date evaluated, results of data collection and analysis" and "actions for program development, maintenance, or revision". The plan does include each end-of-program SLO and program outcomes related to licensure examination pass rates, program completion rates, and job placement rates.

While the SEP includes each of the end-of-program SLOs, the assessment methods do not consistently align with the ELAs identified and each assessment method does not have a specific ELA. Additionally, the ELAs are not specific and measurable. For example, end-of-program SLO #1 has assessment methods identified as being the NCSBN Mountain Measurement which would be post-graduation, standardized testing, and the clinical evaluation tool. However, the ELA is "greater than or equal to 72%" (SEP, p. 3). This is the same ELA and assessment methods identified for each end-of-program SLO (SEP, pp. 4-17).

The faculty should ensure that all assessment methods are utilized at or near the end of the program and that the ELA reflect the assessment method; each assessment method should have a specific and measurable ELA aligned with it that is related specifically to the identified end-of-program SLO. The faculty should ensure that the SPE includes each end-of-program SLO with an ELA and data specific to each. The faculty should identify an appropriate direct assessment method(s) related to each end-of-program SLO and the ELA should be consistent with the assessment method as well as the end-of-program SLO. The assessment methods should include direct methods of assessment (e.g., scores on sub-scales of clinical evaluation tool

grades or standardized examinations) and may include indirect measures (e.g., surveys). If the faculty utilize surveys to collect data, then the response rates (number of surveys returned divided by the number of surveys distributed/graduates) should be recorded for each survey whether hard copy, digital, telephone, or other survey method.

The outcome for licensure examination pass rate has an ELA of "greater than or equal to 80%" (SEP, p. 17); however, this ELA does not specify all first-time test-takers during the same 12month period as required by the ACEN Criterion. The faculty should revise the ELA to reflect the ACEN Criterion. The program reports licensure examination pass rates of 57% in 2015, 67% in 2016, and 59% in 2017; no disaggregated data by option or date of completion is provided. However, a review of the FBON website indicates licensure pass rates of 26.32% (5/19) in 2014, 57.1% (48/84) in 2015, 69.09% (38/55) in 2016, and 68.76% (47/80) in 2017. Consistent information must be provided in the Self-Study Report. Data must also be disaggregated by option (e.g., day and evening) and date of completion (e.g., May, August, December) prior to the aggregation of the whole

The faculty are reported to have responded to the lower licensure examination pass rates by reviewing the potential contributing factors, purchasing the Mountain Measurement Report to begin reviewing and revising the curriculum, and beginning a curriculum revision (SEP, pp. 17-19). However, no specific information was provided regarding when the revised curriculum will be implemented. While the rates have trended upward, the program has not achieved an 80% for first-time test-takers. An initial accreditation visit should not occur until the licensure examination pass rates are at or above 80% consistently.

The outcome for program completion has an ELA of "greater than or equal to 65%" with "graduation at 150% timeframe" (SEP, p. 19-20). The presentation does not provide and information regarding the rationale for the ELA based upon student demographics; the Self-Study Report must provide information regarding the rationale. The program reports program completion rates of "69% for the last three years" (SEP, p. 19) with the 2017 rate being 65% and "all rates exceeding the ELA of 60%" (p. 20); however, 60% is not the ELA. Consistent information musts be provided regarding the ELA. Annual rates are not provided and no disaggregate data is available. The faculty should disaggregate the data by date of completion (e.g., May, August, December) and option (e.g., day and evening) prior to the aggregation for the whole year; annual rates must be specified in the Self-Study Report.

The outcome for job placement has an ELA of "greater than or equal to 60%" (SEP, p. 21); however, a timeframe is not specified. No information is provided regarding the rationale utilized by faculty to set this rate; the Self-Study Report must provide the rationale and it should be based upon program demographics. The program reports job placement rates of 36% in 2015, 48% in 2016, and 59% in 2017 (SEP, p. 21); the ELA has not been met. However, this reviewer is not clear whether the rates reflect the graduating cohorts or only those responding to a questionnaire or successfully completing the licensure examination. Based upon the assessment column the faculty have utilized the term "exemptions" which may reflect not including all graduates. The job placement rates should including all graduates. See the ACEN Glossary definition of job placement rates.

The faculty are reported to have responded to the lower job placement rates by working with a new Director of Career Services and moving the assignment timeframe to one (1) year after graduation (SEP, p. 21). The faculty must provide response rates (# of surveys returned divided by the number of surveys sent/graduates) when calculating job placement rates to verify sufficient data has been collected to inform program decision-making. All graduates must be included in the rates.

<u>Analysis</u>

The program is not in compliance with Standard 6 as Criterion 6.1 is not met at this time, as evidenced by:

- There is a lack of evidence that the expected levels of achievement of the end-ofprogram student learning outcomes are consistently met.
- There is a lack of evidence that there is ongoing assessment of the extent to which students attain the end-of-program student learning outcomes.
- There is a lack of evidence that the expected level of achievement for first-time test takers during the same 12-month period on the licensure examination has been consistently met.

With the following areas needing development:

- Ensure the program demonstrates that there are specific, measurable expected levels of achievement for each end-of-program student learning outcome.
- Ensure the program demonstrates that there are appropriate assessment methods that result in meaningful data for each end-of-program student learning outcome.
- Ensure that strategies/actions are identified when the expected levels of achievement for end-of-program student learning outcomes are not met.
- Ensure the program demonstrates evidence that the expected levels of achievement for students' attainment of the end-of-program student learning outcomes are consistently met.
- Review and revise the expected level of achievement for the licensure examination pass rate to be congruent with the ACEN Criterion.
- Ensure the program demonstrates evidence of a minimum of the three (3) most recent years of available licensure examination pass rate data aggregated for the nursing program as a whole.
- Ensure the program demonstrates evidence of a minimum of the three (3) most recent years of available licensure examination pass rate data disaggregated by program option, and date of program completion.
- Ensure the program demonstrates evidence that the evaluation plan contains specific, measurable expected level(s) of achievement determined by the faculty and reflecting student demographics and appropriate assessment method(s) that result in meaningful data for students' achievement in completing the nursing program.
- Ensure the program demonstrates evidence of a minimum of the three (3) most recent years of available program completion data and that data are aggregated for the nursing

program as a whole as well as disaggregated by program option and date of program completion or entering cohort.

- Continue to implement strategies to improve the program completion rate(s).
- Review and revise the expected level of achievement for job placement to be congruent with the ACEN definition of job placement.
- Ensure the program demonstrates evidence that the evaluation plan contains specific, measurable expected level(s) of achievement determined by the faculty and reflecting program demographics and appropriate assessment method(s) that result in meaningful data for graduates' job placement.
- Ensure the program demonstrates evidence that there is ongoing assessment of job placement and that job placement data are sufficient to inform program decision-making.
- Ensure that strategies/actions are identified when the expected levels of achievement for job placement are not met.
- Continue to implement strategies to improve job placement rate(s).

All Criteria for all six (6) Standards must be met to achieve Initial Accreditation.

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Recommendation for Candidacy Action:

X Approved Disapproved Deferred

Summary:

In the Self-Study Report, all tables and supporting documents should have a unique number/letter and a title. Tables and supporting documents should be referenced in the narrative of the Self-Study Report. Tables should ideally appear on the same page; the faculty should consider using a landscape format and a slightly smaller font size to facilitate this. If a table is larger than a single page, then the faculty should ensure that column headers appear on each subsequent page of the table. Smaller tables may be inserted in the narrative box available for each Criterion in the AMS. Larger tables should be saved as a searchable-PDF file that can be uploaded in the supporting documents.

Each supporting document in the Self-Study Report should also have a unique number/letter and title. The faculty should ensure the supporting document name appears on each page of the table to facilitate reading of the report.

Currently, the program is not in compliance with Standard 6 Outcomes and is in minimal compliance with Standard 4 Curriculum. The program also has multiple areas needing development.

For Standard 2 Faculty and Staff, the nursing education unit must ensure comprehensive information regarding the requirements of the governing organization, the accrediting body of the governing organization, and any state regulatory agency are provided related to faculty. Additional information is also needed regarding how each faculty member maintains expertise in their area(s) of responsibility which may include a didactic, skills, simulation, and/or clinical learning environment. The number of full-time faculty must also be sufficient to facilitate the achievement of the end-of-program student learning outcomes and program outcomes.

For Standard 4 Curriculum, the faculty must ensure the evidence provided clearly demonstrates how the end-of-program student learning outcomes and program outcomes are utilized to organize the curriculum, guide the delivery of instruction, direct learning activities, and evaluate the progression of the student. The faculty should ensure the abbreviated syllabi include all of the required components and the evaluation methodologies should reflect the end-of-program student learning outcomes and progress (e.g., simple to complex) throughout the curriculum. Additional information is also needed regarding the use of simulation within the program and additional information is needed regarding how the teaching strategies, learning activities, and evaluation methodologies are appropriate for a face-to-face delivery format.

For Standard 5 Resources, the faculty must ensure that fiscal resources are commensurate with those of the governing organization. Specific and comprehensive information must also be provided regarding the physical resources including offices/workspaces, classrooms, computer laboratories, and skills/simulation laboratories as well as learning resources.

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For Standard 6 Outcomes, the faculty must ensure the systematic evaluation plan includes an expected level of achievement and data related to each specific end-of-program student learning outcome. Data should be available for all components of the plan from the time that Candidacy status is achieved. The expected levels of achievement should be consistent with the assessment methods to provide meaningful data and should have specific timeframes. Data related to licensure pass rates and program completion rates should be disaggregated by date of completion prior to aggregation for the whole program/year. The faculty should provide the rationale/justification regarding the expected levels of achievement related to program completion and job placement rates; this rationale/justification should be based upon the student and program demographics.

Even though the program is not in compliance with Standard 4 and in minimal compliance with Standard 4 as well as having multiple areas needing development, this reviewer recommends the program for Candidacy. The program has demonstrated improvement since the first Candidacy Presentation submitted as well as evidence of the ability to achieve compliance during the Candidacy period and prior to their initial accreditation visit. An initial accreditation visit should not be scheduled until the programs can demonstrate compliance with all of the ACEN Accreditation Standards; the licensure examination pass rates should be trending at or above 80% prior to scheduling an initial accreditation visit. It is highly recommended that the nurse administrator and the faculty attend an upcoming ACEN Self-Study Forum to facilitate a better understanding of the accreditation process.

Reviewer Name & Signature:

Date _____

Nell Ard, PhD, RN, CNE, ANEF Associate Director Case 9:22-cv-81883-RAR Document 141-2 Entered on FLSD Docket 12/19/2023 Page 1020 of 1026

EXHIBIT 72

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	Page 1
1	Volume I
	Pages 1 to 120
2	Exhibits 1 - 12
3	
	UNITED STATES DISTRICT COURT FOR THE
4	SOUTHERN DISTRICT OF FLORIDA
	West Palm Beach Division
5	
6	
	:
7	BRITTANY ROBERSON, REBECCA :
	FREEMAN, BIANCA VIÑAS, :
8	TIFFANY KING and TRESHA :
	THOMPSON, individually and on :
9	behalf of others similarly :
	situated, :
10	Plaintiffs, : Civil Action No.
	: 9:22-cv-81883-
11	vs. : RAR
	:
12	HEALTH CAREER INSTITUTE LLC :
	(dba HCI COLLEGE LLC and HCI :
13	ACQUISITION LLC), FLORIAN :
	EDUCATION INVESTORS LLC, and :
14	STEVEN W. HART, :
	Defendants. :
15	:
16	
17	DEPOSITION OF SHARON MUNOZ, a witness
	called on behalf of the Plaintiffs, appearing from
18	San Clemente, California, taken pursuant to the
	Federal Rules of Civil Procedure remotely before
19	Carol H. Kusinitz, Registered Professional Reporter
	and Notary Public in and for the Commonwealth of
20	Massachusetts, on Monday, November 27, 2023,
	commencing at 12:11 p.m. Eastern Standard Time.
21	
22	
23	
24	(Appearances on Page 2)

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	Page 2
1	(All participants appeared via Zoom)
2	
	PRESENT:
3	
4	Project on Predatory Student Lending
	(by Rebecca Eisenbrey, Esq., Jennifer
5	Thelusma, Esq., and Victoria Roytenberg,
	Esq.) 769 Centre Street, Suite 166, Jamaica
6	Plain, MA 02130, reisenbrey@ppsl.org,
_	jthelusma@ppsl.org, vroytenberg@ppsl.org
7	617.322.2808
-	- and -
8	Nicole Mayer, Esq.
	171 Dommerich Drive, Maitland, FL 32751,
9	nicole@mayerlawflorida.com, 352.494.3657,
	for the Plaintiffs.
10	
11	Messer Caparello, P.A.
ΤT	(by Bob L. Harris, Esq.)
12	2618 Centennial Plaza, Tallahassee, FL 32308, bharris@lawfla.com, 850.222.0720
12	-and-
13	Kubicki Draper
10	(by Michael J. Carney, Esq.)
14	110 E. Broward Boulevard, #1400,
	Fort Lauderdale, FL 33301, 954.768.0011,
15	mjc@kubickidraper.com, for the Defendants.
16	Mrachek Law
_ •	(by Gregory S. Weiss, Esq.)
17	505 S. Flagler Drive, Suite 600, West Palm
18	Beach, FL 33401, 561.655.2250,
19	gweiss@mrachek-law.com, for the Witness.
20	
21	
22	
23	
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Page 30 1 The nursing exam. And then do you use the Q. look-alike audience option? 2 3 Α. Yes. And what is that? 4 0. So that's -- like, I input a list of 5 Α. 6 students, and we would say, "Okay, look for people 7 who have similar profiles as this set of group." 8 Usually you need, like, at least 100 people. 9 0. And are these decisions that you're making 10 on your own? 11 I mean, that's standard Facebook --Α. Yeah. 12 that's how you would get the most people interested 13 in -- it's standard practice. 14 Okay. So is someone from HCI approving 0. 15 your list of attributes? 16 Like, I don't get a list of the results, if Α. 17 that's what you're asking. 18 Ο. Okay. 19 Like, I get the list of -- are we still on Α. 20 look-alikes there? 21 Ο. Yes. 22 Α. I get the list of students. So that comes straight from, like, HCI's database. 23 24 Q. But are you choosing which students?

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1	ads. So we have some ads that you produced that
2	were Facebook ads. I'm just going to pull up a
3	couple.
4	(Document displayed via Zoom Share)
5	Q. So is this an example of one of the
6	Facebook ads that we've been discussing?
7	A. Yes.
8	Q. So who actually develops the ad?
9	A. I would.
10	Q. So you choose you write the copy and
11	choose the images?
12	A. Yes.
13	Q. And where are you pulling images from?
14	A. These are all stock photos. So iStock.
15	Q. And how do you search for appropriate
16	photos?
17	A. We're looking for someone in, like, nursing
18	uniform, scrubs, things like that.
19	Q. Are you looking for specific races of
20	models?
21	A. No.
22	Q. So you wouldn't have searched for, you
23	know, black nurses?
24	A. I would have searched male nurses, if

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1 COMMONWEALTH OF MASSACHUSETTS)

2 SUFFOLK, SS.) 3 I, Carol H. Kusinitz, RPR and Notary Public in and for the Commonwealth of Massachusetts, do hereby 4 5 certify that there came before me remotely on the 6 27th day of November, 2023, at 12:11 p.m. Eastern 7 Standard Time, the person hereinbefore named, who 8 was by me duly sworn to testify to the truth and 9 nothing but the truth of her knowledge touching and 10 concerning the matters in controversy in this cause; 11 that she was thereupon examined upon her oath, and 12 her examination reduced to typewriting under my 13 direction; and that the deposition is a true record 14 of the testimony given by the witness. 15 16 17 18 19 20 21 22 23

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Page 119 1 Under Federal Rule 30: 2 X Reading and Signing was requested 3 Reading and Signing was waived Reading and Signing was not requested 4 5 6 I further certify that I am neither attorney or 7 counsel for, nor related to or employed by, any 8 attorney or counsel employed by the parties hereto 9 or financially interested in the action. 10 In witness whereof, I have hereunto set my hand 11 and affixed my notarial seal this 5th day of 12 December, 2023. 13 14 Carol H. Kusinitz 15 16 17 18 Notary Public 19 Commission expires 5/20/27 20 21 22 23 24