



4/21/26

Dear Ms. Melby,

We hope this message finds you well. On behalf of United Nursing College, we are writing in response to a request for institutional support submitted by Stanbridge University regarding their proposed expansion of a prelicensure registered nursing program in the San Marcos area.

We recognize the importance of expanding access to nursing education in California and share the goal of supporting the state's nursing workforce needs. We also value maintaining collegial relationships among nursing education programs. After careful consideration of current regional conditions, however, we are unable to provide support for the proposed expansion at this time.

Since establishing our Associate Degree in Nursing and RN to Bachelor of Science in Nursing programs in Murrieta in 2023, United Nursing College has experienced significant changes in clinical placement availability across the region.

Specifically:

- Multiple planned clinical partners, including Birth Choice, Rady Children's Hospital, and Mental Health Systems, did not ultimately execute affiliation agreements.
- Renaissance Memory Care became unavailable following a change in ownership.
- Crestwood Fallbrook experienced an administrative change and ceased accepting nursing students as of Spring 2025 and has not reopened to student placements, requiring use of alternate sites in San Diego and Rancho Bernardo.
- Inland Valley Medical Center and Rancho Springs Medical Center suspended or reduced clinical rotations due to facility construction projects.
- At certain facilities, including Temecula Valley Hospital, reductions in education department staffing have limited the capacity to process student clearances. As clearance activities require dedicated resources, the number of students that can be accommodated at one time has been reduced, limiting larger group rotations and overall placement capacity. Temecula Valley Hospital has limited placements to one day per week on a single medical-surgical unit.
- Riverside Community Hospital has restricted placements primarily to night shift experiences, with limited availability in medical-surgical units during traditional scheduling periods. Multiple nursing programs compete for the same clinical rotations, requiring coordination among schools for limited availability. Stanbridge University currently utilizes these clinical placements through its Riverside campus, and its Orange County programs also draw from the same regional clinical resources.
- United Nursing College has attempted to secure clinical placements at Riverside University Health System (RUHS), Sharp Healthcare, Arrowhead Regional Medical Center, and Eisenhower Health. Each facility declined due to limited capacity.
- Palomar Health, located in Escondido and in close geographic proximity to Stanbridge College's San Marcos campus, is similarly impacted and not accepting additional nursing programs for clinical placement.

United Nursing College continues to meet all clinical education requirements through coordinated placements with established partners and approved settings. While consortium processes support coordination, the current environment requires increased effort due to shared resources, evolving site availability, and broader healthcare system challenges. The addition of another prelicensure program in the region would further increase competition for these limited resources and make coordination more difficult.

Clinical site constraints require substantial and ongoing scheduling flexibility across the program. As a result, a significant proportion of clinical education occurs during nontraditional hours. This impact is most pronounced within acute care settings, where 62% of clinical shifts take place on weekends and 56% occur during night hours. These figures reflect current limitations in accessing standard weekday, day-shift clinical placements and demonstrate the extent of competition for available acute care training opportunities. Further increases in competition for these limited sites will directly constrain program capacity and impede the ability to expand in alignment with workforce needs.

As outlined in our original BRN self-study, United Nursing College planned to utilize qualified preceptors to support portions of the clinical experience. However, clinical partners have reported constraints affecting preceptor availability, including workforce turnover, onboarding demands for newly hired graduates, and overall staff fatigue. These factors have reduced participation in preceptor roles. In response, the program has increased direct clinical rotations to ensure required clinical experiences are met.

Regional capacity considerations extend beyond our institution. Multiple hospital systems have indicated limitations in their ability to accommodate additional nursing programs, reflecting the high utilization of available clinical training resources, including those already supporting existing programs in the region.

United Nursing College offers an Advanced Placement (LVN-to-RN) pathway, admitting 20 students twice annually. Applicant demand exceeds the number of available positions in this pathway. While there is demonstrated demand to expand access, growth of this pathway is dependent on the availability of robust clinical experiences. Additional competition for these placements may limit our ability to increase capacity in alignment with workforce needs.

Given these regional considerations, we are concerned that the addition of another prelicensure nursing program within the same geographic area may further strain access to clinical and preceptor resources and intensify existing limitations on program expansion.

For these reasons, while we respect Stanbridge University's efforts to expand educational access, we are unable to offer support for the proposed program at this time. We remain committed to working collaboratively with the Board and regional partners to support responsible and sustainable growth in nursing education.

Thank you for your consideration.

Respectfully,



Dr. Michelle Rowland
Chief Executive Officer
mrowland@uunursing.com



Dr. Susan Drummond
Director of Nursing
sdrummond@uunursing.com

2/12/2026

Department of Nursing – BSN Program
School of Health Professions
National University
9388 Lightwave Ave, San Diego, CA 92123

To: Board of Registered Nursing (BRN)
Re: Petition – Stanbridge University Expansion

To Whom This May Concern,

National University (NU) was recently notified that Stanbridge University is pursuing expansion of its Bachelor of Science in Nursing (BSN) program into San Diego County. It is with significant concern that I formally petition to prevent this expansion from moving forward at this time.

The nursing education landscape within San Diego County is already highly saturated, placing substantial strain on available clinical placement sites and qualified preceptors. NU, along with other established programs, is experiencing increasing difficulty securing and maintaining clinical placements necessary to ensure regulatory compliance and meet Board of Registered Nursing (BRN) standards. The introduction of an additional pre-licensure BSN program into this region would further intensify competition for limited clinical resources, potentially compromising the quality, continuity, and stability of student clinical experiences across institutions.

Moreover, NU has invested considerable time and effort in cultivating and sustaining strong, collaborative relationships with our clinical partners. These partnerships are foundational to student success, workforce development, and the delivery of safe, high-quality patient care. Further market saturation risks destabilizing these relationships, creating scheduling conflicts, diluting placement opportunities, and placing undue administrative and operational burdens on healthcare facilities already navigating staffing shortages and post-pandemic recovery challenges.

At a time when healthcare systems are striving to balance patient safety, workforce demands, and educational obligations, the expansion of additional programs without a demonstrated increase in clinical capacity may inadvertently undermine the collective mission of preparing competent, practice-ready nurses.

For these reasons, I respectfully urge careful consideration of the current clinical placement capacity within San Diego County and the potential downstream impact on existing accredited programs before approving further expansion.

Kindly,



Flávia Q. McCarthy, RN, MSN-Ed, CNL
Campus Associate Program Director – San Diego
National University

August 1, 2026

Statement Opposing Approval of New Prelicensure Nursing Programs in Region 10

Southwestern College respectfully opposes the approval of additional prelicensure nursing programs in Region 10 (San Diego–Imperial County) at this time due to documented and ongoing clinical placement saturation that is already displacing students in existing, BRN approved programs.

Region 10 nursing programs are operating in an environment of severe clinical constraints, where the number of prelicensure programs exceeds the region's available clinical training capacity. Hospitals and community partners consistently cite staffing shortages, limited preceptor availability, patient acuity, and scheduling constraints as reasons for denying or canceling placements. These constraints have resulted in actual student displacement and course disruption, not merely projected risk.

At Southwestern College, this impact is clearly documented. In Spring 2024, the college was displaced from 18 Obstetrics (OB) clinical placements (or 18 students), directly affecting student progression and cohort scheduling. More recently, in Fall 2025, 18 Psychiatric/Mental Health clinical placements (18 students) were canceled, Fall of 2026, SWC was displaced 18 Psychiatric/Mental Health clinical placements (18 students), and one (1) Medical-Surgical placement for 8 students, further demonstrating that displacement is not isolated or historical, but ongoing and unresolved. These losses occurred despite longstanding partnerships and reflect the fragile and overextended nature of the region's clinical placement ecosystem.

Local healthcare facilities have also responded to staffing and operational pressures by reducing allowable clinical group sizes. Several Region 10 partners have decreased student group sizes from eight (8) students per instructor to six (6), significantly reducing the total number of students that can be accommodated per rotation and further constrain clinical capacity across the region.

During a recent nursing advisory board meeting attended by Chief Nursing Officers (CNOs) from several of Region 10's major healthcare organizations, employers reported that they are not experiencing a shortage of new graduate registered nurses. Rather, hospitals emphasized critical workforce shortages among experienced RNs in specialty areas. This feedback highlights a misalignment between prelicensure program expansion and actual workforce needs.

Approval of a new private prelicensure nursing program—such as Stanbridge College—into Region 10 would further intensify competition for an already insufficient number of clinical placements. New program approval would require access to the same acute care, OB, pediatric, geriatric, and psychiatric clinical sites currently relied upon by existing community college and university programs. Given current saturation and reduced group sizes, this would likely result in displacement of students from established programs, increased cancellations, reduced cohort sizes, and further erosion of long-standing clinical partnerships.

While workforce data continues to show overall demand for registered nurses, the primary constraint in Region 10 is not a lack of graduates or instructional capacity, but insufficient clinical placement availability and limited pathways to specialty practice. Approving additional prelicensure nursing programs under these conditions would intensify competition for already constrained clinical sites, increasing displacement without addressing true workforce gaps.

Community college nursing programs are disproportionately impacted by this saturation. All of Southwestern College's displacements were awarded to baccalaureate program or cancelled outright. As public institutions CC's, serve as a critical pipeline for locally trained nurses who reflect the communities they serve. Clinical displacement undermines equity, delays student completion, and diminishes the return on public investment in nursing education.

Recent state action further acknowledges this systemic issue. AB 1577 (2024) established the Nursing Clinical Placements Collaborative, requiring health facilities to meet in good faith with community college and CSU nursing programs and formally justify denied placements—underscoring that clinical capacity, not program quantity, is the critical limiting factor.

Given the documented displacement in Region 10, reductions in clinical group sizes, employer confirmation that shortages are concentrated among experienced specialty RNs—not new graduates—and the anticipated impact of adding a new program such as Stanbridge College, approval of additional prelicensure nursing programs at this time would be counterproductive.

For these reasons, we strongly urge a pause in approving additional prelicensure nursing programs in Region 10 until clinical placement capacity demonstrably exceeds current program demand and existing displacement has been resolved.

Thank you for your consideration!

Best,

Samantha Girard Ph.D. RN PHN CNE
Senior Director of Nursing & Health Occupations Programs
Southwestern College
Higher Education Center Otay Mesa
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O: (619) 216-6762



Dear Members of the California Board of Registered Nursing:

The San Diego & Imperial Counties Community Colleges Regional Consortium respectfully opposes the approval of additional prelicensure nursing programs in Region 10 (San Diego–Imperial) at this time from a workforce development perspective.

Our concern is that adding new entry-level nursing programs, without expanding clinical capacity, will further delay students from completing their education and entering the healthcare workforce.

Region 10 is experiencing significant clinical placement shortages.

Hospitals and community healthcare partners consistently cite staffing shortages, limited preceptor availability, patient acuity, and scheduling constraints as barriers to accommodating nursing students. These challenges have already resulted in student displacement, disrupted clinical rotations, and delayed program progression.

The region has also lost several long-standing clinical placements despite established partnerships, and many healthcare facilities have reduced clinical group sizes from eight students per instructor to six. While necessary for quality and safety, these reductions significantly limit the number of students who can complete required clinical experiences each semester.

Regional workforce data reinforces this concern. **The San Diego Regional EDC's employer-led Healthcare Talent Demand Report** found that while the region will need more than **1,500 additional RNs** over the next three years, only about **300 are projected to be new-graduate positions**, while approximately **2,000 new RNs are already graduating annually**. Employers identified the greatest workforce need in **specialty nursing**, particularly Operating Room, ICU/Critical Care, and Labor & Delivery. **Please see report:** <https://www.sandiegobusiness.org/blog/report-meeting-san-diegos-healthcare-talent-needs/>

This is fundamentally a workforce pipeline issue. Every delayed clinical placement can mean a delayed graduation, delayed licensure, and a delayed entry of qualified nurses into our healthcare system.

Expanding the number of new prelicensure programs without increasing clinical training capacity risks slowing the region's nursing workforce.

We respectfully urge the Board of Registered Nurses to prioritize protecting clinical placements for students already enrolled in approved local programs, expanding clinical capacity, and investing in specialty nursing pathways that align with documented regional workforce needs before approving additional prelicensure programs.

Thank you for your consideration and your commitment to building a strong, sustainable nursing workforce for the San Diego/Imperial region.

Best regards,

Connie Lafuente, MPH

Director of Regional Health Initiatives

San Diego/Imperial Counties

California Community Colleges

San Diego/Imperial Counties Regional Consortium



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Date: February 11, 2026
To: EDUCATION/LICENSING COMMITTEE
Jovita Dominguez, Chair
From: Wendy Hansbrough
Director, California State University San Marcos School of Nursing
RE: Stanbridge University Expansion into San Marcos

I am addressing you today to express my concerns regarding the proposed expansion of Stanbridge School of Nursing to establish a campus in San Marcos. Notably, their website already indicates plans to open a campus in San Marcos beginning Summer 2026.

I have communicated directly with Stanbridge to convey my concerns about their entry into this region's clinical placement resources, as I believe the addition of another pre-licensure program could adversely affect the availability of clinical opportunities for nursing students.

The CSUSM School of Nursing has served North County for two decades, maintaining consistent enrollment levels. Our deep familiarity with local clinical placement challenges is grounded in experience; each semester, we coordinate approximately 950 clinical placements across San Diego and southern Riverside counties. Currently, we share regional clinical placements among seven other pre-licensure BSN programs, seven ADN programs, and several out-of-state institutions requesting preceptorships. Our students attend clinical experiences at various times, including days, evenings, nights, and weekends.

Several existing programs have recently requested increases in enrollment, which will require regional clinical sites to accommodate additional students. While I am confident we can collaborate with these institutions to manage such increases, introducing another pre-licensure program would further strain clinical placement resources.

Additionally, I am concerned about the limited supply of master's-prepared nursing faculty in the area. The faculty shortage is a pressing issue, and expanding nursing programs in northern San Diego County may exacerbate demand for the limited number of qualified educators.

In conclusion, the CSUSM School of Nursing formally opposes Stanbridge's planned expansion into San Marcos.

Thank you for providing me with the opportunity to present these remarks.

cc. MaryAnn.McCarthy@dca.ca.gov.
MaryJane.Rosenblatt@dca.ca.gov



MIRACOSTA COMMUNITY COLLEGE DISTRICT

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California Board of Registered Nursing
PO Box 944210
Sacramento, CA 94244-2100

February 10, 2026

Dear Members of the California Board of Registered Nursing,

I am writing on behalf of MiraCosta College to formally express that the College does not support Stanbridge University's proposed expansion into San Diego County.

Given the ongoing constraints related to clinical placement capacity and workforce alignment within the region, MiraCosta College has significant concerns regarding the impact of additional program expansion in San Diego County. For your reference, enclosed please find the letter previously sent to Stanbridge University outlining our position in greater detail.

Thank you for your attention to this matter and for your continued oversight of nursing education programs in California. Please feel free to contact me should additional information be needed.

Sincerely,

Yvette Duncan DNP, RN, CNS, CEN
Director, Associate Degree Nursing Program
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MIRACOSTA COMMUNITY COLLEGE DISTRICT

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February 10, 2026

Dear Dr. Lubelle D'Luna-O'Grady,

Thank you for reaching out and for sharing information regarding your program's proposed expansion into Northern San Diego County. I appreciate the courtesy of engaging regional partners as part of your planning process.

In my role as the Associate Degree RN and LVN-to-RN Program Director, I am unable to provide written support for Stanbridge University's proposed expansion into San Diego County.

This decision is based on several considerations. First, clinical placement capacity in San Diego County, particularly in nursing specialty areas, is extremely constrained. Regional nursing programs continue to face significant challenges in securing sufficient, high-quality clinical placements for existing students. Given these limitations, any additional program expansion in the region requires careful evaluation to avoid further strain on already limited clinical resources.

Additionally, limited information was shared regarding Stanbridge University's proposed expansion, including details related to the campus location and anticipated annual student enrollment. More importantly, insufficient information was provided regarding established partnerships with San Diego County clinical agencies, which are critical to ensuring sustainable and appropriate clinical placements.

And finally, while nursing shortages persist in certain regions of California, San Diego County is not currently identified as an RN workforce shortage area. Regional programs collectively graduate sufficient numbers of nurses each year to meet local workforce needs. Although this California Community College Nursing Shortage [map](#) was intended for grant eligibility purposes, it provides a useful representation of workforce demand across the state.

Thank you again for your outreach and for the opportunity to share my perspective.

Warm regards,

Dr. Yvette Duncan DNP, RN, CNS, CEN

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