

Agenda Item # 6.A.2.



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

Board of Vocational Nursing and Psychiatric Technicians
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DATE: November 6, 2014

TO: Board Members

FROM: Donna G. Johnson, R.N.P., M.S., M.A.
Nursing Education Consultant

SUBJECT: Bay Area College of Nursing, Palo Alto, Vocational Nursing Program:
Reconsideration of Provisional Approval (Director: Rachele Cagampan, Palo Alto,
Santa Clara County, Private)

On November 10, 2011, the Board placed the Bay Area College of Nursing, Palo Alto Vocational Nursing Program on provisional accreditation¹ for a two (2) year period from November 10, 2011 through November 30, 2013, due to noncompliant licensure pass rates. At that time, the program's average annual pass rate was **39%**, which was **thirty-seven (37)** percentage points **below** the state average annual pass rate. The Board directed that the program demonstrate incremental progress in correcting its violation.

On November 22, 2013, with an average annual pass rate of **42%**, which was **thirty-two (32)** percentage points **below** the state average annual pass rate, the Board extended the program's provisional accreditation for the one (1) year period from December 1, 2013 through November 30, 2014.

Since being placed on provisional accreditation in November 2011, a total of **one hundred-eight (108)** students were admitted to the program and on September 12, 2014, another **forty (40)** students were approved as noted below.

1. One (1) evening class of twenty (20) students and two (2) alternates to commence September 29, 2014, graduating December 20, 2015 to **replace** the class that graduated August 2013.
2. One (1) day class of twenty (20) students and two (2) alternates to commence November 10, 2014, graduating February 14, 2016 to **replace** the class that graduated August 2014.

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.

History of Prior Board Actions

(See Attachment A for Prior Board Actions)

Enrollment

The program currently offers classes that are thirty (30) hours per week and fifty-eight (58) weeks in length. Approval by the full Board is required prior to the admission of each class. The program's admission pattern for current classes is seen in the enrollment table below.

The following table represents **current and projected** student enrollment based on current and proposed class starts and completions. The table indicates a **maximum enrollment of fifty-seven (57) students** for the period from **January 2010 through February 2016**.

ENROLLMENT DATA				
CLASS DATES		#Students Admitted	#Students Current or Completed	Total Enrolled
Start	Completed			
1/10 (Eve)		24	21	21
7/10 (Eve)		25	22	22 + 21 = 43
1/11 (Eve)		16	14	43 + 14 = 57
	2/11 (1/10 class)		-21	57 - 21 = 36
	9/11 (7/10 class)		-22	36 - 22 = 14
12/11 (Eve)		10	13	14 + 13 = 27
	2/12 (1/11 class)		-14	27 - 14 = 13
6/12 (Eve)		19	18	13 + 18 = 31
	3/13 (12/11 Class)		-13	31 - 13 = 18
5/13 (Eve)		11	10	18 + 10 = 28
	8/13 (6/12 Class)		-18	28 - 18 = 10
2/14 (Eve)	5/15	14	15	10 + 15 = 25
	8/14 (5/13 Class)		-10	25 - 10 = 15
9/14 (Eve)	12/15	20		15 + 20 = 35
11/14 (Day)	2/16	20		35 + 20 = 55

Licensing Examination Statistics

The following statistics, furnished by the Pearson Vue and published by the National Council of State Boards of Nursing as "Jurisdictional Summary of All First-Time Candidates Educated in Member Board Jurisdiction," for the period January 2010 through September 2014, specify the pass percentage rates for graduates of the Bay Area College of Nursing, Palo Alto, Vocational Nursing Program on the National Council Licensure Examination for Practical (Vocational) Nurses (NCLEX-PN®), and the variance from state average annual pass rates.

NCLEX-PN® Licensure Examination Data							
Quarterly Statistics					Annual Statistics*		
Quarter	# Candidates	# Passed	% Passed	State Quarterly Pass Rate	Program Average Annual Pass Rate	State Average Annual Pass Rate [CCR § 2530 (I)]	Variance From State Average Annual Pass Rate
Jan – Mar 2010	18	7	39%	75%	64%	74%	-10
Apr – Jun 2010	13	6	46%	74%	59%	75%	-16
Jul – Sep 2010	17	7	41%	76%	45%	75%	-30
Oct – Dec 2010	11	2	18%	77%	37%	76%	-39
Jan – Mar 2011	13	7	54%	80%	41%	77%	-36
Apr – Jun 2011	2	0	0%	71%	37%	76%	-39
Jul – Sep 2011	15	7	47%	74%	39%	76%	-37
Oct – Dec 2011	4	3	75%	74%	50%	75%	-25
Jan – Mar 2012	11	5	45%	77%	47%	74%	-27
Apr – Jun 2012	13	7	54%	72%	51%	74%	-23
Jul – Sep 2012	8	5	63%	74%	56%	74%	-18
Oct – Dec 2012	3	1	33%	70%	51%	74%	-23
Jan – Mar 2013	5	1	20%	75%	48%	73%	-25
Apr – Jun 2013	3	0	0%	78%	37%	73%	-36
Jul – Sep 2013	8	6	75%	75%	42%	74%	-32
Oct – Dec 2013	5	4	80%	76%	52%	76%	-24
Jan – Mar 2014	5	4	80%	74%	67%	76%	-9
Apr – Jun 2014	6	4	67%	66%	75%	73%	+2
Jul – Sep 2014	No Candidates Tested			72%	75%	73%	+2

*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.”

This data substantiates the program's non-compliance with Section 2530 (l) of the California Code of Regulations for fifteen (15) consecutive quarters. However, it is also noted that for the first **three (3)** quarters of 2014, the program's average annual pass rate is compliant with regulatory requirements. This is based on **eleven (11)** candidates.

Based on the most current data available (July through September 2014), the program's average annual pass rate is **75%**. The California average annual pass rate for graduates from approved vocational nursing programs who took the NCLEX-PN® for the first time is 73%. The average annual pass rate for the Bay Area College of Nursing, Palo Alto, Vocational Nursing Program is **two (2)** percentage points **above** the state average annual pass rate. **However, no first – time candidates took the examination during the most recent quarter.**

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 eleven (11), including the director. The director has 90% administrative and 10% teaching duties. Of the total faculty, ten (10) instructors, including the director, are approved to teach clinical.

Based on a maximum enrollment of fifty-seven (57) students, four (4) instructors are needed. Therefore, the number of current faculty is adequate for the current and proposed enrollment.

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

“Schools shall have clinical facilities adequate as to number, type, and variety of patients treated, to provide clinical experience for all students in the areas specified by Section 2533. There must be available for student assignment, an adequate daily census of patients to afford a variety of clinical experiences consistent with competency-based objectives and theory being taught.”

The program has clinical facilities that are adequate as to type and variety of clients treated to enable current and proposed students to meet clinical objectives in accordance with Section 2534 (b) of the Vocational Nursing Rules and Regulations.

Other Considerations

As noted previously, the Board placed the Bay Area College of Nursing, Palo Alto Vocational Nursing Program on provisional approval for a two (2) year period from November 10, 2011 through November 30, 2013, due to noncompliant program pass rates. At the time, the program's average annual pass rate was **39%**. On November 22, 2013, with an average annual pass rate of **42%**, the Board extended the program's provisional approval for the one

(1) year period from December 1, 2013 through November 30, 2014 and scheduled reconsideration of provisional approval for November 2014.

In an effort to improve NCLEX/PN® pass rates, the program proposed revisions to its admission, screening, and selection criteria, and completed a major curriculum revision that was approved on April 17, 2012. The revised curriculum shifted some of the focus in the theoretical content, increased clinical hours from **970** to **1012.5**, and incorporated ATI, as noted below.

In August and September 2013, the program director submitted an analysis of the most recent three (3) classes, problems identified per class, and the actions taken by the program to address those problems for subsequent classes.

The following actions were reported.

- Revised Admission Criteria by increasing the passing score on the admission examination from 8th grade level to 12th grade level or higher and adding the Scholastic Level Exam (SLE) with a passing score of 14 or higher as part of the admission testing.
- Increased the number of tests and quizzes that are given during the program to desensitize students with test anxiety
- Added the Assessment Technologies Institute (ATI) VN Package with proctored computerized testing throughout the program.
- Incorporated students' ATI grades as part of their overall grade and raised the passing score to 75%, including the ATI predictor examination.
- Utilizing third-party vendors, provided in-service training to faculty with the goal of improving teaching techniques and test development skills.
- Worked with faculty to evaluate and assure competence.
- Ensured that students strictly adhere to attendance policy.

The required comprehensive analysis follow-up, which was due on August 1, 2014 was submitted on September 24, 2014 after phone consultation with the program director. That document (Attachment B) added improvements noted to date to the previously submitted analyses.

As a point of clarification, it has been noted that the program has alternately been called a full – time program and also a part – time program. The director reports the program has remained a thirty (30) hours per week program of fifty-eight (58) weeks in length.

Summary

At the time of placement on provisional approval, the program's quarter pass rate was 47%; its average annual pass rate was 39%, which was thirty-seven (37) percentage points below the state average annual pass rate. Since placement on provisional approval, the program's quarter pass rate has increased. However, the program's average annual pass rate has been compliant with regulations for only the last **three (3) quarters** and this is based on a total of **eleven (11) candidates**.

A closer examination of licensing pass rate data, as provided 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,” and enrollment and graduation data as provided by the program, documents that **fewer graduates are taking the licensing examination**. The first cohort to experience the revised curriculum entered the program in June 2012 and **eighteen (18)** students graduated in August 2013. To date, only **nine (9)** graduates of that cohort, or **50%**, have taken the licensing examination. **Eight (8)** graduates of that cohort have passed the licensing examination. For the class graduating in March 2013, 77% of the graduates took the licensing examination and for the class graduating in February 2012, 86% of the graduates took the licensing examination.

Since implementation of the new curriculum, an additional **ten (10)** students graduated in August 2014. Examination data from these graduates is not expected to be available for at least the next two (2) quarters.

Recommendations:

1. Extend provisional approval of the Bay Area College of Nursing, Palo Alto, Vocational Nursing Program for the one year period from December 1, 2014 through to November 30, 2015 (see Attachment C).
2. Continue to require the program to maintain its average annual pass rate at no more than ten percentage points below the state average annual pass rates.
3. Continue to require the program to admit no additional students unless approved by the full Board.
4. Require the program to provide no less than one (1) clinical instructor for every 10 (ten) students in all clinical experiences.
5. Require the program to submit a report analyzing the reasons for the decrease in the number of graduates taking the licensing examination since the introduction of the new curriculum. The report must be submitted no later than January 15, 2015.
6. Require the program to submit a follow-up report in nine (9) months, but no later than **August 1, 2015**. The report must include a **new** 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. Continue to 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. Continue to require the program to demonstrate incremental progress in correcting the violations. If the program fails to satisfactorily demonstrate incremental progress, the full Board may revoke the program's approval.
 9. Failure to take any of these corrective actions may cause the full Board to revoke the program's approval.
 10. Place the program on the **November 2015** Board agenda for reconsideration of provisional approval.

Rationale:

As noted previously, the Board placed the Bay Area College of Nursing, Palo Alto, Vocational Nursing Program on provisional approval for a two (2) year period from November 10, 2011 through November 30, 2013, due to noncompliant program pass rates. At that time, the program's quarter pass rate was 47%; its average annual pass rate was **39%, thirty-seven (37) percentage points below** the state average annual pass rate. With an average annual pass rate of **42%, thirty-two percentage points below** the state average annual pass rate, the program was given a one (1) year extension of provisional approval in November 2013.

Since being placed on provisional approval, the program has made changes aimed at achieving regulatory compliance and improving students' possession of the knowledge, skills, and abilities necessary for the provision of safe and competent client care upon entry into professional practice.

Published examination statistics demonstrate the program's improved pass rates for the first **three (3)** quarters of 2014. This is based on **eleven (11)** exam candidates. The program had no first-time exam candidates during this most recent quarter. The program's average annual pass rate has increased to be less than ten (10) percentage points below the state average annual pass rate since the first quarter of this year. Currently, the program's average annual pass rate is **75%, two (2) percentage points above** the state average annual pass rate.

However, the improvement is recent and based upon low numbers of graduates testing and even fewer licensing examination candidates since the implementation of the new curriculum with the nineteen (19) students admitted in June 2012. Of those students, **eighteen (18)** graduated in August 2013. That class has a lower rate of graduates taking the examination (50%). This, and the brief period of improvement in the average annual pass rate, supports the extension of provisional approval and continued close monitoring at this time.

- Attachment A: History of Prior Board Actions.
- Attachment B: Program Follow-up Comprehensive Analysis Submitted September 24, 2014.
- Attachment C: Draft Notice of Change in Approval Status

Agenda Item ## 6.A.2., Attachment A

BAY AREA COLLEGE OF NURSING, PALO ALTO VOCATIONAL NURSING PROGRAM

History of Prior Board Actions

- On April 12, 2006, the Executive Officer approved Bay Area College of Nursing, Palo Alto's request to begin a vocational nursing program with an initial full-time class of 20 students commencing May 22, 2006 only; and approved the program curriculum for 1598 hours, including 628 theory, and 970 clinical hours.
- February 8, 2007, the Board received correspondence stating the program name was changed to Bay Area College of Nursing, Inc., Palo Alto.
- On June 25, 26, 2007, the program was inspected to determine compliance with regulatory requirements specified in California Code of Regulations Article 5.
- On July 10, 2007, the Executive Officer approved the program's full accreditation for the period from June 26, 2007, through June 25, 2011, and issued a certificate accordingly.

Additionally, the Executive Officer approved the program's request for ongoing admissions of a full-time class of 60 students each January and July only, commencing July 17, 2007, 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 two (2) full-time classes of 60 students plus 6 alternates in January and July of each year.
 - b. The director documents that adequate resources, i.e. faculty and facilities, are available to support each admitted class of students.
- On November 8, 2007, the Executive Officer approved the program's request to admit a full-time evening class of 30 students commencing November 5, 2007 only, graduating December 16, 2008.
 - On April 30, 2008, the Executive Officer approved the program's revised curriculum for 1646 hours (Theory – 676 hours; Clinical – 970 hours.) The program was directed to submit a revised instructional plan consistent with the revised program hours by May 1, 2008.
 - On May 5, 2008, the program submitted documentation and pictures relative to its new Skills Laboratory. The Executive Officer approved the program's revised instructional plan for 1646 hours (Theory – 676 hours; Clinical – 970 hours).

- On May 15, 2008, the program submitted its revised instructional plan and documentation confirming completion of lesson plans for Terms I, II, and III.
- On December 8, 2010, the assigned consultant forwarded correspondence to the director advising that the program's average annual pass rate had fallen more than ten (10) percentage points below the state average annual pass rate for the past four (4) quarters. The program was requested to submit a written plan for improving their NCLEX-PN® pass rates by December 17, 2010.
- On December 10, 2010, the Board received electronic correspondence from Abigail Ethel A. Valbuena, Assistant Director of Nursing, Bay Area College of Nursing, Palo Alto Daly City Milpitas San Jose, relative to a proposed curriculum revision.
- On December 16, 2010, program representatives delivered correspondence and a computer disk to the Board's Sacramento headquarters, specifying the program's plan to improve program pass rates.
- On December 21, 2010, the Executive Officer approved the Bay Area College of Nursing, Palo Alto, Vocational Nursing Program's request to admit 30 students into an evening class commencing January 3, 2011 and graduating February 10, 2012. The Executive Officer required the program to submit a report by **February 1, 2011**, that includes 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.
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 - n. Evaluation of Student Achievement.
 - o. Current Enrollment Information

Additionally, the Executive Officer **rescinded** the program's approval for the ongoing admission of 60 students into full-time day classes each January and July; **and**, required the program to obtain Board approval prior to the admission of students into day and evening classes.

- On March 22, 2011, the Board received program documents related to its comprehensive analysis.

- On August 24, 2011, the director submitted a comprehensive program analysis dated January 28, 2011.
- On August 26, 2011, the Executive Officer deferred action on Bay Area College of Nursing, Palo Alto, Vocational Nursing Program's request to admit 22 students commencing September 19, 2011, to the full Board; **and**, placed the program on the agenda for the November 10, 2011 Board meeting for consideration of placement on provisional accreditation; **and**, required the program to obtain Board approval prior to the admission of future classes.
- On October 7, 2011, the assigned consultant forwarded correspondence requesting submission of fifteen (15) copies of pertinent documents, plan, and subsequent actions taken to correct identified problems that they desire Board members to consider.
- On October 31, 2011, the Board received fifteen (15) copies of pertinent documents for Board consideration related to subsequent actions taken by the program to correct identified problems.
- On November 10, 2011 the Board placed Bay Area College of Nursing, Palo Alto, Vocational Nursing Program on provisional accreditation for the two-year period from November 10, 2011, through November 30, 2013, and issued a notice to the program to identify specific areas of noncompliance and requirements for correction as referenced in Section 2526.1 (e) of the California Code of Regulations; **and**,

Required the program to bring its average annual pass rate to no more than ten (10) percentage points below the State average annual pass rate; **and**

Approved the program's request to admit a class of 14 full-time evening students on December 14, 2011, graduating on February 24, 2013, at this time; **and**,

Required the program to admit no additional students unless approved by the full Board; **and**,

Required the program to submit follow-up reports in nine months, but no later than **August 1, 2012**, and 21 months, but no later than **August 1, 2013**. The reports must include a comprehensive analysis of the program, specific actions taken to improve program pass rates, timeline for implementation, and the effect of employed interventions. The following elements must be addressed in the analysis.

- a. Admission Criteria.
- b. Screening and Selection Criteria.
- c. Terminal Objectives.
- d. Curriculum Objectives.
- e. Instructional Plan.
- f. Theory and Clinical Objectives for Each Course.
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- n. Evaluation of Student Achievement.
- o. Current Enrollment; **and**,

Required 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; **and**,

Required the program to demonstrate incremental progress in correcting the violations. If the program fails to satisfactorily demonstrate incremental progress, the full Board may revoke the program's approval; **and**,

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

Placed the program on the **November 2013** Board agenda for reconsideration of provisional approval.

- On November 22, 2011 the Board forwarded to the director the Notice of Change in Approval Status.
- On March 26, 2012, the Board received correspondence from program director requesting approval to admit 20 students plus two (2) alternates into an evening class commencing May 15, 2012 and graduating July 21, 2013 to **replace** students who graduated on February 24, 2012.
- On April 4, 2012, the Executive Officer approved Bay Area College of Nursing, Palo Alto, Vocational Nursing Program's request for a major revision of the curriculum to include a change in total curriculum hours to 1588, a change in theory hours to 576, and a change in clinical hours to 1012.5; **and**, approved the program's new instructional plan, instructional methods and materials, admission criteria, screening and selection criteria, attendance policies and evaluation of student achievement.
- On April 9, 2012, the Board received school correspondence that they wished the full Board to consider.
- On April 11, 2012, the Board received the program's plan of action to improve the performance of program graduates on the licensure examination.
- On May 11, 2012, the Board approved the program's request to admit 20 students plus two (2) alternates into an evening class commencing May 15, 2012 and graduating July 21, 2013 to **replace** students who graduated on February 24, 2012; and continued to require the program to admit no additional students unless approved by the full Board.

- On August 6, 2012, the Board received the program's follow-up report that was due on August 1, 2012.
- On September 14, 2012, the Board received correspondence from program director requesting approval to admit 20 students plus two (2) alternates into an evening class commencing November 26, 2012 and graduating February 16, 2014.
- On October 3, 2012, the assigned consultant forward correspondence to the director requesting documents for dissemination to Board Members.
- On November 9, 2012 the Board approved the Bay Area College of Nursing, Palo Alto, Vocational Nursing Program's request to admit 20 students plus two (2) alternates into an evening class commencing November 26, 2012 and graduating February 16, 2014 **and** continued to require the program to admit no additional students unless approved by the full Board.
- On September 12, 2013, the Board received correspondence from the program director requesting approval to admit 20 students plus two (2) alternates into an evening class commencing February 10, 2014, and graduating May 24, 2015. The requested class would replace the class that graduated on March 3, 2013.
- On November 22, 2013, the Board extended the provisional approval of the Bay Area College of Nursing, Palo Alto, Vocational Nursing Program for the one (1) year period from December 1, 2013 through to November 30, 2014; **and** approved the Bay Area College of Nursing, Palo Alto, Vocational Nursing Program's request to admit twenty (20) students plus two (2) alternates into an evening class commencing February 10, 2014 and graduating May 24, 2015; **and** continued to require the program bring its average annual pass rate to no more than ten percentage points below the state average annual pass rates; **and** continued to require the program to admit no additional students unless approved by the full Board; **and** required the program to submit follow-up reports in nine (9) months, but no later than **August 1, 2014**. The report 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.
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- m. Evaluations of Clinical Rotations and Their Correlation to Theory Presentations.
- n. Evaluation of Student Achievement.
- o. Current Enrollment

In addition, the Board required 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; **and** required the program to demonstrate incremental progress in correcting the violations; **and** if the program fails to satisfactorily demonstrate incremental progress, the full Board may revoke the program's approval.

- On September 12, 2014 the approved the following: a request to admit one (1) part-time evening class of twenty (20) students and two (2) alternates to commence September 29, 2014, graduating December 20, 2015 to **replace** the class that graduated August 2013 **and** one (1) part-time day class of twenty (20) students and two (2) alternates to commence November 10, 2014, graduating February 14, 2016 to **replace** the class that graduated August 2014.
- On September 23, 2014, the assigned consultant phoned the program director to request the required follow-up report that was due on August 1, 2014.
- On September 24, 2014, via electronic correspondence, the Board received the required report from the program director.



Agenda Item #6.A.2., Attachment B

BAY AREA COLLEGE OF NURSING

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Bay Area College of Nursing – Comprehensive Analysis

BVNPT RECD EDU
ON 9.24.14. WITH

Due: August 1, 2014

1. Admission Criteria

a. COMPREHENSIVE ANALYSIS:

We are currently utilizing the revised Wonderlic/WBST entrance exams score of 12th grade level or higher. By increasing the grade level for a passing with the addition of the Scholastic Level Exam, this will assess the readiness and suitability of the students who are going to be enrolled in the program. In addition, this can also provide an accurate appraisal for a candidate's potential as a nurse.

b. SPECIFIC ACTIONS TO IMPROVE PASS RATE:

The addition of SLE with a passing score of 14 or higher as well as the revised WBST passing score from 8th Grade level (200 Verbal and 210 Quantitative) to a score at the 12th grade level or higher for the Verbal and Quantitative categories, are tools to assess the readiness and sustainability for success in the VN program and can provide an accurate appraisal of a candidate's potential as a nurse. Of the cohort that the revised entrance exam has been implemented all but one student has successfully completed the course in a timely manner.

c. TIMELINE:

In effect.

d. EFFECT OF INTERVENTION: Expected outcome of intervention will be as follows:

- i. There will be a reduction in student cancellations/withdrawals/terminations due to failure to commit to the rigorous training/education that the school offers.
- ii. Minimize failure to pass the academic requirements of the program.
- iii. The school's annual pass rate will improve to 80% or higher by the end of the course program.
- Our pass rate has been gradually increasing in the past seven consecutive quarters with a current annual pass rate of 75%. (Please refer to Table Attachment)

2. Screening and Selection Criteria

a. COMPREHENSIVE ANALYSIS:

We have initially proposed a 3.0 cumulative grade point average or higher but learned that this was not feasible for majority of applicants have a 2.0 GPA. The students will have to go through and pass the interview process along with meeting the minimum passing grade in the entrance examination required by the school.

b. SPECIFIC ACTIONS TO IMPROVE PASS RATE:

We will require a 2.0 (C average) or higher overall cumulative grade point average based on completed secondary education or GED equivalency. We anticipate that candidates will cope with the demands of being a student when they achieve the increased in score on WBST from a passing score at the 8th Grade level (200 Verbal and 210 Quantitative) to a score at the 12th Grade level or higher for the Verbal and Quantitative categories. In addition, testing the students' cognitive ability using SLE with a passing score of 14 will also assess



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their readiness and suitability for success in the field of nursing. The candidates will also have to undergo a rigorous interview process using the Rubric criteria, which evaluates attitude, skills and experience.

- The gradual increase in pass rate for the past seven quarters with the last quarter being at 67% clearly shows that increasing the WBST scores of at least at a 12th grade level and the SLE of 14 has helped the students' readiness and suitability for success in the field of nursing. (Please refer to the Table Attachment)

c. **TIMELINE:**

In effect.

d. **EFFECT OF INTERVENTION:** Expected outcome of intervention will be as follows:

- i. There will be a reduction in student cancellations/withdrawals/terminations due to failure to commit to the rigorous training/education that the school offers
- ii. Minimize failure to pass the academic requirements of the program.
- There are no currently enrolled students dropping out of the program.
- iii. The school's annual pass rate will improve to 80% or higher by the end of the course program.
- The school's annual pass rate has increased consecutively in the past 2 years with the latest of 75%. (Please refer to the Table Attachment)

3. Terminal Objectives

a. **COMPREHENSIVE ANALYSIS:**

Integrate and provide an end-of-the program clinical case study review/NCLEX test plan in preparation for the NCLEX-PN state exams.

b. **SPECIFIC ACTIONS TO IMPROVE PASS RATE:**

- i. Currently monitoring student progress throughout the three (3) terms to determine capability to advance or complete the program by instituting the following:
 1. (a) Proctored ATI exams throughout each term.
 2. (b) Students are deemed eligible to advance to the next term when they reach an overall passing grade and be cleared by their instructors as well as show improvement in their ATI exams (Level II). Failure to reach an overall passing grade will not be cleared to proceed to the next level of the program, therefore, will have to repeat the entire term.
 3. (c) At the end of the program, the student will have to take the comprehensive final examination that will determine their probability of passing the NCLEX if they sat and take it that day. After taking the comprehensive exam, the students will be given a list of topics they need to study, making remediation more streamlined. There have been many studies to show the ATI Proctored Comprehensive Predictor is predictive of how students will perform on the NCLEX. Any student that doesn't



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meet the benchmark established by Bay Area College of Nursing (Level II) will have to remediate based on the plan established by the Director.

- ii. Utilize the annual reports for ongoing evaluation of factors influencing the program's NCLEX results.

- We now have results of the newly implemented curriculum and it shows that since the program was placed under probation in November 2011, we have gradually increased our quarterly passed rate to currently 67%. Our annual pass rate has increased in the past seven consecutive quarters. Currently, our annual pass rate is at 75% (2% points above the state average annual pass rate) up from 39%, when we were placed under probation. (Please see Table/Graph Attachment)

- c. TIMELINE: This is being implemented and in progress.

- d. EFFECT OF INTERVENTION:

Expected outcome of intervention will be as follows:

- i. The students will be fully prepared to take and successfully pass the ATI-administered comprehensive final exams. Of the cohort that took the comprehensive final exam, it showed that they were prepared for the exam by obtaining high marks on their final exam at the end of the program as well as obtaining an overall passing grade.
- ii. The school's annual pass rate will improve to 80% or higher by the end of the course program.
- With the latest annual pass rate of 75%, clearly, it shows that the new curriculum has helped the students in this cohort pass the NCLEX exam in their first attempt. (Please refer to Table Attachment)

4. Instructional Plan

- a. COMPREHENSIVE ANALYSIS:

Current curriculum approved and in use is the 1588.5 hours. The school has incorporated ATI in the curriculum that will help students hone their knowledge in specific areas where they struggled from during the course of the program.

- b. SPECIFIC ACTIONS TO IMPROVE PASS RATE:

- i. The school has instituted the 1588.5 curriculum hours. The hours have been revised to reduce the length of time specific subjects are discussed and to eliminate redundancy of topics. Although the revised hours have been reduced, the number of weeks increased by 2. During certain weeks, the amount of theory hours is reduced in order to maximize outside class time to absorb and study the material. Students are spending more time outside class hours improving their understanding of the materials by doing ATI practice exams, tutorials, and templates. Although student have access to ATI practice exams, tutorials, modules, and videos, time spent on these modes of learning are not counted in the actual curriculum hours.

Currently being implemented.



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ii. Begin using ATI-administered practice exams, proctored exams, and comprehensive predictor exam as part of the curriculum and a requirement of the program. The ATI Proctored Comprehensive Predictor is created from the NCLEX PN 2011 Blueprint. The assessment will tell the student their probability of passing the NCLEX if they sat for it that day. Once the student has completed their practice or proctored assessment, they will have a list of topics they need to study, making remediation more streamlined. There have been many studies to show the ATI Proctored Comprehensive Predictor is predictive of how students will perform on the NCLEX. Any students that do not meet the benchmark established by Bay Area College of Nursing (Level II) will have to remediate to the plan established by the Director.

- **Currently being implemented and there were four students who needed to take a remediation exam at the end of the program.**

iii. Perform a cross analysis of the curriculum with the detailed clinical case study/NCLEX test plan and course review.

- **Currently being implemented.**

iv. Utilize board consultants as needed in program evaluation and curriculum development

- **Currently being implemented.**

v. Include development of study and test-taking skills early in the program.

- **Currently being implemented.**

vi. Faculty needs to receive training on test development and instructional techniques. The school promotes better teaching through attendance of faculty workshops, in-service trainings, continuing education, seminars, and other activities that would foster professional growth. Faculty members are also encouraged to observe other instructors, at their own convenience

- **The school has agreements with third-party vendors (ATI Academy, D&D Educational Resources, etc.) to provide the necessary in-service training for the improvement of instruction of our faculty and staff.**

c. TIMELINE:

In effect.

d. EFFECT OF INTERVENTION: Expected outcome of intervention will be as follows:

i. The students will be academically and clinically prepared to perform nursing tasks and functions and will successfully pass all the requirements per term including the ATI-administered practice exams, proctored exams, and comprehensive exit exams. The students successfully completed the ATI-administered examinations and were able to meet the benchmark set in order to pass the program.

ii. The school's annual pass rate will improve to 80% or higher by the end of the course program.

- **The school's latest annual pass rate has increased to 75%, which is 2% points higher than the state annual pass rate. (Please refer to the Table Attachment)**



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5. Theory and Clinical Objectives for Each Course

a. COMPREHENSIVE ANALYSIS:

Theory and clinical objectives are met and the school started implementation of ATI proctored examinations in order to help the students improve their understanding of the materials and test taking skills.

b. SPECIFIC ACTIONS TO IMPROVE PASS RATE:

The students are currently using ATI-administered practice exams, proctored exams, and comprehensive predictor exams as part of the curriculum and a requirement of the program.

c. TIMELINE:

These are currently being implemented and are constantly monitored.

d. EFFECT OF INTERVENTION:

Expected outcome of intervention will be as follows:

- i. The students will be academically and clinically prepared to perform nursing tasks and functions and will successfully pass all the requirements per term including the ATI-administered practice exams, proctored exams, and comprehensive exit exams. The students successfully completed the ATI-administered examinations and were able to meet the benchmark set in order to pass the program.
- ii. The school's annual pass rate will improve to 80% or higher by the end of the course program.

- Since the successful completion of ATI-administered examinations, we have seen a gradual increase in the school's pass rate for the past 7 consecutive quarters as well as the last couple of annual pass rate the latest being 67% and 75%, respectively. (Please refer to the Table/Graph Attachment)

6. Lesson Plans for each Course

a. COMPREHENSIVE ANALYSIS:

Lesson plans are submitted by the instructor after the class is taught and is kept on file.

- This is being implemented and monitored.

b. SPECIFIC ACTIONS TO IMPROVE PASS RATE:

- i. Faculty will attend school related activities, Faculty Development Plans, etc. to help improve their test development and instructional techniques. In addition, the school director monitors the lesson plans and course syllabi created by the faculty to ensure that the objectives of the instructional plan are met.
- ii. Lesson plans shall reflect implementation of test taking strategies and NCLEX practice tests at the end of each course topic.

c. TIMELINE:

These are currently being implemented and are constantly monitored.

d. EFFECT OF INTERVENTION:



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Expected outcome of intervention will be as follows:

- i. Required evidence of ongoing professional development certifications related to teaching strategies & methods, test development will be kept on file.
 - **Quarterly CEUs for professional and educational/teaching development are required to be submitted by each faculty. The school has agreements with third-party vendors (ATI Academy, D&D Educational Resources, etc.) to provide the necessary in-service training for the improvement of instruction of our faculty and staff.**
- ii. The students will be academically and clinically prepared to perform nursing tasks and will successfully pass the standards set forth by the school and the ATI-administered practice exams, proctored exams, and comprehensive exit exams. The students successfully completed the ATI-administered examinations and were able to meet the benchmark set by the school to pass the program.
- iii. The school's annual pass rate will improve to 80% or higher by the end of the course program.
 - **The school's annual pass rate has increased to 75% since the implementation of the new curriculum with the expectation of continued increase annually. (Please refer to the Table Attachment)**

7. Textbooks

a. COMPREHENSIVE ANALYSIS:

The school uses textbooks required for the nursing theory and practical class. The school also incorporated in the curriculum the utilization of NCLEX-related materials and provided the students with ATI books.

- **Currently being utilized by the students.**

b. SPECIFIC ACTIONS TO IMPROVE PASS RATE:

The school has added more materials for instructors and students' utilization in the library. Online access to journals, books, and others were also added for students' utilization at their discretion. The online library is accessible 24 hours/day, 7 days a week.

c. TIMELINE:

These are currently being implemented.

d. EFFECT OF INTERVENTION: Expected outcome of intervention will be as follows:

- i. The students will be fully equipped with resources for further learning.
- ii. Students will be prepared to take and successfully pass the exams by utilizing all resources provide. ATI-administered practice exams, proctored exams, and comprehensive exit exams. The students successfully completed the ATI-administered examinations and were able to meet the benchmark set by the school to pass the program.
- iii. The school's annual pass rate will improve to 80% or higher by the end of the course program.
 - **The result of the newly implemented curriculum showed a gradual increase in the school's quarterly and annual pass rates. This means that**



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the students' performance has been greatly enhanced by utilizing this new curriculum. (Please refer to the Table/Graph Attachment)

8. Attendance Policies

a. COMPREHENSIVE ANALYSIS:

Attendance is monitored daily and absences made up accordingly. Some of the factors affecting student attendance are family responsibilities and employment issues.

- We have one (1) student that was placed under Probation due to personal and family issues leading to excessive absences.

b. SPECIFIC ACTIONS TO IMPROVE PASS RATE:

We explained to the candidates/students that increased family responsibilities and employment hours negatively impact their nursing education and their success in the program. Full commitment to the program included in the admission criteria. We will continue monitoring the students' attendance and enforced accordingly.

c. TIMELINE:

These are currently being implemented.

d. EFFECT OF INTERVENTION:

There will be a reduction in the number of students on probation or warning due to absences.

- There was a decrease in probation due to excessive absences.

9. Remediation Policies

a. COMPREHENSIVE ANALYSIS:

Remediation policies are being followed accordingly. ATI examinations are being given and students have to complete the remediation hours and templates depending on the level that they get on these proctored/practice examinations.

b. SPECIFIC ACTIONS TO IMPROVE PASS RATE:

A follow-up consultation with the student to determine progress will be conducted by the Director in collaboration with the faculty, and clinical coordinator. With proper completion of remediation, students are able to retake failed exams in the following:

- i. End of the term comprehensive final proctored exam.
- ii. End of the program ATI comprehensive predictor exam.

c. TIMELINE:

In effect.

d. EFFECT OF INTERVENTION:

By monitoring the progress of each student on remediation, all enrolled students will successfully pass the course program and be more prepared in taking the NCLEX-PN exam.

- There were four students who needed to take a remediation exam at the end of the program.



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10. Evaluations of Theory and Clinical Faculty

a. COMPREHENSIVE ANALYSIS:

Proposed faculty training is being implemented through ATI Academy which is an online course offering topics such as: The Crossroads: Cancer in Ages 15-39, Best Practices for Using Admission Assessments, etc. The school is also providing in-service training for all the faculty through DND Educators.

b. SPECIFIC ACTIONS TO IMPROVE PASS RATE:

i. Faculties need to receive training on test development and instructional techniques. The school director observes and evaluates new faculty members 90 days after initial employment and annually at the end of the year. The school director may informally observe other faculty from time to time or as necessary. The end-of-the-year evaluation includes performance and progress made in implementing the professional development plan and the formulation of the plan for the coming year.

ii. Faculties need to spend adequate time evaluating NCLEX result data and plan program changes based on data.

- This is currently in progress.

iii. Will hire full-time instructors.

There are new instructors that have been hired. Assigned instructors are now consistent with the batch that they are teaching from the beginning until the end of the program.

iv. Provide continuing education for faculty members on test development and analysis skills. The school will also provide in-service training for the faculty members, through DND Educators, and will ask for CE certificates to be added into their individual files.

- Quarterly CEUs for professional and educational/teaching development are required to be submitted by each faculty. Faculties can log in to ATI academy and access material for their CEUs, i.e. The Crossroads: Cancer in Ages 15-39, Best Practices for Using Admission Assessments, etc. The school has agreements with third-party vendors (ATI Academy, D&D Educational Resources, etc.) to provide the necessary in-service training for the improvement of instruction of our faculty and staff.

v. Continue end-of-term evaluation and unannounced evaluations/drop-ins.

- This is an on-going process done by the DON.

vi. The Clinical Coordinator assists in managing faculty needs, clinical assignment management, obtaining new clinical sites and establishing a good relationship with current clinical sites.

- This is done continuously throughout the year.

vii. Continue routine evaluation of theory and clinical instructors and effectiveness as a teacher. The school director annually reviews and evaluates each faculty member in the classroom or at the clinical site using the faculty evaluation form. The director discusses the written observation report subsequent to the



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classroom visit. During the annual evaluation, the director and faculty member will address the recommendations made in the classroom observation report and plan any action to improve or enhance their teaching skills and strategies

- This is continuously being implemented.

c. **TIMELINE:**

This is implemented currently.

d. **EFFECT OF INTERVENTION:**

Required evidence of professional development certifications related to teaching, curriculum and test development will be kept on file.

- This is currently being implemented and monitored.

11. Evaluations of Theory Presentations

a. **COMPREHENSIVE ANALYSIS:**

All essential theoretical elements and contents are being discussed and covered adequately. Lesson plans are submitted by the faculty. Theory presentations are evaluated by the students at the end of each term and the DON every six months/annually.

b. **SPECIFIC ACTIONS TO IMPROVE PASS RATE:**

i. Ensure that all essential theoretical elements and content are adequately covered and discussed. Instructional plan development are reviewed and evaluated annually and updated as necessary.

- This is constantly being reviewed.

ii. Will check and evaluate effectiveness of theory lesson plans submitted by the faculty. In addition, the school director monitors the lesson plans and course syllabi created by the faculty to ensure that the objectives of the instructional plan are met.

- This is regularly being monitored.

iii. Incorporate an ATI comprehensive final examination (predictor exam) at the end of the last term of the course program before its completion and prior to graduation. Continue routine evaluation of theory instructors and effectiveness of teaching strategies and materials. The school director also periodically visits classrooms informally during the course of the year to monitor new faculty, to monitor the use of new materials, and/or to visit faculty who request an informal observation. The school also administers in-class student surveys that evaluate instruction. The Student Evaluation of Faculty evaluates individual faculty in specific courses

- This is regularly being monitored

c. **TIMELINE:**

In effect.

d. **EFFECT OF INTERVENTION:**

i. The students will pass the theoretical portion of the course program.

- This is constantly being evaluated by checking the students' progress throughout the program.



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ii. The students will be fully prepared to take and pass the ATI-administered practice exams, proctored exams, and comprehensive exit exams.

- This is constantly being implemented

iii. The school's annual pass rate will improve to 80% or higher by the end of the course program.

- The newly implemented curriculum showed an increase in the school annual pass rate as well as a gradual increase in quarterly pass rate for the past seven (7) quarters. (Please refer to Table Attachment)

12. Evaluations of Clinical Rotations

a. COMPREHENSIVE ANALYSIS:

Clinical rotations are evaluated by the students and faculty at the end of each term. Clinical sites are adequate and have added more sites as well as discontinued some clinical facilities.

b. SPECIFIC ACTIONS TO IMPROVE PASS RATE:

i. Increased practical lab hours are in effect to improve, hone, and correctly apply the nursing and medical skills/procedures learned during the theory portion of the course program.

- The students were able to show great improvement in their skills by passing the practical exam that was given to them.

ii. Follow theory to clinical hour 1:3 ratio to comply with general educational requirements.

c. TIMELINE:

In effect.

d. EFFECT OF INTERVENTION:

i. Students will become and remain confident in performing all nursing and medical procedures based on their clinical objectives before exposure to the clinical sites.

- This is currently in effect.

ii. By obtaining a high percentage grade and not only a passing mark on the NCLEX predictor exam, the students will be fully prepared to take the NCLEX examination.

- The students are constantly being monitored and evaluated.

iii. The school's annual pass rate will improve to 80% or higher by the end of the course program.

- The students confidence level were enhanced and were fully prepared prior to taking the NCLEX examination as shown by the result of the past seven (7) quarters and the last two (2) annual results where both of these categories gradually increased. (Please refer to the Table/Graph Attachment)

13. Evaluation of Student Achievement

a. COMPREHENSIVE ANALYSIS:



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Evaluate student achievement after each term by administering written exams and ATI proctored exams.

b. SPECIFIC ACTIONS TO IMPROVE PASS RATE:

- i. Identify students for at-risk status early in the program and implement a plan to assist them throughout the remainder of the program. At-risk students are those who are required to repeat failed nursing courses and score below school standards of NCLEX predictor exams. In addition, students are assessed by:
 - (a) Proctored ATI exam throughout each term.
 - (b) Proctored comprehensive ATI exam and written exam at the end of each term.
 - (c) At the end of the program, the student will be required to pass the predictor exam and obtain an overall passing grade in the class in order to graduate and be awarded a certificate of completion from the program.
- ii. The students must obtain a passing grade on the ATI predictor exam and must have an overall passing grade (75%) at the end of the program. Students who fail the predictor exam and get an overall failing grade will have another chance to pass after going through an extensive remediation and completing certain number of Remediation Templates and Hours.
- iii. Increase the minimum passing grade from 70% to 75% to pass the nursing courses.

This is being implemented.

c. TIMELINE:

In effect.

d. EFFECT OF INTERVENTION:

Expected outcome of intervention will be as follows:

- i. By reaching a passing grade on the NCLEX predictor exam, the students will be fully prepared to take the NCLEX exams.
- ii. The school's annual pass rate will improve to 80% or higher by the end of the course program, because the students will be well prepared to take the NCLEX-PN examination by passing the predictor exam. On the other hand, students who fail the predictor exam and get an overall failing grade in the program are not fully prepared to take the NCLEX and will not be able to graduate from the program.
- iii. All students are expected to complete the course program in a timely manner.
- All but one student failed to complete the program in a timely manner.

14. Current Enrollment

a. COMPREHENSIVE ANALYSIS:

Implementing current student quota approved by the board. Student to Teacher ratio complies with the required ratio mandated by the board.

b. SPECIFIC ACTIONS TO IMPROVE PASS RATE:



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Maintain approved student quota and instructor to student ratio. Identify students for at-risk status early in the program and implement a plan to assist them with success in the program.

c. **TIMELINE:**

In effect.

d. **EFFECT OF INTERVENTION:** Expected outcome of intervention will be as follows:

- i. The school's completion rate will improve by the end of the course program.
- ii. All students will complete the course program in a timely manner.

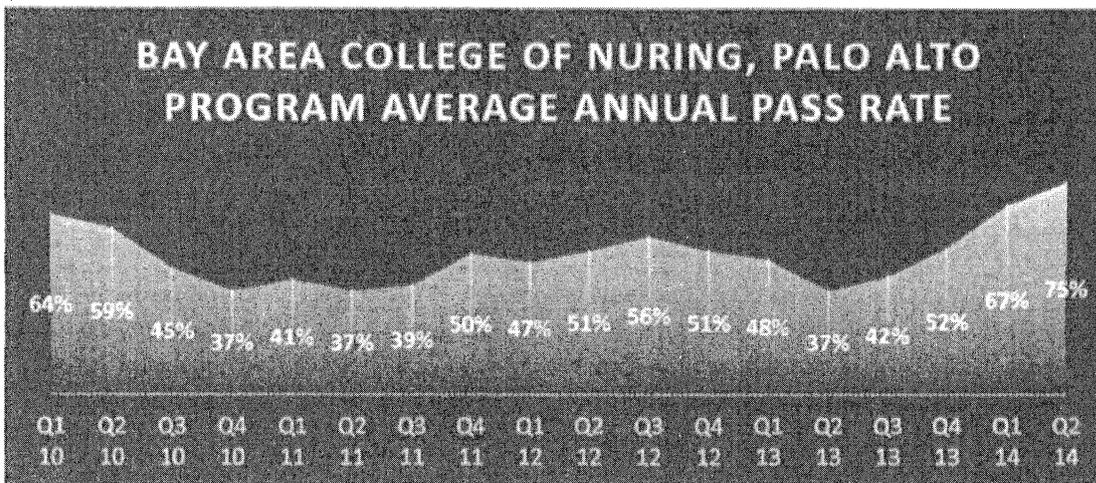
- Of the cohort that has completed the program, all but one enrolled student within the cohort has successfully completed the program in a timely manner.



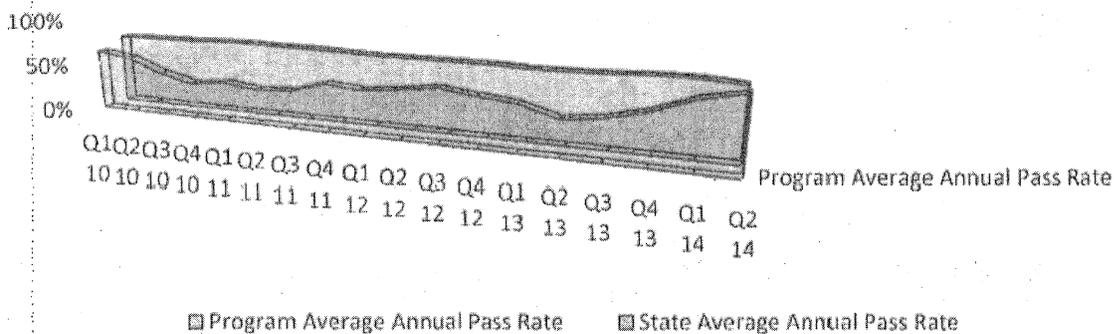
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GRAPH ATTACHMENT:



Bay Area College of Nursing, Palo Alto Program vs State Average Annual Pass Rate



NOTE: Graph was taken from BVNPT website.



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TABLE ATTACHMENT:

Quarterly Statistics					Annual Statistics*		
Quarter	# Candidates	# Passed	% Passed	State Quarterly Pass Rate	Program Average Annual Pass Rate	State Average Annual Pass Rate [CCR § 2530 (l)]	Variance From State Average Annual Pass Rate
Jan – Mar 2010	18	7	39%	75%	64%	74%	-10
Apr – Jun 2010	13	6	46%	74%	59%	75%	-16
Jul – Sep 2010	17	7	41%	76%	45%	75%	-30
Oct – Dec 2010	11	2	18%	77%	37%	76%	-39
Jan – Mar 2011	13	7	54%	80%	41%	77%	-36
Apr – Jun 2011	2	0	0%	71%	37%	76%	-39
Jul – Sep 2011	15	7	47%	74%	39%	76%	-37
Oct – Dec 2011	4	3	75%	74%	50%	75%	-25
Jan – Mar 2012	11	5	45%	77%	47%	74%	-27
Apr – Jun 2012	13	7	54%	72%	51%	74%	-23
Jul – Sep 2012	8	5	63%	74%	56%	74%	-18
Oct – Dec 2012	3	1	33%	70%	51%	74%	-23
Jan – Mar 2013	5	1	20%	75%	48%	73%	-25
Apr – Jun 2013	3	0	0%	78%	37%	73%	-36
Jul – Sep 2013	8	6	75%	75%	42%	74%	-32
Oct – Dec 2013	5	4	80%	76%	52%	76%	-24
Jan – Mar 2014	5	4	80%	74%	67%	76%	-9
Apr – Jun 2014	6	4	67%	66%	75%	73%	+2

*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.

NOTE: Table was taken from BVNPT website.

Agenda Item #6.A.2., 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

November X, 2014

Rachelle Cagampan
Director, Vocational Nursing Program
Bay Area College of Nursing, Palo Alto
824 San Antonio Road
Palo Alto, CA 94303

Subject: Notice of Extension of Provisional Approval

Dear Ms. Cagampan,

Pursuant to the action of the Board of Vocational Nursing and Psychiatric Technicians (Board) on November 21, 2014, provisional approval has been extended for the Bay Area College of Nursing, Palo Alto, Vocational Nursing Program for the one – year period from December 1, 2014 through November 30, 2015.

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, December 12, 2014**.

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 approval when that program does not meet all requirements as set forth in this chapter and in Section 2526...”

Section 2530(l) of title 16 of the California Code of Regulations states:

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

The program pass rates of the Bay Area College of Nursing, Palo Alto Vocational Nursing Program for the past nineteen (19) quarters are set forth in the following table.

NCLEX-PN® Licensure Examination Data							
Quarterly Statistics					Annual Statistics*		
Quarter	# Candidates	# Passed	% Passed	State Quarterly Pass Rate	Program Average Annual Pass Rate	State Average Annual Pass Rate [CCR § 2530 (l)]	Variance From State Average Annual Pass Rate
Jan – Mar 2010	18	7	39%	75%	64%	74%	-10
Apr – Jun 2010	13	6	46%	74%	59%	75%	-16
Jul – Sep 2010	17	7	41%	76%	45%	75%	-30
Oct – Dec 2010	11	2	18%	77%	37%	76%	-39
Jan – Mar 2011	13	7	54%	80%	41%	77%	-36
Apr – Jun 2011	2	0	0%	71%	37%	76%	-39
Jul – Sep 2011	15	7	47%	74%	39%	76%	-37
Oct – Dec 2011	4	3	75%	74%	50%	75%	-25
Jan – Mar 2012	11	5	45%	77%	47%	74%	-27
Apr – Jun 2012	13	7	54%	72%	51%	74%	-23
Jul – Sep 2012	8	5	63%	74%	56%	74%	-18
Oct – Dec 2012	3	1	33%	70%	51%	74%	-23
Jan – Mar 2013	5	1	20%	75%	48%	73%	-25
Apr – Jun 2013	3	0	0%	78%	37%	73%	-36
Jul – Sep 2013	8	6	75%	75%	42%	74%	-32
Oct – Dec 2013	5	4	80%	76%	52%	76%	-24
Jan – Mar 2014	5	4	80%	74%	67%	76%	-9
Apr – Jun 2014	6	4	67%	66%	75%	73%	+2
Jul – Sep 2014	No Candidates Tested			72%	75%	73%	+2

*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. The Bay Area College of Nursing, Palo Alto, Vocational Nursing Program shall continue to maintain its average annual pass rate at no more than ten percentage points below the state average annual pass rates.

2. The program shall continue to admit no additional students unless approved by the full Board.
3. The program shall provide no less than one (1) clinical instructor for every ten (10) students in all clinical experiences.
4. The program shall submit a report analyzing the reasons for the decrease in the number of graduates taking the licensing examination since the introduction of the new curriculum. The report must be submitted no later than **January 15, 2015**.
5. The program shall submit a follow-up report in nine (9) months, but no later than **August 1, 2015**. The report must include a **new** 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. The program shall continue 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. The program shall continue to demonstrate incremental progress in correcting the violations. If the program fails to satisfactorily demonstrate incremental progress, the full Board may revoke the program's approval.
8. Failure to take any of these corrective actions may cause the full Board to revoke the program's provisional approval.

Notice of Change in Approval Status
Bay Area College of Nursing, Palo Alto
Vocational Nursing Program
November X, 2014
Page 4 of 4

FUTURE BOARD ACTION

Your program will be placed on the **November 2015** Board Meeting agenda, at which point the Board may revoke or extend the program's provisional approval. If you have additional information that you wish considered beyond the required corrections listed on page 2 through 3, you must submit this documentation by the fifteenth day of the second month prior to the Board meeting.

OTHER IMPORTANT INFORMATION

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

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

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

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

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

Sincerely,

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

Enclosures

cc: Board Members

TBJ: cca