

Agenda Item #11.F.



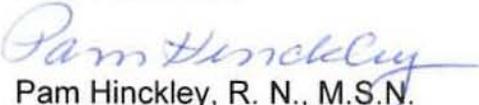
STATE AND CONSUMER SERVICES AGENCY • GOVERNOR EDWIN G. BROWN, JR.

BOARD OF VOCATIONAL NURSING & PSYCHIATRIC TECHNICIANS
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DATE: August 25, 2011

TO: Board Members

FROM: 
Pam Hinckley, R. N., M.S.N.
Nursing Education Consultant

SUBJECT: Palladium Technical Academy Vocational Nursing Program –
Consideration of Request to Admit Students (Director: Ann Catone, El Monte,
Los Angeles County, Private)

The Palladium Technical Academy Vocational Nursing Program requests approval to admit 30 students and three (3) alternates commencing September 19, 2011, and graduating December 7, 2012. The proposed class would **replace** students that graduated June 3, 2011.

History of Prior Board Actions

- On February 3, 2006, the Board approved Palladium Technical Academy's request to begin a vocational nursing program with an initial class of 30 students on April 1, 2006. Commencement of the initial class was delayed to March 3, 2008, with an expected graduation date of May 19, 2009.
- **On March 20, 2008, a new program director was approved.**
- On February 27, 2009, the Executive Officer approved initial full accreditation for the Palladium Technical Academy Vocational Nursing Program for the period February 27, 2009 through February 26, 2013, and issued a certificate accordingly. Additionally, the program's request to admit a full - time class of 45 students in June, 2009, to **replace** students graduating on May 19, 2009 was approved.
- On December 2, 2009, the Executive Officer approved the Palladium Technical Academy Vocational Nursing Program's request to increase the frequency of admissions, **and** admit a full-time day class of 30 students on January 19, 2010, with an anticipated graduation date of April 19, 2011.

When processing information in support of the current request, the program notified the Board that commencement of the January 2010 class was delayed to March 15, 2010, and is expected to graduate June 4, 2011.

- On November 18, 2010, the program was notified that its average annual pass rates had fallen more than ten (10) percentage points below the state average annual pass

rate for the past four (4) quarters. The program was requested to submit a written plan for improving their NCLEX-PN[®] pass rates by November 30, 2010.

- On November 24, 2010, the Board received correspondence from the director and documents related to the program's written plan to increase NCLEX-PN[®] pass rates.
- On November 30, 2010, the Executive Officer **denied** Palladium Technical Academy Vocational Nursing Program's request to admit a class of 45 students commencing November 8, 2010, and graduating February 3, 2012, to **replace** students graduating October 2010, at this time; **and** required the program to submit a report by **December 20, 2010**. The report shall include a comprehensive analysis of the program, specific actions taken to improve program pass rates, timelines for expected results, and the effectiveness of corrective actions taken to address the following elements:
 - 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.
- On December 3, 2010, the assigned consultant forwarded correspondence advising the program of Executive decisions rendered November 30, 2010.
- On December 4, 2010, the program was notified that its average annual pass rates had fallen more than ten (10) percentage points below the state average annual pass rates for the past five (5) quarters. The program was requested to submit a written plan for improving their NCLEX-PN[®] pass rates by December 20, 2010.
- On December 20, 2010, the Board received a report of the comprehensive program analysis and identification of deficiencies.
- On January 5, 2011, the Board received program correspondence requesting approval to admit 30 students on March 14, 2011, to **replace** students that graduated October 1, 2010. Graduation of the proposed class was projected for June 1, 2012.
- On February 15, 2011, the program was notified that its average annual pass rates had fallen more than ten (10) percentage points below the state average annual pass rate

for the past six (6) quarters. The director was requested to submit a written report evaluating the effectiveness of interventions to improve its NCLEX-PN® pass rates.

- On February 18, 2011, the Executive Officer deferred action on the program's request for consideration by the full Board at the May 20, 2011, Board meeting. That action was based on the program's pass rate statistics and previous Board action to deny students with a 29% pass rate. The consultant notified the director of the decision per telephone.
- On April 14, 2011, the assigned consultant forwarded correspondence requesting current enrollment and faculty. Also, the program was requested to submit fifteen (15) copies of pertinent documents from the December 20, 2010, comprehensive program analysis and subsequent actions taken to correct identified problems that they desire Board members to consider.
- On May 20, 2011, the Board placed the Palladium Technical Academy Vocational Nursing Program on provisional accreditation for the two-year period from May 20, 2011, through May 31, 2013, **and** issued a notice to the program to identify specific areas of noncompliance and requirements for correction as referenced in Section 2526.1 (e) of the California Code of Regulations; **and** required the Palladium Technical Academy Vocational Nursing Program to bring its average annual pass rate to no more than ten (10) percentage points below the State average annual pass rate by May 31, 2013.

Additionally, the Board **denied** the program's request to admit 30 students commencing June 6, 2011, graduating August 17, 2012, to **replace** students that graduated October 1, 2010, **and; approved** the program's admission of 15 students commencing June 6, 2011, and graduating August 17, 2012; **and** required the program to admit no additional students unless approved by the full Board; **and** required the program to demonstrate progress in improvement of its pass rates on the NCLEX/PN® by May 31, 2012.

The Board required the program to submit follow-up reports in 9 months, but no later than **February 1, 2012**, and 21 months, but no later than **February 1, 2013**. The reports 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. Admission Criteria.
- b. Screening and Selection Criteria.
- c. Terminal Objectives.
- d. Curriculum Objectives.
- e. Instructional Plan.
- f. Theory and Clinical Objectives for Each Course.
- g. Lesson Plans for Each Course.
- h. Textbooks.
- i. Attendance Policy.
- j. Remediation Policy.
- k. Evaluations of Theory and Clinical Faculty.
- l. Evaluations of Theory Presentations.

- m. Evaluations of Clinical Rotations and Their Correlation to Theory Presentations.
- n. Evaluation of Student Achievement.
- o. Current Enrollment.

The Board placed the program on the May 2012 Board agenda for reconsideration of provisional accreditation; **and** required 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 2526.

- On June 30, 2011, the Board forwarded to the director the Notice of Change in Accreditation Status.

Enrollment

The program requires Board approval prior to the admission of each class. The program offers a full – time course of instruction that is 60 weeks in length. The pattern of admissions for current classes is seen in the enrollment table below.

The following table represents **projected** student enrollment based on **current and proposed** class starts and completions. The table indicates a **maximum enrollment of 64 students** for the period **March 2010 through August 2012**.

5/08		30	27	27
	5/09 (5/08 Class)		-27	$27 - 27 = 0$
7/09		45	39	$0 + 39 = 39$
3/10 (AM Class)		30	25	$39 + 25 = 64$
	10/10 (7/09 Class)		-39	$64 - 39 = 25$
	6/11 (3/10 AM Class)		-25	$25 - 25 = 0$
6/11 (PM Class)	8/12	14	16	$0 + 16 = 16$
9/11 (Proposed AM Class)	12/12	30 (+ 3 alternates)		$16 + 30 = 46$
	8/12 (6/11 PM class)		-16	$46 - 16 = 30$

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 Board Jurisdiction," for the period July 2009 through June 2011, specify the pass percentage rates for graduates of the Palladium Technical Academy, 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 Quarterly Pass Rate	Program Average Annual Pass Rate	State Average Annual Pass Rate
Jul - Sep 2009	4	1	25%	74%	25%	72%
Oct - Dec 2009	12	4	33%	76%	31%	73%
Jan - Mar 2010	2	1	50%	76%	33%	74%
Apr - Jun 2010	4	0	0%	74%	27%	75%
Jul - Sep 2010	No Candidates Tested			76%	28%	75%
Oct - Dec 2010	2	1	50%	77%	25%	76%
Jan - Mar 2011	12	7	58%	80%	44%	77%
Apr - Jun 2011	9	3	33%	71%	48%	76%

*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. If no data is available for the relevant period, the statistic is carried over from the last quarter for which data is available.

Based on the most current data available (April to June 2011), the program's average annual pass rate is 48%. The California average annual pass rate for graduates from accredited vocational nursing programs who took the NCLEX-PN® for the first time is 76%. The average annual pass rate for the Palladium Technical Academy, Vocational Nursing Program is **28** 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 ten (10), including the program director. There are two (2) approved teacher assistants. The director has 100% administrative duties. Of the total faculty, ten (10) are approved to teach in the clinical area.

Based on a maximum enrollment of 64 students, five (5) instructors are needed. Therefore, the number of current faculty is adequate for the current and proposed 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. This has been verified by the consultant.

Other Considerations

At the May 20, 2011 Board meeting, the Board placed Palladium Technical Academy on Provisional Accreditation for a two (2) year period, May 20, 2011, through May 31, 2013, due to low licensure pass rates. Additionally, the Board required the program to obtain approval by the full Board prior to the admission of additional students. (See Attachment A)

The program's current average annual pass rate is 44%. Since the program's inception the pass rates have been significantly below the state average annual pass rate. To date, the program's highest reported average annual pass rate is 44%. As a result of the Board's decision to place the program on Provisional Accreditation, the director is required to submit a report of the comprehensive analysis of the program no later than February 1, 2012 and again in 21 months.

On June 3, 2011, the program graduated a class of 24 students. It is anticipated that these students will take the licensure examination within the next six (6) months. Based upon their performance, new licensure data will be available that will assist the program and the Board to assess the effectiveness of the program's interventions to improve their pass rates to date.

Recommendations:

1. Deny Palladium Technical Academy Vocational Nursing Program's request to admit 30 students and three (3) alternates commencing September 19, 2011, and graduating December 7, 2012. The proposed class would **replace** students that graduated June 3, 2011.

2. Approve the program to admit 15 students with one (1) alternate commencing September 19, 2011, and graduating December 7, 2012, only. The proposed class would **replace** students that graduated June 3, 2011.
3. Continue to require the program to obtain approval by the full Board prior to the admission of each class.

Rationale: The program has enrolled 119 students and graduated 91, to date. Of the 91 graduates, 45 graduates have taken the licensure examination through June 30, 2011. Of the 45 graduates tested, 17 passed and 28 failed. As such, **37.7%** of all program graduates tested passed the licensure examination and **62.3% failed**. The program's current **average annual** pass rate is **48%**.

Such statistics confirm the rationale for the Board's actions to place the program on provisional accreditation at the May 20, 2011 Board meeting. Additionally, these same statistics support the rationale to decrease the requested class size from 30 students and one (1) alternate to 15 students and one (1) alternate. A comprehensive analysis of the program is to be completed prior to February 1, 2012, and new licensure data should be available for the students that graduated June 3, 2011. This information should give the program and the Board increased insight into the program's attempt to bring their licensure pass rates up.

The program has demonstrated that it has sufficient resources, including faculty and facilities, to support the current and proposed enrollment. Board staff will continue to monitor the program's effectiveness by tracking class admissions, the effectiveness of employed interventions, and the program's licensure examination pass rates each quarter.

Attachment A: Notice of Change in Accreditation Status Dated June 30, 2011.