

Agenda Item #14.C.



STATE AND CONSUMER SERVICES AGENCY • ARNOLD SCHWARZENEGGER, GOVERNOR

BOARD OF VOCATIONAL NURSING & PSYCHIATRIC TECHNICIANS

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DATE: February 1, 2010

TO: Board Members

FROM: Cheryl C. Anderson, M.S., R. N.
Supervising Nursing Education Consultant

SUBJECT: Healthcare Education Advancement Center Vocational Nursing Program –
Reconsideration of Provisional Accreditation (Director: Violeta Doles Arevalo, La
Crescenta, Los Angeles, Private)

Healthcare Education Advancement Center Vocational Nursing Program is presented to the Board for reconsideration of its provisional accreditation. The program's status was changed to provisional accreditation on May 9, 2008. That action was taken due to the program's noncompliance with Section 2530 (I) of the Vocational Nursing Rules and Regulations, which states:

"The program shall maintain a yearly average minimum pass rate on the licensure examination that does not fall below 10 percentage points of the state average pass rate for first time candidates of accredited vocational nursing schools for the same period.

(1) Failure to maintain the required yearly average minimum pass rate for two years or eight consecutive quarters may be cause to place a program on provisional accreditation."

The following table shows the variance of the program's pass rates from the state average annual pass rates of first time graduates of accredited vocational nursing programs for the past **15** quarters. This data substantiates the program's continued noncompliance with Section 2530(I) of the Vocational Nursing Rules and Regulations.

NCLEX-PN® Licensure Examination Pass Rates			
Quarter	State Average Annual Pass Rate	Program Average Annual Pass Rate	Variance from State Average Annual Pass Rate
Jan - Mar 2006	79%	56%	-23
Apr - Jun 2006	79%	39%	-40
Jul - Sep 2006	79%	37%	-42
Oct - Dec 2006	78%	34%	-44
Jan - Mar 2007	77%	27%	-50
Apr - Jun 2007	77%	27%	-50
Jul - Sep 2007	76%	40%	-36
Oct - Dec 2007	76%	63%	-13
Jan - Mar 2008	75%	58%	-17
Apr - Jun 2008	74%	64%	-10
Jul - Sep 2008	74%	57%	-17
Oct - Dec 2008	73%	50%	-23
Jan - Mar 2009	72%	29%	-43
Apr - Jun 2009	70%	41%	-29
Jul - Sep 2009	72%	42%	-30

Additionally, the program requests approval to admit a class of 30 students into a part – time class on March 11, 2010 to **replace** part - time students graduating March 5, 2010. The proposed class is projected to complete program requirements on September 13, 2011.

History of Prior Board Actions

- On February 21, 2003, the Board approved the Healthcare Education Advancement Center to begin a full-time vocational nursing program with an initial class of 15 students on March 3, 2003, only. The program’s total curriculum hours are 1,588 hours, including 604 theory and 984 clinical hours.
- On February 20, 2004, the Board approved initial full accreditation for the Healthcare Education Advancement Center Vocational Nursing Program for the period March 3, 2003 through February 19, 2008, and issued a certificate accordingly.

The Board also approved the program’s request to admit 30 full-time students starting May 3, 2004, replacing students that graduate March 9, 2004 only. Admission of 30 students increased the class size from 15 to 30 students per class. The class actually started on June 7, 2004, due to delayed enrollment.

The Board approved the program’s request to begin a part-time vocational nursing program with 30 students starting on February 26, 2004 only, thereby increasing frequency of admissions.

- On September 10, 2004, the Board approved the program's request to begin a second part-time class of 30 students starting on September 13, 2004, thereby increasing the frequency of admissions.
- On May 13, 2005, the Executive Officer approved the Healthcare Education Advancement Center Vocational Nursing Program's request to admit 30 students into the full-time program starting on July 5, 2005 only, replacing students graduating on June 25, 2005. The Board approved the program's request to admit 30 students into the part-time program starting on August 25, 2005 only, replacing students graduating July 22, 2005.
- On August 31, 2005, the Board sent a letter to the program indicating that its average annual licensure examination pass rates for the past four (4) consecutive quarters were more than 10 percentage points below the state average annual pass rate. Thus, the program was not in compliance with section 2530(I) of the Vocational Nursing Rules and Regulations. The director of the Healthcare Education Advancement Center Vocational Nursing Program had already developed a plan to improve pass rates and was in the process of implementing this plan for the current class.
- On October 20, 2005, the Board sent a letter to the program indicating that its average annual licensure examination pass rates for the past five (5) consecutive quarters were more than 10 percentage points below the state average annual pass rate. Thus, the program was not in compliance with section 2530(I) of the Vocational Nursing Rules and Regulations.
- On February 3, 2006, the Executive Officer approved the Healthcare Education Advancement Center Vocational Nursing Program's request to admit 30 students into the part-time program starting on March 20, 2006 only, replacing students graduating on March 14, 2006.

The Executive Officer requested the director submit an analysis regarding the small number of students testing in relationship to the number of students graduating. The analysis will include statistical data and a plan to increase the number of test-takers who test earlier. The director will present the analysis at the May 12, 2006, Board meeting.

- On May 12, 2006, the Board requested the director submit a plan of correction regarding the small number of students testing in relationship to the number of students graduating.

The Board also approved the program's request to admit 30 students into the full-time program starting on July 17, 2006 only, replacing students graduating on July 10, 2006.

- On June 14, 2006, the director met with the Executive Officer, the Supervising Nursing Education Consultant and the Nursing Education Consultant to present a draft of her plan of correction.
- On July 3, 2006, the director submitted the final revision of her plan of correction to increase the number of testers in relationship to the number of graduates and to improve pass rate percentage.
- On September 8, 2006, the Board accepted the Healthcare Education Advancement Center Vocational Nursing Program's plan of correction to improve pass rates.

The Board also requested that a progress report on the program's plan of correction be presented at the February 2007 Board meeting.

- On February 2, 2007, the Board accepted the Healthcare Education Advancement Center's progress report and requested that another progress report on the program's plan of correction be presented at the May 2007 Board meeting.
- On March 1, 2007, the Board approved the Healthcare Education Advancement Center Vocational Nursing Program's request to admit 30 students into the part-time class starting on April 5, 2007 only, to replace students graduating on March 15, 2007.
- On March 21, 2007, the Board notified the director in writing that the Healthcare Education Advancement Center Vocational Nursing Program's pass rates had fallen below 10 percentage points of the state average pass rate for the past four (4) quarters.
- On May 11, 2007, the Board accepted the Healthcare Education Advancement Center, Inc. Vocational Nursing Program's progress report.

The Board members had several inquiries regarding the progress report. Due to the program director's absence, the Board requested the following:

1. An invitation for the program director to attend the September 2007 Board meeting on September 7, 2007, in Los Angeles.
2. The director's analysis of the effectiveness of the plan of correction;
3. Feedback from the program faculty regarding the effectiveness of the plan of correction;
4. Samples of reports from student study group leaders that are given to the program director and student feedback regarding the plan of correction.
5. The consultant's review of Board issues and the status of each; and
6. The consultant's identification of significant changes (if any) regarding licensure examination pass rates.

- On May 31, 2007, the Board notified the director that the Healthcare Education Advancement Center Vocational Nursing Program's pass rates had fallen more than 10 percentage points below the state annual average pass rate for the past five (5) quarters.
- On August 9, 2007, the Board notified the director that the program's pass rates had fallen 10 percentage points below the state annual average for the past six (6) quarters.
- On September 7, 2007, in the absence of a quorum, a committee of the Board heard the consultant's report recommending acceptance of the Healthcare Education Advancement Center, Inc. Vocational Nursing Program's progress report. The report will be presented at the February 1, 2008, Board meeting for full-Board action.
- On November 28, 2007, the Board notified the director that the program's pass rates had fallen 10 percentage points below the state annual average for the past (7) seven quarters. The Board requested the director to submit an analysis of the program's plan of correction submitted in July 2004, indicating elements that have been effective and those that have not.
- On December 7, 2007, the Board granted the Healthcare Education Advancement Center, Inc. Vocational Nursing Program continued accreditation for the period February 19, 2008 through February 18, 2012, and issued a certificate accordingly.
- On January 18, 2008, the Board accepted the Healthcare Education Advancement Center, Inc. Vocational Nursing Program's progress report.
- On January 28, 2008, the Board notified the director that the program's pass rate had fallen ten percentage points below the state annual average pass rate for the past eight (8) quarters. Therefore, the program would be considered for provisional accreditation at the May 2008 Board Meeting.
- On March 1, 2008, the director submitted an analysis of the effectiveness of her plan of improvement to increase pass rates.
- On May 9, 2008, the Board placed the Healthcare Education Advancement Center, Inc. Vocational Nursing Program on **provisional accreditation** for the two year period from **May 9, 2008, through May 8, 2010.**

The Board issued a notice to the program identifying specific areas of noncompliance and requirements for correction as referenced in section 2526.1(e) of the Vocational Nursing Rules and Regulations.

- On August 13, 2008, the Board approved the program's request to admit 30 students into the full-time program on September 8, 2008, to replace students graduating on August 10, 2008. The projected completion date of the requested class is September

11, 2009. The program's request to admit 30 students into the part-time program on September 18, 2008, to replace students graduating on August 30, 2008 was approved. The projected graduation date of the new class is January 15, 2010.

- On February 27, 2009, the Executive Officer approved Healthcare Education Advancement Center, Inc. Vocational Nursing Program's request to admit 30 students into a part-time class on March 30, 2009 only, to **replace** part-time students graduating on March 15, 2009. The projected completion date of the requested class is August 14, 2010.
- On July 16, 2009, the Executive Officer approved the program's request to admit 30 students into a full – time class on August 31, 2009 only, to **replace** full – time students graduating on August 23, 2009. The projected completion date of the requested class is August 15, 2010.

Enrollment

The program is approved to offer full-time and part-time classes. Each class admission requires prior Board approval. The pattern of admissions for all classes is seen in the enrollment table below.

The following table represents **current and proposed** student enrollment based on current and proposed class starts and completions. The enrollment table indicates a **maximum enrollment of 56 students** during the period April 2007 through March 2010.

ENROLLMENT DATA				
CLASS DATES		#Students Admitted	#Students Current or Completed	Total Enrolled
Start	Complete			
8/08 (FT)		30	22	22
9/08 (PT)		30	15	22 + 15 = 37
3/09 (PT)		30	17	37 + 17 = 54
	8/09 (8/08 FT)		- 22	54 – 22 = 32
8/09 (FT)		30	9	32 + 9 = 41
	3/09 (9/08 PT)		- 15	41 – 15 = 26
3/10 (Proposed PT)		30		26 + 30 = 56

Licensing Examination Statistics

The following statistics, furnished by the Pearson Vue and published by the National Council of State Boards of Nursing as “Jurisdictional Summary of All First-Time Candidates Educated in Member Bureau Jurisdiction,” for the period January 2006 through September 2009, specify the pass percentage rates for graduates of the Healthcare Education Advancement Center Vocational Nursing Program on the National Council Licensure Examination for Practical (Vocational) Nurses (NCLEX-PN®).

NCLEX-PN® Licensure Examination Data						
Quarterly Statistics				Annual Statistics*		
Quarter	# Candidates	# Passed	% Passed	State Average Quarterly Pass Rate	Program Average Annual Pass Rate	State Average Annual Pass Rate
Jan - Mar 2006	15	8	53%	80%	56%	79%
Apr – Jun 2006	23	6	26%	76%	39%	79%
Jul - Sep 2006	10	3	30%	79%	37%	79%
Oct - Dec 2006	17	5	29%	77%	34%	79%
Jan – Mar 2007	5	1	20%	77%	27%	77%
Apr – Jun 2007	5	1	20%	74%	27%	77%
Jul - Sep 2007	8	7	88%	76%	40%	76%
Oct - Dec 2007	20	15	75%	76%	63%	76%
Jan - Mar 2008	22	9	41%	75%	58%	75%
Apr – Jun 2008	5	4	80%	70%	64%	74%
Jul - Sep 2008	2	0	0%	74%	57%	74%
Oct - Dec 2008	7	5	71%	73%	50%	73%
Jan - Mar 2009	24	7	29%	70%	42%	72%
Apr – Jun 2009	8	5	63%	71%	41%	70%
Jul - Sep 2009	11	4	36%	74%	42%	72%

The Annual Pass Rate changes every quarter. It is calculated by dividing the number of candidates who passed during the current and previous three quarters by the number of candidates who tested during the same period.

Based on the most recent data available (July – September 2009), the program's average annual pass rate is 42%. The California average annual pass rate for graduates from accredited vocational nursing programs who took the NCLEX-PN® for the first time during the same period is 72%. The average annual pass rate for the Healthcare Education Advancement Center Vocational Nursing Program is thirty (30) percentage points **below** the state average annual pass rate.

Faculty and Facilities

Section 2534(d) of the Vocational Nursing Rules and Regulations states:

"For supervision of clinical experience, there shall be a maximum of 15 students for each instructor."

The total number of Board approved faculty is nine (9), including the program director. The director has 50% administrative and 50% teaching duties. Of the total faculty, nine (9) are approved to teach in the clinical area.

Based on a maximum enrollment of 56 students, four (4) instructors are needed. Therefore, the number of current faculty is **adequate** for the current and projected enrollment.

Section 2534(b) of the Vocational Nursing Rules and Regulations states:

"Schools shall have clinical facilities adequate as to number, type, and variety of patients treated, to provide clinical experience for all students in the areas specified by Section 2533. There must be available for student assignment, an adequate daily census of patients to afford a variety of clinical experiences consistent with competency-based objectives and theory being taught."

The program has clinical facilities that are adequate as to type and variety of patients treated to enable current and proposed students to meet clinical objectives, in accordance with Section 2534(b) of the Vocational Nursing Rules and Regulations.

Other Considerations

Examination statistics furnished by the Pearson Vue and published by the National Council of State Boards of Nursing as "Jurisdictional Summary of All First-Time Candidates Educated in Member Board Jurisdiction," substantiates that Healthcare Education Advancement Center Vocational Nursing Program has failed to achieve an annual average pass rate on the NCLEX-PN[®] that is within 10 percentage points of the state average annual pass rate for the periods January 2006 through March 2008 and July 2008 through September 2009. As such, the program was in violation of section 2530(l) of the Vocational Nursing Rules and Regulations for 14 of the past 15 quarters.

On May 9, 2008, the Board placed the Healthcare Education Advancement Center, Inc. Vocational Nursing Program on **provisional accreditation** for a two year period from **May 9, 2008, through May 8, 2010**. (See Attachment A)

On June 10, 2008, the director notified the Board that several changes had been made in program elements impacting student achievement. Two (2) mandatory prerequisite classes were added. Applicants for program admission are required to complete an Anatomy & Physiology class in addition to a class in Medical Terminology. An overall score of 80% must be achieved in each course. Those applicants who achieve the

required 80% may be admitted to the vocational nursing program. Applicants who fail these mandatory courses forfeit program admission. The program's admission policy was revised consistent with these changes.

The program was been approved to admit students into full – time and part – time classes to **replace** graduating students on January 18, 2008, April 25, 2008, August 13, 2008, February 27, 2009, and July 16, 2009. These replacement classes are consistent with provisional accreditation requirements set forth in Section 2526.1 (d). As specified therein, programs holding provisional accreditation may admit “new” classes consistent with its established pattern of admissions previously approved by the Board. That admission pattern is defined by the number of students per class and the frequency of admissions for the six class admissions that immediately precede the Board action to consider provisional accreditation.

In November 2009, the program submitted a request for approval to admit a class of 30 students into a part – time class on March 11, 2010 to **replace** part - time students graduating March 5, 2010. The proposed class is projected to complete program requirements on September 13, 2011.

The assigned consultant requested the director complete a comprehensive program analysis. In December 2009, correspondence was forwarded to the director advising that the program's accreditation status would be reconsidered by the Board on February 18, 2010. A comprehensive report was requested. On January 14, 2010, the requested information was submitted.

In summary, from January 2006 through June 2007, the program's average annual pass rate declined substantially, from 56% to 27%, 50 percentage points below the state average annual pass rate. Since that time, the program's average annual pass rate has risen sporadically. For the period April - June 2008, the program's average annual pass rate was 64%, 10 percentage points below the state average annual pass rate. Since that time, the pass rates have declined. For the period January – March 2009, the program's average annual pass rate was 29%, 43 percentage points below the state average annual pass rate. Based on the July – September 2009 statistics, the program's average annual pass rate is 42%. As such, the average annual pass rate for the Healthcare Education Advancement Center Vocational Nursing Program is thirty (30) percentage points below the state average annual pass rate for the current quarter.

Recommendations:

1. Deny Healthcare Education Advancement Center Vocational Nursing Program's request to admit a class of 30 students into a part – time class on March 11, 2010 to **replace** part - time students graduating March 5, 2010. The denial will result in a balance of 26 students.
2. Extend provisional accreditation of Healthcare Education Advancement Center Vocational Nursing Program for the period from May 9, 2010 through September

30, 2010, and issue a notice to the program to identify specific areas of non compliance and requirements for correction as referenced in Section 2526.1 (e) of the California Code of Regulations (see Attachment B Draft).

3. Require the program to show documented progress by submitting a follow-up report in 6 months. The report must include a comprehensive analysis of the program, specific actions taken to improve program pass rates, timeline for implementation, and the effect of employed interventions. The following elements must be addressed in the analysis:
 - a. Current Student Enrollment.
 - b. Admission Criteria.
 - c. Screening and Selection Criteria.
 - d. Terminal Objectives.
 - e. Curriculum Objectives.
 - f. Instructional Plan.
 - g. Theory and Clinical Objectives for Each Course.
 - h. Lesson Plans for Each Course.
 - i. Textbooks.
 - j. Attendance Policy.
 - k. Remediation Policy.
 - l. Evaluations of Theory and Clinical Faculty.
 - m. Evaluations of Theory Presentations.
 - n. Evaluations of Clinical Rotations and Their Correlation to Theory Presentations.
 - o. Evaluation of Student Achievement.

4. Require the program to comply with all accreditation standards in article 4 of the Vocational Nursing Practice Act, commencing at Business and Professions Code section 2880, and article 5 of the Board's regulations, commencing at California Code of Regulations, title 16, section 2525.

Rationale: The program has not demonstrated full compliance with Article 5 of the California Code of Regulations. To be fully accredited, the program must maintain a yearly average minimum pass rate on the licensure examination that does not fall below 10 percentage points of the state average pass rate for first time candidates of accredited vocational nursing schools for the same period.

The program director has demonstrated sporadic improvement. However, to date, sustained improvement has not been achieved. The director has implemented significant interventions to address the lack of student achievement. By September 2010, the Board will have four (4) additional quarters of data to assess the program's status.

Board staff will continue to monitor the program by tracking its licensure examination pass rate quarterly, reviewing Annual Reports submitted by the program, and performing accreditation surveys every four years.

Attachment A: Notification of Change in Accreditation Status Dated May 13, 2008

Attachment B: Notification of Change in Accreditation Status Draft