

Agenda Item #13.B.1.



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

Board of Vocational Nursing and Psychiatric Technicians
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DATE: May 1, 2014

TO: Board Members

FROM: 
Denise Rodriguez, M.S.N., R.N.
Nursing Education Consultant

SUBJECT: Preferred College of Nursing, Van Nuys Vocational Nursing Program –
Consideration of Placement on Provisional Approval¹ (Director: Joievelynn Herra,
Van Nuys, Los Angeles County – Private)

Preferred College of Nursing, Van Nuys, Vocational Nursing Program is presented to the Board for consideration of placement on provisional approval.

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

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

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

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

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

History of Prior Board Actions

(See Attachment A, History of Prior Board Action)

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.

Enrollment

The Preferred College of Nursing Van Nuys, Vocational Nursing Program currently has approval for an ongoing admission pattern of one (1) full-time class of 40 students each year and four (4) part-time classes of 40 students, to **replace** graduating students only.

The following table represents **current** student enrollment based on class starts and completions. The table indicates a **maximum enrollment of 115 students** for the period **August 2012 through August 2014**.

ENROLLMENT DATA				
CLASS DATES		#Students Admitted	#Students Current or Completed	Total Enrolled
Start	Complete			
08/12 PT-1		25	18	18
11/12 PT-2		25	21	18 + 21 = 39
3/13 PT-3		22	21	39 + 21 = 60
9/13 PT-4		20	18	60 + 18 = 78
12/13 FT-1		7	7	78 + 7 = 85
	3/14 (8/12 PT-1)		-18	85 - 18 = 67
3/14 (Replaces PT-1) (Projected)		30		67 + 30 = 97
	6/14 (11/12 PT-2)		-21	97 - 21 = 76
7/14 (Replace PT-2) (Projected)		30		76 + 30 = 106
	8/14 (3/13 PT-3)		-21	106 - 21 = 85
8/14 (Replace PT-3) (Projected)		30		85 + 30 = 115

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 2008 through March 2014 specify the pass percentage rates for graduates of the Preferred College of Nursing, Van Nuys, Program on the National Council Licensure Examination for Practical/Vocational Nurses (NCLEX-PN®)

NCLEX-PN® Licensure Examination Data							
Quarterly Statistics					Annual Statistics*		
Quarter	# Candidates	# Passed	% Passed	State Average Quarterly Pass Rate	Program Average Annual Pass Rate	State Average Annual Pass Rate [CCR §2530(I)]	Variance from State Average Annual Pass Rate
July - Sep 2008	20	12	60%	70%	75%	74%	+1
Oct - Dec 2008	18	12	67%	73%	70%	73%	-3
Jan - Mar 2009	16	9	56%	70%	62%	72%	-10
Apr - Jun 2009	29	18	62%	71%	61%	70%	-9
July - Sep 2009	35	22	63%	74%	62%	72%	-10
Oct - Dec 2009	30	18	60%	76%	61%	73%	-12
Jan - Mar 2010	18	11	61%	76%	62%	74%	-12
Apr - Jun 2010	21	13	62%	74%	62%	75%	-13
Jul - Sep 2010	13	9	69%	76%	62%	75%	-13
Oct - Dec 2010	9	6	67%	77%	64%	76%	-12
Jan - Mar 2011	20	16	80%	80%	70%	77%	-7
Apr - Jun 2011	16	10	63%	71%	71%	76%	-5
Jul - Sep 2011	9	5	56%	74%	69%	76%	-7
Oct - Dec 2011	5	5	100%	74%	70%	75%	-5
Jan - Mar 2012	6	4	67%	77%	67%	74%	-7
Apr - Jun 2012	15	7	47%	72%	60%	74%	-14
Jul - Sep 2012	13	6	46%	74%	56%	74%	-18
Oct - Dec 2012	7	4	57%	70%	54%	74%	-20
Jan - Mar 2013	4	2	50%	75%	49%	73%	-24
Apr - Jun 2013	4	3	75%	78%	54%	73%	-19
Jul - Sep 2013	12	7	58%	75%	59%	74%	-15
Oct - Dec 2013	17	7	41%	76%	51%	76%	-25
Jan - Mar 2014	19	8	42%	74%	48%	76%	-28

*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.

California Code of Regulations §2530(I) 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.”

Examination statistics for the period of July 2008 through March 2014 substantiate the program's **noncompliance for eight (8) consecutive quarters.**

Based on the **most recent data available** (January to March 2014), the program's average annual pass rate is **48%**. The California average annual pass rate for graduates from accredited vocational nursing programs who took the NCLEX-PN® Licensure Examination for the first time during the same period is 76%. The average annual pass rate for the Preferred College of Nursing Van Nuys, Vocational Nursing Program is **28 percentage points below** the state average annual pass rate.

Faculty and Facilities

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

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

The number of Board-approved faculty totals twenty-nine (29) including the director. The director has 70% administrative and 30% teaching duties. Twenty (20) instructors teach clinical.

For a maximum enrollment of 115 students, eight (8) instructors are needed. Therefore, the existing faculty meets regulatory requirements for the current and proposed enrollment.

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

“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 sufficient clinical facilities to afford the number type and variety of patients that will provide clinical experience consistent with competency-based objectives and theory.

Other Considerations

Based on published examination statistics, the program's average annual pass rates have fallen more than ten (10) percentage points below State average annual pass rates in thirteen (13) of the previous twenty-three (23) quarters. For **the most recent eight (8) consecutive quarters (April 2012 through March 2014), the program's average annual pass rate has been in excess of ten (10) percentage points below State average annual pass rates.** Over the most recent five (5) quarters (January 2013 – March 2014), the program's quarter pass rate has ranged from 41% to 75% and its average annual pass rate has ranged from 48% to 59%. For the current reporting period, January – March 2014, the program's quarterly pass rate was 42% and the average annual pass rate is 48%.

On May 29, 2013, in response to the Board's request, the program submitted a plan of action to improve its licensure examination pass rate. (See Attachment B)

The director's explanation of the decline in the pass rate was that as the economy slowed there were fewer students who could get loans to attend school and enrollment dropped. For that reason, she said, the school put “austerity measures” into place that included accepting less qualified students, making all employees part-time and discontinuing support services for students such as Assessment Technology Institute (ATI) resources and the 72-hour NCLEX review course for students who were ready to graduate.

In her plan of action she describes the following actions:

- Reinstitution of a strict student selection process
- Return of some employees to full-time status, including four instructors
- Contracting with ATI again for supplemental learning review resource effective June 2013
- Resuming the 72-hour NCLEX review.
- Continuous review of the curriculum including correlation with the NCLEX-PN® Test Plan.
- Faculty enrichment including faculty development sessions that focus on:
 - Teaching strategies in the classroom and clinical settings
 - Test item construction and analysis that is in conformity with the NCLEX-PN® Test Plan.
- Providing structured tutoring and remediation assistance to all at-risk students.
- Requiring that students pass a comprehensive examination at the end of Term 3 and which must be passed in order to progress to Term 4 and again at the end of Term 5 in order to be eligible to take the ATI Predictor Exam.

On November 15, 2013, an email letter was sent to the director asking her to submit documentation that her plan of correction submitted on May 29, 2013 has been implemented and to discuss the elements implemented. She failed to submit the requested documentation.

On December 5, 2013, the director informed the Board that she would be away on leave from December 11, 2013 until January 30, 2014. When asked about the missing documentation she said that she would submit the information that day. She did not.

The director submitted an application for an assistant program director to be in charge of the program while the director was gone. The application could not be approved because it was incomplete and the director was notified. Subsequently, the application was resubmitted and was approved.

Based on published program statistics, submitted documents, and materials, the following violations are identified.

Section 2526 (a)(13) of the California Code of Regulations (Code) states:

**“The institution shall apply to the Board for approval. Written documentation shall be prepared by the director and shall include:
(13) Screening and selection criteria”**

Violation #1: Submitted information confirms the program failed to screen and selection students for program admission consistent with its Board – approved screening and selection criteria.

Correction #1: This violation **has been corrected.**

Section 2527 (a) of the Code states:

“The Board shall require such reports by schools and conduct such investigations as necessary to determine whether or not approval will be continued.”

Violation #2: On November 15, 2013, the Board requested the program director to submit a report that confirmed implementation of the program’s plan of correction that was proposed and submitted on May 29, 2013. To date, the requested report has not been received.

Plan of Correction #2: This violation is **not corrected**.

Section 2526 (a)(16) of the Code states:

**“The institution shall apply to the Board for approval. Written documentation shall be prepared by the director and shall include:
(13) List of resources for provision of counseling and tutoring services for students.”**

Section 2530 (a) of the Code states:

“The program shall have sufficient resources, faculty, clinical facilities, library, staff, and support services, physical space, skills laboratory, and equipment to achieve the program’s objectives.”

Violation #3: Submitted information substantiates that the program failed to have sufficient resources including faculty, counseling, and tutoring services to achieve the program’s objectives. As noted under **Faculty and Facilities**, the program has the required number of faculty for current and proposed enrollment; however, the quality of the faculty and other available resources are inadequate to achieve the program’s objectives, as evidenced by the director’s assessment and proposed plan of action submitted May 29, 2013.

Plan of Correction #3: This violation has **not been corrected**. Once implemented, the school’s plan of correction should address this violation. Unfortunately, the Board has no confirmation if or when the plan of correction will be implemented.

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

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

Violation #4:

Based on published examination statistics, the program has failed to maintain an average annual pass rate that is compliant with regulatory requirements. Specifically, the program's average annual pass rates have fallen more than ten (10) percentage points below State average annual pass rates in thirteen (13) of the previous twenty-three (23) quarters. For the most recent eight (8) consecutive quarters (April 2012 through March 2014), the program's average annual pass rates have been in excess of ten (10) percentage points below State average annual pass rates.

Plan of Correction #4:

This violation is **not corrected**. The violation will be corrected when the program's pass rates improve and are consistent with regulatory requirements.

Recommendations:

1. Place Preferred College of Nursing, Van Nuys, Vocational Nursing Program on provisional approval for the four - month period from May 16, 2014, 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 C for Draft Notice).
2. Rescind approval of the program's ongoing admissions.
3. Require the program to admit no additional classes without prior approval by the full Board.
4. Require the program to submit a written report no later than **June 1, 2014**. The report shall include a comprehensive analysis of the program including all elements in the previously submitted plan of correction, identification of factors negatively impacting student achievement, specific actions taken to improve program pass rates, dates of implementation, the effect of employed interventions, and specific program resources required for achievement of program objectives.
5. If the program fails to submit the report as specified in Recommendation #4 by **June 1, 2014**, place the program on the **September 2014** Board agenda for reconsideration of provisional approval.
6. If the program submits the report as specified in Recommendation #4 by **June 1, 2014**, extend the program's provisional approval from September 30, 2014 through May 31, 2016.
7. 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.
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. Require the program to submit follow-up reports in two (2) months, but no later than **July 1, 2014**, and 21 months, but no later than **February 1, 2016**. 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.
10. 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.
11. Failure to take any of these corrective actions may cause the full Board to revoke the program's approval.

Rationale: Currently the program's average annual pass rate is twenty - eight (28) percentage points **below** the State average annual pass rate. The program has been noncompliant with regulatory requirements for eight (8) consecutive quarters.

On May 29, 2013, the program submitted a plan of action to address its noncompliant program pass rates. On November 15, 2013, the director was requested to submit a report verifying implementation of that plan and the effect of employed interventions. Despite repeated requests for submission, the requested report has not been received.

The program's failure to comply with regulatory requirements supports the recommendations to place the program on provisional approval. Board staff will continue to monitor the program by tracking submission of required reports, analyzing the program's licensure examination pass rate quarterly, reviewing Annual Reports submitted by the program, and performing approval surveys.

- Attachment A: History of Prior Board Actions
Attachment B: Plan of Action to Increase NCLEX-PN Pass Rate, dated May 28, 2013
Attachment C: Draft Notice of Change in Approval Status

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

PREFERRED COLLEGE OF NURSING, VAN NUYS VOCATIONAL NURSING PROGRAM

History of Prior Board Actions

- On April 27, 2001, the Board approved the school's request to begin a part-time weekend vocational nursing program with an initial class of 20 students on May 11, 2001, only. The Board also approved the vocational nursing curriculum of 1,550 hours, including 590 theory and 960 clinical hours. The program is 75 weeks in length. Classes are held on Fridays, Saturdays and Sundays. There are 5 terms, each 15 weeks long.
- On September 6, 2002, the Board approved initial accreditation for the Preferred College of Nursing Vocational Nursing Program for the period from May 11, 2001, to September 5, 2006. Additionally, the Board approved the school's request to admit 20 students into the part-time weekend class on December 8, 2002, only, to **replace** students graduating December 7, 2002.
- On June 20, 2003, the Board approved the school's request to begin a second 75-week part-time evening program of 20 students on July 8, 2003, only. This class is known as the part-time Tuesday-Thursday class.
- On September 19, 2003, the Board approved the school's request to begin a full-time program of 20 students on October 10, 2003, only.
- On February 20, 2004, the Board approved the school's request to begin a part-time program (Wednesday and Friday class) of 20 students on March 26, 2004, only.
- On May 14, 2004, the Board approved the program's request to admit 30 students into the part-time week-end class starting June 18, 2004, only, to replace students graduating on June 13, 2004.

The Board approved the program's request to increase class size from 20 to 30 students per class in both the part-time and full-time programs.

The Board approved on-going admissions to **replace** graduating classes, only, for the Preferred College of Nursing, Panorama City, Vocational Nursing Program with the stipulation that no additional classes are to be added to the program's current pattern of admissions without prior Board approval. The program's current pattern of admissions includes 1 part-time weekend class, 1 part-time Tuesday & Thursday evening class, 1 part-time Wednesday & Friday evening class and 1 full-time class Monday through Friday per year, each admitting 30 students per class.

- On September 10, 2004, the Board approved the program's request to admit 30 students into a fourth part-time Tuesday, Wednesday, Thursday class starting on October 28, 2004, only, with a projected completion date of May, 2006.

- On April 21, 2005, the director notified the Board of a location and address change to Van Nuys, California. The name of the school was changed to reflect this change as Preferred College of Nursing, Van Nuys.
- On June 20, 2005, the director submitted a plan to improve NCLEX-PN pass rates, as requested by the consultant.
- On September 16, 2005, the Executive Officer approved the program's request to admit 30 students into the Monday through Friday full-time class starting on September 19, 2005, with a projected graduation date of September 22, 2006, replacing the students that graduate on September 28, 2005; approved the program's request to admit 30 students into the Su-M-W-F part-time program starting on October 3, 2005, with a projected graduation date of June 4, 2007, to replace students graduating October 10, 2005; **and** approved ongoing admissions to **replace** graduating classes, only, for the program with the following stipulations:
 - a. No additional classes are added to the program's current pattern of admissions without prior Board approval. The program's current pattern of admissions includes one full-time class which admits once each calendar year and four part-time classes which admit every 18 months.
 - b. The director documents that adequate resources, i.e. faculty and facilities, are available to support each admitted class of students.
- On October 20, 2005, the Board notified the director that the program's pass rates had fallen more than ten (10) percentage points below the state average pass rate for the fourth quarter. The school was acknowledged for submitting a written plan for pass rate improvement and requested that any additional plans currently implemented be submitted to the Board.
- On February 8, 2006, the Board notified the director that the program's pass rates had fallen more than ten (10) percentage points below the state average pass rate for the fifth quarter.
- On May 12, 2006, the Executive Officer approved continued full accreditation for the Preferred College of Nursing, Van Nuys, Vocational Nursing Program for the period from September 5, 2006, through September 4, 2010, and issued a certificate accordingly.
- On December 6, 2006, the Executive Officer approved the Preferred College of Nursing, Van Nuys, Vocational Nursing Program's request to admit 40 students into the Monday, Wednesday, Friday, and Saturday part-time program starting on January 26, 2007, with a projected graduation date of July 18, 2008.

The Board approved the program's request to increase the class size from 30 to 40 students per class.

- On January 5, 2007, the director notified the Board of a modification of the part-time program scheduled to start January 26, 2007. The start date was changed to February 6, 2007 with a projected graduation date of July 18, 2008. Instead of a Monday, Wednesday, Friday, and Saturday schedule, a change was made to a Monday, Tuesday, Friday, and Saturday schedule.

- **On September 15, 2008 a new director was approved.**
- **On March 11, 2009 a new director was approved**
- On April 23, 2010, the Board received the program's completed Program Records Survey for Continued Accreditation and required supporting documents.
- On April 27, 2010, the Executive Officer approved the Preferred College of Nursing, Los Angeles, Vocational Nursing Program's request to admit a part-time class of 30 students on April 11, 2011, the anticipated graduation date of the class is September 16, 2011; **and** approved the program's request to admit a full-time class of 30 students on April 26, 2010, the anticipated graduation date of the class is April 29, 2011; **and** approved the program's request to change its pattern of admissions from three (3) part-time and three (3) full-time classes of 30 students per year, to four (4) part-time and four (4) full-time classes of 30 students per year, with the following stipulations:
 - a. No additional classes are added to the program's current pattern of admissions without prior Board approval. The program's current pattern of admissions includes one full-time class admission every 12 months and three part-time programs which admit every 18 months.
 - b. The director documents that adequate resources, i.e. faculty and facilities, are available to support each admitted class of students.
- On July 22, 2010, the Executive Officer approved continued full accreditation for the Preferred College of Nursing, Van Nuys, Vocational Nursing Program for the period September 5, 2010 through September 4, 2014, and issued a certificate accordingly; **and**, continued approval of the program's ongoing admission pattern of one (1) full-time class of 40 students once each year and four (4) part-time classes of 40 students which admits every 18 months to **replace** outgoing students only, with the following stipulation: the program must maintain an average annual licensure pass rate within ten (10) percentage points of the California average annual licensure examination pass rate, consistent with Section 2530 (l) of the Vocational Rules and Regulations.
- On April 16, 2012, the Executive Officer approved the following recommendations:
 1. **Deny** Preferred College of Nursing, Vocational Nursing Program's request to admit an additional full-time evening class of 40 students and **approve** a class of 30 students with a commencement date of April 18, 2012 and graduation date of May, 25 2013 **only**.
 2. Continue the program's approval for ongoing admissions of one (1) full-time class of 40 students each year and four (4) part-time classes of 40 students every 18 months to **replace** graduating students only, with the following stipulations:

- a. No additional classes are added to the program's current pattern of admissions without prior Board approval. The current pattern is approval is one (1) Full-time class each year and four (4) Part-time classes every 18 months.
- b. The director documents that adequate resources, i.e. faculty and facilities, are available to support each admitted class of students.
- c. The program's average annual pass rate is no more than ten (10) percentage points below the state average annual pass rate.

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

Introduction

Preferred College of Nursing prides itself on its consistent history of achieving a more than average NCLEX passing rate. This current decline experience by the institution started a few years ago. When the economy slowed down in 2008 and finally became a reality at PCN late in 2009, the number of qualified student applicants remained high; it was their inability to secure any type of financing for their tuition that has dramatically resulted in this current situation. PCN relied heavily on student loans paid thru to by Sallie Mae, and when the credit crunch kicked-in, the institution saw significant dropped in enrollment. Though student prospects remained high, the institution practically had to survive with those very few who can easily afford the tuition, and to ensure survival, drastic austerity measures were put in place.

There are four main contributing factors that has triggered this current decline and mostly as a direct result of the austerity measures put in place: **1)** The student selection process has been compromised out of necessity. **2)** During the earlier years, PCN maintained a core of seven full-time instructors, a combination pool of at least ten regular part-time, and five "non-regular" part-time instructors. As part of the austerity measures during the enrollment drop, all remaining employees were made part-time. **3)** Assessment Technologies Institute (ATI as supplemental learning review resource) which was paid for solely by the institution was discontinued. **4)** The cancellation of the 72-hour NCLEX review conducted just before graduation, also funded by PCN.

Thanks to the institution's approval to provide Title IV Federal student funding in October 16, 2011, PCN has slowly but surely reinstated the strict selection process it once had. Now, with this slow economic recovery PCN is cautiously proceeding with its expansion and has managed to bring back some employees to full-time status including four instructors, and as many as ten regular part-time instructors on rotation. A negotiation to reinstate ATI has been finalized and will be implemented the first week of June. A second wave of NCLEX review that started May 4th is currently on-going.

This Plan of Action outlines other contributing factors and specific strategies that will significantly improve PCN's NCLEX-pass rate.

ACTION PLAN TO INCREASE NCLEX-PN® PASS RATE

Area	Action Plan	Timeline/ Target Date
<p align="center">Admission</p>	<p>Maintain 80% passing rate of the entrance test, so that best qualified applicants to succeed in the program will be selected</p>	<p>Ongoing</p>
	<p>Revise and/or modify the entrance test with emphasis on biology and include conversion between systems, transactional analysis, ratio and proportion and first aid topics to ensure familiarity of the major concepts within the program</p>	<p>October 2013</p>
	<p>Conduct orientation sessions before official start date to enhance student applicant awareness and readiness to the program. This includes the following seminar workshops:</p> <ol style="list-style-type: none"> 1. Critical thinking 2. Math competency 3. Behavioral expectations 4. Medical terminology 5. Overview of proper nursing documentation 	<p>Ongoing</p>
	<p>Panel interview with the VN Director, Program Manager and Faculty member to complete the admission process</p>	<p>Ongoing</p>
	<p>Once all completed applications, reference letters and transcripts have been received, each application along with the entrance test score and interview result will be reviewed for final deliberation.</p>	

Curriculum	<p>The school continuously reviews the curriculum content and correlates them with the current detailed NCLEX-PN® Test Plan to ensure that essential concepts are covered adequately</p> <p>The school directs the Curriculum Committee to provide a managed framework for curriculum enrichment parallel to the NCLEX-PN® Test Plan</p>	Ongoing
Faculty	<p>The school directed the Curriculum & Faculty Development Committee to administer faculty development sessions that focuses on teaching strategies in the classroom and clinical settings, test-item construction and analysis that is in conformity with the NCLEX-PN® Test Plan.</p> <p>Faculty members were oriented with the current NCLEX-PN® Test Plan for them to be familiar and instructed to use test questions with applicable patient care situations emphasizing critical thinking.</p> <p>The school conducted instructional skills workshop to help instructors identify their teaching strengths and weaknesses and pinpoint areas for development and likewise, to allow them explore new approaches to teaching using new technology in the classroom.</p> <p>New faculty members are encouraged to sit-in during class sessions (theory, skills and clinical) handled by senior faculty or instructor. Senior faculty members are tasked to mentor the new</p>	<p>May to December 2013 but will be implemented on a regular basis; other topics related to faculty development will be tackled</p> <p>June 2013</p> <p>Ongoing</p>

	<p>faculty members in different aspects of teaching, including test item-writing and content delivery.</p> <p>Part of the faculty hiring process includes a 15-minute teaching or clinical instruction demonstration with the Program Director or representative</p> <p>A comprehensive orientation on policies and procedures, and inputs on how to properly conduct classroom and clinical instruction are also part of the initial orientation process</p>	<p>Ongoing</p> <p>Ongoing</p>
Instruction	<p>The school provided structured tutorial and remediation assistance to all at-risk students.</p> <p>As part of the student activity, the following approaches are reinforced:</p> <ul style="list-style-type: none"> • Group Dynamics – Critical thinking questions will be answered through sharing of group member's ideas and knowledge followed by a group presentation, discussion among group members and critique by instructors from the instructor • Critical thinking questions at the end of each chapter were included as homework to enhance class discussion • Peer mentoring is encouraged on top students in a class to help fellow students cope with the educational demands • Return Demonstration/ Practical Test – to be done by group and individual with emphasis on the rationale of nursing skills and techniques 	<p>Ongoing</p> <p>Ongoing</p>

	<p>using the performance checklist to assess nursing competency</p> <ul style="list-style-type: none"> • Revalidation of selected nursing skills will be done at the end of the Fundamentals of Nursing concept or every term, as appropriate • Practical skills competency check-off - on a weekly basis to assess students' clinical performance • Pre- & Post-Conferences – during the pre-conference, students discuss with the clinical instructor the care needed for their patients. The students provide care under supervision of the clinical instructor. A post-conference at the end of the day is a time for students to share their experiences and the application of classroom content to the care of patients. • Weekly Nursing Care Plan and Drug Study – to evaluate students' ability to apply concepts acquired through clinical practice • Case Study Presentation – to synthesize theoretical knowledge and nursing skills and to enhance critical thinking, done periodically then at the end of the term, grand case presentation • Clinical Pre- and Post-tests - to assess the concepts & knowledge related to the clinical objectives • NCLEX-type questions given during post-conferences as needed to further enhance student critical thinking 	
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	<ul style="list-style-type: none"> • After review of the Curriculum and Faculty Development Committee, it was recommended, to consider replacing the current reference textbook on Medical Surgical Nursing (Introduction to Medical-Surgical Nursing) by Linton to Medical-Surgical Nursing by Barbara Timby and Nancy Smith, 10th. This will be adapted after syllabus, lesson plans and tests are updated, submitted and approved by the board • Replacement of the prescribed NCLEX- PN® reviewer from Davis NCLEX-PN ® by Tradewell and Beare reviewer to Lippincott by Timby et al. • Major and supplemental references are periodically reviewed. The school's book review group sees to it that resources are up to date and evidence-based. • Use of ATI (Assessment Technologies Institute) as supplemental learning review resource 	<p>To be implemented</p> <p>Ongoing</p> <p>June 2013</p>
<p>Evaluation Instruments</p>	<p>Inclusion of NCLEX questions related to the subject matter from the beginning of the program to familiarize students with the scope and content of NCLEX-PN® Test Plan.</p> <p>Program Director requires instructor to submit quizzes, tests or examinations prior to its administration to ensure that materials used are in alignment with the content covered and questions are made with consideration of an</p>	<p>Ongoing</p> <p>Ongoing</p>

<p>Use of standardized testing to ensure reliability and validity</p>	<p>NCLEX-PN type of question and test plan</p> <p>The school considered utilization of ATI at the end of each term and as an NCLEX Predictor Exam at the end of the program as an evaluation tool use to determine student competency in proceeding with the program and in the NCLEX –PN success.</p> <p><u>Student Evaluation:</u></p> <p>Previously identified low-performing students are monitored throughout the program and remediation plans with early intervention and counseling are regularly implemented.</p> <p><u>Faculty:</u></p> <p>The Program Director or representative conducts at least one announced and one unannounced classroom and clinical visit and observation.</p> <p>Students are asked to evaluate their clinical and theory instructors at the end of every concept or clinical rotation.</p> <p><u>Facility:</u></p> <p>Externship surveys were distributed every after rotation to assess the quality of the experience and training the students received during clinical rotation</p>	<p>October 2013</p> <p>Ongoing</p> <p>Ongoing</p> <p>Ongoing</p>
<p>Comprehensive NCLEX-PN® Review</p>	<p>The review program is based on current NCLEX-PN® Test Plan Structure that provides the content and scope of the licensing exam and serves as a guide for</p>	<p>October 2013</p>

<p>Academic Advising, counseling and tutorial</p>	<p>candidate preparation. This extensive review will reinforce and strengthen concepts learned early in the nursing curriculum.</p> <p>At the completion of Term 5, students are required to attend a post program hours, NCLEX-PN® in house review with content area examinations given per session. Attendance and post review evaluation tests are mandatory, monitored and recorded.</p> <ul style="list-style-type: none"> • See proposed revised Comprehensive Examination and Program Completion Policy with algorithm for details. The students who failed in any exam has the option to request for a focused review on the subject or concept prior to scheduled test date. 	<p>July 2013</p>
	<p>Instructors teaching a subject are asked to identify students having difficulty or weakness in the content area and recommend them for tutorial sessions after class or as scheduled, to prevent future failures in the subject. Additionally, the Program Director or representative conducts after school sessions on the following topics: time management, proper studying and note taking, concept mapping, nursing care plan, case presentation, test taking strategies, and short refresher classes on anatomy and physiology and pharmacology as well as NCLEX Test Plan familiarization.</p>	<p>July 2013</p>

PREFERRED COLLEGE OF NURSING

6551 Van Nuys Blvd. Suite 200 Van Nuys CA 91401
Tel. (818) 902-3719 Fax: (818) 902-3790

Proposed Comprehensive Examination and Program Completion Policy

The Vocational Nursing Program of Preferred College of Nursing (PCN) requires the Comprehensive Examination for the following reasons:

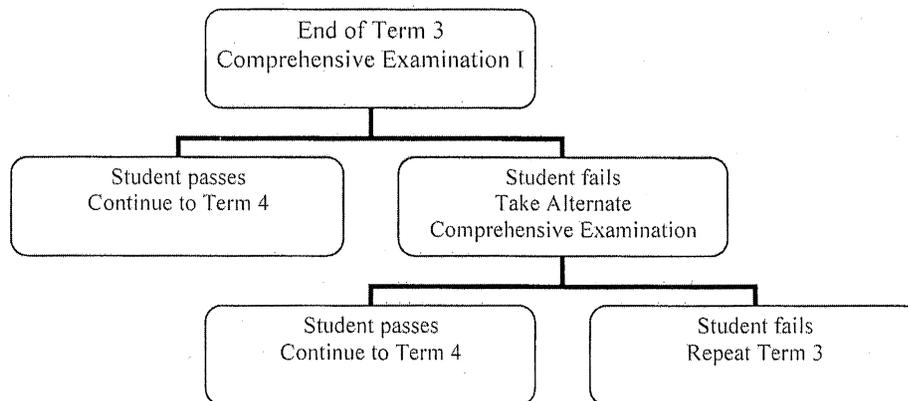
1. To determine if the student has attained the class and clinical objectives successfully.
2. To determine the ability of the student of the student to proceed to the next term
3. To determine the strengths and weaknesses of the student prior to taking the NCLEX-PN examination.

The student must pass 2 Comprehensive Examinations, namely: **Comprehensive Examination I** which is given at the end of Term 3; and **Comprehensive Examination II** which is given at the end of Term 5 with a grade of 75% or higher.

The student is allowed to proceed to the following term after passing Comprehensive Examination I at the end of Term 3 and is able to graduate from the Program after passing Comprehensive Exam II at the end of Term 5.

Comprehensive Examination I

If the student does not pass Comprehensive Examination I at the end of Term 3, he/she will be required to take an Alternate Comprehensive Examination (remediation exam)and must obtain a passing grade of 75%. If the student does not pass the Alternate Comprehensive Examination, he/she is required to repeat Term 3.



Comprehensive Examination II

During the later part of Term 5, a **mandatory NCLEX review** will be scheduled and exams per content area will be given. The student is required to attend all review classes and obtain an average grade of 75% in the entire test taken, with no grade below 60% in any of the content areas to be eligible to take Comprehensive Examination II at the end of Term 5.

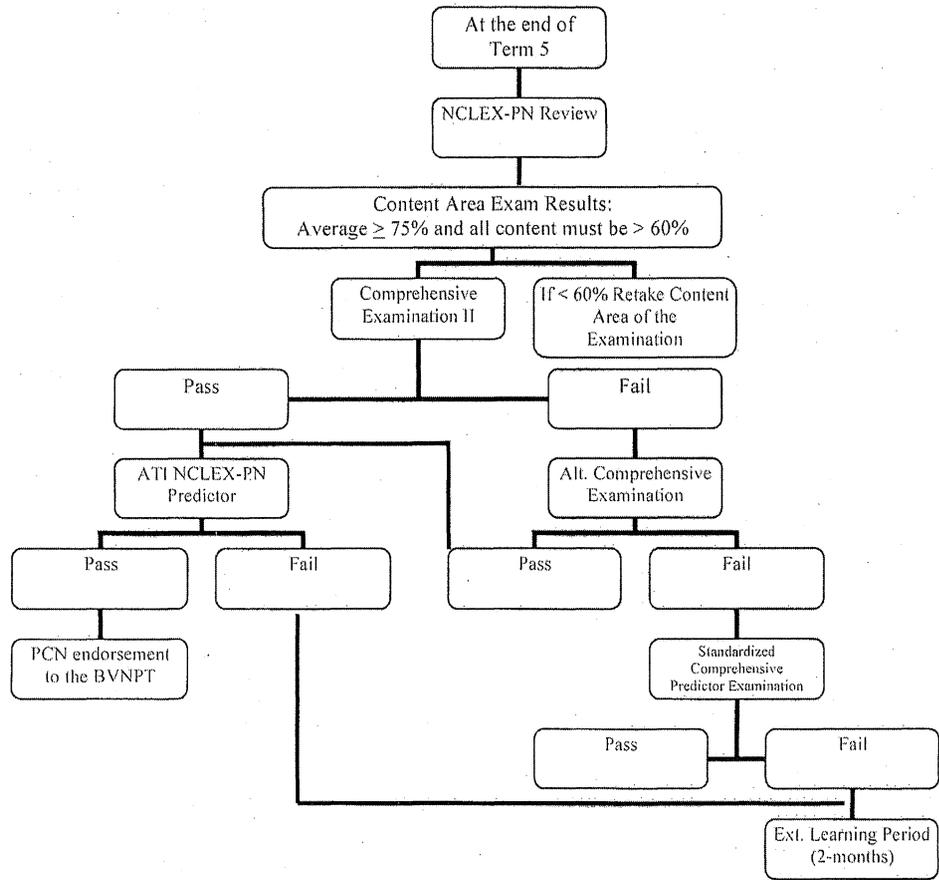
If the student's grade in a particular content area is below 60%, he/she is required to retake the test in that content area. There is no limit to the number of attempts in taking the test until a grade of at least 60% is obtained. Failure to take the test as scheduled will merit only 75% even if a higher score was earned.

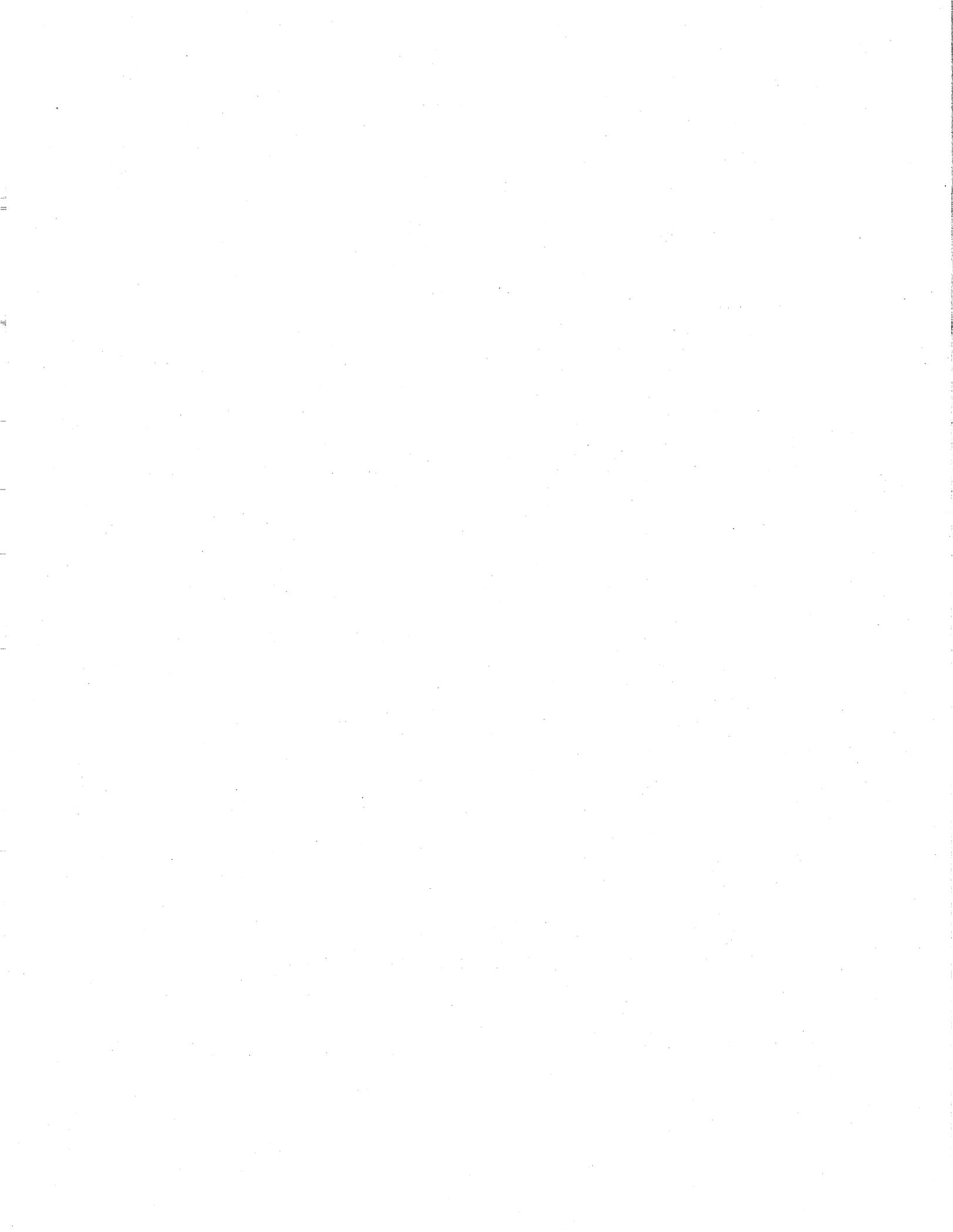
If the student does not pass Comprehensive Examination II at the end of Term 5, he/she will be required to take the Alternate Comprehensive Examination (remediation exam) and must obtain a passing grade of 75%. If the student does not pass the Alternate Comprehensive Examination, he/she is required to do the following steps:

- Take the **Standardized Comprehensive Predictor Examination** and obtain a grade of 75%. The student can take this examination only once. Failure in this examination will require the student to undergo **Extended Learning Period**.
- During the **Extended Learning Period**, the school will recommend a learning tool or reviewer, which the student will use at his/her expense. Anytime during the last week of the 2-month Extended Learning Period, a final **ATI NCLEX Predictor Test** will be given which the student has to pass with a grade of 75%. There is no limit to the number of attempts in taking the NCLEX Predictor Test until a passing grade has been obtained.

Failure to satisfactorily comply with these requirements will result in non-completion of the Vocational Nursing Program and will cause a delay in the submission of the NCLEX eligibility application to the Board of Vocational Nursing and Psychiatric Technicians (BVNPT).

(PLEASE SEE ALGORITHM BELOW)





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



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

Board of Vocational Nursing and Psychiatric Technicians
2535 Capitol Oaks Drive Suite 205, Sacramento, CA 95833-2945
Phone 916-263-7800 Fax 916-263-7855 Web www.bvnpt.ca.gov



CERTIFIED MAIL

May XX, 2014

Joievelynn Herra, Director
Preferred College of Nursing, Van Nuys
Vocational Nursing Program
6551 Van Nuys Blvd., Suite 200
Van Nuys, CA 91401

Subject: Notice of Change in Approval Status

Dear Ms. Herra:

Pursuant to the action of the Board of Vocational Nursing and Psychiatric Technicians (Board) on May 16, 2014, the status of the Preferred College of Nursing, Van Nuys, Vocational Nursing Program has been changed from full approval to provisional approval for the two – year period from May 16, 2014 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, May 30, 2014**.

AREAS OF NON-COMPLIANCE [VIOLATION(S)]

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

"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 2526 (a)(13) of the Code states:

"The institution shall apply to the Board for approval. Written documentation shall be prepared by the director and shall include:
(13) Screening and selection criteria."

Section 2526 (a)(16) of the Code states:

“The institution shall apply to the Board for approval. Written documentation shall be prepared by the director and shall include:

- (13) List of resources for provision of counseling and tutoring services for students.”

Section 2527 (a) of the Code states:

“The Board shall require such reports by schools and conduct such investigations as necessary to determine whether or not approval will be continued.”

Section 2530 (a) of the Code states:

“The program shall have sufficient resources, faculty, clinical facilities, library, staff, and support services, physical space, skills laboratory, and equipment to achieve the program’s objectives.”

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 Preferred College of Nursing, Van Nuys, Vocational Nursing Program for the past twenty-two (22) quarters are set forth in the following table.

NCLEX-PN® Licensure Examination Data			
Annual Statistics*			
Quarter	State Average Annual Pass Rate	Program Average Annual Pass Rate	Variance from State Average Annual Pass Rate
July - Sep 2008	74%	75%	+1
Oct - Dec 2008	73%	70%	-3
Jan - Mar 2009	72%	62%	-10
Apr - Jun 2009	70%	61%	-9
July - Sep 2009	72%	62%	-10
Oct - Dec 2009	73%	61%	-12
Jan - Mar 2010	74%	62%	-12
Apr - Jun 2010	75%	62%	-13
Jul - Sep 2010	75%	62%	-13
Oct - Dec 2010	76%	64%	-12
Jan - Mar 2011	77%	70%	-7
Apr - Jun 2011	76%	71%	-5
Jul - Sep 2011	76%	69%	-7
Oct - Dec 2011	75%	70%	-5
Jan - Mar 2012	74%	67%	-7

NCLEX-PN® Licensure Examination Data			
Annual Statistics*			
Quarter	State Average Annual Pass Rate	Program Average Annual Pass Rate	Variance from State Average Annual Pass Rate
Apr - Jun 2012	74%	60%	-14
Jul - Sep 2012	74%	56%	-18
Oct - Dec 2012	74%	54%	-20
Jan - Mar 2013	73%	49%	-24
Apr - Jun 2013	73%	54%	-19
Jul - Sep 2013	74%	59%	-15
Oct - Dec 2013	76%	51%	-25
Jan - Mar 2014	76%	48%	-28

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

REQUIRED CORRECTION(S)

1. Preferred College of Nursing, Van Nuys, Vocational Nursing Program shall submit a written report no later than **June 1, 2014**. The report shall include a comprehensive analysis of the program including all elements in the previously submitted plan of correction, identification of factors negatively impacting student achievement, specific actions taken to improve program pass rates, the effect of employed interventions, and specific program resources required for achievement of program objectives.
2. The program shall admit no additional students without prior approval by the full Board.
3. If the program fails to submit the report as specified in Corrective Action #1, place the program on the September 2014 Board agenda for reconsideration of provisional approval.
4. If the program submits the report as specified in Corrective Action #1, by **June 1, 2014**, the program's provisional approval shall be extended from September 30, 2014 through May 31, 2016.
5. The program shall bring its average annual pass rate to no more than ten (10) percentage points below the State average annual pass rate.
6. 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 approval.

7. The program shall submit follow-up reports in two (2) months, but no later than **July 1, 2014**, and 21 months, but no later than **February 1, 2016**. 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.
8. 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.
9. 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 **September 2014** Board Meeting agenda, at which point the Board may revoke or extend the program's accreditation. 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 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 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

Enclosures

cc: Board Members

TBJ/sc

