

Agenda Item #14.A.4.



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



DATE: August 28, 2014

TO: Board Members

FROM: *Jessica Stony*
for Donna G. Johnson, RNP, MS, MA
Nursing Education Consultant

SUBJECT: Central Nursing College Vocational Nursing Program – Reconsideration of Provisional¹ Approval Based Upon Consideration of Report of Unannounced Survey Visit and Consideration of Unauthorized Admissions; (Director: George Evans, Los Angeles, Los Angeles County, Private)

Central Nursing College Vocational Nursing Program is presented to the Board for reconsideration of provisional approval based upon consideration of a report of an unannounced survey visit and consideration for unauthorized admissions.

On February 22, 2013 the Board placed Central Nursing College Vocational Nursing Program on provisional approval for the two year period ending February 28, 2015, relative to failure to maintain the required yearly average minimum pass rate for eight (8) consecutive quarters. The Board also rescinded the program's approval for ongoing admissions and approved the admission of two (2) full-time classes of thirty (30) students to begin February 25, 2013 and April 29, 2013. The program was required to obtain approval by the full Board prior to the admission of additional students.

The Board specified that the program was required to demonstrate incremental progress in correcting its violation. The program was required 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.

Reconsideration of the program's status was scheduled for February 2015.

History of Prior Board Actions

(See Attachment A, History of Prior Board Action)

Enrollment

The program is required to obtain approval by the full Board prior to the admission of additional students.

The following table represents **current** student enrollment based on current class starts and completions. The table indicates a **maximum enrollment of 61 students** for the period from **August 2009 through July 2014**.

ENROLLMENT DATA				
CLASS DATES		#Students Admitted	#Students Current or Completed	Total Enrolled
Start	Complete			
2/12 FT		14	12	12
4/12 FT		14	12	12 + 12 = 24
7/12 PT		14	12	24 + 12 = 36
9/12 PT		19	17	36 + 17 = 53
12/12 FT		8	8	53 + 8 = 61
	1/13 (2/12 FT Class)		-12	61 - 12 = 49
3/13 FT		10	6	49 + 6 = 55
	4/13 (4/12 FT Class)		-12	55 - 12 = 43
5/13 FT		6	3	43 + 3 = 46
7/13 FT Unapproved		9	2	46 + 2 = 48
	9/13 (7/12 PT Class)		-12	48 - 12 = 36
10/13 FT Unapproved	10/14	13	8	36 + 8 = 44
11/13 PT Unapproved	3/15	9	3	44 + 3 = 47
	11/13 (9/12 PT Class)		-17	47 - 17 = 30
	11/13 (12/12 PT Class)		-8	30 - 8 = 22
1/14 FT Unapproved	12/14	18	12	22 + 12 = 34
	2/14 (3/13 FT Class)		-6	34 - 6 = 28
3/14 FT Unapproved	5/15	26	15	28 + 15 = 43
4/14 PT Unapproved	9/15	14	9	43 + 9 = 52
	7/14 (5/13 FT Class)		-3	52 - 3 = 49

ENROLLMENT DATA				
CLASS DATES		#Students Admitted	#Students Current or Completed	Total Enrolled
Start	Complete			
	7/14 (7/13 FT Class)		-2	49 – 2 = 47

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 April 2007 through June 2014, specify the pass percentage rates for graduates of Central Nursing College Vocational Nursing Program on the National Council Licensure Examination for Practical/Vocational Nurses (NCLEX-PN®).

Quarterly Statistics					Annual Statistics*		
Quarter	# Candidates	# Passed	% Passed	State Quarterly Pass Rate	Program Average Annual Pass Rate	State Average Annual Pass Rate [CCR §2530(I)]	Variance From State Average Annual Pass Rate
Apr-Jun 2007	4	3	75%	74%	91%	77%	+14
Jul-Sep 2007	5	3	60%	76%	86%	76%	+10
Oct-Dec 2007	10	5	50%	76%	74%	76%	-2
Jan-Mar 2008	5	5	100%	75%	67%	75%	-8
Apr-June 2008	4	3	75%	70%	67%	74%	-7
July-Sep 2008	6	4	67%	74%	68%	74%	-6
Oct-Dec 2008	3	2	67%	73%	78%	73%	+5
Jan-Mar 2009	4	2	50%	70%	65%	72%	-7
Apr – Jun 2009	3	1	33%	71%	56%	70%	-14
Jul – Sep 2009	8	5	63%	74%	56%	72%	-16
Oct – Dec 2009	1	1	100%	76%	56%	73%	-17
Jan – Mar 2010	4	4	100%	76%	69%	74%	-5
Apr – Jun 2010	8	6	75%	74%	76%	75%	+1
Jul – Sep 2010	13	9	69%	75%	77%	75%	+2
Oct –Dec 2010	10	8	80%	77%	77%	76%	+1
Jan – Mar 2011	13	5	38%	80%	64%	77%	-13
Apr – Jun 2011	6	3	50%	71%	60%	76%	-16
Jul – Sep 2011	11	3	27%	74%	48%	75%	-27
Oct – Dec 2011	11	3	27%	74%	34%	75%	-41

Quarterly Statistics					Annual Statistics*		
Quarter	# Candidates	# Passed	% Passed	State Quarterly Pass Rate	Program Average Annual Pass Rate	State Average Annual Pass Rate [CCR §2530(I)]	Variance From State Average Annual Pass Rate
Jan – Mar 2012	9	5	56%	77%	38%	74%	-36
Apr – Jun 2012	13	6	46%	72%	39%	74%	-35
Jul – Sep 2012	10	7	70%	74%	49%	74%	-25
Oct – Dec 2012	9	3	33%	70%	51%	74%	-23
Jan – Mar 2013	4	2	50%	75%	50%	73%	-23
Apr – Jun 2013	9	4	44%	78%	48%	73%	-25
Jul – Sep 2013	7	2	29%	75%	37%	74%	-37
Oct – Dec 2013	10	5	50%	76%	42%	76%	-34
Jan – Mar 2014	10	3	30%	74%	39%	76%	-37
Apr – Jun 2014	13	1	7%	66%	28%	73%	-45

*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, Section 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 substantiate the program’s **noncompliance** with regulatory requirements twenty (21) out of 24 quarters.

Based on the most recent data available (April through June 2014), the program's average annual pass rate is **28%**. 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 73%. The pass rate for the Central Nursing College Vocational Nursing Program is **forty-five (45)** percentage points **below** the state average annual pass rate.

Faculty and Facilities

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

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

The total number of Board-approved faculty is nine (9), including the program director. The director has full-time administrative responsibility. Seven (7) instructors are approved to teach in the clinical area.

For a maximum enrollment of 61 students, five (5) are needed for a 1:15 instructor to student ratio; therefore, the number of current faculty is adequate for the maximum 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 students to meet clinical objectives in accordance with Section 2534(b) of the Vocational Nursing Rules and Regulations, **provided that the clinical facilities allow the students to function at a level appropriate for vocational nursing students.** However, during the recent unannounced survey visit, it was not the case that students were able to access experiences consistent with competency-based objectives and theory being taught.

Other Considerations

As previously noted, the Board placed the program on provisional approval on February 22, 2013, for the two (2) year period ending February 28, 2015, relative to failure to maintain the required yearly average minimum pass rate for eight (8) consecutive quarters. The Board rescinded the program’s approval for ongoing admissions and required the program to obtain approval by the full Board prior to the admission of additional students. On March 14, 2013, the assigned consultant forwarded a Notice to the Director, per certified mail, advising of identified program deficiencies and required corrections (see Attachment B).

On October 31, 2013, the director submitted a report as required by Corrective Action #3 of the Notice (see Attachment C). That report included:

- Description of admissions and screening and selection processes
- Discussion of plans to revise the curriculum with a draft to be ready for review in December 2013
- List of textbooks without publication dates
- Plan to address the problem with student attendance
- Description of the remediation plan
- Plan to increase frequency of evaluations of theory and clinical faculty
- Plan for director to evaluate theory instructors
- Plan to evaluate how theory and clinical is correlated
- Discussion of issues related to evaluation of student achievement
- Discussion of current enrollment including identifying the problem of “students moving to higher level courses without the fundamental knowledge to be successful,” as well as the statement that the director “will not be requesting any more starting cohorts for 2013.”

According to the director, the plan was to “focus on current enrollment and recent graduates.” The director also described the plan to focus on enforcement of the academic policy of the school.

Unannounced Survey Visit

On July 15 and 16, 2014, an unannounced school site visit was completed by Board representatives to determine compliance with Board and regulatory requirements. During the two-day visit, the consultants assessed the program’s resources including faculty, clinical facilities, library, staff and support services, physical space, skills laboratory and equipment required to achieve the program’s objectives. In addition, the NECs reviewed records for newly graduated and currently-enrolled students, visited a clinical facility with students on site, interviewed students and a clinical instructor, and facilitated discussions with the program director, and other staff members. Assessment of program resources is as follows:

➤ ***Campus and Classroom Space:***

Central Nursing College is located in a downtown office building. Parking is not provided; public transportation is nearby. There are three (3) classrooms with tables, chairs, and whiteboards. Projectors are carried into classrooms for use with the students. One classroom was equipped with a monitor for use with a computer. Posters and a skeleton were noted. One classroom serves as a computer laboratory with ten (10) computer stations. The director described that students use paper and pencil tests until the last term of the program when they utilize the computers. A small student lounge is located in one of the rooms utilized by the school. Most of the materials in the waiting area of the school office are not in English.

➤ ***Skills Laboratory (Lab):***

The skills laboratory contains five (5) beds and one (1) basic mannequin. The lab was crowded and unorganized. No equipment list or inventory is kept. The lab contained crutches, walkers, two (2) wheel chairs, a blood glucose monitor, oxygen supplies, blood drawing supplies, disposable caps and masks, sixteen (16) tracheostomy care kits, some syringes and heparin and insulin practice packs, some sterile gloves, feeding tubes, and some equipment for basic hygiene care.

Equipment related to practicing more advanced skills was not in evidence. According to the director, students are primarily utilizing the skills lab only in the first five (5) weeks, when they are not attending clinical sites.

➤ ***Computer Laboratory and Hard Copy Library:***

As noted, the ten (10) station computer lab is located in a classroom. The school lacks a physical library. A collection of textbooks is kept in the director’s office and a small, older collection of texts is located in the student lounge.

➤ **Faculty:**

The school currently employs the director, who has 100% administrative time, five (5) registered nurses, and two (2) licensed vocational nurses. Currently six (6) faculty members are available for clinical instruction. A seventh faculty member, also for clinical instruction and a registered nurse, was recently approved by the Board. Many of the faculty applications indicate that, while the faculty met the criteria as specified in Section 2529(c) (3) of the regulations, overall, the faculty has little teaching experience. With a faculty to student ratio of 1:15, the current number of faculty appears to be adequate for the current student enrollment.

➤ **Clinical Facilities:**

Central Nursing College Vocational Nursing Program is currently utilizing four (4) skilled nursing facilities, three (3) of which include rehabilitation or convalescent units. Other clinical sites include one acute hospital and two (2) private practice gynecology offices. At the skilled nursing and rehabilitation clinical site visited by the NECs, students, who were in the second half of the first term, are not assigned patients needing treatments. Two students are paired with a nursing assistant and help provide basic care related to hygiene and nutrition. Students are not allowed to administer medications.

➤ **Program and Student Records:**

Based on documents in the student records of the last cohort to graduate and a portion of the currently enrolled students, all of the students appeared to meet admission criteria. None of the students lacked documentation of high school completion or its equivalent.

Based on program records reviewed and interviews with the director and other staff, it was noted that a conceptual framework is not being utilized, an instructional plan is not being utilized, neither curriculum nor clinical facilities are being evaluated by faculty, and, it became apparent that **six (6) unapproved classes have been admitted. This totals eighty-three (83) students and alternates admitted** after the two (2) classes that were approved by the Board on February 22, 2013. The program added **twelve (12) readmitted students** to the unapproved classes. Of the **ninety-five (95)** students in classes without Board approval, **forty-three (43)** students did not continue with their cohort.

Given the foregoing, the following violations of the California Code of Regulations (Code) were identified:

Section 2526(a) (1) of the Code states:

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

. . . (1) Philosophy of the program . . .

Violation #1: Board records confirm approval of the program's curriculum and the consistency of that curriculum with established education principles. The director was not able to describe the program's philosophy. Further, there was no evidence the philosophy is incorporated in the curriculum currently presented to students.

Plan of Correction #1: This violation is **not corrected** at this time.

Section 2526(a) (2) of the Code states:

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

. . . (2) Conceptual framework . . .

Violation #2: The director reports a conceptual framework is not being utilized in the program at this time.

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

Section 2526(a) (4) of the Code states:

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

. . . (4) Curriculum objectives. . .

Violation #3: The director was unable to produce curriculum objectives.

Plan of Correction #3: This violation is **not corrected** at this time.

Section 2526(a) (7) of the Code states:

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

. . . (7) Instructional plan. . .

Violation #4: The director was unable to produce an instructional plan.

Plan of Correction #4: This violation is **not corrected** at this time.

Section 2526(a) (8) of the Code states:

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

. . . (8) Evaluation methodology for curriculum. . .

Violation #5: The director reported the curriculum is not being evaluated.

Plan of Correction #5: This violation is **not corrected** at this time.

Section 2526(a) (11) of the Code states:

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

. . . (11) Evaluation methodology for clinical facilities. . .

Violation #6: The director reported that clinical facilities are not being evaluated by the director or the faculty.

Plan of Correction #6: This violation is **not corrected** at this time.

Section 2527(b) of the Code states:

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

Violation #7: The program failed to notify the board of termination of four (4) faculty members within ten (10) days as required by existing regulations.

Plan of Correction #7: This violation is **not corrected** at this time.

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 #8: During the survey visit, consultants observed there is no physical library. There is a minimal collection of texts in the director's office and the student lounge. On the day of the survey visit there were ten (10) computer stations available for the forty-nine (49) enrolled students. The only private space to counsel students is the director's office. The skills lab is equipped for only the most basic level of care and has one basic mannequin.

Plan of Correction #8: This violation is **not corrected** at this time

Section 2530(f) of the Code states:

“The program's instructional plan shall be available to all faculty.”

Violation #9: The director could not locate or identify a Board - approved instructional plan.

Plan of Correction #9: This violation is **not corrected** at this time

Section 2530(k) of the Code states:

“The program shall have prior Board approval to increase the number of students per class and/or increase the frequency of admission of classes.”

Violation #10: On February 22, 2013, the Board placed Central Nursing College on provisional approval for a two year period, rescinded the program’s approval for ongoing admissions, and required the program to obtain approval by the full Board prior to the admission of additional classes. At that time, the Board approved two (2) full-time classes of thirty (30) students to begin February 25, 2013 and April 29, 2013. The program delayed admission of these classes and admitted a full-time class on March 14, 2013 (six (6) students from that class have since graduated) and the program admitted a full-time class of five (5) students on May 14, 2013.

The program subsequently admitted five (5) unapproved full-time classes and one (1) unapproved part-time class, totaling forty-nine (49) students in unapproved classes. The program failed to obtain Board approval prior to the admission of the admitted classes.

Plan of Correction #10: This violation is **not corrected** at this time.

Section 2533(a) of the Code states:

“Vocational nurse programs shall include theory and correlated clinical experience.”

Violation #11: Board representatives observed, during a visit to a clinical site, that assigned clinical experience is not correlated to presented theory instruction. This was also identified by the program in the January 20, 2014 faculty meeting minutes that were submitted to Board representatives.

Plan of Correction #11: This violation is **not corrected** at this time.

Section 2533(f) of the Code states:

“All curricular changes that significantly alter the program philosophy, conceptual framework, content, objectives, or other written documentation as required in Section 2526, shall be approved by the Board prior to implementation . . .

Violation #12: Based on interviews of the director and a review of submitted documents, it was identified the program is not using the Board - approved instructional plan and curriculum. Board records confirm that the curriculum in current use was not presented nor approved by the Board prior to implementation.

Plan of Correction #12: This violation is **not corrected** at this time.

Section 2534(b) of the Code 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 . . .

Violation #13: As observed by a visit to a clinical site by Board representatives, and, as noted in discussions with a clinical instructor and with the director, clinical experiences consist primarily of only basic care with late first-term students being paired with nursing assistants. Thus, students are not able to achieve competency-based objectives.

Plan of Correction #13: This violation is **not corrected** at this time.

Section 2534(c) of the Code states:

“Schools are responsible for the continuous review of clinical facilities to determine if the student's clinical objectives for each facility are being met.”

Violation #14: The program failed to provide evidence of faculty review or evaluation of clinical facilities to determine if clinical objectives can be achieved.

Plan of Correction #14: This violation is **not corrected** at this time.

Summary

The following table describes pass rates, as furnished by the Pearson Vue and published by the National Council of State Boards of Nursing as “Jurisdictional Summary of All First-Time Candidates Educated in Member Board Jurisdiction” for the period January 2011 through June 2014, compared to the number of graduated students as furnished by the Central Nursing College Vocational Nursing Program.

CENTRAL NURSING COLLEGE VOCATIONAL NURSING PROGRAM FIRST TIME LICENSING EXAMINATION PASS RATE BY YEAR OF GRADUATION					
Year of Graduation	# of Graduates	Graduates Taking Exam		Graduates Passing First Exam	
		#	%	#	%
2011	61	26	42.6%	5	8.2%
2012	44	35	79.5%	17	38.6%
2013	61	24	39.3%	9	14.7%

As noted in the above table, only **8.2%** of 2011 graduates passed the licensing examination on the first attempt, as of June 2014. Also as noted above, to date, only **14.7%** of 2013 graduates have passed the licensing examination on the first attempt.

As noted in the February 2013 report to the Board, an important issue identified with the program is the frequent turnover in program directors. Prior to the February 2013 Board meeting, there had been seven (7) different program directors since 2007 leading to a lack of continuity of leadership and effective administration in this program. **Since February, 2013, the program has had a total of four (4) directors, including the current director who was approved on September 18, 2013.**

The February 2013 report also noted that one of the most important elements of the program's action plan was to revise the program curriculum. The plan to revise the curriculum was also identified in the November 2013 report submitted by the current director. **That curriculum revision was started by a previous program director, edited by a subsequent program director, and has never been completed.** As observed at the July 2014 unannounced survey visit, an instructional plan was not in use, curriculum objectives were not in use, and purchased content was being utilized as lesson plans. According to the director and a fourth term student, computer-based testing is **not** introduced until the last term of the program. This information contradicts information in the program's plan to improve program pass rates, submitted December 4, 2012.

As recorded in the Notice of Change in Approval Status received by Central Nursing College on March 14, 2013, **the school was aware that no additional classes were to be admitted without prior approval by the full Board** (see Attachment I). The Acknowledgement of Change in Approval Status was signed by the program director on March 18, 2013 (see Attachment J). As previously stated, **the program admitted four (4) unapproved full-time classes and two (2) unapproved part-time class, totaling eighty-three (83) students. The program added twelve (12) readmitted students to unapproved classes.**

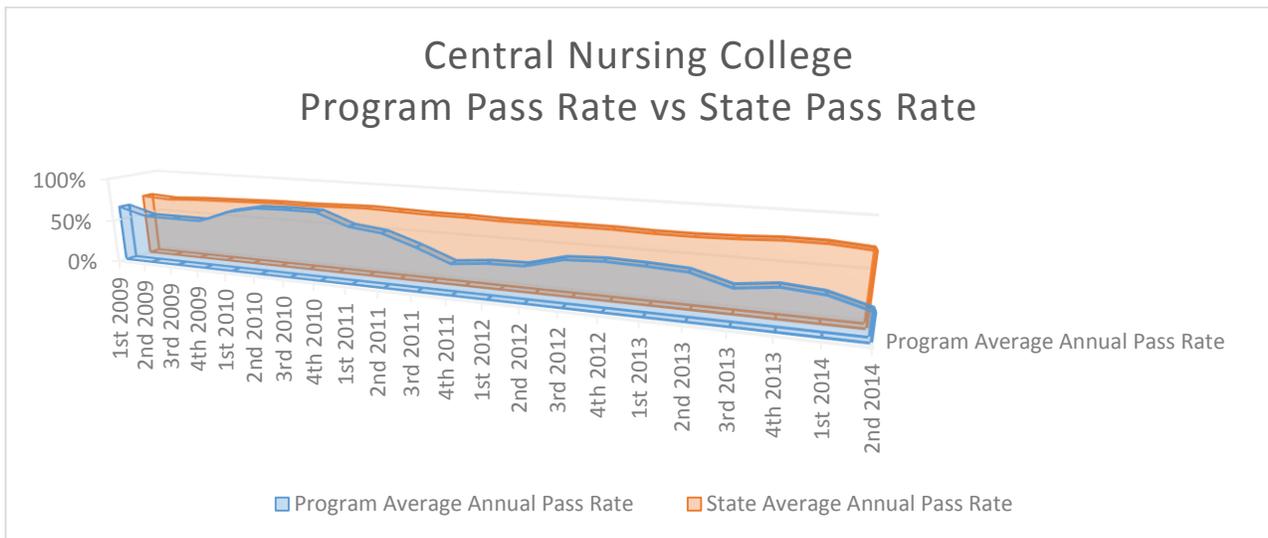
When placed on provisional approval on February 22, 2013, Central Nursing College Vocational Nursing Program had eight (8) consecutive quarters of average annual licensing examination pass rates that were greater than ten (10) percentage points **below** the state average annual pass rate. Since that time, the program's highest average annual pass rate was **51%** during Quarter 4 - 2012. During 2013, the program's pass rate averaged **29.75 percentage points below the state average annual pass rate.** For Quarter 1 – 2014, the program's average annual pass rate was **39%**; for Quarter 2 – 2014, the program's average annual pass rate decreased to **28%**.

Using the data 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 April 2007 through June 2014, and presented in the Licensing Examination Statistics, above, the following graph depicts the historical trend of the Central Nursing College Vocational Nursing Program pass rates:

CENTRAL NURSING COLLEGE PROGRAM AVERAGE ANNUAL PASS RATE



Finally, using the same data, the following graph compares the program’s average annual pass rate with the state’s average annual pass rate:



Recommendations:

1. Revoke Central Nursing College Vocational Nursing Program’s provisional approval, effective December 31, 2014.
2. Remove the program from the Board’s *List of Approved Programs*.

Rationale: The Board placed the program on provisional approval on February 22, 2013. On March 14, 2013, the Board forwarded to the director, per certified mail, advising the program of the change in the program’s status, identified violations,

and required corrections. The Board directed that the program demonstrate incremental progress in correcting identified violations and stated that the failure to do so may result in revocation of program approval.

To date, the program has failed to demonstrate incremental progress as specified in the Notice. Since being placed on provisional approval, average annual licensing examination pass rates have continued to decrease and are currently at **28%**, which is 45 percentage points below the state average annual pass rate. The demonstrated non-compliance with regulatory requirements has been documented by the number and type of violations identified on the recent unannounced survey visit. The extent of unauthorized admissions is one example of the demonstrated non-compliance with regulatory requirements. Also significant are the violations related to lack of sufficient resources to achieve the educational objectives of a vocational nursing program, the lack of correlation between theory and clinical instruction, and the failure to provide clinical experiences that would allow students to achieve competency-based objectives.

The previously reported action plans have not been completed and the program has failed to demonstrate awareness of the serious nature of the need for programmatic improvement, nor ability to correct the deficits.

A closure date of December 31, 2014 is recommended to allow for two (2) classes of students, a total of twenty (20) students, to graduate (October 7, 2014 and December 23, 2014) before closure. The remaining twenty-seven (27) students are not scheduled to graduate until March 29, 2015 (three (3) students), May 5, 2015 (fifteen (15) students) and September 6, 2015 (nine (9) students).

If the Board adopts the recommendations, the following options are available for these students.

1. Students may apply for admission to other programs, requesting transfer credit for previously completed theory and clinical instruction.
2. Students with prior paid work experience may apply for vocational nurse licensure based on equivalent education and experience.

Attachment A: History of Prior Board Actions.

Attachment B: Notice of Change in Approval Status Dated February 27, 2013.

Attachment C: Signed Acknowledgement of Change in Approval Status Dated March 18, 2013.

Attachment D: Notice of Violations Dated August 12, 2014.

Agenda Item #14.A.4., Attachment A

History of Prior Board Actions

- On April 14, 2004, the Executive Officer approved Central Nursing College to begin a vocational nursing program with an initial class of 15 students on May 17, 2004, only; and approved the program curriculum for 1616 hours, including 604 theory, and 1012 clinical hours.
- On May 13, 2005, the Executive Officer approved initial full accreditation for the Central Nursing College Vocational Nursing Program for the period May 13, 2005, through May 12, 2009, and issued a certificate accordingly; approved the program's request to replace students graduating August 26, 2005, with 15 students beginning September 5, 2005, only; and approved the program's request to admit a part-time class of 15 students on May 16, 2005, only. Following the Board meeting, the director informed the consultant that the start of the May 2005 part-time class would be postponed to June 2005.
- On August 17, 2005, the Executive Officer approved the program's request to admit two additional full-time classes of 15 students, one on October 20, 2005, and one on February 6, 2006.
- On November 17, 2005, the Executive Officer approved the program's request to admit an additional part-time class of 15 students on February 1, 2006, only. Subsequently, the director informed the Board that the program did not start a part-time class on February 1, 2006, because there were not sufficient applicants for the class.
- On April 12, 2006, the Executive Officer approved the program's request to admit an additional full-time class of 15 students on June 12, 2006, only. Subsequently, the director informed the Board that the program did not start a full-time class on June 12, 2006, because there were not sufficient applicants at that time. The full-time class started on July 17, 2006, with 15 students.
- On September 8, 2006, the Executive Officer approved the program's request to admit a full-time class of 30 students on October 2, 2006, only; and a part-time class of 15 students on October 16, 2006, only. On December 19, 2006, the director informed the Board that the full-time class approved to start on October 2, 2006, did not start until November 13, 2006 and the part-time class approved to start on October 16, 2006, did not start at all. The program is planning to start that class on January 7, 2007. Both classes were delayed because the program could not recruit students for the classes.
- On February 2, 2007, the Board denied the program's request to admit a full-time class of 15 students on February 5, 2007; and required the director to submit an analysis and status report regarding the following issues: the problem of recruiting and retaining students and faculty, ongoing friction between the director of the vocational nursing program and the administrator of the school, the students' perception regarding the poor quality of the education they are receiving, the fees that are being charged for make-up theory and clinical

sessions, and the program's poor pass rate. Additionally, the Board required that the director appear at the May 2007 Board Meeting to respond to questions from Board Members.

- On March 15, 2007, the director informed the Board that the part-time class that was approved to start on October 16, 2006, was not started until February 5, 2007, because the school could not recruit enough students for the class. That class started with eight students.
- **On March 15, 2007, a new director was approved; however, on April 4, 2007, that director resigned.**
- **On April 18, 2007, Susan Wood was approved as new program director.**
- On May 11, 2007, the Board accepted the program's status report; and approved the program's request to admit a full-time class of 15 students on June 4, 2007, to replace students who graduated on March 8, 2007.
- On October 26, 2007, the Board approved the Central Nursing College Vocational Nursing Program's request to admit a full-time class of 15 students on October 15, 2007, only.
- On January 9, 2008, the Board approved the Central Nursing College Vocational Nursing Program's request to admit 30 students on February 25, 2008, only, with an anticipated graduation date of February 20, 2009.
- On April 2, 2008, the Board approved the Central Nursing College Vocational Nursing Program's request to admit 30 students on June 16, 2008, only, with an anticipated graduation date of June 19, 2009.

The Board also approved the Central Nursing College Vocational Nursing Program's request to admit a part-time class of 15 students on June 16, 2008, with an anticipated graduation date of September 19, 2009.

- On August 13, 2008, the Executive Officer approved the Central Nursing College Vocational Nursing Program request to admit a full-time class of 30 students commencing September 15, 2008, with an anticipated graduation date of August 12, 2009; approved the program request to admit a full-time class of 30 students commencing December 15, 2008, with an anticipated graduation date of November 12, 2009; and approved ongoing admissions to replace graduating classes only, with the following stipulations:
 - a. No additional classes are added to the program's current pattern of admissions without prior approval. The program's current pattern of admissions includes admission of four (4) full-time classes of 30 students per year, and one (1) part-time class of 30 students, every 15 months.
 - b. The director documents that adequate resources, i.e. faculty and facilities, are available to support each admitted class of students.
- **On October 23, 2008, Sue Etter was approved as the new program director.**
- **On February 4, 2009, Linda Kim was approved as the new program director.**

- **On August 2, 2011, George Evans was approved as the new program director.**
- On February 22, 2012, the Board forwarded correspondence to the director advising that the program's average annual pass rates on the licensure examination had been more than ten (10) percentage points below state average annual pass rates for four quarters. The director was requested to submit a plan for improving the program's pass rates.
- On March 8, 2012, the Board received correspondence from the program director, George Evans, relative to an assessment of program and action plan to improve licensure examination pass rates.
- On May 7, 2012, the Board forwarded correspondence informing the school of five quarters of pass rates more than 10 percentage points **below** the state average pass rate and requesting a plan for improving the pass rates.
- **On May 11, 2012, Lynne Barnum was approved as the new program director.**
- On August 2, 2012, the Board sent correspondence per certified mail informing the program of six quarters of pass rates more than 10 percentage points below the state average pass rate and requesting a status report regarding the plan for improving the pass rates.
- **On October 23, 2012, Andrew Cha was approved as the new program director.**
- On November 2, 2012, the Board sent correspondence sent per certified mail informing the program of seven quarters of pass rates more than 10 percentage points of the state average pass rate and requesting information from the director in preparation for being considered for provisional approval at the February 2013 Board Meeting.

That information was to be submitted by December 15, 2012. The information was received from the new director on December 4, 2012.

- On December 26, 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 February 22, 2013, the following decisions were rendered by the Board:
 - 1) Place the Central Nursing College Vocational Nursing Program on provisional approval for the two – year period from February 22, 2013, through February 28, 2015, 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 I for draft of Notice)
 - 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 rates.

- 2) Rescind the program's approval for ongoing admissions and require the program to obtain approval by the full Board prior to the admission of additional students.
 - 3) Approve the admission of the full-time class of 30 students projected to start on February 25, 2013
 - 4) Approve the admission of the full-time class of 30 students projected to start on April 29, 2013.
 - 5) Require the program to submit follow-up reports in nine (9) months, but no later than **November 1, 2013**, and 21 months, but no later than **November 1, 2014**. The reports must include a comprehensive analysis of the program, specific actions to improve program pass rates, timeline for implementation, and expected outcomes. 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.
 - 6) 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.
 - 7) Require the program to demonstrate incremental progress in correcting the violation. If the program fails to satisfactorily demonstrate incremental progress, the full Board may revoke the program's approval. Failure to take any of these corrective actions may cause the full Board to revoke the program's approval.
 - 8) Place the program on the **February 2015** Board agenda for reconsideration of provisional approval.
- On March 13, 2014, the Board forwarded per certified mail the Notice of Change in Approval Status. That Notice specified identified deficiencies, required corrections, and time line for completion.

- **In March 2013 Jacqueline Miller was approved as director of the program.**
- **In June 2013 Catherine Dowling was approved as director of the program.**
- **On September 18, 2013 the current director, George Evans, was approved as director of the program.**
- On October 31, 2013 the director submitted a response to the February 2013 recommendations of the Board.
- On July 15 and 16, 2014 an unannounced survey visit was conducted by representatives of the Board.
- On August 11, 2014, the Board sent a Notice of Violations to the program.

Agenda Item #14.A.4., Attachment B



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

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



CERTIFIED MAIL

February 27, 2013

Andrew Jinbang Cha, Director
Vocational Nursing Program
Central Nursing College
3550 Wilshire Blvd.
Los Angeles, CA 90010

Subject: Notice of Change in Approval Status

Dear Mr. Cha:

Pursuant to the action of the Board of Vocational Nursing and Psychiatric Technicians (Board) on February 22, 2013 the approval status of the Central Nursing College Vocational Nursing Program has been changed from full approval to provisional approval for the two-year period from February 22, 2013, through February 28, 2015. The purpose of this letter is to explain the areas of non-compliance found and the corrections required of our program to avoid losing accreditation completely.

Once you have reviewed this letter, please sign and return the enclosed "Acknowledgement of Change in Approval Status" form by **Friday, March 15, 2013**.

AREAS OF NON-COMPLIANCE [VIOLATION(S)]

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

"The Board may place any program on provisional accreditation¹ when that program does not meet all requirements as set-forth in this chapter and in Section 2526..."

Section 2530 (I) 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.

- (I) Failure to maintain the required yearly average minimum pass rate or two years or eight consecutive quarters may be cause to place a program on provisional accreditation."

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.

Section 2533(f) of the California Code of Regulations states:

“All curricular changes that significantly alter the program philosophy, conceptual framework, content, objectives, or other written documentation as required in Section 2526, shall be approved by the Board prior to implementation. Proposed curricular changes must be submitted to the Board in final form by the fifteenth day of the second month preceding the month preceding the month of the Board meeting at which the changes will be considered. Revisions should include:

- (1) Explanation of changes;
- (2) Rationale for proposed revision;
- (3) Description of revised curriculum materials; and
- (4) Changes to behavioral objectives, if applicable.”

Program pass rates of the Central Nursing College Vocational Nursing Program for the past eight quarters are set forth in the following table.

Quarterly Statistics					Annual Statistics*		
Quarter	# Candidates	# Passed	% Passed	State Quarterly Pass Rate	Program Average Annual Pass Rate	State Average Annual Pass Rate	Variance From State Average Annual Pass Rate
Jan – Mar 2011	13	5	38%	80%	64%	77%	-13
Apr – Jun 2011	6	3	50%	71%	60%	76%	-16
Jul – Sep 2011	11	3	27%	74%	48%	75%	-27
Oct – Dec 2011	11	3	27%	74%	34%	75%	-41
Jan – Mar 2012	9	5	56%	77%	38%	74%	-36
Apr – Jun 2012	13	6	46%	72%	39%	74%	-35
Jul – Sep 2012	10	7	70%	74%	49%	74%	-25
Oct – Dec 2012	9	3	33%	70%	51%	74%	-23

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 comply with the annual average pass rate requirement.

REQUIRED CORRECTION(S)

1. The program shall bring its average annual pass rate to no more than ten (10) percentage points below the state average annual pass rates.
2. The program shall obtain approval by the full Board prior to the admission of any additional students.
3. Require the program to submit follow-up reports in nine (9) months, but no later than **November 1, 2013**, and 21 months, but no later than **November 1, 2014**. The reports must include a comprehensive analysis of the program, specific actions to improve program pass rates, timeline for implementation, and expected outcomes. The following elements must be addressed in the analysis.
 - a. Admission Criteria.
 - b. Screening and Selection Criteria.
 - c. Terminal Objectives.
 - d. Curriculum Objectives.
 - e. Instructional Plan.
 - f. Theory and Clinical Objectives for Each Course.
 - g. Lesson Plans for Each Course.
 - h. Textbooks.
 - i. Attendance Policy.
 - j. Remediation Policy.
 - k. Evaluations of Theory and Clinical Faculty.
 - l. Evaluations of Theory Presentations.
 - m. Evaluations of Clinical Rotations and Their Correlation to Theory Presentations.
 - n. Evaluation of Student Achievement.
 - o. Current Enrollment.
7. Require the program to comply with all approval standards in Article 4 of the Vocational Nursing Practice Act, commencing at Business and Professions Code Section 2880, and ~~Article 5 of the Board's Regulations, commencing at California Code of Regulations, Title 16, Section 2526.~~
8. The program shall demonstrate incremental progress in correcting the violation. If the program fails to satisfactorily demonstrate incremental progress, the full Board may revoke the program's approval. Failure to take any of these corrective actions may cause the full Board to revoke the program's approval.
9. The program shall notify all enrolled students of actions taken by the Board relative to the program's accreditation status, and expected time for resolution.

FUTURE BOARD ACTION

Your program will be placed on the **February 2015** 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, 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: **Based on the above corrections, the full Board's permission will be required for each future class admission.**

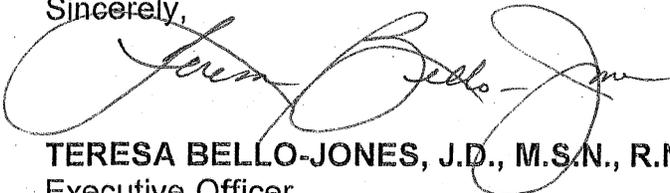
In the event your program is required to submit any report(s) as a corrective action pursuant to this notice, such reports are required in addition to any other reports required pursuant to 2527 of the Board's regulations.

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

A copy of title 16, California Code of Regulations, section 2526.1, regarding provisional 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

California Code of Regulations
Title 16
Section 2526.1

2526.1. Provisional Accreditation.

- (a) Provisional accreditation means a program has not met all requirements as set forth in this chapter and in Chapter 6.5, Division 2 of the Business and Professions Code.
- (b) Provisional accreditation shall be granted for a period determined by the Board.
- (c) 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. If the program has not met all requirements at the end of the initial provisional accreditation period, provisional accreditation may be extended if the program demonstrates to the satisfaction of the Board a good faith effort to correct all deficiencies.
- (d) Any program holding provisional accreditation may not admit "new" classes beyond the established pattern of admissions previously approved by the Board. The admission pattern is defined by the number of students per class and the frequency of admissions for the six class admissions that immediately precede the Board action to consider provisional accreditation.
- (e) A program placed on provisional accreditation shall receive written notification from the Board. The notification to the program shall include specific areas of noncompliance and requirements for correction. A program's failure to correct delineated areas of noncompliance is cause for revocation of provisional accreditation.
- (f) A material misrepresentation of fact by a vocational nursing program in any information submitted to the Board is cause for revocation of provisional accreditation.
- ~~(g) A program whose provisional accreditation has been revoked shall be removed~~ from the Board's list of accredited programs. The status of students as potential applicants for licensure will be determined by the Board.
- (h) A program that is removed from the Board's list of accredited programs subsequent to Board action based on the program's non-compliance with applicable regulations shall not reapply to establish a vocational nursing program for a minimum period of one calendar year.



Acknowledgement of Change in Approval Status

I, _____, director of Central Nursing College VN Program
(Director's Name) (Name of Program)

hereby acknowledge that this program's status has been changed from full approval to provisional approval. I understand that in accordance with Section 2526.1 (f) of the Vocational Nursing Rules and Regulations and Section 2581.1 (f) of the Psychiatric Technician Rules and Regulations, the Board will consider any advertisement of full approval while on provisional approval as "material misrepresentation of fact". "Material misrepresentation of fact" may lead to revocation of the program's approval. Further, I understand the program's provisional approval status will be reflected on the Board's internet website.

Please complete and return this form to the Board by **March 15, 2013**.

I certify under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

(Signature of Director)

(Date)



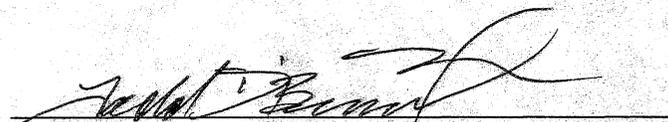
CERTIFICATE OF PROVISIONAL APPROVAL

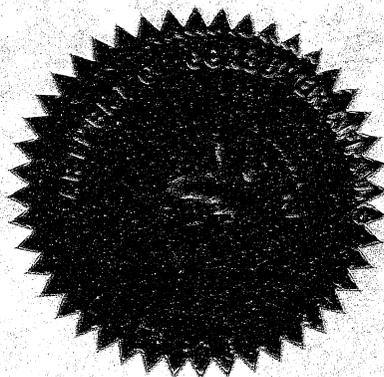
for

**Central Nursing College
Vocational Nursing Program**

This document reflects that the Board of Vocational Nursing and Psychiatric Technicians (Board) has provisionally approved the above-named program pursuant to Article 5 of the Vocational Nursing Practice Act and the Board's Rules and Regulations. A copy of documents related to the provisional approval may be obtained by contacting the Board at the address above. A candidate's completion of an approved vocational nursing program is partial fulfillment of requirements for the vocational nurse licensure examination.

Effective: February 22, 2013


Todd D'Braunstein, P.T.
President



Expires: February 28, 2015


Teresa Bello-Jones
Executive Officer

Received via email 3/19/13

11

Agenda Item #14.A.4., Attachment C



STATE AND CONSUMER SERVICES AGENCY • ARNOLD SCHWARZENEGGER, GOVERNOR

BOARD OF VOCATIONAL NURSING & PSYCHIATRIC TECHNICIANS
2535 Capitol Oaks Drive, Suite 205, Sacramento, CA 95833-2945
Phone (916) 263-7800 Fax (916) 263-7866 Web www.bvnpt.ca.gov



Acknowledgement of Change in Approval Status

I, ANDREW CHA, director of Central Nursing College VN Program
(Director's Name) (Name of Program)

hereby acknowledge that this program's status has been changed from full approval to provisional approval. I understand that in accordance with Section 2526.1 (f) of the Vocational Nursing Rules and Regulations and Section 2581.1 (f) of the Psychiatric Technician Rules and Regulations, the Board will consider any advertisement of full approval while on provisional approval as "material misrepresentation of fact". "Material misrepresentation of fact" may lead to revocation of the program's approval. Further, I understand the program's provisional approval status will be reflected on the Board's internet website.

Please complete and return this form to the Board by **March 15, 2013**.

I certify under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Andrew Cha MSN, RN-BC, PHN
(Signature of Director)

3-18-2013
(Date)



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

August 12, 2014

George Evans, Director
Vocational Nursing Program
Central Nursing College
3550 Wilshire Blvd, Suite 830
Los Angeles, CA 90010

Subject: Vocational Nursing Program Notice of Violation

Dear George Evans:

On July 15 and 16, 2014, the Board of Vocational Nursing and Psychiatric Technicians (Board) made an unannounced site visit to Central Nursing College. Based on the site visit and review of submitted documents, the following violations were identified:

Section 2526(a)(1) of the Vocational Nursing Rules and Regulations states:

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

... (1) Philosophy of the program ...

Violation #1: The director was not able to describe the philosophy and there was no evidence the philosophy is incorporated in the curriculum or presented to students.

Section 2526(a)(2) of the Vocational Nursing Rules and Regulations states:

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

... (2) Conceptual framework ...

Violation #2: The director reports a conceptual framework is not being utilized in the program at this time.

Section 2526(a)(4) of the Vocational Nursing Rules and Regulations states:

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

... (4) Curriculum objectives. . .

Violation #3: The director was unable to produce curriculum objectives.

Section 2526(a)(7) of the Vocational Nursing Rules and Regulations states:

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

... (7) Instructional plan. . .

Violation #4: The director was unable to produce an instructional plan.

Section 2526(a)(8) of the Vocational Nursing Rules and Regulations states:

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

... (8) Evaluation methodology for curriculum. . .

Violation #5: The director reported the curriculum is not being evaluated.

Section 2526(a)(11) of the Vocational Nursing Rules and Regulations states:

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

... (11) Evaluation methodology for clinical facilities. . .

Violation #6: The director reported that clinical facilities are not being evaluated by the director or the faculty.

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

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

Violation #7: The program failed to notify the board of termination of four (4) faculty members within the ten (10) days required by existing regulations.

Section 2530(a) of the Vocational Nursing Rules and Regulations 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 #8: During the survey visit, it was observed there is no physical library. There is a minimal collection of texts in the director's office and the student lounge. On the day of the survey visit there were ten (10) computer stations available for the forty-nine (49) enrolled students. The only private space to counsel students is the director's office. The skills lab is equipped for only the most basic level of care and has one basic mannequin.

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

"The program's instructional plan shall be available to all faculty."

Violation #9: A Board approved instructional plan could not be identified.

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

"The program shall have prior Board approval to increase the number of students per class and/or increase the frequency of admission of classes."

Violation #10: On February 22, 2013, the Board placed Central Nursing College on provisional approval for a two year period, rescinded the program's approval for ongoing admissions, and required the program to request approval of the full board for any future admissions. At that time, the Board approved two (2) full-time classes of thirty (30) students to begin February 25, 2013 and April 29, 2013. The program delayed admission of these classes and admitted a full-time class on March 14, 2013 (six students from that class have since graduated) and the program admitted a full-time class of five (5) students on May 14, 2013.

The program subsequently admitted five (5) unapproved full-time classes and one (1) unapproved part-time class, totaling forty-nine (49) students in unapproved classes.

Section 2533(a) of the Vocational Nursing Rules and Regulations states:

"Vocational nurse programs shall include theory and correlated clinical experience."

Violation #11: Board representatives observed, during a visit to a clinical site, that clinical experience is not being correlated with theory. This was also identified by the program in the January 20, 2014 faculty meeting minutes that were submitted to the Board representatives.

Section 2533(f) of the Vocational Nursing Rules and Regulations states:

“All curricular changes that significantly alter the program philosophy, conceptual framework, content, objectives, or other written documentation as required in Section 2526, shall be approved by the Board prior to implementation . . .

Violation #12: Based on interviews of the director and a review of submitted documents, it was identified the program is not using the Board approved instructional plan and curriculum. The program has altered and implemented a curriculum without prior Board approval.

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 . . .

Violation #13: As observed by a visit to a clinical site by Board representatives, and, as noted in discussions with a clinical instructor and with the director, clinical experiences consist primarily of only basic care with late first-term students being paired with nursing assistants. Thus, students are not able to achieve competency-based objectives.

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

“Schools are responsible for the continuous review of clinical facilities to determine if the student's clinical objectives for each facility are being met.”

Violation #14: The program failed to provide evidence of faculty review of clinical facilities to determine if clinical objectives can be achieved.

Be advised that the continuation of such violations jeopardizes your program's approval. A plan and timeline for correction of each violation (1-14) listed above will be required.

Please submit the following by the date listed below:

1. Submit an outline of the revised curriculum, including philosophy and conceptual framework, instructional plan, and curriculum objectives for review.
2. Develop evaluation forms utilized by the director for the following:

- a. Curriculum
 - b. Facilities
3. Submit a written plan for providing sufficient resources, as listed in Violation # 8 above.
 4. Submit a written plan for providing clinical facilities and clinical instruction such that students are provided with clinical experiences consistent with Board approved competency-based objectives.

The Board requires the above information no later than **September 3, 2014.**

Additionally, submit a revised curriculum, including philosophy and conceptual framework, instructional plan, and curriculum objectives for review **no later than October 15, 2014.**

Due to the severity and complexity of these violations, Central Nursing College Vocational Nursing Program has been placed on the September 2014 Board agenda for Consideration of Unannounced Survey Visit and Consideration of Unauthorized Admissions.

Additional information to assist you with preparation for the Board meeting will be sent separately. Should further information be needed, please feel free to contact me.

Sincerely,



**Donna G. Johnson, RNP, MS, MA
Nursing Education Consultant**