STATE OF CALIFORNIA
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DEPARTMENT OF CONSUMER AFFAIRS

BUSINESS, CONSUMER SERVICES, AND HOUSING AGENCY • GOVERNOR EDMUND G. BROWN 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

DATE: August 28, 2013

TO: Board Members

FROM: Suellen Clayworth, MN, RN
Nursing Education Consultant, Retired Annuitant

SUBJECT: North-West College, Glendale, Vocational Nursing Program – Reconsideration of Provisional Approval[1]; Consideration of Request to Admit Students (Director: Vickie Lapre', Glendale, Los Angeles County, Private)

On September 9, 2011, the Board placed the North - West College, Glendale, Vocational Nursing Program on provisional approval for a two (2) year period from September 9, 2011, through September 30, 2013, due to low licensure examination pass rates. At that time, the program's average annual pass rate was 45%. The Board directed that the program admit no additional students unless approved by the Board. Reconsideration of the program's status was scheduled for the September 2013 Board meeting. On October 5, 2011, the Notice of Change in Accreditation Status was forwarded to the program director.

The program is presented to the Board for review of its provisional approval status. Additionally, the program director requests approval to admit 30 full-time students to an evening class commencing February 3, 2014, and graduating April 27, 2015, to **replace** the class projected to graduate on December 16, 2013.

## History of Prior Board Actions

(See Attachment A, History of Prior Board Actions)

## Enrollment

Currently, the program requires prior Board approval to admit students into each 60-week full-time class. The pattern of admissions for current classes is seen in the enrollment table below.

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[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.

The following table represents **projected** student enrollment based on **current and proposed** class starts and completions. The table indicates **a maximum enrollment of 30 students** for the period from **September 2012 through February 2014.**

| ENROLLMENT DATA | | | | |
|---|---|---|---|---|
| CLASS DATES | | #Students Admitted | #Students Current or Completed | Total Enrolled |
| Start | Complete | | | |
| 9/12 – Eve Class | | 26 | 20 | **20** |
| | 12/13 (9/12 Class) | | -20 | 20 – 20 = **0** |
| 2/14 – Eve Class | | 30 (Proposed Class) | | 0 + 30 = **30** |

## Licensing Examination Statistics

The following statistics, furnished by the Pearson Vue 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 April 2009 through June 2013, specify the pass percentage rates for graduates of the North - West College, Glendale, 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 | Variance From State Average Annual Pass Rate |
| Apr – Jun 2009 | 8 | 3 | **38%** | 71% | **38%** | 70% | **-32** |
| Jul – Sep 2009 | 9 | 5 | **56%** | 74% | **47%** | 72% | **-25** |
| Oct– Dec 2009 | 4 | 1 | **25%** | 76% | **43%** | 73% | **-30** |
| Jan– Mar 2010 | **No Candidates Tested** | | | 76% | **43%** | 74% | **-31** |
| Apr – Jun 2010 | 3 | 3 | 100% | 74% | **56%** | 75% | **-19** |
| Jul – Sep 2010 | 15 | 7 | **47%** | 76% | **50%** | 75% | **-25** |
| Oct– Dec 2010 | 6 | 3 | **50%** | 77% | **54%** | 76% | **-22** |
| Jan– Mar 2011 | 1 | 0 | **0%** | 80% | **52%** | 77% | **-25** |
| Apr – Jun 2011 | **No Candidates Tested** | | | 71% | **45%** | 76% | **-31** |
| Jul – Sep 2011 | 7 | 6 | 86% | 74% | **64%** | 76% | **-12** |
| Oct - Dec 2011 | 10 | 5 | **50%** | 74% | **61%** | 75% | **-14** |

| 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 | Variance From State Average Annual Pass Rate |
| Jan - Mar 2012 | 3 | 2 | 67% | 77% | 65% | 74% | -9 |
| Apr - June 2012 | **No Candidates Tested** | | | 72% | 65% | 74% | -9 |
| July-Sep 2012 | 2 | 1 | **50%** | 74% | **53%** | 74% | **-12** |
| Oct – Dec 2012 | 1 | 1 | 100% | 70% | 67% | 74% | -7 |
| Jan – Mar 2013 | 10 | 6 | **60%** | 75% | **62%** | 73% | **-11** |
| Apr-Jun 2013 | 7 | 4 | **57%** | 78% | **60%** | 73% | **-13** |

*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 2013), the program's average annual pass rate is 60%. The California average annual pass rate for graduates from approved vocational nursing programs who took the NCLEX-PN® for the first time is 73%. The average annual pass rate for the North - West College, Glendale, Vocational Nursing Program is **13** 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 current number of Board-approved faculty totals thirty-four (34), including the program director. The director has 100% administrative duties, but is approved to teach in the clinical area. Of the total faculty, thirty-three (33) instructors are approved to teach clinical.

Based upon a maximum enrollment of 30 students, two (2) instructors are required for clinical supervision. Therefore, the current number of 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.

**Other Considerations**

As noted previously, the Board placed the North - West College, Glendale, Vocational Nursing Program on provisional approval on September 9, 2011, for the two (2) year period from September 9, 2011, through September 30, 2013, due to noncompliant program pass rates on the licensure examination. On October 4, 2011, the Board forwarded the Notice of Change in Accreditation Status to the program director (see Attachment B). That document specified the program's areas of noncompliance and required corrections.

On April 20, 2012, the Board received the program's comprehensive follow-up report, as required by Corrective Action #3 specified in the Notice of Change in Accreditation Status. The report highlighted changes in the program's Admission Criteria, Screening and Selection Criteria, Terminal and Curriculum Objectives and Instructional Plan that were made with the goal of improving student outcomes. The program also changed the textbooks used in order to offer a "more comprehensive nursing education" to the students. Additional changes, including personnel changes, have been made in an effort to improve the program. The follow-up report referenced the program's improved pass rate (up 20 percentage points from the second quarter of 2011) as a "significant move in the right direction" toward their goal of improvement.

On May 28, 2013, the program director submitted a second follow-up report as required by Corrective Action #3 of the Notice of Change in Accreditation Status. The report reiterated the changes mentioned above. (Attachment C) The director indicated that before she was approved in 2010, there had been inconsistent nursing leadership for the program. She stated that she is committed to providing students with the consistency and leadership they need to be successful in the program.

As follow-up to her original report, the director submitted the required 21-month report that described the following actions:

- **Admission Criteria**

  Adoption of the National League for Nursing's Pre-Admission Exam (PAX) as an additional mandatory requirement for accepting and enrolling prospective VN students.

This additional admission testing tool serves two major objectives. By enrolling more qualified students, we expect higher retention rates throughout the duration of the program as well as improved NCLEX pass rates.

- **Screening/Selection Criteria**: Remain the same.

- **Terminal and Curriculum Objectives:** Remain the same.

- **Instructional Plan (IP):** Revised in 2012. This revised IP has been given to each of the instructors for their use. It is much more comprehensive than the previous IP and includes the Theory and Clinical Objectives and Lesson Plans for material scheduled to be covered on a weekly basis.

- **Attendance and Remediation Policies**: Remain in place as these policies have proven to be effective.

- **Evaluations of Theory and Clinical Instructors**: Done periodically by the DON, and Clinical Coordinator.

- **Student Evaluations:** Student achievement is closely monitored by the Theory and Clinical Instructors and both Didactic and Clinical Evaluations are done every month to keep the students abreast of their achievement and to address students that need additional help. Both the Theory and Clinical Instructors sit with each student individually and review their progress regularly.

- **System - Wide Changes**: Over the last three years, the entire North - West College system has made the following changes in an effort to improve student outcomes:
    - The program's minimum GPA was increased from 75% to 80%. Students must pass each term with at least 80% to continue on to the next term.
    - The program contracted with the NLN for their online testing services which provide online assessments with practice tests for each term as well as remediation for these exams.
    - The program also began utilizing the NLN Comprehensive exam at the end of our program. The students must pass the exam with an 80% probability of passing the NCLEX before they can graduate from the program. For those who do not pass the first time, intensive remediation is done, followed be repeat testing.
    - The breakdown of the program's required GPA was changed as well. Written exams compose 50% of the grade, NLN online exams are 15%, homework, quizzes and projects are 5% and the Comprehensive is 30% of their grade. This change puts more emphasis on the NLN exams as well as the Comprehensive.

- In the past, the program allowed students to retake tests for failure. This is no longer the case; no re-takes are allowed in the program.

- Nursing Administration is responsible for building the Comprehensive exams and administering them at the end of each term.

- As an additional resource in the NLN program, the students have a 3,300 question online review bank available to them to assist them in studying for the NCLEX.

- The program also administers the NLN Diagnostic Readiness Test approximately 40 days before the end of the program. This exam provides the NLN with the areas of strength and weakness for this class. The NLN then sends an instructor out to conduct an NCLEX review day based on the needs of the class.

- In order to offer an incentive to students to take the NCLEX in a timely manner that will also help ensure their success, the College reimburses the $200 testing fee for those who pass the NCLEX.

- With our Class #3, we instituted an additional NCLEX review class which is conducted on an ongoing basis, until the students take their NCLEX. This class will be taught by an instructor different from the one who taught them their didactic portion of the course and continues until the majority of the students have taken the NCLEX.

- **Campus Personnel**: Two personnel changes at the Glendale campus have taken place that will assist with improving our program. A new Campus Director, Mr. Vivek Sharma, is providing strong and stable leadership for the campus as a whole. Also, as previously mentioned, Mr. Allan Chang, ADON, is teaching theory for class #5. Mr. Chang has been with our family of colleges for several years, first as a Clinical Instructor, then as a Theory Instructor.

A review of the program success for first-time test-takers based on the most recent graduating classes revealed the following data:

| Graduation Date | Number of Graduates | Number Tested | Number Passed | Percentage of Class Who Passed |
|---|---|---|---|---|
| June 2011 | 20 | 20 | 14 | 70% |
| August 2012 | 19 | 18 | 11 | 61% |

At the time the program was placed on provisional approval its annual average pass rate was 45%. Since that time, the program's average annual pass rate has varied between 53% and 67% demonstrating some improvement; however, the improvement has not been on a

consistently upward path and is currently only 60%. It is of concern that the most recent graduating class that had some exposure to the program's plan of correction did more poorly than the proceeding graduating class.

On June 12, 2013, the assigned Nursing Education Consultant sent electronic correspondence to the director asking for her assessment of the poor showing of the August 2012 class. (Attachment D)

In response, on June 18, 2013, the director replied (Attachment E) that three students who spoke English as a second language had been admitted to the August 2012 class. In addition, two students who had failed the vocational nursing program at other schools were admitted. Two of the students in the August 2012 class demonstrated borderline performance throughout the program, but were able to graduate. All of these students failed the licensure examination. The director indicated that the program offered tutoring and NCLEX review courses to all of the students, but not all students availed themselves of these services.

**Recommendations:**

1. Approve the North West College, Glendale, Vocational Nursing Program's request to admit 30 full-time students to an evening class commencing February 3, 2014, and graduating April 27, 2015, to **replace** the class projected to graduate on December 16, 2013.

2. Extend the North West College, Glendale, Vocational Nursing Program's Provisional Approval for the one - year period from September 13, 2013 through September 30, 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).

3. 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**.**

4. Require the program to show documented progress satisfactory to the Board to improve the effectiveness of instruction and program pass rates on the NCLEX-PN®. If no progress is shown, the Board may revoke the program's approval completely.

5. Require the program to admit no additional classes unless approved by the full Board.

6. Require the program to submit follow-up reports in nine (9) months, but no later than **June 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.

7. Require the program to comply with all approval 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 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 **September 2014** Board agenda for reconsideration of provisional approval.

**Rationale:** The program has complied with all actions required by the Board in relation to provisional approval; however, the pass rate has not consistently improved over the past seven quarters. The program has implemented changes that should affect the pass rate of the December 2013 graduating class. These changes support the recommendation to extend the program's provisional approval. Additionally, these changes support the recommendation to approve the program's request to admit the class of 30 students.

The program has demonstrated that it has sufficient resources to support the current and proposed enrollment. Board staff will continue to monitor the program by tracking its licensure examination pass rate quarterly,

reviewing Annual Reports and other required documents and reports as submitted by the program.

Attachment A: History of Prior Board Actions
Attachment B: Notice of Change in Accreditation Status, dated October 4, 2011.
Attachment C: Glendale Campus 21-Month Provisional Status Follow-up Report, received May 28, 2013
Attachment D: Email from NEC to Program Director dated June 12, 2013
Attachment E: Email from Program Director to NEC dated June 18, 2013
Attachment F: Draft Notice of Change in Approval Status

# Agenda Item #11.B.5., Attachment A

## NORTH - WEST COLLEGE, GLENDALE
## VOCATIONAL NURSING PROGRAM

**History of Prior Board Actions**

- On August 9, 2006, the Board approved North West College, Glendale's request to begin a vocational nursing program with an initial class of 30 students commencing on September 25, 2006, only.

  The Board approved the program curriculum for 1,624 hours, including 664 theory and 960 clinical hours.

  The program delayed admitting its first class until August 2007 due to enrollment and faculty recruitment issues. The program did not notify the Board of the delay.

- **On July 9, 2008, a new program director was approved.**

- On November 5, 2008, the Executive Officer approved initial full accreditation for the North West College, Glendale, Vocational Nursing Program for the four-year period November 5, 2008, through November 4, 2012, and issued a certificate accordingly.

  The Executive Officer approved the North West College, Glendale, Vocational Nursing Program's request to admit a full-time **replacement** class of 30 students, commencing November 10, 2008 only, with an anticipated graduation date of February 7, 2010.

- **On June 2, 2009, a new program director was approved.**

- **On May 4, 2010, a new program director was approved.**

- On May 17, 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 eight (8) quarters.

- On June 3, 2011, the Executive Officer approved the North-West College, Glendale, Vocational Nursing Program's request, to admit a full-time class of 30 students, on June 6, 2011 to **replace** a class that will graduate on June 5, 2011. The proposed class is projected to graduate on August 26, 2012, **and;** placed the program on the September 2011 Board agenda for consideration of placement on provisional accreditation. That action was based on the program's low licensure pass rates.

- On August 4, 2011, the assigned consultant forwarded correspondence requesting the program to submit fifteen (15) copies of pertinent documents relevant to the programs plan to improve licensure pass rates that they desire Board members to consider.

- On September 9, 2011, the Board placed the program on provisional accreditation for the two-year period from September 9 , 2011, through September 30, 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; required the program to admit no additional students unless approved by the Board; required the program to submit follow-up reports in 9 months, but no later than **June 1, 2012**, and 21 months, but no later than **June 1, 2013**; required 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 September 1, 2013; 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; and required 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 accreditation.

- On October 5, 2011, the Board forwarded the Notice of Change in Accreditation Status to the program director.

- On July 19, 2012, the Executive Officer approved the program's request to admit 30 full-time students commencing September 17, 2012, and graduating December 16, 2013, to **replace** the class projected to graduate on August 24, 2012; and continued the program's requirement to obtain Board approval prior to the admission of each class.

- On July 31, 2013, a letter was sent to the director giving her the opportunity to submit additional documents to support her request to admit students that will be considered at the September 2013 Board Meeting.

# Agenda Item #11.B.5., Attachment B

**Notice of Change in Accreditation Status for North-West College, Glendale, dated October 4, 2011 follows:**

STATE OF CALIFORNIA
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DEPARTMENT OF CONSUMER AFFAIRS

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
Phone (916) 263-7800 Fax (916) 263-7859 Web www.bvnpt.ca.gov

***CERTIFIED MAIL***

October 4, 2011

Vickie Lapre', B.S., R.N.
Director, Vocational Nursing Program
North-West College, Glendale
221 North Brand Blvd.
Glendale, CA 91203

***Subject: Notice of Change in Accreditation Status***

Dear Ms. Lapre':

Pursuant to the action of the Board of Vocational Nursing and Psychiatric Technicians (Board) on September 9, 2011, the status of the North-West College, Glendale, Vocational Nursing Program has been changed from full accreditation to provisional accreditation for the two – year period from September 9, 2011 through September 30, 2013. The purpose of this letter is to explain the areas of noncompliance found and the corrections required of your program to avoid losing accreditation completely.

Please sign and return the enclosed "Acknowledgement of Change in Accreditation Status" form by **Friday, October 14, 2011.**

**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 North West College, Glendale, Vocational Nursing Program for the past nine (9) 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** |
| Apr – Jun 2009 | 70% | **38%** | **-32** |
| Jul – Sep 2009 | 72% | **47%** | **-25** |
| Oct – Dec 2009 | 73% | **43%** | **-30** |
| Jan – Mar 2010 | 74% | **43%** | **-31** |
| Apr – Jun 2010 | 75% | **56%** | **-19** |
| Jul – Sep 2010 | 75% | **50%** | **-25** |
| Oct – Dec 2010 | 76% | **54%** | **-22** |
| Jan – Mar 2011 | 77% | **52%** | **-25** |
| Apr – Jun 2011 | 76% | **45%** | **-31** |

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

## REQUIRED CORRECTION(S)

1. The North West College, Glendale, Vocational Nursing Program shall bring its licensure examination average annual pass rate to no more than ten (10) percentage points below the State annual average pass rate by **September 1, 2013**.

2. The program shall submit follow-up reports in 9 months, but no later than **June 1, 2012**, and 21 months, but no later than **June 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 Information.

3. The program shall admit no additional students unless approved by the Board.

4. The program shall 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.

5. The program shall demonstrate incremental progress in correcting the violations. If the program fails to satisfactorily demonstrate incremental progress, the full Board may revoke the program's accreditation.

6. Failure to take any of these corrective actions may cause the full Board to revoke the program's accreditation.

In the event additional violations of the accreditation standards are identified, such violations may result in further corrective action or revocation of provisional accreditation.

## FUTURE BOARD ACTION

Your program will be placed on the **September 2013** Board meeting agenda for reconsideration of your accreditation 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. If you have additional information that you wish considered beyond the required corrections listed on page 2 and 3, you must submit this documentation by the fifteenth day of the second month prior to the 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 approval by the full Board 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 accreditation, 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

Enclosures

cc: Board Members

TBJ:ph

# Agenda Item #11.B.5., Attachment C

## NORTH – WEST COLLEGE, GLENDALE
## VOCATIONAL NURSING PROGRAM

### Glendale Campus 21-Month Provisional Status Follow-up Report

Ms. Suellen Clayworth
Nursing Education Consultant
Board of Vocational Nursing and Psychiatric Technicians
2535 Capitol Oaks Drive, Suite 205
Sacramento, CA 95833

May 28, 2013

RE: North-West College – Glendale Campus 21-month Provisional Status follow-up report

Dear Suellen:

As you know, on September 9, 2011, the status of the Glendale campus VN program was changed from full accreditation to provisional accreditation due to low NCLEX pass rates.

Please allow me to share a brief history about our Glendale VN program. I took over the Program Director position in May, 2010, when our third class was in Term 1. Up to that point there was no consistent Nursing Administration in place, as there had been three DONs during the first two classes. I have been the DON for three years now and I am totally committed to the success of the students. I have been with North-West College for six years and am committed to providing the students with the consistency and leadership they need to be successful in our program.

The nine quarter pass rates from 2nd quarter, 2009 through 2nd quarter, 2011 for our first two classes ranged from 38% to 56%, which resulted in the College being placed on provisional status. Class #3 graduated in July of 2011 with an overall pass rate of 70%, which demonstrates a significant improvement over the previous classes. Our 4th class graduated in August, 2012 and is still testing. So far, our overall pass rate for this class is 66.66% with four students yet to test. This does indicate a significant move in the right direction that has been realized with these latest two classes as well as compliance with the Board's requirement that pass rates must be with ten percentage points of the CA state average.

Following is the 21-month comprehensive analysis of our program outlining the changes we have made as well as the effects of these changes for expected future outcomes:

The Admission Criteria from our VN Student Handbook is the same as last year's update. Previously, we utilized the Wonderlic Scholastic Level Exam (SLE) but did not require a Nursing-specific entrance exam. We continue to use the SLE and have also adopted the National League for Nursing's Pre-Admission Exam (PAX) as an additional mandatory requirement for accepting and enrolling prospective VN students. The PAX is composed of three sections; Math, Verbal and Science. The candidate must achieve a minimum overall passing score of 99 in order to enroll in the VN program. The prospective student is allowed to take the exam only twice and is offered a study guide as well as tutoring to assist with

preparing for the exam. This additional admission testing tool serves two major objectives; by enrolling more qualified students, we expect higher retention rates throughout the duration of the program as well as improved NCLEX pass rates. Copies of the PAX Individual Performance Report and SLE were included in last year's report.

Our Screening/Selection Criteria have remained the same and are part of our VN Admission Guidelines which are given to each prospective student for their review and signature. The College enrolls up to 40 students in our SOS (Seminar on Success) pre-requisite class, with the understanding that only 33 will be allowed to enter Term 1, per BVNPT regulations. The SOS class consists of 77 Theory hours and provides a review of basic Math and English Comprehension, Medical Terminology and introductory Anatomy and Physiology. This class is also part of our screening process. If there are 33 students that pass the SOS course, three of these students are considered alternates during the Skills Lab portion at the beginning of Term 1. After the Skills Lab portion of our Fundamentals of Nursing course is completed, the top 30 students will remain in the class. Six criteria are used to determine which students will make up the final 30 students: 1) Grades, 2) Attendance, 3) Professionalism, 4) Financial responsibility and affordability, 5) Providing the required documentation as listed in the VN Admission Guidelines, 6) Adverse results from physical examination, drug screening and/or background check. By making the students aware of this selection process, it encourages them to work harder to ensure their place in the class.

Terminal and Curriculum Objectives also remain the same. These objectives provide goals and expectations for the student as they progress through and complete the VN program at North-West College. These are provided to assist the students in awareness of program expectations in an effort to enable them to meet their educational goals of becoming successful graduates and ultimately, competent, entry-level LVNs.

We have also adopted new textbooks more recently. The list of these textbooks was sent to the Board in the previous report. We had been using primarily one textbook as our main text. However, with feedback from our theory instructors, we realized that having one textbook will no longer be effective in ensuring that students are successful in completing our curriculum objectives and are prepared for the updated NCSBN testing plan and subsequent changes in the NCLEX level of difficulty. We have chosen the new textbooks because they offer the students and instructors much more detailed and extensive information than the textbook we had previously been using. Additionally, most of our textbooks are from Elsevier, which offers many online resources through their EVOLVE online support system for students and instructors, including Power Point presentations and video clips. These new textbooks will help us provide a more comprehensive nursing education to our students to better prepare them to become successful nurses.

Our Instructional Plan (IP) was revised in 2012 by Adnan Al Mouazzen, with the assistance of Diane Oran, NEC. This revision was completed in an effort to further improve the program and to provide a more comprehensive, consistent education for our VN students across all our campuses. This revised IP has been given to each of our instructors for their use. It is much more comprehensive than our previous IP and includes the Theory and Clinical Objectives and Lesson Plans for material scheduled to be covered on a weekly basis.

Our Attendance and Remediation policies also remain in place as these policies have proven to be effective. These policies are provided to the students in our VN Student Handbook. Our Attendance policy remains very strict in order to prepare our students to be responsible, reliable employees, once the graduate. The students' progress is reviewed by the instructor on an ongoing basis. If a student's GPA falls below 80% or when the student has failed two consecutive exams, the instructor will advise the

student on their recommendations to improve their academic performance. The student is then referred to me and is formally placed on a remediation plan. The student is required to attend remediation sessions in an effort to assist them in understanding the material and improving their academic performance and GPA. If, after two remediation sessions, the student's grades fail to improve, the student is placed on probation for 30 days. During this time, the student continues to attend remediation sessions. If after this 30 day period, the student fails to achieve a passing GPA of 80% or better, they will be terminated from the program. The same type of remediation process is in place for the clinical portion of the program.

Evaluations of Theory and Clinical Instructors are done periodically by the DON, and Clinical Coordinator. Most of our Clinical Instructors have been with the college for several years and are well respected by the facility staff as well as the students. They all receive positive student evaluations, which I review. I offer suggestions for improvement and ask for feedback from each of the instructors. As far as our Theory Instructors, we have implemented a strategy of changing instructors with each term, when possible. Currently our ADON, Allan Chang has been teaching our class #5. Mr. Chang is an experienced and knowledgeable theory instructor who is thorough in his presentation of the VN curriculum.

Online student surveys are also done in May and November of each year in order to gain the students' perspective on the campus and classroom instruction. Clinical Evaluations are given after each clinical rotation to assess the effectiveness of the clinical faculty, facilities and how the clinical experiences correlate to theory.

As previously mentioned, student achievement is closely monitored by the Theory and Clinical Instructors and both Didactic and Clinical Evaluations are done every month to keep the students abreast of their achievement and to address students that need additional help. Both the Theory and Clinical Instructors sit with each student individually and review their progress regularly.

Over the last three years, our College system has made the following changes in an effort to improve student outcomes:

1. Our minimum GPA was increased from 75% to 80%. Students must pass each term with at least 80% to continue on to the next term.
2. We contracted with the NLN for their online testing services which provide online assessments with practice tests for each term as well as remediation for these exams.
3. We also began utilizing the NLN Comprehensive exam at the end of our program. The students must pass the exam with an 80% probability of passing the NCLEX before they can graduate from the program. For those who do not pass the first time, intensive remediation is done, followed be repeat testing.
4. The breakdown of our GPA was changed as well. Written exams compose 50% of the grade, NLN online exams are 15%, homework, quizzes and projects are 5% and the Comprehensive is 30% of their grade. This change puts more emphasis on the NLN exams as well as the Comprehensive.
5. In the past, tests were allowed to be retaken for failure. This is no longer the case; no re-takes are allowed in the program.
6. The Nursing Administration is responsible for building the Comprehensive exams and administering them at the end of each term.
7. As an additional resource in the NLN program, the students have a 3300 question online review bank available to them to assist them in studying for the NCLEX.
8. We also administer the NLN Diagnostic Readiness Test approximately 40 days before the end of the program. This exam provides the NLN with the areas of strength and weakness for this

class. The NLN then sends an instructor out to conduct an NCLEX review day based on the needs of the class.

9. In order to offer an incentive to the students to take the NCLEX in a timely manner that will also help ensure their success, the College reimburses the $200 testing fee for those who pass the NCLEX.
10. With our Class #3, we instituted an additional NCLEX review class which is conducted on an ongoing basis, until the students take their NCLEX. This class will be taught by an instructor different from the one who taught them their didactic portion of the course and continues until the majority of the students have taken the NCLEX.

We have also had two personnel changes at the campus that will assist with improving our program. We have a new Campus Director, Mr. Vivek Sharma who is providing strong and stable leadership for the campus of the whole. Also, as previously mentioned, Mr. Allan Chang, our ADON, is teaching theory for class #5. Mr. Chang has been with our family of colleges for several years, first as a Clinical Instructor, then as a Theory Instructor.

Our Glendale class #3 graduated on June 6, 2011 and the overall first-time pass rate for this class was 70% (14 of 20). This is a 22% increase over class #2, which had a 48% (13 of 27) overall pass rate. I believe this demonstrates great improvement in the pass rates, due to the measures we have instituted over the last three years. Additionally, of the six students from class #3 that did not pass the first time, three have retaken the NCLEX and passed. This brings our current overall pass rate for that class to 85%. From our class #4, which graduated on August 27, 2012, one student took and passed the NCLEX during the last quarter of 2012. Ten more students took the exam in the first quarter of 2013 and six passed for a total of 63.6% so far for this class. Of the remaining eight students, four more took the exam in April and three passed, which bring the class average to 66.6% so far this year, which again shows a significant, consistent upward trend since instituting the program improvement measures. The remaining four students are expected to take the exam before the end of the second quarter. We are in contact with these students and are encouraging them to schedule their exams as soon as possible and are continuing to offer ongoing NCLEX review classes to them.

**At this time I would like to request your approval for an evening replacement class of 30 students to follow our Glendale VN class #5**. Class #5 is due to graduate on December 16, 2013. The proposed class would start on February 3, 2014, with a proposed graduation date of April 27, 2015.

We would like to ask for your support in enabling us to bring our Glendale campus up to our system-wide standards by recommending Board approval for our campus to be returned to full accreditation as well as approving the aforementioned class. Please let me know if you need further information or have any questions. Thank you for your continued support and assistance in our efforts to continue improving the quality of our VN program.

Sincerely,

Vicki Lapre', RN, BSN, PHN
Director of Nursing
North-West College & Glendale Career College
Glendale & Pasadena Campuses

## NORTH – WEST COLLEGE, GLENDALE
## VOCATIONAL NURSING PROGRAM

### Email from NEC to Program Director dated June 12, 2013

I'm still reviewing documents for the report for the September Board Meeting and I'm a bit more concerned than I was initially. I pulled all the pass rate data by class since the June 2011 graduating class. Here are the results:

| Graduation Date | Number of Graduates | Number Tested | Number Passed | Percentage of Class Who Passed |
|---|---|---|---|---|
| June 2011 | 20 | 19 | 13 | 68% |
| August 2012 | 19 | 17 | 10 | 59% |

It is of concern to me that the August 2012 class had done so poorly on the exam. Do you have any insight into what happened with this class?

*Suellen*

Suellen Clayworth, M.N., R.N.
Nursing Education Consultant, Retired Annuitant
Board of Vocational Nursing and Psychiatric Technicians
2535 Capitol Oaks Drive, Suite 205
Sacramento, CA 95833
Phone: 916-263-7826
Fax: 916-263-7866
Email: suellen.clayworth@dca.ca.gov

# Agenda Item #11.B.5., Attachment E

## NORTH WEST – COLLEGE, GLENDALE
## VOCATIONAL NURSING PROGRAM

### Email from Program Director to NEC dated June 18, 2013

Hi Suellen –

I'm sorry for the late response, but I was out of the office for a few days and I'm just catching up. By our records for the June 2011 class, all 20 took the exam and 14 passed, giving us 70% for that class. For the August, 2012 class, we now have 18 that have taken the exam and 11 passed, giving is 61% with one left to test, including one for the 3rd quarter. She was a very good student, so we fully expect her to pass the first time, which will bring the final class total to 63%. She is testing by the end of June.

Unfortunately, this class did have 3 students that were ESL and although we did give them extensive remediation, all 3 failed the NCLEX, I believe due to their trouble with English. Also, we had 2 students that had failed the VN program at one of our other campuses who transferred over and did pass at our campus, but ultimately failed the NCLEX. The other 2 that failed were borderline students throughout the program. We did offer tutoring as well as an NCLEX review classes, but some of the students chose not to attend.

You had mentioned that you would be looking closely at our current class and I do believe it is a good class. They are very motivated and focused, so we have high hopes that they will be successful in passing the NCLEX the first time.

Thank you for your consideration of this important issue, and please let me know if you have more questions,

V.

Vicki Lapre', RN, BSN, PHN
Director of Nursing
North-West College & Glendale Career College
Glendale & Pasadena Campuses
vickil@success.edu
(818) 242-0205 GL - (626) 796-5815 PA
(818) 243-1131 GCC

STATE OF CALIFORNIA
DEPARTMENT OF CONSUMER AFFAIRS
BUSINESS, CONSUMER SERVICES, AND HOUSING AGENCY • GOVERNOR EDMUND G. BROWN 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

DRAFT

## *CERTIFIED MAIL*

September XX, 2013

Vickie Lapre', B.S., R.N.
Director, Vocational Nursing Program
North-West College, Glendale
221 North Brand Blvd.
Glendale, CA 91203

***Subject: Notice of Change in Approval Status***

Dear Ms. Lapre':

Pursuant to the action of the Board of Vocational Nursing and Psychiatric Technicians (Board) on September 13, 2013, the provisional approval[1] status of the North – West College, Glendale, Vocational Nursing Program has been extended for the one – year period from September 13, 2011 through September 30, 2014.

The purpose of this letter is to explain the areas of non-compliance found and the corrections required of your program to avoid losing approval completely.

Once you have reviewed this letter, please sign and return the enclosed "Acknowledgement of Change in Approval Status" form by **Friday, September XX, 2013.**

### 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.

[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.

(l) 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 program pass rates of the North - West College, Glendale, Vocational Nursing Program for the past seventeen (17) 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** |
| Apr – Jun 2009 | 70% | **38%** | **-32** |
| Jul – Sep 2009 | 72% | **47%** | **-25** |
| Oct – Dec 2009 | 73% | **43%** | **-30** |
| Jan – Mar 2010 | 74% | **43%** | **-31** |
| Apr – Jun 2010 | 75% | **56%** | **-19** |
| Jul – Sep 2010 | 75% | **50%** | **-25** |
| Oct – Dec 2010 | 76% | **54%** | **-22** |
| Jan – Mar 2011 | 77% | **52%** | **-25** |
| Apr – Jun 2011 | 76% | **45%** | **-31** |
| Jul – Sep 2011 | 76% | **64%** | **-12** |
| Oct – Dec 2011 | 75% | **61%** | **-14** |
| Jan – Mar 2012 | 74% | 65% | -9 |
| Apr – Jun 2012 | 74% | 65% | -9 |
| Jul – Sep 2012 | 74% | **62%** | **-12** |
| Oct – Dec 2012 | 74% | 67% | -7 |
| Jan – Mar 2013 | 73% | **62%** | **-11** |
| Apr – Jun 2013 | 73% | **60%** | **-13** |

Based on this data, the program failed to comply with regulatory requirements relative to the maintenance of the annual average pass rate.

## REQUIRED CORRECTION(S)

1. The North – West College, Glendale, Vocational Nursing Program shall bring its average annual pass rate to no more than ten (10) percentage points below the State average annual pass rate**.**

2. The program shall show documented progress satisfactory to the Board, to improve the effectiveness of instruction and program pass rates on the NCLEX-PN®. If no progress is shown, the Board may revoke the program's approval completely.

3. The program shall admit no additional students without prior approval by the full Board.

4. The program shall submit a follow-up report in 9 months, but no later than **June 1, 2014.** 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. 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 Student Enrollment.

5. The program shall comply with all approval 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. The program shall continue 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 accreditation.

7. Failure to take any of these corrective actions may cause the full Board to revoke the program's approval.

8. In the event additional violations of the approval standards are identified, such violations may result in further corrective action or revocation of provisional approval.

## FUTURE BOARD ACTION

Your program will be placed on the **September 2014** Board Meeting agenda, at which point the Board may revoke or extend the program's approval. If you have additional information that you wish considered beyond the required corrections listed on page 3 and 4, you must submit this documentation 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: **Based on the above corrections, the full Board's permission will be required for each future class admission**.

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 approval 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

Enclosures

cc: Board Members

TBJ:cca