

Agenda Item #13.C.1.



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

BOARD OF VOCATIONAL NURSING & PSYCHIATRIC TECHNICIANS
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DATE: February 13, 2014

TO: Board Members

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

SUBJECT: Bethesda University of California Vocational Nursing Program –
Consideration of Request to Admit Students (Director: Nanyun Lee, Anaheim,
Orange County, Private)

On May 11, 2012, the Board placed the Bethesda University of California, Vocational Nursing Program on provisional approval¹ for the two – year period from May 11, 2012 through May 30, 2014. The program was required to admit no additional students without prior approval by the full Board. That action was taken due to the program's noncompliance with Section 2530 (I) of the Vocational Nursing Rules and Regulations.

The program requests Board approval to admit 30 full-time students into a class commencing on May 6, 2014; graduating on April 10, 2015, to **replace** students that graduated on October 8, 2012.

History of Prior Board Actions

(See Attachment A, History of Board Action)

Enrollment

The program is approved to offer a full-time course of instruction that is 60 weeks in length. 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.

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 **proposed** student enrollment based on proposed class starts and completions. The table indicates a **maximum enrollment of 78 students** for the period from **March 2008 through May 2014**.

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
5/10 (Cited Prev. - Unapproved)		27	21	26 + 21 = 47
	8/10 (6/09 Class)		-14	47 - 14 = 33
10/10 FT (Class E)		7	6	33 + 6 = 39
10/10 PT (Cited Prev. Class J) (Unapproved - Transferred from Stanton)		15	12	39 + 12 = 51
	3/11 (2/10 FT Class)		-12	51 - 12 = 39
3/11 PT (Cited Prev. Class L) (Unapproved - Transferred from Stanton)		25	10	39 + 10 = 49
	6/11 (5/10 Class)		-21	49 - 21 = 28
6/11 PT (Cited Prev. Class M) (Unapproved - Transferred from Stanton)		14	3	28 + 3 = 31
8/11 FT (Cited Prev. - Class N) (Unapproved - Transferred from Stanton)		14	14	31 + 14 = 45

ENROLLMENT DATA				
CLASS DATES		#Students Admitted	#Students Current or Completed	Total Enrolled
Start	Completed			
10/11 PT (Cited Prev. - Class F) (Unapproved - Transferred from Stanton)		8	10	45 + 10 = 55
	11/11 (10/10 FT Class)		-6	55 - 6 = 49
3/12 PT (Cited Prev. - Class G) (Unapproved)		21	13	49 + 13 = 62
	5/12 (10/10 PT Class)		-12	62 - 12 = 50
	7/12 (8/11 FT N Class)		-14	50 - 14 = 36
	9/12 (10/11 FT F Class)		-10	36 - 10 = 26
	10/12 (3/11 PT L Class)		-10	26 - 10 = 16
	1/13 (6/11 PT M Class)		-3	16 - 3 = 13
	11/13 (3/12 PT G)		-13	13 - 13 = 0
5/14 FT Proposed	4/15	30		0 + 30 = 30

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 December 2013, 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®), and the variance of the program's pass rates from state average annual pass rates for the past 18 quarters.

NCLEX-PN® Licensure Examination Data							
Quarterly Statistics					Annual Statistics*		
Quarter	# Candidates	# Passed	% Passed	State Average Quarterly Pass Rate	Program Average Annual Pass Rate	State Average Annual Pass Rate [CCR §2530(I)]	Variance From State Average Annual Pass Rate
Jul - Sep 2009	7	6	86%	72%	86%	72%	+14

NCLEX-PN® Licensure Examination Data							
Quarterly Statistics					Annual Statistics*		
Quarter	# Candidates	# Passed	% Passed	State Average Quarterly Pass Rate	Program Average Annual Pass Rate	State Average Annual Pass Rate [CCR §2530(l)]	Variance From State Average Annual Pass Rate
Oct – Dec 2009	1	0	0%	76%	75%	73%	+2
Jan – Mar 2010	No Candidates Tested			76%	75%	74%	+1
Apr – Jun 2010	10	5	50%	74%	61%	75%	-14
Jul – Sep 2010	8	3	38%	75%	42%	75%	-33
Oct – Dec 2010	9	3	56%	77%	48%	76%	-28
Jan – Mar 2011	7	2	29%	80%	44%	77%	-33
Apr – Jun 2011	2	0	0%	71%	39%	76%	-37
Jul – Sep 2011	6	1	17%	74%	33%	75%	-42
Oct – Dec 2011	16	7	44%	74%	32%	75%	-43
Jan – Mar 2012	7	1	14%	77%	29%	74%	-45
Apr – Jun 2012	1	0	0%	72%	30%	74%	-44
Jul – Sep 2012	5	2	40%	76%	35%	74%	-39
Oct – Dec 2012	3	1	25%	70%	33%	74%	-41
Jan – Mar 2013	6	2	33%	75%	33%	73%	-40
Apr – Jun 2013	12	7	58%	78%	46%	73%	-27
Jul – Sep 2013	10	7	70%	75%	55%	74%	-19
Oct – Dec 2013	7	3	43%	76%	54%	76%	-22

*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.

This data substantiates the program's **noncompliance** with Section 2530 (l) of the Vocational Nursing Rules and Regulations for the period **April 2010 through December 2013**.

California Code of Regulations, section 2530(l) 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 approved vocational nursing schools for the same period."

Based on the most recent data available (October – December 2013), the **program's average annual pass rate is 54%**. The **California average annual pass rate** for graduates from approved vocational nursing programs who took the NCLEX-PN® for

the first time during the same period is **76%**. The average annual pass rate for the Bethesda University of California Vocational Nursing Program is **22** 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 program's Board - approved faculty totals nine (9), including the program director. Six (6) instructors are available to teach in the clinical area. The director has 100% administration duties.

Based on a maximum enrollment of 78 students, six (6) instructors are required for clinical supervision. Therefore, the current number of faculty is adequate for the current 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's clinical facilities are adequate as to type and variety of patients treated to enable current and proposed students to meet clinical objectives in accordance with Section 2534(b) of the Vocational Nursing Rules and Regulations. This has been verified by the consultant.

Other Considerations

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.

On March 14, 2012, the director of record submitted a plan to increase the program's licensure examination pass rates. Included in that plan were the following.

- 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.

On March 28, 2012, the program was issued a notice of violation relative to its noncompliance with California Code of Regulations (Code), Sections 2527(b) and 2530 (k). Specifically, the program failed to report faculty terminations within ten (10) days as specified by Section 2527 (b) of the Code. Additionally, the program failed to obtain Board approval prior to the admission of additional classes, as specified in Section 2530(k) of the Code. The program was required to submit a plan to prevent future violations by **April 20, 2012**. On April 6, 2012, the Board received the required plan to prevent future reoccurrence of these violations from the director.

As noted previously, on May 11, 2012, the Board placed the program on provisional approval for the two – year period from May 11, 2012 through May 30, 2014 and directed the program to admit no additional students without prior approval by the full Board. The Board's action resulted from the program's noncompliance with Section 2530 (l) of the Vocational Nursing Rules and Regulations relative to program pass rates. At that time, the program's quarter pass rate was 14% and its average annual pass rate was 29%.

On May 16, 2012, the Board forwarded to the director the Notice of Change in Approval Status, identifying program deficiencies and required corrections (see Attachment B)

On September 13, 2012, Board received electronic correspondence from the director requesting a meeting with Board representatives. Additionally, the director requested the program be placed on the November Board agenda. The director reported the following program updates.

- Mandatory Tutoring.
- Mandatory Virtual ATI
- Proctored ATI
- Optional NCLEX review.
- Development of a Pre-course for all students but mainly targeting ESL students to include medical terminology and documentations.
- Textbooks were updated in the curriculum.
- Re-assignment of staff so that strong instructors are used in theory and clinical.

- VN Administration is being restructured due to concerns about unprofessional conduct.

Included in the update were concerns about the program's administration.

On September 18, 2012, the SNEC and NEC met with Bethesda University representatives, Director, Nanyun Lee, Young Choo Kim, Chief Academic Officer, Mantae Kim, Chief Financial Officer and Mark Treston, Compliance director, in Board headquarters. The meeting was held at the request of the director to discuss the program's status and a request to admit students.

At that meeting, Bethesda representatives attempted to clarify the relationship between College of Medical Arts, Stanton University, and Bethesda University. Additionally, program representatives attempted clarification of the subsequent transfer of students between Stanton University and Bethesda University. As presented, College of Medical Arts started with 3 separate Board - approved campuses. Two (2) of those campuses became Stanton University and Bethesda University. Lengthy explanations were given by representatives from the school, however, upon conclusion of the meeting, it still remains unclear the current relationship between Stanton University and Bethesda University.

Additionally, program representatives questioned Board decisions relative to the program's approval status. The school's chief academic officer cited "errors" in the History of Board Action that required correction. The school's chief financial officer queried "how can we repair the current situation?"

The SNEC advised program representatives that the History of Board Action included in the Board report is a chronology of Board Actions. Further, the representatives were advised that the Board placed the program on provisional approval due to noncompliance with regulatory requirements and that a Notice of Change in Approval Status had been forwarded to the director on June 13, 2012. That document identified program deficiencies and required corrections to avoid complete loss of approval. Additionally, the SNEC reminded the director of the upcoming comprehensive analysis that due to the Board on February 1, 2013.

The director provided documents relative to her findings upon assuming the position of director. Additionally, the director provided a verbal account of her assessment of the program and problems she has identified thus far. The director stated that the program had hired a consultant to assist with curriculum revision and that a significant portion had been completed.

A review of enrollment data provided by program representatives and the director identified discrepancies between current data and information that was previously submitted to the NEC by the director. The director was advised to provide the NEC with the following documents:

- Updated enrollment data;
- Facility list;
- OB/Peds clinical rotation schedule for all current and proposed students; and

- Resources utilized by the instructors in the classroom and skills laboratory.

On September 24, 2012, the Board received correspondence from the director including information as requested during the September 18, 2012 meeting. Additionally, the director included a list of program resources utilized by instructors and photographs of the laboratory and classroom.

On October 3, 2012, the director submitted documentation for Board member consideration setting forth a plan to correct program deficiencies and subsequent actions taken to correct identified problems. The submitted plan included the following information:

- Program's plan to prevent future violations of 2527(b), 2530(k) and 2530(l).
- Mandatory NCLEX prep classes (60 hours).
- ATI Testing (entrance and throughout the program).
- Continuing Education courses for faculty.
- Encouraging former graduates to come to the school for NCLEX review.
- Success Plan (identifies at-risk students and implements interventions).
- Consultant hired. As a result, an ongoing analysis of the curriculum is in effect. Incorporated Concept Mapping and Critical Thinking Skills into the curriculum.
- Increased mandatory passing score from 75% to 77%.
- Reassigned staff to ensure placement of the most experienced staff in theory and clinical.
- Instructional Plan revised to incorporate most recent textbooks.
- Administration restructuring.
- Initiated Mandatory passing of Exit Exam.

On November 9, 2012, the Board denied the program's request to admit 30 part-time students into a class commencing on January 10, 2013 and graduating on June 15, 2014 **and** denied the program's request to admit 30 full-time students into a class commencing on March 10, 2013 and graduating on March 20, 2014. The Board continued the program's requirement to obtain approval by the full Board prior to the admission of each class.

On March 22, 2013, the Board received correspondence from the program director requesting approval to admit 30 students August 5, 2013, graduating August 4, 2015. Additionally, the director reported program actions taken to correct identified deficiencies. The following elements were reported:

- The director created a "Green Light" program for graduates. Essentially, the green light program identifies those graduates who have passed the ATI exit examinations and are ready to take the NCLEX-PN®.
- Implemented mandatory:
 - Tutoring for all students in remediation
 - Virtual ATI
 - Weekly ATI proctored exams
- NCLEX prep class 3 nights per week for a total of 60 hours.
- Medical terminology class started for all students but specifically ESL students.

- Restructuring of administration to add focus on VN program.

On May 10, 2013, the Board denied the program's request to admit 30 students into a class commencing on August 5, 2013, and graduating on August 4, 2014; **and** continued the program's requirement to obtain approval by the full Board prior to the admission of each class.

On December 6, 2013, the NEC received the director's updated plan to increase licensure pass rates (see Attachment C). Included there in were the following:

- Revised Admission Criteria to include:
 - Increasing the minimum ATI accepted score to 80% from 67% for Reading and Grammar.
 - Adoption of an interview that assesses conversational English.
 - Allowing the program Director to make the decision on which students are accepted into the program.
 - Potential students that fail the entrance examination are referred to a Medical ESL class. Upon completion of the 6 week class or upon achieving competence, the potential students may re-take the ATI entrance examination.
- Revised ESL Pre – Requisite Class. Hours increased from 40 to 60 hours.
- Revised Faculty Orientation and In-Service Program which includes a 5 day mentoring system for new clinical faculty and assessment of theory instructors' power point presentations.
- Ongoing Faculty Monitoring and Evaluation. Increased emphasis on faculty accountability.
- Increased Communication with Program Graduates Including Coaching Until The Graduate Passes the NCLEX-PN®.
- Established a Graduate Tracking System.
- Implemented a Mandatory NCLEX review, A Minimum of 60 hours in Length.
- Implemented Mandatory Student Participation in Virtual ATI Review and Testing.
- Increased GPA requirement to 78%.
- Curriculum revision in process.

Published examination statistics specify that the program's **current quarter** licensure pass rate is **43%** and the **average annual** pass rate is **54%**. As such, the average annual pass rate for the Bethesda University of California Vocational Nursing Program is **22** percentage points **below** the state average annual pass rate.

Recommendations:

1. Deny Bethesda University of California Vocational Nursing Program 's request to admit 30 full-time students into a class commencing on May 6, 2014; graduating on April 10, 2015 to **replace** students that graduated on October 8, 2012.
2. Continue to require the program to obtain full Board approval prior to the admission of each class.

Rationale: As noted previously, the program was placed on provisional approval May 11, 2012 for two (2) years, due to pass rates on the NCLEX/PN® that were noncompliant with regulatory requirements. **At that time, the program's average annual pass rate was 29%, 45 percentage points below the state average annual pass rate.** Currently, the average annual pass rate has risen to 54%. As such, the pass rate is 22 percentage points below the state average annual pass rate.

The program's plan to bring up the licensure pass rates was implemented in March 2012. Based on submitted program enrollment data, forty - six (46) students graduated in 2012. Of the 46 graduates, 36 have taken the licensure examination, to date. Published licensure examination statistics confirm that 21 program graduates passed (58%) and 15 failed (42%). Ten (10) graduates remain to take the licensure examination from the 2012 graduates. Additionally, submitted enrollment data also stated that sixteen (16) graduates completed the program in 2013. Those graduates also have not tested, to date. **It is anticipated that the November 2013 graduates will take the licensure examination in quarters one (1) and two (2) of 2014. It must be noted that a statistically significant number of graduates have not taken the licensure examination.**

The program is scheduled for reconsideration of provisional approval at the May 2014 Board meeting. At that time, the program may request a replacement class. Delaying the admission of a replacement class will allow time for the graduates from the November 2013 class to take the licensure examination. Additionally, the Board will have one (1) more quarter of data available for consideration on which to make their decision. Currently no students are enrolled in classes.

Attachment A: History of Prior Board Actions.

Attachment B: Notice of Change in Approval Status, Dated May 16, 2012.

Attachment C: Program Correspondence Dated December 3, 2013; Received December 6, 2013.

Agenda Item # 13.C.1., Attachment A

Bethesda University of California Vocational Nursing Program

- 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.
- On May 11, 2012, the Board denied 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; **and**, denied 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; **and**,

Placed 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; **and**,

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 April 1, 2014; and**,

Required the program to admit no additional students without prior approval by the full Board; **and**,

Required 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; **and**,

Required the program to comply with all accreditation standards in Article 4 of the Vocational Nursing Practice Act, commencing at Business and Professions Code Section 2880, and Article 5 of the Board's Regulations, commencing at California Code of Regulations, Title 16, Section 2526; and,

Required 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; **and**, advised the program that failure to take any of these corrective actions may cause the full Board to revoke the program's approval; **and**,

Place the program on the **May 2014** Board agenda for reconsideration of provisional approval.

- On June 13, 2012, the Board forwarded to the director the Notice of Change in Approval Status.
- On August 17, 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 September 18, 2012, Board representatives met with program representatives relative to the program's approval status and request to admit students. Program representatives present were: Nanyun Lee, Director, Young Choo Kim, Chief Academic Officer, Mantae Kim, Chief Financial Officer and Mark Treston, Compliance director.
- On October 3, 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 November 9, 2012, the Board **denied** Bethesda University of California Vocational Nursing Program 's request to admit 30 part-time students into a class commencing on January 10, 2013 and graduating on June 15, 2014; **and, denied** the program's request to admit 30 full-time students into a class commencing on March 10, 2013 and graduating on March 20, 2014; and, required the program to continue to obtain full Board approval prior to the admission of each class.

- On March 11, 2013, the assigned consultant forwarded correspondence requesting submission of two (2) copies and a CD or Flash Drive of pertinent documents, plan, and subsequent actions taken to correct identified problems that they desire Board members to consider by March 22, 2013.
- On March 22, 2013, the Board received correspondence from the program director and two (2) copies and a CD of pertinent documents and subsequent actions taken to correct identified problems that they desire the Board members to consider.
- On May 10, 2013, the Board **denied** Bethesda University Vocational Nursing Program 's request to admit 20 full-time students into a class commencing on August 5, 2013 and graduating on August 4, 2014; and, required the program to continue to obtain full Board approval prior to the admission of each class.
- On December 6, the Board received the director's updated plan to improve licensure pass rates.



Agenda Item #13.C.1., Attachment B



STATE AND CONSUMER SERVICES AGENCY • GOVERNOR EDMUND G. BROWN JR.

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May 16, 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 31, 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.
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



Agenda Item 13.C.1., Attachment C Bethesda University of California

730 N. Euclid Street. Anaheim, CA, 92801
(714) 683-1460 Main School Line Fax (714) 683-1419

December 3, 2013

Pam Hinckley, RN, MSN
Nursing Education Consultant
Board of Vocational Nursing and
Psychiatric Technicians
2535 Capitol Oaks Drive, Suite 205
Sacramento, CA 95833-2945

BVNPT RECD – EDU
ON 12.6.13 WITH Dg

Re: Vocational Nursing Program
Request to admit replacement class,
Full time, for Spring, 2014

Dear Ms. Hinckley:

Thank you for your letter of November 24, 2013, requesting further information for consideration of the request to approve a new class to start for Bethesda University VN Program. This Full Time will replace the class which graduated October 2012.

Enclosed please find the completed forms which you requested. In addition, there is a summary of the additional actions taken to support student success in the program and achievement of first-time testing pass rate.

The pass rates for the last 3 quarters of 2013 have shown small but notable incremental improvement. It is anticipated that 4th quarter results will propel the annual pass rate to the regulation-required score.

The Program Analysis Report submitted earlier this year detailed the deficiencies identified and actions taken to correct them. However, until another class is approved to start, it is not possible to fully implement all of the Action Plan items and evaluate their efficacy in ensuring student success in the program as well as passing the NCLEX examination. I urge you to take into consideration the improving pass rates to date, and our efforts to reach prior graduates and provide review and preparatory sessions for them. As well, there have been significant faculty and school Administration changes, with the DON being more fully supported.

As you requested, I am going to reiterate our plan to increase our pass rates, although I have articulated these important changes that have been made to our VN Program (see Program Analysis Report Submitted 2013).

- 1) More stringent admission requirements
- 2.) Tutoring: The previous director said there was mandatory tutoring but there was little follow through. The tutoring policy needed more structure, consistent follow-up, and monitoring. This was discussed in the monthly faculty meetings.
- 3.) Faculty Orientation and In-service: I believe that there was no faculty orientation and in-service s in order to provide the best qualified staff that is trained properly. On-going evaluation and monitoring system were also implemented. Emphasis on faculty accountability was also implemented.
- 4.) Communication with Graduates: Under the former administration there was no communication with the students after graduation. This communication is necessary because the students need continued support until they take the NCLEX. Bethesda will continue to monitor and coach the students until Virtual ATI is completed. Thus the NCLEX Exam success will be guaranteed by approximately 98 percent.
- 5.) Tracking Students Pass Rates on NCLEX: The previous administration also did not track the students pass rate of the NCLEX. (Attachment C & D - Student Tracking)
- 6.) Curriculum Restructuring: The curriculum needed to be updated because the previous textbooks did not match up with the lesson plans. I have updated the textbooks and they now coincide with the lesson plans. Also the previous administration did not offer a weekly proctored ATI examination with subsequent focused review. This part of the curriculum was cut because of budget issues and it is vital for the success of the students. Bethesda has mandatory ATI ongoing at all levels and it is monitored and supported by an ATI coach.
- 7.) NCLEX Prep Class: The previous administration did not have the NCLEX prep class, which is a live review class, as MANDATORY. Bethesda now offers this NCLEX prep class as MANDATORY and it is sixty (60) hours or more.
- 8.) ESL Class: The previous administration offered an ESL class that was 40 hours and I have increased the current ESL class to 60 hours. Bethesda continuously offers extra help to ESL students and instructors monitor growth and reports students progress at the monthly faculty meetings.
- 9) Increase GPA to 78% as of (3-20-2013)

I appreciate your continued support of and interest in the VN Program at Bethesda University. It has taken some time to identify and correct the deficiencies of the past.

As you aware our Provisional Status extends to May, 2014. If that status is not changed, I would like to request whatever extension is possible at that time. Our last group of students completed the program November 2, 2013. First and second quarter 2014 will reflect pass rates achieved by these graduates.

Thank you for your continued guidance and assistance.
I look forward to seeing you at the February meeting in L.A.

Yours truly,

Nan Yun Lee -BSN, RN
Director of Nursing
Bethesda University of California

Enclosed :

- 1) Enrollment Data Table
- 2) Faculty / Student Clinical Assignments
- 3) Maternity and Pediatric Tracking Form
- 4) School Faculty, Attachment A
- 5) School Facilities, Attachment B
- 6) Student Tracking 2012, Attachment C
- 7) Student Tracking 2013, Attachment D

