

Agenda Item #12.A.4.



STATE AND CONSUMER SERVICES AGENCY • GOVERNOR EDMUND G. BROWN, JR.
BOARD OF VOCATIONAL NURSING & PSYCHIATRIC TECHNICIANS
2535 Capitol Oaks Drive, Suite 205, Sacramento, CA 95833-2945
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DATE: April 25, 2012

TO: Board Members -

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

SUBJECT: Bethesda University of California Vocational Nursing Program-
Consideration of Placement on Provisional Approval; Request to Admit
Students (Director: Nanyun Lee, Anaheim, Orange County, Private)

Bethesda University of California, also known as College of Medical Arts, Torrance, College of Medical Arts, Lawndale, Stanton University, and Bethesda Christian University, Vocational Nursing Program is presented to the Board for consideration of placement on provisional approval¹.

In accordance with Section 2526.1(c) of the Vocational Nursing Rules and Regulations,

"The Board may place any program on provisional accreditation when a program does not meet all requirements as set forth in this chapter and in Section 2526..."

Section 2530(l) of the Vocational Nursing Rules and Regulations 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 approved vocational nursing

¹ Prior to January 1, 2012, references in article 4 of the Vocational Nursing Practice Act and article 4 of the Psychiatric Technicians Law provided that the Board accredits all vocational nursing and psychiatric technicians programs. Pursuant to Business and Professions Code Sections 2883 and 4532 (Senate Bill 539, Chapter 338, Statutes of 2011), **accredit** was changed to **approve**. There was no change to the Board's authority or jurisdiction.

programs over the past eight (8) consecutive quarters. This data substantiates the program's noncompliance with Section 2530(l) of the Vocational Nursing Rules and Regulations.

NCLEX-PN® Licensure Examination Pass Rates			
Quarter	State Annual Average Pass Rate	Program Annual Average Pass Rate	Variance from State Annual Average Pass Rate
Jul – Sep 2009	72%	86%	+14
Oct – Dec 2009	73%	75%	+2
Jan – Mar 2010	74%	75%	+1
Apr – Jun 2010	75%	61%	-14
Jul – Sep 2010	75%	42%	-33
Oct – Dec 2010	76%	48%	-28
Jan – Mar 2011	77%	44%	-33
Apr – Jun 2011	76%	39%	-37
Jul – Sep 2011	75%	33%	-42
Oct – Dec 2011	75%	32%	-43
Jan – Mar 2012	74%	29%	-45

The program is requesting approval to admit a full-time class of 30 students commencing on July 17, 2012, graduating June 19, 2013, to **replace** students who were transferred to Bethesda University from Stanton University.

The program is also requesting approval to admit a part-time class of 30 students on June 11, 2012, graduating December 13, 2013, to **replace** students who were transferred to Bethesda University from Stanton University.

History of Prior Board Actions

- On February 13, 2008, the Executive Officer approved the College of Medical Arts, Torrance request, to begin a vocational nursing program with an initial full-time class of 30 students commencing February 19, 2008 only; **and** approved the program curriculum for 1590 hours, including 622 theory, and 968 clinical hours.
- On March 5, 2008, the Board was notified that the school had formed a partnership with Centinela Valley School District to offer the program at the Centinela Valley Adult School site and would delay commencement of the first class until March 10, 2008. At that time the school will be known as the College of Medical Arts, Lawndale, Vocational Nursing Program.
- On November 7, 2008, the program submitted documentation of the school's name change to Stanton University, effective December 1, 2008.

- On December 8, 2008, the Executive Officer approved initial full accreditation for Stanton University (formerly College of Medical Arts, Torrance, and College of Medical Arts, Lawndale), Vocational Nursing Program for the period from December 8, 2008, through December 7, 2012, and issued a certificate accordingly. Additionally, the Executive Officer approved the program's requests to admit the following classes, thereby increasing the program's frequency of admissions.
 - a. A full-time class of 45 students on February 17, 2009 only, to **replace** students graduating on February 27, 2009.
 - b. A full-time class of 45 students on December 15, 2008 only, graduating December 4, 2009.
- On May 13, 2009, the Executive Officer approved the program's request to admit 45 students into a full-time class on June 15, 2009 only, graduating May 15, 2010.
- On September 17, 2009, the Board received correspondence requesting a change in the program's name to Bethesda Christian University Vocational Nursing Program.
- On October 8, 2009, the Board received electronic notification of the director's resignation, effective October 5, 2009.
- **On October 12, 2009, a new program director was approved.**
- On January 7, 2010, the Executive Officer approved Bethesda Christian University Vocational Nursing Program's request to admit a full-time class of 30 students on January 11, 2010 only, with a projected graduation date of January 13, 2011.
- On June 25, 2010, the program notified the Board that commencement of the January 11, 2010 class was delayed to February 8, 2011.
- On August 6, 2010, the Executive Officer approved Bethesda University of California Vocational Nursing Program's request to admit a full-time class of 30 students on September 13, 2010 only, with a projected graduation date of August 25, 2011, to **replace** students graduating March 16, 2010; and, required the program to obtain Board approval prior to the admission of all classes.
- On May 11, 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 rates for the past five (5) quarters.
- On August 14, 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 rates for the past six (6) quarters.
- On February 22, 2012 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 more than seven (7) consecutive quarters. The following information was requested by March 9, 2012.

- a. Current and projected enrollment.
 - b. Approved faculty.
 - c. Approved clinical facilities.
 - d. Clinical rotation schedule.
 - e. Analysis of the submitted corrective action plan.
- On March 14, 2012, the Board received the program's plan to increase the licensure pass rates.
 - **On March 26, 2012, a new program director was approved.**
 - On March 28, 2012, the Board forwarded a notice of violation to the program director relative to violations of the California Code of Regulations, sections 2527(b) and 2530(k). The program was required to submit a plan to prevent future violations to the Board by **April 20, 2012**.
 - On April 4, 2012, the assigned consultant forwarded correspondence requesting submission of eighteen (18) copies of pertinent documents, plan, and subsequent actions taken to correct identified problems that they desire Board members to consider.
 - On April 6, 2012, the director submitted a plan to prevent future violations, as referenced on March 28, 2012.
 - On April 16, 2012, the Board received correspondence from the program director and eighteen (18) copies of pertinent documents and subsequent actions taken to correct identified problems that they desire the Board members to consider.
 - On April 17, 2012, the school manager and the director met with the SNEC and NEC at the Board's offices. The focus of the meeting was to inform the Board's representatives of the school's history and request consideration of replacement classes. The NEC provided the new director an orientation to her new role.

Enrollment

The program is approved to offer full-time classes over 60 weeks. The program is required to obtain Board approval prior to the admission of each class. The pattern of admissions for proposed 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 110 students** for the period from **December 2008 through December 2013**.

ENROLLMENT DATA				
CLASS DATES		#Students Admitted	#Students Current or Completed	Total Enrolled
Start	Completed			
3/08 FT		27	22	22
12/08		31	20	22 + 20 = 42
2/09		25	4	42 + 4 = 46
	2/09 (3/08 Class)		-22	46 - 22 = 24
6/09 FT		17	14	24 + 14 = 38
	12/09 (12/08 Class)		-20	38 - 20 = 18
	2/10 (2/09 Class)		-4	18 - 4 = 14
2/10 FT		27	12	14 + 12 = 26
	8/10 (6/09 Class)		-14	26 - 14 = 12
5/10 (Cited prev) (Unapproved)		27	21	12 + 21 = 33
10/10 FT		9	6	33 + 6 = 39
10/10 PT (Class J) (Unapproved) Transferred from Stanton		15	12	39 + 12 = 51
	3/11 (2/10 FT Class)		-12	51 - 12 = 39
3/11 PT (Class L) (Unapproved) Transferred from Stanton		25	19	39 + 19 = 58
	6/11 (5/10 Class)		-21	58 - 21 = 37
6/11 PT (Class M) (Unapproved) Transferred from Stanton		14	3	37 + 3 = 40
8/11 FT (Class N) (Unapproved) Transferred from Stanton		17	14	40 + 14 = 54
10/11 PT (Class F) (Unapproved) Transferred from Stanton		13	7	54 + 7 = 61

ENROLLMENT DATA				
CLASS DATES		#Students Admitted	#Students Current or Completed	Total Enrolled
Start	Completed			
	11/11 (10/10 FT Class)		-6	61 - 6 = 55
3/12 PT (Class G) (Unapproved)		21	21	55 + 21 = 76
	5/12 (10/10 PT Class)		-12	76 - 12 = 64
6/12 PT (PROPOSED)	12/13	30		64 + 30 = 94
	7/12 (8/11 FT N Class)		-14	94 - 14 = 80
7/12 FT (PROPOSED)	6/13	30		80 + 30 = 110
	9/12 (10/11 FT F Class)		-7	110 - 7 = 103
	10/12 (3/11 PT L Class)		-19	103 - 19 = 84
	1/13 (6/11 PT M Class)		-3	84 - 3 = 81
	6/13 (7/12 FT Class)		-30	81 - 30 = 51
	7/13 (3/12 PT G Class)		-21	51 - 21 = 30
	12/13 (6/12 PT Class)		-30	20 - 30 = 0

Licensing Examination Statistics

The following statistics, furnished by 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 March 2012, specify the pass percentage rates for graduates of Bethesda University of California 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	7	6	86%	72%	86%	72%
Oct - Dec 2009	1	0	0%	76%	75%	73%
Jan - Mar 2010	No Candidates Tested			76%	75%	74%

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
Apr – Jun 2010	10	5	50%	74%	61%	75%
Jul – Sep 2010	8	3	38%	75%	42%	75%
Oct – Dec 2010	9	3	56%	77%	48%	76%
Jan – Mar 2011	7	2	29%	80%	44%	77%
Apr-Jun 2011	2	0	0%	71%	39%	76%
Jul – Sep 2011	6	1	17%	74%	33%	75%
Oct – Dec 2011	16	7	44%	74%	32%	75%
Jan – Mar 2012	7	1	14%	77%	29%	74%

*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 recent data available (January to March 2012) the program's average annual pass rate is **29%**. 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 74%. The pass rate for the Bethesda University of California Vocational Nursing Program is **45** 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 seventeen (17), including the program director. The director has 100% administrative responsibility and duties. Of the total faculty, sixteen (16) instructors are approved to teach in the clinical area.

Based on a maximum enrollment of 110 students, eight (8) 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. The adequacy of clinical facilities has been verified by the consultant.

Other Considerations:

Board records substantiate approval of the program's initial class on February 13, 2008. Published examination statistics specify an average annual pass rate of 86% for graduates of that class. For the next two (2) consecutive quarters, the program's average annual pass rates were 75%. Thereafter, the program's average annual pass rates declined progressively.

On February 22, 2012, the program was notified their pass rates had been more than ten (10) percentage points below the state average annual pass rate for seven (7) quarters. Additionally, they were advised they were being placed on the May 2012 Board agenda (see Attachment A)

On March 14, 2012, the director of record submitted a plan to increase the program's licensure examination pass rates. Included in that plan are the following (see Attachment B).

- Kaplan Test Prep will provide a live test prep class for the NCLEX examination.
- ATI proctored, non-proctored and NCLEX preparation exams.
- Incorporated Evolve website with Blackboard. Case studies, assessment forms, videos, etc are available on this site.
- Tutoring provided by a nursing instructor.
- Continuing education provided for instructors.
- Four (4) week NCLEX review course provided.
- Improved communication between staff and students.
- Implemented a success plan to identify and help at risk students.
- Increased communication between theory and clinical instructors to assure that students are meeting the objectives.

To date, the program has admitted a total of thirteen (13) classes. Based on information and documents submitted, the following violations of the California Code of Regulations are identified (see Attachment C).

Section 2527 (b) of the California Code of Regulations states,

“A school shall report to the Board within ten days of the termination of a faculty member.”

Violation #1: On May 3, 2010, the program was cited for the failure to notify the Board of termination of 16 terminated faculty members within the time prescribed by regulation. **Since that time, the program failed to notify the Board of an additional three (3) terminated faculty.**

Correction #1: This violation has been **corrected**. On March 28, 2012, a notice of violation was sent to the program. The director submitted a plan to prevent future reoccurrence of this violation.

Section 2530 (k) of the California Code of Regulations states:

“The program shall have prior Board approval to increase the number of students per class and/or increase the frequency of admission of classes. Criteria to evaluate a school’s request to increase the number of students per class and/or increase the frequency of class admissions include but are not limited to:

- 1. Sufficient program resources as specified in section 2530 (a).**
- 2. Adequacy of clinical experience as specified in section 2534.**
- 3. Licensure examination pass rates as specified in section 2530 (l).**

Violation #2: On **May 3, 2010**, the program was **cited for admitting an unapproved class**. The director of record reported that a new policy had been created to prevent this violation from reoccurring in the future.

Since that time, an additional six (6) classes have been admitted without prior Board approval. Five (5) of the six (6) unapproved classes were classes moved from Stanton University to Bethesda University. Four (4) of the classes were part-time and one (1) was a full-time class. The sixth (6th) class was an additional part-time class that was initiated at Bethesda University. As such, **seven (7) of the 13 classes were admitted without prior Board approval.**

Additionally, the program commenced a part-time class and admitted students on five (5) separate occasions. Board records substantiate that the program was approved for full-time classes only.

Correction #2: This violation has been **corrected**. The assigned consultant informed the current director that the program was in violation of existing regulations in that prior Board approval had not been obtained for commencement of six (6) classes that commenced from September 13, 2010 forward, to date. On March 29, 2012, a notice of violation was sent to the program. The director submitted a detailed explanation of why the violations occurred and a plan to prevent future reoccurrences.

Section 2530(l) of the California Code of Regulations 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.”

Violation #3: The program's average annual pass rates for first time graduates have been noncompliant with regulatory requirements for eight (8) of the past eleven (11) quarters since its inception. For the past eight (8) consecutive quarters, the program's average annual pass rates have been more than ten (10) percentage points below the State average annual pass rate.

Plan of Correction #3: This violation is **not corrected**. The violation will be corrected when the program's pass rates improve consistent with regulatory requirements.

On April 4, 2012, the assigned consultant forwarded correspondence requesting submission of eighteen (18) copies of pertinent documents, plan, and subsequent actions taken to correct identified problems that they desire Board members to consider (see Attachment D).

On April 16, 2012, the Board received correspondence from the program director and eighteen (18) copies of pertinent documents and subsequent actions taken to correct identified problems that they desire Board members to consider (see Attachment E). Included in the plan are the following elements:

- Mandatory NCLEX review utilizing Kaplan testing (implemented 6 months ago).
- ATI testing (entrance and throughout the program).
- Added new textbooks
- Since January 2011, tutoring is available to students on Wednesdays.
- Continuing education provided to staff.
- School is improving communication to previous graduates who have not taken the NCLEX-PN® to inform them of services available at the school (NCLEX review).
- Created a "Success Plan". The Success Plan is to identify at risk students and implement interventions early.
- Developed a curriculum review committee.
- Increased test passing score from 75% to 77%.
- Mandatory 120 hour pre-requisite course for ESL students.

Recommendations:

1. Deny Bethesda University Vocational Nursing Program's request to admit a full-time class of 30 students commencing on July 17, 2012, graduating June 19, 2013, to **replace** students who transferred to Bethesda University from Stanton University.
2. Deny the program's request to admit a Part-time class of 30 students on June 11, 2012, graduating December 13, 2013, to **replace** students who transferred to Bethesda University from Stanton University.

3. Place Bethesda University Vocational Nursing Program on provisional approval for the two-year period from May 11, 2012, through May 31, 2014, and issue 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 (see Attachment F).
4. Require the program to bring its average annual pass rate to no more than ten (10) percentage points below the State average annual pass rate **by April 1, 2014**.
5. Require the program to admit no additional students without prior approval by the full Board.
6. Require the program to submit follow-up reports in nine months, but no later than **February 1, 2013**, and 21 months, but no later than **February 1, 2014**. The reports shall 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.
7. 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 2526.
8. Require the program to demonstrate substantive incremental progress in correcting the violations. If the program fails to satisfactorily demonstrate incremental progress, the full Board may revoke the program's approval.
9. Failure to take any of these corrective actions may cause the full Board to revoke the program's approval.
10. Place the program on the **May 2014** Board agenda for reconsideration of provisional approval.

Rationale: The program's **average annual pass rate is currently 29%**. This is **45** percentage points **below** the state average annual pass rate.

Board records and submitted data substantiate that the program has admitted thirteen (13) classes, to date. Seven (7) of the 13 classes were admitted without prior approval by the Board. A notice of violation was sent to the program on May 3, 2010, when the program admitted the first unapproved class. The program submitted a plan to prevent a future reoccurrence.

However, since that time, an **additional** six (6) classes have been admitted without prior Board approval. Five (5) of the six (6) unapproved classes were moved from Stanton University to Bethesda University. Four (4) of the classes were part-time and one (1) was a full-time. The sixth (6th) class was an additional part-time class that was initiated at Bethesda University. As such, **seven (7) of the 13 classes were not approved by the Board**. Additionally, Board records substantiate that the program was approved for full-time classes only.

Additionally, on May 3, 2010, the program was cited for the failure to notify the Board of the termination of 16 faculty members within the time prescribed by regulation. Since that time, the program again failed to notify the Board of terminated faculty, and was cited accordingly.

The Board is concerned with the program's **continued** disregard for the California Code of Regulations. The program's actions wherein it failed to request six (6) classes, commencing a part-time course of instruction and admitting students without prior Board approval, and failed to notify the Board of the termination of faculty, not only on one (1) occasion, but several occasions, demonstrate an egregious disregard for the regulatory requirements. Such continued noncompliance and the program's poor licensure performance statistics over the last eight (8) consecutive quarters warrant the program's placement on provisional approval.

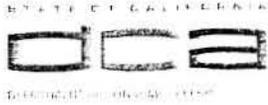
Further, denial of the program's request to admit replacement classes in June and July is recommended. As proposed, the program requests approval to admit students to replace graduating classes transferred from Stanton University. However, it must be noted that the program admitted 55 students without prior approval by the Board. Seventy-six (76) students remain enrolled in classes.

A new director was approved by the Board on March 26, 2012. The new director indicated that she is very concerned with the program's actions and has a sincere interest in following the California Code of Regulations.

The Board will continue to monitor all aspects of the program's performance and compliance with the California Code of Regulations.

- Attachment A: Board Correspondence Dated February 22, 2012.
- Attachment B: Program Correspondence Dated March 7, 2012, Received March 14, 2012.
- Attachment C: Notice of Violation Dated March 26, 2012.
- Attachment D: Board Correspondence Dated April 4, 2012.
- Attachment E: Program Documents Dated April 16, 2012, Received April 16, 2012.
- Attachment F: Draft Notice of Change in Approval Status.

Agenda Item #12.A.4. Attachment A



BOARD OF VOCATIONAL NURSING & PSYCHIATRIC TECHNICIANS
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CERTIFIED

February 22, 2012

Cassie Zalewski
Bethesda University of California
Vocational Nursing Program
730 North Euclid Avenue
Anaheim, CA 92801

Dear Ms. Zalewski:

Section 2530 (l) of the Vocational Nursing Rules and Regulations 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 achieve the required yearly average minimum pass rate within two years of initial approval may be cause to place a program on provisional accreditation.
- (2) 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."

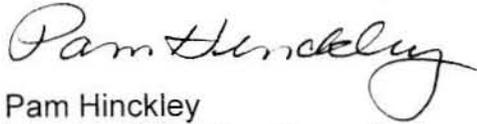
Statistics furnished by the Pearson VUE and published by the National Council of State Boards of Nursing as "Jurisdictional Summary of All First-Time Candidates Educated in Member Board Jurisdiction", indicate that the pass rates for **Bethesda University of California** have fallen below 10 percentage points of the state average pass rate for the past seven quarters. **This means that on May 11, 2012 (tentative date) your program may be considered for provisional accreditation.**

Please submit the following information to me by **March 9, 2012.**

1. Current enrollment information.
2. Current faculty and facility information.
3. Documentation demonstrating the clinical rotation schedules for all current classes.
4. An analysis of your program's correctional plan indicating the elements that have been effective and those that have not. Describe alterations that you will make in the plan based on this analysis.
5. Any other pertinent information to be considered by the Board. (Note: Information submitted after the deadline may not receive due consideration by the Board.)

Should you have questions, please do not hesitate to contact me at (916) 263 - 7840.

Sincerely,

A handwritten signature in cursive script that reads "Pam Hinckley". The signature is written in black ink and is positioned above the printed name.

Pam Hinckley
Nursing Education Consultant

Enclosures: Enrollment Form
Faculty and Facility Forms
OB/Peds Rotation Form
Faculty Clinical Assignment Form



Agenda Item #12.A.4. Attachment B

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idre
BVNPT Received
on 3/14/12 with LR

March 7, 2012

Pam Hinckley M.S., R.N.
Supervising Nursing Education Consultant
Board of Vocational Nursing and Psychiatric Technicians
2535 Capitol Oaks Drive, Suite 205
Sacramento, CA. 95833-2945

SUBJECT: NCLEX PASS RATE CORRECTIONAL PLAN ANALYSIS

Dear Ms. Hinckley,

This letter is in response to your request on February 22, 2012, for information before potential provisional status related to inadequate pass rates. The last correctional plan I submitted was on October 27, 2012. In the analysis below, I have addressed our current correctional plan as well as added to the plan, particularly in areas involving 1-20 students. Finally, I have offered additional pertinent information which I hope the Board will consider in making a decision for BUC to be placed on provisional status in May.

- I. In Spring of 2010, we began a relationship with Kaplan to have one of their instructors provide live NCLEX prep instruction for each of our classes at the end of their program. The classes are 4 days long with six (6) hours of instruction per day. Instruction includes information and practice in taking NCLEX-like tests as well as content based on the current NCLEX-PN Test Plan.
Evaluation/Discussion - students must attend the course in its entirety as well as content prep done also by school faculty. The students are all attending and the students are offered additional group study sessions or email discussions with the Kaplan consultant as desired. Students who have passed their boards gave feedback that they felt the Kaplan instruction was very relevant in that regard. Also, pass rates had been slowly climbing at SU before the students left in December. At this time, we will continue the board prep as is with the same requirements.
- II. ATI, an NCLEX-prep product, was added to the book list and curriculum in Fall of 2010. All the students from that time forward had practice and proctored assessments in all major content areas of the vocational nursing program. At BUC, there have been issues with bandwidth and wifi when all the students are on ATI. It has been recommended that separate network lines be purchased for the VN students in place of wireless. As well, the students must pass a NCLEX- pass predictor test before graduating from Bethesda University of CA. Remediation tools are offered for students who do not pass the first time. The current expected pass percentage for ATI is 90 %.

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- III. ***Evaluation/Discussion - ATI is in place as outlined above and will be continued as such. In March, 2012, wireless network will be purchased and implemented for the VN program. In addition, other prep products will be evaluated this year in order that we are assured that we have the best product on the market. Also, we will evaluate adding to our current ATI products if, after discussion with the product representative, it appears that it would be advantageous in improving pass rates.***
- IV. In Fall 2010, textbooks were changed and additional ones were added, such as a separate pharmacology book with study guide, a drug book, medical dictionary and a care planning book. The main textbook for the program, published by El Sevier, has a student website called Evolve which provides many adjunctive products to enhance student learning. In addition, we have also included case scenarios on Evolve to the student book list which enhances critical thinking. Other resources that have been added this year include the Virtual Clinical Excursion dvd's by Christensen and Taylor's Clinical Nursing Skills dvd's. We will also make more textbook changes when our next class convenes. We have added a Saunders NCLEX-PN review book and an A and P book.
Evaluation/Discussion - Our textbooks are more appropriate as the prior textbooks did not offer in-depth coverage in certain important areas. The instructors feel they are much easier to teach from and the layout is better for the students to read. The Evolve website which was managed by the Asst. Director of Nursing has been taken down and is no longer available to the instructors. Other instructors are beginning to build their own and we hope to have these adjunct resources again soon.
- V. Starting in January 2011, we had a nursing instructor serving as tutor. Tutoring is set up with a student or students on an "as needed" basis". Any student may request tutoring at any time to be conducted during daytime hours.
Evaluation/Discussion – Our tutoring system was modified to make it more relevant and convenient for students. Students make an appointment with the tutor and let him know in advance what topic they need assistance in learning. Moreover, the tutor used adult learning strategies to improve study habits, time-management skills, prioritization, etc. as well as teach content. Unfortunately, the tutor was our Asst. Director who has left the program in December. Since the tutoring process started at SU we felt it helped make improvement in overall school success for students and will bring it back. Starting in March, we will designate additional hours for one of our instructors to take over this process.
- VI. Continuing Education is provided frequently at monthly faculty meeting on topics relevant to teaching nursing theory and clinical instruction. Bethesda has always been included in the training, especially since I became Director in June. Some topics in the past year included: NCLEX Update – Incorporating NCLEX into your Curriculum, Clinical Reasoning in Clinical Education, The Med Pass, Concept Mapping Patient Care and Skills Lab Simulation. Our goal

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is to continually improve the quality of our instruction which we believe will translate to improved board scores.

Evaluation/Discussion - The instructors have attended faculty meetings in which continuing ed was done. As they continue to benefit from the offerings at faculty meetings, I believe it will strengthen the quality of instruction overall with special focus on passing boards. This practice will continue.

- VII. We have improved the quantity and appropriateness of our clinical sites especially in adding more Sub-Acute experiences. Having hands-on experience with, for example, tracheostomy care and suctioning has been a valuable addition for our students and we hope it will be helpful in our students having a broader knowledge base for state boards.
- Evaluation/Discussion – We have good clinical sites in a very competitive market – Bethesda has 2 Sub-acute facilities and 2 acute sites as well as many SNF sites. We maintain them by expecting high professional standards of our faculty and students.***
- VIII. Cassie Zalewski as Nursing Director at BUC. Since she was also director at Stanton University, there will be opportunities for our students to benefit from some resources and processes at Stanton that were already in place there. Also, she will seek approval for an Assistant Director to strengthen the program at BUC.
- Evaluation/Discussion – I came on board as Director in June 2011. I do believe my directorship over both schools will be an advantage as I seek to implement the same improvements as Stanton. An Assistant Director is needed and will be added in the next few months.***
- IX. The ADON at Stanton will be offering a weekly 4-hour NCLEX-PN review that will be year-round for both schools. Interested students and graduates will be welcome to attend which we believe will be a valuable adjunct to our existing resources.
- Evaluation/Discussion – This was very good until the instructor left. Attendance was good enough to warrant keeping it. I definitely want to continue it and will have the new Asst. Director lead it when they are hired.***
- X. We have improved communication with our students and graduates with a quarterly newsletter developed by our Career Services Coordinator as well as frequent contact via email. Through these channels, we are able to inform them of resources and offerings available to them to assist with board passage. Also, the grads are given a gratuity when they come back and speak to current students. This gives them more information in preparing for boards. Our grads are allowed to continue to use all school resources until they have successfully taken NCLEX.

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Evaluation/Discussion – Contact with graduates has improved. This allows us to evaluate their success at boards and make needed adjustments in our program in weak areas. We will definitely continue this practice.

- XI. We utilize a Success Plan for students who are at risk in either clinical or the classroom. Faculty are encouraged to implement a plan early when a student first demonstrates a problem in school such as failing quizzes, being tardy, inattention, poor study habits, working too much, etc. The idea is to prevent poor habits from developing into major problems later on. A big piece of the plan is input from students and investment into changes they must make.

Evaluation/Discussion – Though some students put on Success Plans end up failing anyway, it has been a “wake-up call” for many students to change their school habits and learn how to be successful in a nursing program. Research shows that individualized support from a teacher has the biggest impact on student success. We will definitely be continuing this successful approach to motivating students.

- XII. We also have attempted to improve communication between theory and clinical instructors by designating theory instructors as lead instructors. The lead instructors’ responsibility is to assure that students are meeting the objectives in clinical that correlate with theory instruction. There is now more collaboration in meeting the objectives and Success Plans, etc, used to improve progress.

Evaluation/Discussion – This has been a big plus in terms of assuring that clinical objectives are being met. It has also worked well in identifying at risk students and helping to improve their competence earlier in the program. Also, if a theory instructor wants a concept emphasized more in clinical, there is a mechanism to do so. When program objectives are being met, I believe students should have the knowledge to pass state boards. We will continue this practice.

- XIII. We have a Curriculum Committee whose goal is to make improvements to the curriculum, making it more relevant and in line with current state and national standards. One element of this was to increase the required passing score in our courses from 75% to at least 77% for most classes and to change our admission test. We submitted these improvements to the board for approval in September, 2011.

Evaluation/Discussion – Though our drop rate has increased, I believe students who do pass now at 77% have a higher chance at passing boards on the first try. We saw a trend that the borderline (always hovering around 75%) students were not passing boards. Also, utilizing an admission test score that is comparable to area community college scores has raised the bar for incoming students who should be able to be successful in the program and at boards.

Some additional improvements that I believe are needed at this point are:

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Phone: 714-683-1460
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IX. We will begin giving mandatory tests at the end of each term that students will be required to pass before moving on to the next term (in addition to the current ATI predictor test). If they do not pass on the first try, they will be given formal remediation and allowed to have a second attempt at passing. If they do not pass at the second attempt, they must repeat the term or be dropped from the program. This change will be submitted to the BVNPT and students will be informed of this policy via their Student Handbook before they begin the program.

X. All I-20 students will now be required to complete an 120 hour ESL Medical Terminology program, offered by BUC, before entering the VN program. The program will run continuously year-round and be comprised of 4-hour segments on different topics and will be numbered from 1-30. When a student has completed all 30 topics, in random order, they may enter the VN program. Hopefully this will deal effectively with students where English is an issue, in the classroom, in clinical and on state boards.

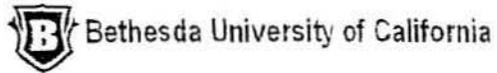
Other issues that impact our students is the long wait time between graduation and board approval. I understand that this is unavoidable due to shortages at the Board, however, research clearly shows the negative relationship between long wait times and pass rates. Students say they begin to forget what they have learned in the program. We encourage them through emails to keep studying and offer any resources to them such as computer review programs, auditing classes, use of skills lab, tutoring, etc.

This concludes my analysis of our correctional plan and additional elements to the plan.

I would like to offer other pertinent information to be considered by the Board to delay provisional accreditation:

On June 9, 2011, I was approved as Director of the Bethesda University of California (BUC) VN program and was also Director of the Stanton University (SU) VN program until December of 2011 at which time the SU students were transferred to BUC. Notification of this was sent to the BVNPT on 11/8/11 and the primary reason stated for the transfers was to give the financial advantage to students of attending a nationally accredited (TRACS) school. In fact, BUC has just received re-accreditation from TRACS for a period of ten (10) years. Four classes of students transferred in December, 2011. This information is given as a reminder to the board that BUC is now a mixture of SU and BUC students. I believe this is an advantage in improving pass rates as SU had a longer history with the improvements made and had stronger pass rates. I believe that both schools had some challenges before that are not as prominent now. BUC's challenge was in moving their program in 2010 from Lawndale to Anaheim as well as not having financial aid for students. Students had to travel great distances as well as many worked long hours to pay for tuition, both of which affected their grades and pass rates. Most students at SU also worked to pay tuition before financial aid was available in January, 2012.

Going back further to when I took over SU and for a short time, BUC, in late 2009, both schools suffered from having a completely incompetent nursing director who, I believe, is now well-known to the Board in that regard. Having to completely re-structure two (2) schools and overcome extremely low pass

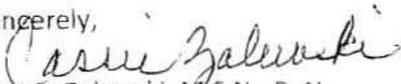


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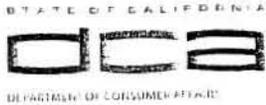
rates has been a very challenging job. I believe that it can be done, however, not in the time allotted for a normal recovery. I sincerely hope that, in May, if our pass rates do not yet meet the state requirements, that you will take into consideration the challenges discussed above.

Please let me know if you have any questions regarding my analysis, additional elements and pertinent information about our program I have submitted today. As always, I welcome any input and suggestions you may have.

Sincerely,


Cassie Zalewski, M.S.N., R. N.
Director of Vocational Nursing

Agenda Item #12.A.4. Attachment C



STATE AND CONSUMER SERVICE AGENCY • GOVERNOR EDWIN D. BRIDGE JR.
BOARD OF VOCATIONAL NURSING & PSYCHIATRIC TECHNICIANS
2535 Capitol Oaks Drive, Suite 205, Sacramento, CA 95833-2945
Phone (916) 263-7800 Fax (916) 263-7855 Web www.bvnpt.ca.gov



March 26, 2012

Nanyun Lee
Vocational Nursing Program
Bethesda University of California
730 North Euclid Avenue
Anaheim, CA 92801

Certified

Subject: Notice of Violations

Dear Ms. Lee:

The Board of Vocational Nursing and Psychiatric Technicians (Board) has received information that confirms several violations by the Bethesda University of California Vocational Nursing Program. Based on submitted documents and information, the following violations are identified,

Section 2527 (b) of the Vocational Nursing Rules and Regulations states:

“A school shall report to the Board within ten days of the termination of a faculty member.”

Violation #1: The program failed to notify the Board of the termination of three (3) faculty members.

Section 2530(k) of the Vocational Nursing Rules and Regulations states:

“The program shall have prior Board approval to increase the number of students per class and/or increase the frequency of admission of classes. Criteria to evaluate a school’s request to increase the number of students per class and/or increase the frequency of class admissions include but are not limited to:

- (1) Sufficient program resources as specified in section 2530 (a).**
- (2) Adequacy of clinical experience as specified in section 2534.**
- (3) Licensure examination pass rates as specified in section 2530 (l).”**

Violation #2: Board records substantiate the Executive Officer's approval of the admission of six (6) full – time classes from February 13, 2008 to August 10, 2010, only. The six (6) classes were approved as follows:

1. Full-time class of 30 students to begin on February 19, 2008, approved on February 13, 2008.
2. Full-time class of 45 students to begin on December 15, 2008; **and**, Full-time class of 45 students to begin on February 17, 2009, only, to replace students who graduated on February 27, 2009. Approved on December 8, 2008.
3. Full-time class of 45 students to begin on June 15, 2009, only, approved on May 13, 2009.

4. Full-time class of 30 students on January 11, 2010, only, approved on January 7, 2010.
5. Full-time class of 30 students on September 13, 2010, only, approved on August 6, 2010.

To date, no further classes have been requested or approved for your program. Accordingly, students who were admitted after September 13, 2010, or other than the identified classes above, were admitted without prior Board approval.

Additionally, the program admitted students into a Part-time class on four (4) separate occasions. Board records substantiate that the program was approved for Full-time classes only.

The Board strongly recommends that violations of this nature be avoided. Such violations jeopardize your program's accreditation. Moreover, such violations seriously jeopardize the education and licensure of students from your program. The Board is mandated to ensure the protection of the health, safety, and welfare of California consumers. Students in your program are consumers.

Please submit the following information no later than **Monday, April 20, 2012.**

- A detailed explanation relative to why the violations occurred.
- Actions you will take to prevent future reoccurrences of each violation.

Should further clarification be needed, please feel free to contact the Board at (916) 263-7843.

Sincerely,

TERESA BELLO-JONES, J.D., M.S.N., R.N.
Executive Officer

TBJ:ph

Agenda Item #12.A.4. Attachment D



STATE AND CONSUMER SERVICES AGENCY • CONSUMER PROTECTION DIVISION

BOARD OF VOCATIONAL NURSING & PSYCHIATRIC TECHNICIANS
2535 Capitol Oaks Drive, Suite 205, Sacramento, CA 95833-2945
Phone (916) 263-7800 Fax (916) 263-7855 Web www.bvnpt.ca.gov



CERTIFIED MAIL

April 4, 2012

Nanyun Lee
Bethesda University
Vocational Nursing Program
730 North Euclid Avenue
Anaheim, CA 92801

Re: Consideration of Provisional Approval

Dear Ms. Lee:

The Board is scheduled to consider **Bethesda University, Vocational Nursing Program's** relative to consideration of placement on provisional approval at its meeting scheduled May 11, 2012. That meeting will be held at the Embassy Suites Milpitas – Silicon Valley, in Milpitas, California.

To ensure dissemination and review by individual Board members and relevant staff for timely consideration prior to the May Board meeting, please submit the following written information by **Wednesday, April 11, 2012**:

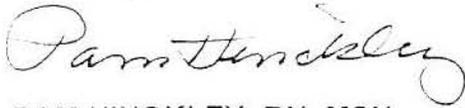
- Eighteen (18) copies of pertinent documents related to subsequent actions taken by the program to correct identified problems ***that you desire Board members to consider***. Please remember existing statutes require that any document considered by the Board will become a public record. Accordingly, please redact all names of students.
- In addition, please provide information on a compact disc (CD) for Board use. Again, please remember to redact any student names prior to copying information onto the CD.

Although the primary purpose of this letter is to convey the Board's need for the copies, please be assured that, if timely submitted, any correspondence and attachments will be reviewed and, if appropriate, information submitted may be included in the report of the assigned consultant.

The Board strongly recommends that you plan to attend the meeting and be prepared to respond to questions from Board members relative to your program.

Please contact the Board at (916) 263-7843 should further clarification be needed.

Sincerely,

A handwritten signature in cursive script that reads "Pam Hinckley". The signature is written in black ink and is positioned above the printed contact information.

PAM HINCKLEY, RN, MSN

Nursing Education Consultant

Board of Vocational Nursing and Psychiatric Technicians

2535 Capitol Oaks Drive, Suite 205

Sacramento, CA 95833

(916) 263-7843 Phone

(916) 263-7866 Fax

Pam_hinckley@dca.ca.gov



**Bethesda University of California
Nursing School**

730 N. Euclid St. Anaheim, CA 92801
TEL: (714) 6831460 FAX: 714-683-1419

April 16, 2012

**Teresa Bello-Jones, J.D., M.S.N., Executive Officer
Board of Vocational Nursing and Psychiatric Technicians
2535 Capitol Oaks Drive, Suite 205
Sacramento, CA. 95833**

SUBJECT: NCLEX PASS RATE CORRECTIONAL PLAN ANALYSIS

Dear Ms. Bello-Jones,

This letter is to modify our correctional plan analysis dated March 7, 2012 submitted by Cassie Zalewski, the previous Director of Vocational Nursing. Modification of Evaluation/Discussions as follows:

I. NCLEX-PN Test Plan:

Evaluation/Discussion – students must attend the course in its entirety as well as content prep done also by school faculty. The students are all attending and the students are offered additional group study sessions or email discussions with the Kaplan consultant as desired. Students who have passed their boards gave feedback that they felt the Kaplan instruction was very relevant in that regard. Also, pass rates had been slowly climbing at SU before the students left in December. At this time, we will continue the board prep as is with the same requirements.

II. ATI, an NCLEX-prep product, was added to the book list and curriculum in Fall of 2010.

Evaluation/Discussion: ATI is in place as outlined in the letter, dated March 7, 2012 and will be continued as such. In April, 2012, wireless network will be purchased and implemented for the VN program. With the new buildings and all new resources will be available by April 30, 2012. In addition, other prep products will be evaluated this year in order that we are assured that we have the best product on the market. Also, we will evaluate adding to our current ATI products if, after discussion with the product representative, it appears that it would be advantageous in improving pass rates.

III. Textbooks were changed and additional ones were added, such as a separate pharmacology book with study guide, a drug book, medical dictionary and a care

planning book.

Evaluation/Discussion – Our text books are more appropriate as the prior textbooks did not offer in-depth coverage in certain important areas. The instructors feel they are much easier to teach from and the layout is better for the students to read. Will have a new Asst. Director of nursing to resume above plan as soon as the Board's approval of the Factivity, Assist, Director of Nursing obtained.

- IV. Starting in January 2011, we had a nursing instructor serving as tutor. Tutoring is set up with a student or students on an "as needed basis".

Evaluation/Discussion – Our tutoring system was modified to make it more relevant and convenient for students. The tutor used adult learning strategies to improve study habits, time-management skills, prioritization, etc. as well as teach content. After the departure of the previous Assist. Director, we designated the new instructor to take over this process starting April 18, 2012 designating every Wednesday.

- V. Continuing Education is provided frequently at monthly faculty meeting on topics relevant to teaching nursing theory and clinical instruction.

Evaluation/Discussion – The instructors have attended faculty meetings in which continuing ED was done. As they continue to benefit from the offerings at faculty meetings, I believe it will strengthen the quality of instruction overall with special focus on passing boards. This practice will continue.

- VI. We have improved the quantity and appropriateness of our clinical sites especially in adding more Sub-Acute experiences. Having hands-on experience with, for example, tracheostomy care and suctioning has been a valuable addition for our students and we hope it will be helpful in our students having a broader knowledge base for state boards.

Evaluation/Discussion – We have good clinical sites in a very competitive market – Bethesda has 2 Sub-acute facilities and 2 acute sites as well as many SNF sites. We maintain them by expecting high professional standards of our faculty and students. Additionally, we obtained five more facilities which includes two Sub-Acute and SNF sites pending the final approval by the facilities.

- VII. The new ADON at Bethesda will be offering a weekly 4-hour NCLEX-PN review that will be year round. Interested students and graduates will be welcome to attend which we believe will be a valuable adjunct to our existing resources.

Evaluation/Discussion – Attendance is good enough to warrant keeping it. We definitely want to continue it and will have the new Asst. Director lead it when she is approved by the Board.

- VIII. We have improved communication with our students and graduates with a quarterly newsletter developed by our Carrere Services Coordinator as well as frequent contact

via email. Through these channels, we are able to inform them of resources and offerings available to them to assist with board passage. Also, the grads are given a gratuity when they come back and speak to current students. This gives them more information in preparing for boards. Our grads are allowed to continue to use all school resources until they have successfully taken NCLEX.

Evaluation/Discussion - Contact with graduates has improved. This allows us to evaluate their success at boards and make needed adjustments in our program in weak areas. We will definitely continue this practice.

- IX. We utilize a Success Plan for students who are at risk in either clinical or the classroom. Faculty are encouraged to implement a plan early when a student first demonstrates a problem in school such as failing quizzes, being tardy, inattention, poor study habits, working too much, etc. The idea is to prevent poor habits from developing into major problems later on. A big piece of the plan is input from students and investment into changes they must make.

Evaluation/Discussion - Though some students put on Success Plans end up failing anyway, it has been a “wake-up call” for many students to change their school habits and learn how to be successful in a nursing program. We will definitely be continuing this successful approach to motivating students.

- X. We also have attempted to improve communication between theory and clinical instructors by designating theory instructors as lead instructors. The lead instructors' responsibility is to assure that students are meeting the objectives in clinical that correlate with theory instruction. There is now more collaboration in meeting the objectives and Success Plans, etc, used to improve progress.

Evaluation/Discussion - This has been a big plus in terms of assuring that clinical objectives are being met. It has also worked well in identifying at risk students and helping to improve their competence earlier in the program. Also, if a theory instructor wants a concept emphasized more in clinical, there is a mechanism to do so. Then program objectives are being met, I believe students should have the knowledge to pass state boards. We will continue this practice.

- XI. We have a Curriculum Committee whose goal is to make improvement to the curriculum, making it more relevant and in line with current state and national standards. One element of this was to increase the required passing score in our courses from 75% to at least 77% for most classes and to change our admission test.

Evaluation/Discussion – Though our drop rate has increased, I believe students who do pass now at 77% have a higher chance at passing boards on the first try. We saw a trend that the borderline (always hovering around 75%) students were not passing boards. Also, utilizing on admission test score that is comparable to area community college scores has raised the bar for incoming students who should be able to be successful in the program and at boards.

Some additional improvements that I believe are needed at this point are:

We will begin giving mandatory tests at the end of each term that students will be required to pass before moving on to the next term (in addition to the current ATI predictor test). If they do not pass on the first try, they will be given formal remediation and allowed to have a second attempt at passing. If they do not pass at the second attempt, they must repeat the term or be dropped from the program. This change will be submitted to the BVNPT and students will be informed of this policy via their Student Handbook before they begin the program.

- XII. All I-20 students will now be required to complete a 120 hour ESL Medical Terminology program, offered by BUC, before entering the VN program. The program will run continuously year-round and be comprised of 4-hour segments on different topics and will be numbered from 1-30. When a student has completed all 30 topics, in random order, they may enter the VN program. Hopefully this will deal effectively with students where English is an issue, in the classroom, in clinical and on state boards.

Other issues that impact our students are the long wait time between graduation and board approval. I understand that this is unavoidable due to shortages at the Board, however, research clearly shows the negative relationship between long wait times and pass rates. Students say they begin to forget what they have learned in the program. We encourage them through emails to keep studying and offer any resources to them such as computer review programs, auditing classes, use of skills lab, tutoring, etc.

This concludes our analysis of our correctional plan and additional elements to the plan.

I would like to offer other pertinent information to be considered by the Board to delay provisional accreditation:

On June 9, 2011, when the Stanton University students were transferred to BUC, the notification of this was sent to the BVNPT on 11/8/11. The primary reason stated for the transfer was to give the financial advantage to students of attending a nationally accredited (TRACS) school. In fact, BUC has just received re-accreditation from TRACS FOR A PERIOD OF TEN (10) YEARS. Four classes of students transferred in December, 2011. This information is given as reminder to the board that BUC is now a mixture of SU and BUC students. I believe this is an advantage in improving pass rates as SU had a longer history with the improvements made and had stronger pass rates. I believe that both schools had some challenges before that are not as prominent now. BUC's challenge was in moving their program in 2010 from Lawndale to Anaheim as well as not having financial aid for students. Students have to travel great distances as well as many worked long hours to pay tuition before financial aid was available in January 2012.

Going back further, in late 2009, both BUC & SU students suffered from having a completely incompetent nursing director who, I believe, is now well-known to the Board in that regard. (This information was provided to me by the previous Director of VN Program.) At that time, having to completely re-structure two (2) schools and overcome extremely low pass rates has been a very challenging job. I believe that it can be done, however, not in the time allotted for normal recovery. I sincerely hope that, in May, if our pass rates do not yet meet the state requirements that you will take into consideration the challenges discussed above.

Please let me know if you have any questions regarding my analysis, additional elements and pertinent information about our program I have submitted today. As always, I welcome any input and suggestions you may have.

Sincerely,

A handwritten signature in black ink, appearing to read 'Nanyun Lee', written in a cursive style.

Nanyun Lee, R. N.

Director of Vocational Nursing

Agenda Item # 12.A.4. Attachment F



STATE AND COUNTY SERVICE AGENCY • GOVERNOR EDMUND G. BROWNE, JR.

BOARD OF VOCATIONAL NURSING & PSYCHIATRIC TECHNICIANS
2535 Capitol Oaks Drive, Suite 205, Sacramento, CA 95833-2945
Phone (916) 263-7800 Fax (916) 263-7859 Web www.bvnpt.ca.gov



May XX, 2012

Nanyun Lee
Bethesda University
Vocational Nursing Program
730 North Euclid Avenue
Anaheim, CA 92801

Subject: Notice of Change in Approval Status

Dear Ms. Lee:

Pursuant to the action of the Board of Vocational Nursing and Psychiatric Technicians (Board) on May 11, 2012, the status of the Bethesda University Vocational Nursing Program has been changed from full approval to provisional approval for the two – year period from May 11, 2012 through May 31, 2014. Please sign and return the enclosed "Acknowledgement of Change in Approval Status" form by **Friday, May XX, 2012**.

AREAS OF NON-COMPLIANCE VIOLATION(S)

In accordance with Section 2526.1(c) of title 16 of the California Code of Regulations,

"The Board may place any program on provisional accreditation when that program does not meet all requirements as set forth in this chapter and in Section 2526..."

Section 2530(l) of title 16 of the California Code of Regulations 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..."

The program pass rates of the Bethesda University Vocational Nursing Program for the past eight (8) quarters are set forth in the following table.

NCLEX-PN® Licensure Examination Pass Rates			
Quarter	State Annual Average Pass Rate	Program Annual Average Pass Rate	Variance from State Annual Average Pass Rate
Jul – Sep 2010	75%	100%	+25
Oct – Dec 2010	76%	50%	-27
Jan – Mar 2011	77%	27%	-50
Apr – Jun 2011	76%	22%	-54
Jul – Sep 2011	76%	18%	-58
Oct – Dec 2011	75%	8%	-67
Jan – Mar 2012	74%	29%	-45

Based on this data, the program failed to meet the average annual pass rate requirement.

REQUIRED CORRECTION(S)

1. Place Bethesda University Vocational Nursing Program on provisional approval for the two-year period from May 11, 2012, through May 31, 2014, and issue 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.
2. Require the program to bring its average annual pass rate to no more than ten (10) percentage points below the State average annual pass rate **by April 1, 2014**.
3. Require the program to admit no additional students without prior approval by the full Board.
4. Require the program to submit follow-up reports in nine months, but no later than **February 1, 2013**, and 21 months, but no later than **February 1, 2014**. 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.
5. 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 2526.
 6. Require the program to demonstrate incremental progress in correcting the violations. If the program fails to satisfactorily demonstrate incremental progress, the full Board may revoke the program's approval.
 7. Failure to take any of these corrective actions may cause the full Board to revoke the program's approval.

FUTURE BOARD ACTION

Your program will be placed on the **May 2014** Board Meeting agenda for reconsideration of your approval status. The nursing education consultant assigned to your program will ask you to submit documentation of the correction of your violation(s) by the fifteenth day of the second month prior to that Board meeting.

OTHER IMPORTANT INFORMATION

Please be advised that, pursuant to the Board's regulations, the program will not be authorized to admit new classes beyond the established pattern of admissions previously approved by the Board. The established pattern of admissions approved by the Board is as follows: Prior Board approval is required to admit classes.

In the event your program is required to submit any report(s) as a corrective action pursuant to this notice, such reports are required in addition to any other reports required pursuant to 2527 of the Board's regulations.

The program may no longer advertise that it has full approval, and should take steps to correct any ongoing advertisements or publications in that regard.

A copy of title 16, California Code of Regulations, section 2526.1, regarding provisional accreditation is attached for your reference. A complete copy of the Board's laws and regulations can be found on the Board's web site at www.bvnpt.ca.gov.

Should you have questions, please do not hesitate to contact the Board.

Sincerely,

TERESA BELLO-JONES, J.D., M.S.N., R.N.
Executive Officer

Enclosure
TBJ/ph
cc: Board Members

Draft