



January 17, 2024

California Board of Registered Nursing  
Education/Licensing Committee  
Sacramento, CA 95834

RE: Public Comment in Letter Form Agenda item 8.6.2

Dear California Board of Nursing Education/Licensing Committee,

This public comment letter is regarding Agenda Item 8.6.2 Discussion and possible action regarding acceptance of substantive changes to an approved program Samuel Merritt University (SMU) Baccalaureate Degree Nursing Program (addition of a new campus or location). The request by SMU to the Education/Licensing Committee is to add an additional campus in Fresno with an enrollment increase of 96 students per year to their ABSN degree track.

This public comment letter is to request that the board considers not accepting the current substantive change and ask SMU to return to the Central San Joaquin Valley Clinical Education Collaborative (CSJVCEC) for further discussion and complete the process for approval to potentially join the Central Valley CCPS. This will allow the CSJVCEC to assess the ability of our CCPS to support the SMU expansion into our area based on data available to us through our Central Valley CCPS system.

The Foundation for California Community Colleges (FCCC) serves as the annual nursing and allied health Centralized Clinical Placement System (CCPS) scheduling tool for use by hospitals and academic providers serving the Central San Joaquin Valley (CSJV), Fresno, Madera, Tulare, Kings, and Merced Counties. These counties may be expanded or scaled to accommodate a broader geography and/or other allied health professionals as approved by the CCPS membership.

The Central Valley CCPS has a very active and collaborative membership with support from Academic/Service Partnership known as the Central San Joaquin Valley Clinical Education Collaborative (CSJVCEC). Membership includes fourteen academic and ten service facilities. It is in this CSJVCEC group where CCPS data analysis and clinical impact is assessed. The purpose of the CSJVCEC and Central Valley CCPS membership is to promote group **transparency** and **communication** to support clinical placements for all clinical disciplines with consideration of facility clinical capacity and student readiness for practice.

Central Valley academia strives to support our Central Valley practice partners as they have continued to support our student's education and are active participants in our membership. The CSJVCEC function is to not limit the addition of new programs or limit increased nursing



program enrollment for existing programs, but rather collaborate with transparency and work with those who wish to join our consortium so we can support our area 6 RN shortage.

The Central Valley CCPS membership is a larger group to include all academic programs, nursing, and allied health along with clinical placement facilities in the counties we serve. We have an operation manual in place that requests schools or facilities interested in joining the CCPS for student placements to meet with CSJVCEC and complete specific documentation to be approved to join our CCPS. The approval to join the Central Valley CCPS is based on documentation provided by the applicant and obtainable CCPS data as it relates to industry need, clinical placement impact and availability. This application information initially is presented to the CSJVCEC for review, discussion, and approval/recommendation then following is presented at CCPS membership for full approval/recommendation.

SMU mentions in their request the following statement(s) that I would like to publicly address in this letter:

- Samuel Merritt has demonstrated ongoing communication with CSU Fresno, Fresno City College, Fresno Pacific University, UCSF Fresno, the Central California Center of Excellence in Nursing, and the Central Valley Higher Education Consortium (pg. 108), however 11 nursing programs were not contacted.
  - o SMU was invited to attend and did attend the September 2023 CSJVCEC meeting. At that time, SMU was asked to schedule another meeting to return as the group had several questions regarding:
    - specific placement facilities and support from those facilities
    - recruitment of students, as we were told the focus of recruitment was on students from out of the area, these students will train locally and then return to their Northern/Southern areas of origin and not be part of our local workforce.
  - o SMU did not have a strong understanding of the far reach of our clinical placement system and that all facilities in all counties belong to the CSJV CCPS. Their understanding of the regions clinical placement issues appeared limited to Fresno, and they didn't seem to be aware of the program expansions that have already been approved in Visalia and Porterville and the consequences of those enrollment increases on already impacted clinical placements.
  - o UCSF Fresno is a medical residency program with a partnership with Community Regional Medical Center- UCSF Fresno is not involved with nursing programs or clinical placements. I am unclear why they would be contacted.
  - o Central California Center of Excellence in Nursing- conversations to invite SMU to attend CSJVCEC meeting Dr. Marie Gilbert, Director.
  - o Central Valley Higher Education Consortium is a 501(c)3 incorporated non-profit organization comprised of accredited public and private colleges, universities, and community college district members and has no involvement with clinical placements.



- Clinical Sites: SMU mentions they have signed Clinical Facility authorization Forms (EDP-P-18) that identifies the addition of clinical placements for two additional hospital sites in Fresno (pg. 109).
  - o This is the information that would be requested to present to the CSJVCEC meeting so we can further assess the placements and potentially approve to support the expansion to our area, specifically specialty content areas such as pediatrics and mental health.
  - o CSJVCEC has not received a request or update from any facilities that are CCPS members regarding approving or increasing clinical student rotations from the VA or Kaiser specifically.
- SMU states that the ABSN will be new and unique program to our area when in fact we do have ABSN program (s) here in our area now (pg. 113).

As we have had recent program enrollment increases approved in our area 6, programs are experiencing displacement that with collaboration we have resolved to the best of our ability. Our area is experiencing significant impactation in mental health and pediatrics. My program was displaced twice this fall in mental health. We have more work to do as a local group to identify what the acute or direct hour needs are for our programs and will need to identify efficient placement strategies to effectively assess the data for program growth or new programs.

Allied health programs are part of our collaborative CCPS and are the pipeline to our nursing programs and LVN-RN programs. As the BRN does not have oversight of these allied health programs, these programs are being impacted significantly and will need to be addressed by our local group.

This public comment letter is to request that the board considers not accepting the current substantive change and ask SMU to return to the Central San Joaquin Valley Clinical Education Collaborative (CSJVCEC) for further discussion and complete the process for approval to potentially join the Central Valley CCPS. This will allow the CSJVCEC to assess the ability of our CCPS to support the SMU expansion into our area based on data available to us through our Central Valley CCPS system and potentially be able to support the expansion request.

Respectfully Submitted,

**KATHRYN DEFEDE MSN RN**

DIRECTOR OF HEALTH CAREERS/DIRECTOR OF NURSING

555 COLLEGE AVE.

LEMOORE, CA 93245

559-925-3145 | [kathryndefede@whccd.edu](mailto:kathryndefede@whccd.edu) | fax 559-924-3126

January 18, 2024

California Board of Registered Nursing

Education/Licensing Committee

Sacramento, CA 95834

RE: Public Comment in Letter Form Agenda item 8.6.2

Dear California Board of Nursing Education/Licensing Committee,

The purpose of this letter is to provide public comment regarding Education/Licensing Committee January 25, 2024, agenda item 8.6.2, “Discussion and possible action regarding acceptance of substantive changes to an approved program Samuel Merritt University Baccalaureate Degree Nursing Program (addition of a new campus or location) (16 CCR §§ 1426 & 1432) (present)”

I request that the ELC consider refraining from approving Samuel Merritt University substantive change proposal for the addition of a Fresno campus Baccalaureate Degree Nursing Program. I ask the ELC to kindly request that Samuel Merritt University reengage in discussions with the Central San Joaquin Valley Clinical Education Collaborative (CSJVCEC) for further dialogue and clarification regarding their proposed new program.

### **Key areas of concern regarding the proposal.**

#### **Communication to Nursing Programs (page 106 & 113)**

Samuel Merritt has communicated with three Nursing Programs in the region (California State University, Fresno, Fresno Pacific University, and Fresno City College), and they report communicating with UCSF, Fresno, and Central Valley Higher Education Consortium (CVHEC). UCSF Fresno is a medical residency program and CVHEC is a 501(c)3 incorporated non-profit organization comprised of accredited public and private colleges, universities, and community college district members. Neither UCSF Fresno nor CVHEC has any direct involvement with nursing programs.

What is noteworthy, is that Samuel Merritt does not appear to have reach out directly to other nursing programs in the area including College of the Sequoias, Gurnick Academy of Medical Arts, National University, Fresno, Porterville College, San Joaquin Valley College, Visalia, Unitek Learning, and West Hills College, Lemoore. All these pre-licensure Nursing programs are members of the Central San Joaquin Valley Centralized Clinical Placement System (CSJV CCPS) and request clinical placements in the region.

Samuel Merritt state “We are not planning to use the facilities identified by the Consortium as their most widely used sites (i.e., St. Agnes, Community Regional, Clovis Medical Center, UCSF Fresno Medical

**Central California Center for Excellence in Nursing**

California State University, Fresno

1625 East Shaw Avenue, Suite 146 M/S OF126 • Fresno, California 93710-8106

P 559.228.2130

F 559.228.2168

[www.FresnoState.edu/chhs/cccn/](http://www.FresnoState.edu/chhs/cccn/)

Center). Instead, we are concentrating on Merced, Visalia, and surrounding clinics, to facilitate our clinical placements.” (page 113). There is evidence from this statement that they do not intend to displace students from three of our Fresno clinical sites (Saint Agnes Medical Center, Clovis Community Medical Center, and Community Regional Medical Center). I am unsure what facility they refer to as the UCSF, Fresno Medical Center. However, nursing programs in our region use more than these three hospitals.

### **Clinical Placements (page 109, 112 &113)**

Samuel Merritt state “Signed Clinical Facility Authorization Forms (EDP-P-18) identifies the addition of clinical placements for two additional hospital sites in Fresno.” (page 106), and on page 113 it identifies these sites as VA Medical Center and Kaiser Permanente, Fresno. However, there do not appear to be strategies to address placements for Pediatrics and/or Behavioral Health. This causes significant concern as pediatric facilities are at capacity for clinical placements and nursing programs are experience declines of requests in Behavioral Health due to nursing program expansions in the area. For example, West Hills Lemoore had their Fall requests for Behavioral Health declined. Through collaboration with two other local nursing programs, a solution was identified for the Fall semester. However, our CCPS historical data shows an increase in the number of clinical placement requests being declined due to capacity.

On page 113 Samuel Merritt states “Multiple discussions have occurred with multiple Fresno Hospitals in the Central Valley Critical Care Consortium to determine how the new program would impact their placements.”

I am unsure who the Central Valley Critical Care Consortium is. There is a Central California Critical Care Consortium (CCCCC) which is a collaborative to promote critical care education for nurses that already have a nursing license. I am curious whether their reference to Central Valley Critical Care Consortium was meant to be a reference to the Central San Joaquin Valley Clinical Education Collaborative (CSJVCEC).

Our region has a strong Academic/Partnership (CSJVCEC), which consists of nursing leadership representation from the following fourteen academic and ten clinical organizations within the regions. Organizations include Adventist Health Central Valley Network, Clovis Community Medical Center, Community Regional Medical Center, Fresno Heart and Surgical Hospital, Kaiser Permanente, Fresno, Kaweah Delta Health Care District, Saint Agnes Medical Center, Sierra View Medical Center, Valley Children’s Healthcare, VA Central California Healthcare System, Clovis Adult Education, College of Sequoias, California State University, Fresno, Fresno Adult School, Fresno City College, Fresno Pacific University, Gurnick Academy of Medical Arts, Madera Community College, National University, Porterville Community College, San Joaquin Valley College, Unitek Learning, Visalia Adult School, and West Hills Lemoore.

#### **Central California Center for Excellence in Nursing**

California State University, Fresno

1625 East Shaw Avenue, Suite 146 M/S OF126 • Fresno, California 93710-8106

P 559.228.2130

F 559.228.2168

[www.FresnoState.edu/chhs/cccen/](http://www.FresnoState.edu/chhs/cccen/)

CSJVCEC meets monthly to provide academic and service updates and identify issues and solutions to promote high quality clinical education for nursing students within the region. Jessica Eads, Executive Director, Clinical Affairs, College of Nursing, Samuel Merritt University attended the CSJVCEC September meeting, and shared information regarding Samuel Merritt's Nursing Programs. There were many questions asked regarding clinical site placements. I appreciate that the level of detail expected to be shared within the CSJVCEC regarding clinical placements may differ from other collaboratives/consortiums in the State. Therefore, an offer was made by myself and a colleague, Joellen Sutterfield, Unitek Vice President, Clinical Education Management, to assist Samuel Merritt review the CCPS historical data to identify specific facilities and shifts available for their student placement.

CSJVCEC has adopted a data informed approach in efforts to maximize clinical placement capacity and support program expansion for all our nursing programs. I am uncertain about the clarity of our offer, as there has been no response from Ms. Eads.

On page 113 it states "We have purposely requested rotations out of their normal patterns and locations to facilitate all programs without significant impact. There are multiple sites available that would not require displacing any other nursing program within 25-mile radius Fresno area."

The impact of the closure of Madera Community Hospital in January 2023 was felt in terms of clinical site capacity, given that it served as a clinical site for numerous programs in the area. This, coupled with recent expansions of nursing programs in the south valley (outlined on Page 110), including those at College of the Sequoias, San Joaquin Valley College, Visalia, Porterville College, and Unitek Learning (Visalia and Fresno sites), has contributed to the situation, and doesn't appear to have been considered with the current Samuel Merritt proposal.

### **Enrollment (page 109 &114)**

Two key areas of concern from the proposal relate to their state and out of state outreach (page 109) and consideration of offering waitlist students from other regions placement at the Fresno Campus (page 114).

This was also an area that CSJVCEC required clarification on. Samuel Merritt acknowledges the significant workforce shortage in the Central Valley. However, based on insights shared by our academic and clinical partners, nursing students from outside the area seldom choose to remain in the valley. In cases where they do stay, it is often for just one year before returning to their home regions.

### **Inaccuracies in information submitted.**

There are several inaccurate statements in the documents submitted. One of the most telling is the claim that "But an ABSN will be new and uniquely different program, potentially reaching a new and different market." (page 113).

#### **Central California Center for Excellence in Nursing**

California State University, Fresno

1625 East Shaw Avenue, Suite 146 M/S OF126 • Fresno, California 93710-8106

P 559.228.2130

F 559.228.2168

[www.FresnoState.edu/chhs/cccn/](http://www.FresnoState.edu/chhs/cccn/)

National University, Fresno is a 22 month Accelerated BSN program, admitting twenty students twice a year in Fresno. While this does not necessarily rule out the possibility of another ABSN program, it seems worthwhile for Samuel Merritt to revisit its needs assessment/feasibility study and collaborate more closely with other nursing programs in the region.

### **Conclusion**

This is not an attempt to target Samuel Merritt, and over the years, the introduction of new programs in the region has proven valuable. I urge the ELC to avoid approving Samuel Merritt University's substantive change at this time. I kindly request that Samuel Merritt University reestablish communication with the CSJVCEC and collaborate to present data-driven evidence demonstrating the clinical capacity to accommodate an additional ninety-eight students annually, especially in Pediatrics and Behavioral Health.

Sincerely,



Marie Gilbert, DNP, RN, CHSE-A  
Director, Central California Center for Excellence in Nursing,  
California State University, Fresno