

## Agenda Item #6.A.3.



BUSINESS, CONSUMER SERVICES, AND HOUSING AGENCY • GOVERNOR EDMUND G. BROWN JR.  
**BOARD OF VOCATIONAL NURSING & PSYCHIATRIC TECHNICIANS**  
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DATE: November 6, 2014

TO: Board Members

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

SUBJECT: Bethesda University of California Vocational Nursing Program –  
Reconsideration of Provisional Approval; Consideration of Request to Admit  
Students (Director: Delores Terriquez, Anaheim, Orange County, Private)

On May 11, 2012, the Board placed the Bethesda University of California, Vocational Nursing Program on provisional approval<sup>1</sup> for the two – year period from May 11, 2012 through May 30, 2014. The program was required to admit no additional students without prior approval by the full Board. That action was taken due to the program's noncompliance with Section 2530 (l) of the Vocational Nursing Rules and Regulations. Reconsideration of the program's status was scheduled for May 2014.

On May 16, 2014, the Board **extended** provisional approval for Bethesda University of California Vocational Nursing Program for the one (1) year period from May 16, 2014 through May 30, 2015, and issued a notice identifying specific areas of non-compliance and requirements for correction as referenced in Section 2526.1 (e) of the California Code of Regulations.

On September 12, 2014, the Board **deferred** action on the program's provisional status to the November 2014 Board agenda.

The program is requesting approval to admit 20 full-time students on January 12, 2015; graduating January 25, 2016. This class would **replace** students that graduated on October 8, 2012.

<sup>1</sup> 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, History of Board Action)

### Enrollment

The program is approved to offer a full-time course of instruction that is 60 weeks in length. The program is required to obtain Board approval prior to the admission of each class. The pattern of admissions for proposed classes is seen in the enrollment table below.

The following table represents **proposed** student enrollment based on proposed class starts and completions. The table indicates a **maximum enrollment of 62 students** for the period from **March 2008 through January 2015**.

ENROLLMENT DATA				
CLASS DATES		# Students Admitted	# Students Current or Completed	Total Enrolled
Start	Completed			
3/08 FT		27	22	<b>22</b>
12/08		31	20	22 + 20 = <b>42</b>
2/09		25	4	42 + 4 = <b>46</b>
	2/09 (3/08 Class)		-22	46 - 22 = <b>24</b>
6/09 FT		17	14	24 + 14 = <b>38</b>
	12/09 (12/08 Class)		-20	38 - 20 = <b>18</b>
	2/10 (2/09 Class)		-4	18 - 4 = <b>14</b>
2/10 FT		27	12	14 + 12 = <b>26</b>
5/10 (Unapproved-Prev. Cited)		27	21	26 + 21 = <b>47</b>
	8/10 (6/09 Class)		-14	47 - 14 = <b>33</b>
10/10 FT (Class E)		7	6	33 + 6 = <b>39</b>
10/10 PT (Class J) [Unapproved - Transferred from Stanton (Prev. Cited)]		15	12	39 + 12 = <b>51</b>
	3/11 (2/10 FT Class)		-12	51 - 12 = <b>39</b>
3/11 PT (Class L) [Unapproved - Transferred from Stanton (Prev. Cited)]		25	10	39 + 10 = <b>49</b>

ENROLLMENT DATA				
CLASS DATES		# Students Admitted	# Students Current or Completed	Total Enrolled
Start	Completed			
	6/11 (5/10 Class)		-21	49 - 21 = 28
6/11 PT (Class M) [Unapproved - Transferred from Stanton (Prev. Cited)]		14	3	28 + 3 = 31
8/11 FT (Class N) [Unapproved - Transferred from Stanton (Prev. Cited)]		14	14	31 + 14 = 45
10/11 PT (Class F) [Unapproved - Transferred from Stanton (Prev. Cited)]		8	10	45 + 10 = 55
	11/11 (10/10 FT Class)		-6	55 - 6 = 49
3/12 PT (Class G) Unapproved - Prev. Cited		21	13	49 + 13 = 62
	5/12 (10/10 PT Class)		-12	62 - 12 = 50
	7/12 (8/11 FT N Class)		-14	50 - 14 = 36
	9/12 (10/11 FT F Class)		-10	36 - 10 = 26
	10/12 (3/11 PT L Class)		-10	26 - 10 = 16
	1/13 (6/11 PT M Class)		-3	16 - 3 = 13
	11/13 (3/12 PT G Class)		-13	13 - 13 = 0
1/15 Proposed	1/16	20		0 + 20 = 20

### Licensing Examination Statistics

The following statistics, furnished by Pearson VUE, and published by the National Council of State Boards of Nursing as "Jurisdictional Summary of All First-Time Candidates Educated in Member Board Jurisdiction," for the period July 2009 through September 2014, specify the pass percentage rates for graduates of Bethesda University of California Vocational Nursing Program on the National Council Licensure Examination for Practical/Vocational Nurses (NCLEX-PN®), and the variance of the program's pass rates from state average annual pass rates for the past 21 quarters.

NCLEX-PN® Licensure Examination Data							
Quarterly Statistics					Annual Statistics*		
Quarter	# Candidates	# Passed	% Passed	State Average Quarterly Pass Rate	Program Average Annual Pass Rate	State Average Annual Pass Rate [CCR §2530(I)]	Variance From State Average Annual Pass Rate
Jul – Sep 2009	7	6	86%	72%	86%	72%	+14
Oct – Dec 2009	1	0	0%	76%	75%	73%	+2
Jan – Mar 2010	No Candidates Tested			76%	75%	74%	+1
Apr – Jun 2010	10	5	50%	74%	61%	75%	-14
Jul – Sep 2010	8	3	38%	75%	42%	75%	-33
Oct – Dec 2010	9	3	56%	77%	48%	76%	-28
Jan – Mar 2011	7	2	29%	80%	44%	77%	-33
Apr – Jun 2011	2	0	0%	71%	39%	76%	-37
Jul – Sep 2011	6	1	17%	74%	33%	75%	-42
Oct – Dec 2011	16	7	44%	74%	32%	75%	-43
Jan – Mar 2012	7	1	14%	77%	29%	74%	-45
Apr – Jun 2012	1	0	0%	72%	30%	74%	-44
Jul – Sep 2012	5	2	40%	76%	35%	74%	-39
Oct – Dec 2012	3	1	25%	70%	33%	74%	-41
Jan – Mar 2013	6	2	33%	75%	33%	73%	-40
Apr – Jun 2013	12	7	58%	78%	46%	73%	-27
Jul – Sep 2013	10	7	70%	75%	55%	74%	-19
Oct – Dec 2013	7	3	43%	76%	54%	76%	-22
Jan – Mar 2014	5	2	40%	74%	56%	76%	-20
Apr – Jun 2014	11	4	36%	66%	48%	73%	-25
Jul – Sep 2014	6	3	50%	72%	41%	73%	-32

\*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 (Code) Section 2530 (I), which states:

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

Examination statistics for the period of April 2010 through September 2014 (4 ½ years) substantiate the program’s **noncompliance**.

Based on the most recent data available (July – September 2014), the **program's average annual pass rate is 41%**. 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 average annual pass rate for the Bethesda University of California Vocational Nursing Program is **32 percentage points below** the state average annual pass rate.

### **Faculty and Facilities**

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

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

The program's Board - approved faculty totals seven (7), including the program director. Six (6) instructors are available to teach in the clinical area. The director has 100% administration duties.

Based on an enrollment of 20 students, two (2) instructors are required for clinical supervision. Therefore, the current number of faculty is adequate for the current enrollment.

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

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

The program **does not** have clinical facilities adequate as to type and variety of patients treated to enable current and proposed students to meet clinical objectives in accordance with Section 2534(b) of the Vocational Nursing Rules and Regulations. This has been verified by the consultant.

### **Other Considerations**

On May 11, 2012, the Board initially placed the Bethesda University of California, Vocational Nursing Program on provisional approval for the two – year period from May 11, 2012 through May 30, 2014, due to noncompliance with regulatory requirements. **At that time, the program's average annual pass rate was 29%.**

On May 16, 2014, the Board **extended** the program's provisional approval for the one (1) year period from May 16, 2014 through May 30, 2015 (see Attachment B). **At that time, the program's average annual pass rate was 56%.** The Board approved the admission of 20 students commencing June 16, 2014.

On June 23 – 24, 2014, Board representatives conducted an unannounced survey visit to determine the program's compliance with regulatory requirements and required corrections specified in the Notice. Thirteen (13) violations were identified.

The Board received notified of the termination of the program director, effective July 9, 2014. On July 21, 2014, the Board approved a new program director.

On August 8, 2014, correspondence was forwarded to the new director advising of violations identified during the unannounced visit (see Attachment C). The director was requested to submit the following documents and information by August 29, 2014.

1. Plan and timeline for correction of each identified violation.
2. Procedures and forms for evaluation of:
  - a. Curriculum.
  - b. Clinical Facilities.
  - c. Faculty.
  - d. Student Performance and Remediation.
  - e. Attendance.
3. Instructional plan for Board – approved full – time class.
4. Lesson plans for all topics taught in the Board approved instructional plan.
5. Signed statement attesting that the program has on file proof of high school completion or the equivalent thereof for all enrolled students.
6. Current Student Handbook.
7. Pictures of classrooms for projected classes.
8. List and proof of purchase of all Skills Laboratory equipment, supplies, and materials.
9. List and proof of purchase of all library publications, electronic resources, and equipment

On August 29, 2014, the Board received correspondence from the program director in response to identified violations. (See Attachment D)

On September 12, 2014, the Board deferred action on the program's status to allow time for the consultant to complete an analysis of the program's responses for identified violations. Reconsideration was scheduled for November 2014.

Identified violations, the program's response to each violation, and an analysis of the submitted response follow:

**Section 2526(a) (12) 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:

... (12) Admission criteria...

**Violation #1:** The program's approved Admission criteria specifies that applicants for program admission must complete the Test of Essential Academic Skills (TEAS) achieving an overall score of 52% and a score of 62% on the Mathematics section. An analysis of school files confirmed that the program failed to follow that criterion when admitting prior students.

**Plan of Correction #1:** This violation is **not corrected**. However, on August 29, 2014, the Board received correspondence from the director stating the program's 2014 Student Handbook “recommends” that candidates for admission strive to obtain a score of 80% or greater on the Health Education Systems, Inc. (HESI) English language entrance exam and a score of 80% on the Mathematics entrance exam on the first attempt. As presented, candidates may repeated a second time at the candidate's expense. Candidates must achieve a score of 75% on each of the exams.

**If implemented as presented, the submitted plan will prevent future violations.**

**Section 2526(a) (13) 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:

... (13) Screening and selection criteria...

**Violation #2:** An analysis of program files confirmed that the program failed to consistently follow its Board – approved Screening and Selection Criteria when selecting candidates for program admission. In so doing, the program admitted students that did not meet the established Screening and Selection Criteria. As such, these students were at increased risk of failure.

**Plan of Correction #2:** This violation is **not corrected**. However, the director has submitted a plan stating that she will strictly adhere to established screening and selection criteria and select the most qualified candidates based on a point system.

**If implemented as presented, the submitted plan will correct the violation.**

**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 #3:** The program failed to notify the Board of the termination of multiple faculty members within the ten (10) days as required by existing regulations.

**Plan of Correction #3:** This violation is **not corrected**. However, the director has submitted a plan stating that the program will notify the Board within ten (10) days of faculty members terminating employment.

**If implemented as presented, the submitted plan will correct the violation.**

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

“A material representation of fact by a vocational nursing program in any information submitted to the Board is cause for denial or revocation of approval or provisional approval.”

**Violation #4:** The program director reported the program had 19 clinical sites confirmed and available for clinical experiences for students in areas consistent with the curriculum.

Board representatives contacted each clinical site reported as available for student clinical assignment by the director. The Board's investigation revealed that:

1. The program had assigned students to Anaheim Healthcare Center in August of 2013; however, the facility reported that a current contract is not in place at this time and may not be available for student assignment.
2. The remaining 18 clinical sites had not been used for minimally 1½ to 2 years and some were much longer (2009/10). Sixteen (16) of the clinical sites reported that the facility did not have a current contract with the program.
3. Two (2) of the clinical sites had closed.

**Plan of Correction #4:** This violation is **not corrected**. The director is in the process of obtaining current facility applications for several identified clinical sites.

However, at the time of this writing the program remains deficient in adequate clinical sites to meet student's clinical objectives.

**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 #5:** During a review of documents, Board representatives requested access to the program's library and the list of library resources required for achievement of program objectives. The director failed to provide the list of resources required to support the program.

**Plan of Correction #5:** This violation is **not corrected**. The director submitted a list and photos of library resources and supplies and equipment utilized in the skills laboratory. The photos appear to be consistent with Board representatives' observations of items visualized at the time of the site visit; however, instead of being in disarray they are now organized into a usable format. The laboratory appears to be organized and adequately stocked with appropriate supplies necessary to provide laboratory experiences consistent with the program's Board approved objectives.

However, as noted above, the program continues to have a deficiency of adequate clinical sites, specifically Maternity and Pediatric clinical sites.

**Note:** Please refer to Violation # 4 related to the status of clinical sites available for the program.

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

"Regular faculty meetings shall be held. Minutes shall be available to the Board's representative.

**Violation #6:** Based on a review of documents and discussion with the director, consultants identified that the program failed to have regular faculty meetings. The program had three (3) faculty meetings in 2013 while students were enrolled in classes.

**Plan of Correction #6:** This violation is **not corrected**. However, the director has submitted a plan stating that she will have faculty meetings monthly. Additionally, she states the instructors will "participate, get focus, maintain momentum and strive to mitigate each

month's issues. The agenda will include students at risk, theory concerns, clinical concerns and open discussion."

**If implemented as presented, the submitted plan will prevent future violations.**

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

"Each instructor shall have a daily lesson plan which correlates the theory and practice offered to the student. A copy of this plan shall be available to the director."

**Violation #7:** The NEC's requested lesson plans for selected topics. The director indicated that she was unable to locate any lesson plans for the program.

**Correction #7:** This violation is **corrected**. The director submitted all lesson plans. **If utilized, the submitted lesson plans will prevent future violations.**

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

"Each school shall have an attendance policy approved by the Board. The policy shall include but not be limited to, criteria for attendance and the specific course objectives for which make-up time is required...."

**Violation #8:** The NEC's requested specific attendance records for which students had been absent and makeup was required. The director failed to provide the requested documents.

**Plan of Correction #8:** This violation is **not corrected**. However, the director has submitted a plan to follow the Board approved attendance policy.

**If implemented as presented, the submitted plan will prevent future violations.**

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

"The school shall evaluate student performance to determine the need for remediation or removal from the program."

**Violation #9:** Although the program had a Remediation Policy in place, program documents substantiate several students were identified as having academic or attendance issues. The remediation plans found were minimal and the school failed to follow through to ensure resolution of the identified problem.

**Plan of Correction #9:** This violation is **not corrected**. The director has submitted a plan to evaluate student performance. The form submitted provides for follow-up of students completion of remediation.

**If implemented as presented, the submitted plan will prevent future violations.**

**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 #10:** On February 13, 2008, the Board approved the program’s request to begin a vocational nursing program offering a full-time course of instruction. The full – time curriculum was approved to include 1590 hours, including 622 theory and 968 clinical.

Information provided by the director confirmed the program’s commencement of a part – time class without prior approval by the Board. As reported, the admitted part – time students graduated in 2013. The director was unable to supply Board representatives with the full – time or part – time curriculum implemented.

**Plan of Correction #10:** This violation is **not corrected**. However, on August 6, 2014, the new director submitted the Board approved full - time curriculum. The director indicates the program will not offer a part-time program without prior consent of the Board.

**If the director adheres to the submitted plan, this will prevent future violations.**

**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 and adequate daily census of patients to afford a variety of clinical experiences consistent with competency-based objectives and theory being taught...”

**California Business and Professions Code, Division 2, Chapter 6.5 Vocational Nursing, Article 4, Section 2882 states:**

“The course of instruction of an approved school of vocational nursing shall consist of not less than the required number of hours of instruction in such subjects as the board may from time to time by regulation determine, together with the required number of hours in the care of medical, surgical, obstetrical patients, care of sick children, and such other clinical experience as from time to time may be determined by the board....”

**Violation #11:**

The program lacks clinical facilities adequate as to number, type, and patients treated to provide clinical experience in Maternity Nursing and Pediatric Nursing for the proposed student enrollment.

Based on an analysis of program documents during the onsite visit, the program failed to provide documents substantiating the availability of adequate clinical experiences that are consistent with the approved curriculum for the projected student population.

The director reported utilization of a specific facility to provide clinical experience in Maternity Nursing and Pediatric Nursing for the program's last graduating classes. However, consultants identified that the Board – approved application for that site did not offer and was not approved for clinical experience in Maternity Nursing and Pediatric Nursing.

Additionally, the director provided consultants a list of clinical facilities at which prior students were assigned. An analysis of the program's Board - approved clinical facility applications revealed that many of the applications listed “College of Medical Arts” as the school name, not Bethesda University. Board records substantiate that the program's name was changed to Bethesda Christian University on September 17, 2009.

**Note:** Please refer to Violation # 4 related to the status of clinical sites available for the program.

**Plan of Correction #11:**

This violation is **not corrected**. Board records indicate the program currently has two (2) long term care sites - Anaheim Healthcare Center and Anaheim Terrace Care Center - available for students' clinical assignment. On October 16, 2014, the director submitted one (1) Pediatric clinical site that will accommodate one (1) student at a time for a 16 - hour satellite rotation.

**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 #12:** Based on a review of documents and interaction with the director, consultants identified that the director had failed to evaluate the program’s clinical facilities to determine their adequacy since March of 2012. The submitted enrollment data confirms that students were enrolled in the program through November 2013.

**Plan of Correction #12:** This violation is **not corrected**. However, the director has identified a plan to visit clinical sites bimonthly and assess available experiences to evaluate if student’s clinical objectives are being met, and relationships, expectations, and communications between facility staff, instructors, and students.

**If implemented as presented, the submitted plan will correct the violation.**

**Section 2529(b) of the Vocational Nursing Rules and Regulations states:**

“Each vocational nursing program shall have one faculty member, designated as director who meets the requirements of subsection (c) (1) herein, who shall actively administer the program. The director is responsible for compliance with all regulations in Chapter 1, Article 5 (commencing with Section 2525 et seq).”

**Violation #13:** During a review of documents, interaction with the director and staff during the visit, and the critical complexity of identified violations, consultants identified that the director had failed to actively administer the program as prescribed by existing regulations. The director failed to assign faculty. Program staff informed consultants that class schedules specifying faculty assignments were made by the secretarial staff with very little input from the program director. Additionally, the director failed to evaluate instructors to determine if the instructional plan was being implemented and the quality and effectiveness of presented instruction.

The director failed to evaluate clinical facilities. The director failed to evaluate the effectiveness of assigned clinical experiences and the ability of clinical sites to provide experiences that correlated with theory instruction and were sufficient for students’ achievement of clinical objectives.

**Plan of Correction #13:** This violation is **not corrected**. The director submitted a plan to actively administer the program. Included within the plan the director indicates she will “monitor clinical sites bimonthly to detect any concerns and determine if clinical objectives are being met.” Additionally, the director identified that she will assign faculty to provide theory and clinical instruction based on content and instructor strengths. Formal evaluation of each instructor will be done upon completion of each course. Students will also evaluate instructors.

**If implemented as presented, the submitted plan will correct the violation.**

### **Summary**

On June 23 and 24, 2014, an unannounced site visit was made to Bethesda University. During the site visit 13 violations were identified.

**The Board received notification of the termination of the program director, effective July 9, 2014. On July 21, 2014, the Board approved a new program director.**

On August 8, 2014, the Board forwarded correspondence to the director advising of identified violations and required corrections. The director was requested to submit a plan to correct all identified violations by August 29, 2014. As requested, the program's plan of correction was submitted.

To date, one of the 13 identified violations has been corrected. Twelve (12) violations remain uncorrected. Of major concern is the program's lack of adequate clinical facilities. Currently the program is lacking Maternity and Pediatric clinical sites. Although one (1) Pediatric clinical site was found and approved by the Board, it will accommodate one (1) student for 16 hours per rotation. At the time of this writing, the program still had no Maternity clinical site.

Since the program was established in 2008, the program has struggled with maintaining its licensure pass rates. The program has 21 quarters (5 1/4 years) of licensure data available since inception. Of the 21 quarters, the program's average annual pass rates have been non – compliant with regulatory requirements for 18 consecutive quarters (4 1/2 years). It is important to note, the three (3) compliant quarters were the first (1<sup>st</sup>) three quarters in which licensure data was recorded for the program. The current average annual pass rate is **41%**. As such, it is **32** percentage points below the state average annual pass rate.

At the time program was placed on provisional approval on May 11, 2012, the program's average annual pass rate was 35%. Subsequent to the program being placed on provisional approval, the program's average annual pass rate rose to a high of 55% during Quarter3 - 2013. Since that time, four (4) quarters later, the licensure pass rates have fallen to 41%. This is a drop of 14 percentage points.

## Recommendations:

1. Rescind the prior approval for Bethesda University Vocational Nursing Program's admission of 20 full-time students commencing June 16, 2014, only.
2. Revoke the provisional approval of the Bethesda University Nursing Vocational Nursing Program, effective immediately.
3. Remove the program from the *List of Approved Vocational Nursing School*.

**Rationale:** At the time program was placed on provisional approval on May 11, 2012, the program's average annual pass rate was 35%. Subsequent to the program being placed on provisional approval, the program's average annual pass rate rose to a high of 55% during quarter three (3) of 2013. Since that time, four (4) quarters later, the licensure pass rates have fallen to 41%. **This is a drop of 14 percentage points.**

On June 23 and 24, 2014, Board representatives made an unannounced school site visit. Thirteen (13) violations of the California Code of Regulations were identified. Subsequently, the Board was informed of the termination of the director.

On July 21, 2014, a new director was approved. On August 8, 2014, correspondence was forwarded to the new director advising of violations identified during the prior visit. On August 29, 2014, the director submitted a plan to address the identified violations. Based on submitted information, one violation has been corrected. Twelve (12) violations remain uncorrected. The director has submitted a plan to address ten (10) of the twelve (12) uncorrected violations. Three (3) violations related to a lack of clinical sites adequate to meet student's clinical objectives remain outstanding. Specifically, the program lacks Maternity and sufficient Pediatric clinical sites.

Revocation of the program's provisional approval is recommended. That recommendation is supported by the program's long history of poor performance of program graduates on the licensure examination, the program's failure to make incremental progress in correcting the identified deficiency relative to average annual pass rates, and the critical complexity of violations identified during the unannounced onsite program survey. Those violations include the lack of adequate resources including clinical facilities providing clinical experiences consistent with the curriculum.

If the Board accepts the recommendations, no students will be impacted. Based on provided enrollment data, the program graduated its last class of 13 students in November 2013. On May 16, 2014, the Board approved the program's admission of 20 students commencing June 16, 2014. That class was not admitted. At this time, no students are enrolled in the program.

Attachment A: History of Prior Board Actions.

Attachment B: Notice of Change in Approval Status dated May 27, 2014.

Attachment C: Notice of Violations, dated August 8, 2014.

Attachment D: Program Correspondence dated August 27, 2014; Received August 29, 2014.

## **Agenda Item #6.A.3., Attachment A**

### **BETHESDA UNIVERSITY OF CALIFORNIA VOCATIONAL NURSING PROGRAM**

#### **History of Prior Board Actions**

- On February 13, 2008, the Executive Officer approved the College of Medical Arts, Torrance request, to begin a vocational nursing program with an initial full-time class of 30 students commencing February 19, 2008 only; **and** approved the program curriculum for 1590 hours, including 622 theory, and 968 clinical hours.
- On March 5, 2008, the Board was notified that the school had formed a partnership with Centinela Valley School District to offer the program at the Centinela Valley Adult School site and would delay commencement of the first class until March 10, 2008. At that time, the school will be known as the College of Medical Arts, Lawndale, Vocational Nursing Program.
- On November 7, 2008, the program submitted documentation of the school's name change to Stanton University, effective December 1, 2008.
- On December 8, 2008, the Executive Officer approved initial full approval for Stanton University (formerly College of Medical Arts, Torrance, and College of Medical Arts, Lawndale), Vocational Nursing Program for the period from December 8, 2008, through December 7, 2012, and issued a certificate accordingly. Additionally, the Executive Officer approved the program's requests to admit the following classes, thereby increasing the program's frequency of admissions.
  - a. A full-time class of 45 students on February 17, 2009 only, to **replace** students graduating on February 27, 2009.
  - b. A full-time class of 45 students on December 15, 2008 only, graduating December 4, 2009.
- On May 13, 2009, the Executive Officer approved the program's request to admit 45 students into a full-time class on June 15, 2009 only, graduating May 15, 2010.
- On September 17, 2009, the Board received correspondence requesting a change in the program's name to Bethesda Christian University Vocational Nursing Program.
- On October 8, 2009, the Board received electronic notification of the director's resignation, effective October 5, 2009.
- **On October 12, 2009, a new program director was approved.**

- On January 7, 2010, the Executive Officer approved Bethesda Christian University Vocational Nursing Program's request to admit a full-time class of 30 students on January 11, 2010 only, with a projected graduation date of January 13, 2011.
- On June 25, 2010, the program notified the Board that commencement of the January 11, 2010 class was delayed to February 8, 2011.
- On August 6, 2010, the Executive Officer approved Bethesda University of California Vocational Nursing Program's request to admit a full-time class of 30 students on September 13, 2010 only, with a projected graduation date of August 25, 2011, to **replace** students graduating March 16, 2010; and, required the program to obtain Board approval prior to the admission of all classes.
- On May 11, 2011, the program was notified that its average annual pass rates had fallen more than ten (10) percentage points below the state average annual pass rates for the past five (5) quarters.
- On August 14, 2011, the program was notified that its average annual pass rates had fallen more than ten (10) percentage points below the state average annual pass rates for the past six (6) quarters.
- On February 22, 2012 the program was notified that its average annual pass rates had fallen more than ten (10) percentage points below the state average annual pass rates for more than seven (7) consecutive quarters. The following information was requested by March 9, 2012.
  - a. Current and projected enrollment.
  - b. Approved faculty.
  - c. Approved clinical facilities.
  - d. Clinical rotation schedule.
  - e. Analysis of the submitted corrective action plan.
- On March 14, 2012, the Board received the program's plan to increase the licensure pass rates.
- **On March 26, 2012, a new program director was approved.**
- On March 28, 2012, the Board forwarded a notice of violation to the program director relative to violations of the California Code of Regulations, sections 2527(b) and 2530(k). The program was required to submit a plan to prevent future violations to the Board by **April 20, 2012**.
- On April 4, 2012, the assigned consultant forwarded correspondence requesting submission of eighteen (18) copies of pertinent documents, plan, and subsequent actions taken to correct identified problems that they desire Board members to consider.

- On April 6, 2012, the director submitted a plan to prevent future violations, as referenced on March 28, 2012.
- On April 16, 2012, the Board received correspondence from the program director and eighteen (18) copies of pertinent documents and subsequent actions taken to correct identified problems that they desire the Board members to consider.
- On April 17, 2012, the school manager and the director met with the SNEC and NEC at the Board's offices. The focus of the meeting was to inform the Board's representatives of the school's history and request consideration of replacement classes. The NEC provided the new director an orientation to her new role.
- On May 11, 2012, the Board denied Bethesda University Vocational Nursing Program's request to admit a full-time class of 30 students commencing on July 17, 2012, graduating June 19, 2013, to **replace** students who transferred to Bethesda University from Stanton University; **and**, denied the program's request to admit a Part-time class of 30 students on June 11, 2012, graduating December 13, 2013, to **replace** students who transferred to Bethesda University from Stanton University; **and**,

Placed Bethesda University Vocational Nursing Program on provisional approval for the two-year period from May 11, 2012, through May 31, 2014, and issue a notice to the program to identify specific areas of noncompliance and requirements for correction as referenced in Section 2526.1 (e) of the California Code of Regulations; **and**,

Required the program to bring its average annual pass rate to no more than ten (10) percentage points below the State average annual pass rate **by April 1, 2014; and**,

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

Required the program to submit follow-up reports in nine months, but no later than **February 1, 2013**, and 21 months, but no later than **February 1, 2014**. The reports shall include a comprehensive analysis of the program, specific actions taken to improve program pass rates, timeline for implementation, and the effect of employed interventions. The following elements must be addressed in the analysis.

- a. Admission Criteria.
- b. Screening and Selection Criteria.
- c. Terminal Objectives.
- d. Curriculum Objectives.
- e. Instructional Plan.
- f. Theory and Clinical Objectives for Each Course.
- g. Lesson Plans for Each Course.
- h. Textbooks.
- i. Attendance Policy.
- j. Remediation Policy.

- k. Evaluations of Theory and Clinical Faculty.
- l. Evaluations of Theory Presentations.
- m. Evaluations of Clinical Rotations and Their Correlation to Theory Presentations.
- n. Evaluation of Student Achievement.
- o. Current Enrollment; **and**,

Required the program to comply with all 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 substantive incremental progress in correcting the violations. If the program fails to satisfactorily demonstrate incremental progress, the full Board may revoke the program's approval; **and**, advised the program that failure to take any of these corrective actions may cause the full Board to revoke the program's approval; **and**, placed the program on the **May 2014** Board agenda for reconsideration of provisional approval.

- On June 13, 2012, the Board forwarded to the director the Notice of Change in Approval Status.
- On August 17, 2012, the assigned consultant forwarded correspondence requesting submission of eighteen (18) copies of pertinent documents, plan, and subsequent actions taken to correct identified problems that they desire Board members to consider
- On September 18, 2012, Board representatives met with program representatives relative to the program's approval status and request to admit students. Program representatives present were: Nanyun Lee, Director, Young Choo Kim, Chief Academic Officer, Mantae Kim, Chief Financial Officer and Mark Treston, Compliance director.
- On October 3, 2012, the Board received correspondence from the program director and eighteen (18) copies of pertinent documents and subsequent actions taken to correct identified problems that they desire the Board members to consider.
- On November 9, 2012, the Board denied Bethesda University of California Vocational Nursing Program 's request to admit 30 part-time students into a class commencing on January 10, 2013 and graduating on June 15, 2014; **and** denied the program's request to admit 30 full-time students into a class commencing on March 10, 2013 and graduating on March 20, 2014; and, required the program to continue to obtain full Board approval prior to the admission of each class.
- On March 11, 2013, the assigned consultant forwarded correspondence requesting submission of two (2) copies and a CD or Flash Drive of pertinent documents, plan, and subsequent actions taken to correct identified problems that they desire Board members to consider by March 22, 2013.

- On March 22, 2013, the Board received correspondence from the program director and two (2) copies and a CD of pertinent documents and subsequent actions taken to correct identified problems that they desire the Board members to consider.
- On May 10, 2013, the Board **denied** Bethesda University Vocational Nursing Program 's request to admit 20 full-time students into a class commencing on August 5, 2013 and graduating on August 4, 2014; **and** continued the program's requirement to obtain full Board approval prior to the admission of each class.
- On December 6, 2013, the Board received the director's updated plan to improve licensure pass rates.
- On February 28, 2014, the Board **denied** Bethesda University of California Vocational Nursing Program 's request to admit 30 full-time students into a class commencing on May 6, 2014; graduating on April 10, 2015 to **replace** students that graduated on October 8, 2012; **and**, continued to require the program to obtain full Board approval prior to the admission of each class.
- On May 16, 2014, the Board **extended** provisional approval for Bethesda University of California Vocational Nursing Program for the one (1) year period from May 16, 2014 through May 30, 2015, and issue a notice identifying specific areas of non-compliance and requirements for correction as referenced in Section 2526.1 (e) of the California Code of Regulations; **and, denied** the program's request to admit 30 full-time students into a class commencing on May 6, 2014; graduating on April 10, 2015 to **replace** students that graduated on October 8, 2012; **and**, approved the program's admission of 20 full-time students into a class commencing on June 16, 2014; graduating on June 5, 2015 to **replace** students that graduated on October 8, 2012, provided that the program has no more than ten (10) students per instructor during clinical experience; **and**, required the program to admit no additional classes without prior approval by the full Board; **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**,

Required the program to submit a follow-up report in four (4) months, but no later than **September 1, 2014**, and nine (9) months, but no later than **February 1, 2015**. The report must include a review of the prior comprehensive analysis, effectiveness of employed interventions, revisions to the original plan, and timeline for implementation and correction; **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 2525; **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**, advised the program that failure to take any of these corrective actions may cause the full Board to revoke the program's approval.

- On May 21, 2014, the Board forwarded to the director the Notice of Change in Approval Status, identifying program deficiencies and required corrections.
- On June 23, 24, 2014, Board representatives conducted an unannounced on site survey of the program. Thirteen (13) violations were identified.
- **On July 21, 2014, a new program director was approved by the Board.**
- On August 8, 2014, a notice of violations was sent to the program per Certified and Regular mail. A plan of correction of all violations is due to the Board by August 29, 2014.
- On August 29, 2014, the program submitted a response to violations listed in the August 8, 2014 letter from the Board.
- On September 12, 2014, the Board deferred action on the program's status to allow time for the consultant to review the program's responses to identified violations. Reconsideration was scheduled for November 2014.

# Agenda Item #6.A.3., Attachment B



BUSINESS CONSUMER SERVICES AND HOUSING AGENCY • GOVERNOR EDMUND G. BROWN JR.  
**BOARD OF VOCATIONAL NURSING & PSYCHIATRIC TECHNICIANS**  
2535 Capitol Oaks Drive, Suite 205, Sacramento, CA 95833-2945  
Phone (916) 263-7800 Fax (916) 263-7855 Web [www.bvnpt.ca.gov](http://www.bvnpt.ca.gov)



## CERTIFIED MAIL

May 27, 2014

Nanyun Lee, B.S., R.N.  
Director, Vocational Nursing Program  
Bethesda University of California  
730 North Euclid Avenue  
Anaheim, CA 92801

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

Dear Ms. Lee:

Pursuant to the action of the Board of Vocational Nursing and Psychiatric Technicians (Board) on May 16, 2014, Bethesda University of California Vocational Nursing Program's provisional approval has been extended for the one – year period from May 16, 2014 through May 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, June 6, 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 Bethesda University Vocational Nursing Program for the past 19 quarters are set forth in the following table.

NCLEX-PN® Licensure Examination Pass Rates			
Quarter	State Annual Average Pass Rate	Program Annual Average Pass Rate	Variance from State Annual Average Pass Rate
Jul – Sep 2009	72%	86%	+14
Oct – Dec 2009	73%	75%	+2
Jan – Mar 2010	74%	75%	+1
Apr – Jun 2010	75%	61%	-14
Jul – Sep 2010	75%	42%	-33
Oct – Dec 2010	76%	50%	-27
Jan – Mar 2011	77%	27%	-50
Apr – Jun 2011	76%	22%	-54
Jul – Sep 2011	76%	18%	-58
Oct – Dec 2011	75%	8%	-67
Jan – Mar 2012	74%	29%	-45
Apr – Jun 2012	74%	30%	-44
Jul – Sep 2012	74%	35%	-39
Oct – Dec 2012	74%	33%	-41
Jan – Mar 2013	73%	33%	-40
Apr – Jun 2013	73%	46%	-27
Jul – Sep 2013	74%	55%	-19
Oct – Dec 2013	76%	54%	-22
Jan – Mar 2014	76%	56%	-20

Based on this data, the program failed to meet the average annual pass rate requirement for sixteen (16) consecutive quarters.

**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 rate.
2. The program shall admit no additional classes without prior approval by the full Board.
3. The program will submit a follow-up report in four (4) months, but no later than **September 1, 2014**, nine (9) months but no later than **February 1, 2015**. The report must include a review of the prior comprehensive analysis, effectiveness of employed interventions, revisions to the original plan, and timeline for implementation and correction.
4. The program shall comply with all approval standards in Article 4 of the Vocational Nursing Practice Act, commencing at Business and Professions Code section 2880, and Article 5 of the Board's Regulations, commencing at California Code of Regulations, Title 16, section 2525.

5. The program shall demonstrate incremental progress in correcting the violations. If the program fails to satisfactorily demonstrate incremental progress, the full Board may revoke the program's approval.
6. Failure to take any of these corrective actions may cause the full Board to revoke the program's approval.

#### FUTURE BOARD ACTION

Your program will be placed on the **May 2015** Board Meeting agenda for reconsideration of your approval status. The nursing education consultant assigned to your program will ask you to submit documentation of the correction of your violation(s) by the fifteenth day of the second month prior to that Board meeting.

#### OTHER IMPORTANT INFORMATION

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

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

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

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

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

Sincerely,



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

Enclosure

TBJ/ph

cc: Board Members



## TITLE 16 CALIFORNIA CODE OF REGULATIONS

### 2526.1. Provisional Approval.

- (a) Provisional approval 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 approval shall be granted for a period determined by the Board.
- (c) 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. If the program has not met all requirements at the end of the initial provisional approval period, provisional approval 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 approval 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 approval.
- (e) A program placed on provisional approval 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 approval.
- (f) A material misrepresentation of fact by a vocational nursing program in any information submitted to the Board is cause for revocation of provisional approval.
- (g) A program whose provisional approval has been revoked shall be removed from the Board's list of approved 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 approved 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.



BOARD OF VOCATIONAL NURSING & PSYCHIATRIC TECHNICIANS  
2535 Capitol Oaks Drive, Suite 205, Sacramento, CA 95833-2945  
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May 27, 2014

TO: Education Division

FROM: Bethesda University of California Vocational Nursing Program

**SUBJECT: Acknowledgement of Receipt of Board Meeting Materials**

I, hereby acknowledge receipt of the following documents with attachments memorializing Board decisions rendered at the May 16, 2014 Board Meeting.

➤ **Bethesda University of California Vocational Nursing Program.**

1. *Notice of Provisional Approval.*
2. California Code of Regulations Excerpt Section 2526.1. Provisional Approval.
3. *Certificate of Provisional Approval.*
4. *Acknowledgement of Change in Approval Status.*

Please sign and fax the **Acknowledgement of Receipt of Board Meeting Materials** to the Board at (916) 263-7866 by Friday, June 6, 2014.

\_\_\_\_\_  
(Signature, Director)

\_\_\_\_\_  
(Date)

Name of Program: \_\_\_\_\_

**Please complete this form and fax to the Board at  
(916) 263-7866 by Friday, June 6, 2014.**



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](http://www.bvnpt.ca.gov)



## **CERTIFICATE OF PROVISIONAL APPROVAL**

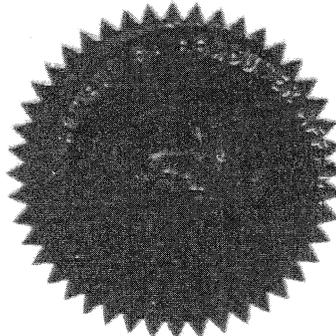
for

### *Bethesda University of California 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: May 16, 2014**

  
Todd D'Braunstein, P.T.  
President



**Expires: May 30, 2015**

  
Teresa Bello-Jones  
Executive Officer



## Acknowledgement of Change in Approval Status

I, Nanyun Lee, director of Bethesda University of California Vocational Nursing  
(Director's Name) (Name of Program)

Program hereby acknowledge that this program's provisional status has been extended through May 30, 2015. 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 Friday, June 6, 2014.

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

*Nanyun Lee*  
(Signature of Director)

June 19, 2014  
(Date)



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**BOARD OF VOCATIONAL NURSING & PSYCHIATRIC TECHNICIANS**  
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May 27, 2014

**TO:** Education Division

**FROM:** Bethesda University of California Vocational Nursing Program

**SUBJECT:** *Acknowledgement of Receipt of Board Meeting Materials*

I, hereby acknowledge receipt of the following documents with attachments memorializing Board decisions rendered at the May 16, 2014 Board Meeting.

➤ ***Bethesda University of California Vocational Nursing Program.***

1. *Notice of Provisional Approval.*
2. California Code of Regulations Excerpt Section 2526.1. Provisional Approval.
3. *Certificate of Provisional Approval.*
4. *Acknowledgement of Change in Approval Status.*

Please sign and fax the ***Acknowledgement of Receipt of Board Meeting Materials*** to the Board at (916) 263-7866 by Friday, June 6, 2014.

  
\_\_\_\_\_  
(Signature, Director)

*June 19, 2014*  
\_\_\_\_\_  
(Date)

Name of Program: *Bethesda University of CA Vocational Nursing Program*

**Please complete this form and fax to the Board at  
(916) 263-7866 by Friday, June 6, 2014.**

# Agenda Item #6.A.3., Attachment C



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

**BOARD OF VOCATIONAL NURSING & PSYCHIATRIC TECHNICIANS**  
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## CERTIFIED MAIL

August 8, 2014

Delores Terriquez, Director  
Vocational Nursing Program  
Bethesda University of California  
730 North Euclid Avenue  
Anaheim, CA 92801

***Subject: Vocational Nursing Program  
Notice of Violation***

Dear Ms. Terriquez:

On June 23 and 24, 2014, the Board of Vocational Nursing and Psychiatric Technicians (Board) made an unannounced program survey visit to the Bethesda University of California Vocational Nursing Program. Based on the survey visit and review of submitted documents, the following violations were identified:

### **Section 2526(a)(12) 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:  
... (12) Admission criteria...

**Violation #1:** Based upon an analysis of school files the school failed to follow its Board approved Admission Criteria for past and currently enrolled students. The approved criterion specifies that applicants for program admission must complete the Test of Essential Academic Skills (TEAS) achieving an overall score of 52% and a score of 62% on the mathematics section.

### **Section 2526(a) (13) 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:  
... (13) Screening and selection criteria...

**Violation #2:** Based on an analysis of program files, the program failed to consistently follow its Board – approved screening and selection criteria when selecting candidates for program admission. In so doing, the program admitted students that did not meet the established screening and selection criteria. As such, these students were at increased risk of failure.

**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 #3:** The program failed to notify the Board of the termination of multiple faculty members within the ten (10) days as required by existing regulations.

**Section 2529(b) of the Vocational Nursing Rules and Regulations states:**

"Each vocational nursing program shall have one faculty member, designated as director who meets the requirements of subsection (c) (1) herein, who shall actively administer the program. The director is responsible for compliance with all regulations in Chapter 1, Article 5 (commencing with Section 2525 et seq)."

**Violation #4:** During a review of documents and interaction with the director and staff, it became evident that the director had failed to administer the program. Clinical site visits had not been made in order to evaluate the effectiveness of the clinical experience and the ability for the clinical site to provide student's achievement of clinical objectives or the correlation of theory to clinical. Class schedules were made by the secretarial staff with very little input from the program director. The director failed to evaluate instructors to determine if the instructional plan was being implemented or if instruction was effective.

**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 #5:** During a review of documents, the director was asked to show the NEC's the program's library and provide a list of resources required for achievement of program objectives. The director failed to provide the list of resources required to support the program.

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

"Regular faculty meetings shall be held. Minutes shall be available to the Board's representative."

**Violation #6:** Based on a review of documents and discussion with the director, consultants identified that the program failed to have regular faculty meetings. The program had three (3) faculty meetings in 2013 while students were enrolled in classes.

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

“Each instructor shall have a daily lesson plan which correlates the theory and practice offered to the student. A copy of this plan shall be available to the director.”

**Violation #7:** The NEC’s requested lesson plans for selected topics. The director indicated that she was unable to locate any lesson plans.

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

“Each school shall have an attendance policy approved by the Board. The policy shall include but not limited to, criteria for attendance and the specific course objectives for which make-up time is required....”

**Violation #8:** The NEC’s requested specific attendance records for which students had been absent and makeup was required. The director failed to provide the requested documents.

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

“The school shall evaluate student performance to determine the need for remediation or removal from the program.”

**Violation #9:** Although the program had a remediation policy in place, program documents substantiate several students were identified as having academic or attendance issues. The remediation plans found were minimal and the school failed to follow through to ensure resolution of the identified problem.

**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 #10:** On February 13, 2008, the Board approved the program’s request to begin a full-time program. The full – time curriculum was approved to include 1590 hours, including 622 theory and 968 clinical.

Information provided by the director confirmed the commencement of a part – time program without prior approval by the Board. The director was unable to supply Board representatives with the full – time or part – time curriculum implemented.

**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 and adequate daily census of patients to afford a variety of clinical experiences consistent with competency-based objectives and theory being taught...”

**California Business and Professions Code, Division 2, Chapter 6.5 Vocational Nursing, Article 4, Section 2882 states:**

“The course of instruction of an approved school of vocational nursing shall consist of not less than the required number of hours of instruction in such subjects as the board may from time to time by regulation determine, together with the required number of hours in the care of medical, surgical, obstetrical patients, care of sick children, and such other clinical experience as from time to time may be determined by the board....”

**Violation #11:** Based on an analysis of program documents, the program failed to provide documents substantiating clinical facilities adequate as to number, type, and variety of patients treated, to provide clinical experience for all students in the areas of the curriculum. The program lacked Maternity and Pediatric clinical sites adequate to provide clinical experience for incoming students.

The director provided consultants a list of clinical facilities at which students were assigned clinical experience. An analysis of the program's Board approved clinical facility applications revealed that many of the applications listed "College of Medical Arts" as the school name, not Bethesda University. Board records substantiate that the program's name was changed to Bethesda Christian University on September 17, 2009.

Additionally, it was found that the clinical site the director indicated was used for the last graduating classes for Maternity and Pediatric clinical experience did not list Maternity or Pediatrics as services they offer to this school on the Board approved application.

**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 #12:** Based on a review of documents and interaction with the director, consultants identified that the director had failed to evaluate the adequacy

of clinical facilities since March of 2012. No evidence of the evaluations the director stated she made in March of 2012 was provided to the NEC's.

**Be advised that the continuation of such violations jeopardizes your program's approval.** Please submit the following by the date listed below:

1. A plan and timeline for correction of each violation listed above (1-12).
2. Develop tools to be utilized for written evaluation of:
  - a. Clinical facilities,
  - b. Student progress,
  - c. Remediation (to include follow-up),
  - d. Attendance
3. Evaluation forms utilized by the Director for the following:
  - a. Curriculum
  - b. Student performance
  - c. Facilities
  - d. Faculty
4. Instructional Plan for the Board approved full-time program.
5. Lesson Plans for all topics taught in the Board approved instructional plan.
6. Submit a signed statement attesting that the program has on file proof of High School completion or the equivalent thereof for all enrolled students.
7. Vocational Nursing Program Handbook
8. Pictures of VN classrooms for planned classes.
9. Pictures and list of equipment in the program's Skills Laboratory.
10. List of all equipment, publications, and electronic resources in the program's library.

The Board requests the above information no later than **Friday, August 29, 2014.**

Should further information be needed, please feel free to contact the Board at (916) 263-7840.

Sincerely,



**PAM HINCKLEY, R.N., M.S.N.**  
Nursing Education Consultant

# Agenda Item #6.A.3., Attachment D



## Bethesda University

730 North Euclid Street, Anaheim, California 92801 Tel: (714)517-1945, Fax: (714)683-1440

BVNPT Received  
on 8/29/14 with pk

Date: August 27, 2014

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

From: Delores Terriquez, DON  
Bethesda University

Subject: Response to Notice of Violation letter dated August 08, 2014

Dear Mrs. Pam Hinckley:

Bethesda Christian University accepts the seriousness of all violations. Our goals are to correct each one, and not have any repeat occurrences or further violations. Bethesda will implement a compliance program to serve as an efficient system for monitoring operations to ensure that all aspects of the nursing program are performed in a compliant and ethical manner.

Bethesda thanks the Board for extending another opportunity for allowing the privilege to turn the VN program around. We are always interested to hear from Board comments that allow us to improve upon to obtain high program standards. Thank you for addressing these concerns in an expedient manner.

Currently Bethesda does not have students enrolled. We hope to admit students in the fall. We are reorganizing the nursing department so that important documents such as lessons plans, the instructional plan and related resources are easily located and accessible. All resources will also be accessible via our intranet.

Please contact me if you have any questions or need further clarification on any of the addressed items in this document.

Sincerely,

Delores Terriquez, RN, MNS/MBA/HC  
Direct Line (714) 683-1462



## Bethesda University

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**Violation #1 : Based upon an analysis of school files the school failed to follow its Board approved admission Criteria for past and currently enrolled students. The approved criterion specifies that applicants for program admission must complete the Test of Essential Academic Skills (TEAS) achieving an overall score of 52% and a score of 62% on the mathematics section.**

Effective upon entrance of all future cohorts, Bethesda University will strictly adhere to established HESI entrance exam scoring policy and select the most qualified candidates to ensure program/candidate success.

The 2014 revised student handbook on page 8 states it is recommended that a candidate strive to obtain a score of 80% or greater on the HESI English Language entrance exams and a score of 80% on the Math entrance exam on the first attempt. The exams may be repeated a second time at the expense of the candidate. A candidate is not eligible for the program if they score below 75% on either of the exams.

Selection of students to the Bethesda Vocational Nursing program is based on a point system. Students are ranked according to total points. Nursing program slots are filled beginning with the highest ranking students. Completing all requirements does not guarantee acceptance into the program.



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**Violation #2: Based on an analysis of program files, the program failed to consistently follow its Board approved screening and selection criteria when**

**selecting candidates for program admission. In so doing, the program admitted students that did not meet the established screening and selection criteria. As such, these students were at increased risk of failure.**

Effective upon entrance of all future cohorts, Bethesda University will strictly adhere to established screening and selection criteria and select the most qualified candidates to ensure program/candidate success. We look for evidence of ability to succeed at the entry level of nursing. Our candidate selection interview performed by the DON and HESI entrance exam are aimed to determine those with compassion, commitment and sensitivity to client care. Other attributes to be assessed are communication skills/style, ability to work with faculty and medical environments, academic aptitude, attitude toward change and stress response, study habits, and time management. We are looking for students with the commitment and personality that would likely support working in this industry.

The student handbook policy, page 8 states:

The Vocational Nursing Program Director or Administrator will:

- A. Verify and document the qualifications of each candidate
- B. Commence oral interviews.
- C. Make a final selection of candidates to be admitted to the program. Selection may be

based upon any or all of the following:

1. Scores on the HESI Entrance Exam. It is recommended that a candidate strive to obtain a score of 80% or greater on the HESI English Language entrance exams and a score of 80% on the Math entrance exam on the first attempt. The exams may be repeated a second time at the expense of the candidate. A



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candidate is not eligible for the program if they score below 75% on either of the exams.

2. Work related experience
3. Interview and scoring
4. Education
5. Background check

The top 20 candidates plus 2 alternates will be selected. See the Alternate Student Policy. In the event two candidates are equally qualified for the last place/slot in the class, selection will be based upon the date of the application.

**Violation #3:** The program failed to notify the Board of the termination of multiple faculty members within the ten (10) days as required by existing regulations.

Effective immediately, Bethesda University will abide by 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."

Current staff are listed on the School Faculty Excel document (see faculty attachment).

*Violation #4 missing - Director states she will submit.*

<sup>5</sup>  
**Violation #4:** During a review of documents and interaction with the director and staff, it became evident that the director had failed to administer the program. Clinical site visits had not been made in order to evaluate the effectiveness of the clinical experience and the ability for the clinical site to provide student' achievement of clinical objectives or the correlation of theory to clinical. Class schedules were made by the secretarial staff with very little input from the program director. The director failed to



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**evaluate instructor to determine if the instructional plan was being implemented or if instruction was effective.**

Effectively immediately, the current DON will administer the program in its entirety to include each student's weekly academic progress, attendance, and areas of concerns or deficiencies.

Clinical sites will be monitored on a bi-monthly basis to detect any concerns and to determine if clinical objectives are being met. Strategies to determine objectives are met will be measured by performing onsite visits and conference with the facility DSD or DON and Bethesda staff. The goal is to identify the organizational and structural barriers and pedagogical challenges faced in optimizing students' clinical learning to align to theory. Also students will experience post conference assignments such as group case studies that align with weekly theory learning and objectives to strengthen critical and clinical thinking.

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The class schedule for each term will be created by the DON.

Each instructor will receive a formal evaluation by the Director at the end of each course. Evaluation will be based on content knowledge, teaching effectiveness, interpersonal relationships, and range of instructional strategies.

Each student will evaluate the instructor at the end of each course. Evaluation will be based on knowledge of subject matter, organization, effectiveness of teaching methods, teaching effect and interpersonal interaction.

The Director will discuss areas of concern and teaching deficiencies with the instructor and determine methods for improvement in order to develop more comprehensive measures of teaching effectiveness. A follow through will be determined during the subsequent evaluation and beforehand as indicated. All documentation will be placed in the instructor's file.



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Violation #5: During a review of documents, the director was asked to show the REG's the program's library and provide a list of resources required for achievement of program objectives. The director failed to provide the list of resources required to support the program.

Please see the VN program book list to be used, library book list attachment and photos of library and the VN book section.

Violation #6: Based on a review of documents and discussion with the director, consultants identified that the program failed to have regular faculty meetings. The program had three (3) faculty meetings in 2013 while students were enrolled in classes.

Effective immediately, VN staff meeting will be held monthly. Ground rules are to participate, get focus, maintain momentum and strive to mitigate each month's issues. The agenda will include students at risk, theory concerns, clinical concerns and open discussion. The Nursing Office Manager will take notes which will be reviewed by the director then typed and inserted in a binder for easy retrieval. The VN staff and academic dean will have access to all meetings and follow-through plan for corrective action.

The process provides an avenue for staff to be able to identify problems and opportunities for improvement and to develop corrective actions and plans. Through this process, the staff is more accountable for the provision of improvement. The intent is that all staff members are committed to ongoing program development and improvement.



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Violation #<sup>8</sup>7: The NEG's requested lesson plans for selected topics. The director indicated that she was unable to locate any lesson plans.

Please see lesson plans attachment.

Lesson plans are maintained in Term 1-3 notebooks located in the VN office, directors office, and intranet for easy access. They may also be obtained from a word document for daily modification which is accessible to all VN staff.

Violation #<sup>9</sup>8: The NEG's requested specific attendance records for which students had been absent and makeup was required. The director failed to provide the requested documents.

Effective upon entrance of all future cohorts, theory and clinical attendance will be monitored and recorded on a daily basis by the DON's office manager. The director and instructors are responsible to monitor and address attendance issues. All VN staff and students will have daily access to the spreadsheet to immediately address any attendance issues, follow related policy and ensure all time has been made up.

Page 11 of the student handbook policy will be followed consistently. See policy below:

### ATTENDANCE POLICY

The Vocational Nursing program encompasses 1590 clock hours. Content areas are determined by the California Board of Vocational Nursing and Psychiatric Technicians. Attendance is expected for the full duration of theory and clinical courses, and is calculated into the grade point average (worth 5% of grade).

If a student will be unavoidably absent, he/she must notify the school at least one (1) hour before the class/clinical start time.

All missed competencies, theory, lab and clinical must be made-up to satisfy the BVNPT requirement. Hours for tardiness and leaving early will also be counted in missed time and are required to be made up. Students must make-up missed



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theory hours outside of class and missed clinical hours on assigned clinical make-up days. All course objectives (missed time) must be completed before moving on to the next term.

Students are encouraged to schedule medical, dental or other personal appointments after school hours. It is expected that missed hours will occur for exceptional reasons such as for illness, death in immediate family, court appearances, and/or *emergency* medical, dental or legal appointments.

A maximum of 2 (two) absences will be allowed per term. When 2 (two) absences have occurred, the student will be placed on probation. A third absence in the same term may result in dismissal from the program. Students may file an appeal as outlined in the Appeal policy. If dismissed from the program, the student may be allowed to re-enter the program at the same level where he/she left the program, if all requirements for re-admission are met and as determined by the Director of Nursing and Chief Academic Officer (see Re-entry policy).

- Theory Absences

It is the student's responsibility to be present and on time for all classes. The student must notify the school if they are going to be tardy, absent, or must leave early. The notification should occur no later than one (1) hour prior to scheduled class time, if possible. All missed time must be made up. If a student is absent, it is the student's responsibility to obtain all class information and assignments from the instructor.

- Clinical Absences

If a student is going to be absent from clinical experience, the student must contact the instructor at least one (1) hour prior to the beginning of the clinical experience. If unable to reach the instructor,



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the student will contact the School of Nursing as soon the office opens. The phone number is 714-683-1460. Failure to contact the instructor regarding an absence will result in written warning. All missed time must be made up.

- A students may not attend a partial skills lab or clinical shift. The student must be present the entire scheduled time or it is considered a clinical absence and must be made up.
- Tardiness/Leaving Early
- Patterns of tardiness/leaving early will be tracked by the Nursing Department Office Manager, Director of Nursing and Instructor. A student will receive a written warning for three (3) or more tardies or leaving early. A fourth (4) offense will result in probation. All hours missed by tardiness and leaving early must be made up in the manner dictated by where the missed time occurred.

**Violation #9:** Although the program had a remediation policy in place, program documents substantiate several students were identified as having academic or attendance issues. The remediation plans found were minimal and the school failed to follow through to ensure resolution of the identified problem.

Effective upon entrance of all future cohorts , the goal is the serve the diverse needs of students. Our intent is for remediation to provide additional academic help, encourage and motivate students to vision themselves as progressing and succeeding. Many students who may have been successful in some courses may reach a course that presents them with a challenge they can't overcome alone. The components of remediation are to assess, prescribe a plan, instruct, and benchmark progress.



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A student will be allowed to remediate one course per term with the exception of VN 101 Foundations in Nursing. The highest remediation grade the student can achieve is 78%.

The student will follow the Student Success Plan (remediation) and must attend two separate one hour sessions and complete assignments by the due date to pass remediation. (see remediation plan attachment)

Violation #10: On February 13, 2008, the Board approved the program's request to begin a full-time program. The full - time curriculum was approved to include 1590 hours, including 622 theory and 968 clinical. Information provided by the director confirmed the commencement of a part- time program without prior approval by the Board. The director was unable to supply Board representatives with the full - time or part - time curriculum implemented.

The full-time curriculum was emailed to consultant Pam Hinckley on August 06, 2014 per her request. It was last updated June 2012. It has been included in this report (see attachment).

Bethesda does not plan to have a part-time program at the present time, and will not start a part-time program without the Board's prior consent. Bethesda University is aware this is an unacceptable violation and it will not be repeated.

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Violation #11: Based on an analysis of program documents, the program failed to provide documents substantiating clinical facilities adequate as to number, type, and variety of patients treated, to provide clinical experience for all students in the areas of the curriculum. The program lacked Maternity and Pediatric clinical sites adequate to provide clinical experience for incoming students.

The director provided consultants a list of clinical facilities at which students were assigned clinical experience. An analysis of the program's Board approved clinical facility applications revealed that many of the applications listed "College of Medical Arts" as the school name, not Bethesda University. Board records substantiate that the program's name



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was changed to Bethesda Christian University on September 17, 2009. Additionally, it was found that the clinical site the director indicated was used for the last graduating classes for Maternity and Pediatric clinical experience did not list Maternity or Pediatrics as services they offer to this school on the Board approved application.

Bethesda University will only use clinical sites approved by the BVNPT under the name of Bethesda University. Clinical sites approved under the name "College of Medical Arts" will not be used, and these documents will be archived.

Please see attached list of approved/pending approval clinical sites.

The director is actively seeking OB and peds clinical sites.

Violation #<sup>13</sup>12: Based on a review of documents and interaction with the director, consultants identified that the director had failed to evaluate the adequacy of clinical facilities since March of 2012. No evidence of the evaluations the director stated she made in March of 2012 was provided to the NEC's.

Effective immediately, the current DON will visit each clinical group/site/instructor bi-monthly to assess that the site is appropriate to meet the students' learning needs and the student/instructor relationships, communication, and expectations are appropriate to meet the learning outcomes of the clinical course.

The DON is required to visit a clinical instructor/group/site more than the allotted time when there are specific concerns about a student brought to the attention of the director or by the clinical instructor or when there are student concerns regarding a clinical instructor. The number of visits will be determined by the need for coaching/mentoring of the instructor or by the need for more observation of the student. Visits will be documented with specific interventions/observations and outcomes.

At the end of each term, the instructor and student will be provided with an evaluation form. If evaluations indicate an area for improvement, the director will



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review and discuss strategies and expectations with the instructor. Bethesda is committed to students' ongoing professional development.



10/8  
BVNPT Received  
on 10/8/14 with *jt*

Bethesda University  
730 North Euclid Street, Anaheim, California 92801 Tel: (714)517-1945,  
Fax: (714) 683-1440

Date: October 07, 2014

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

From: Delores Terriquez, DON  
Bethesda University

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Subject: Updated Response to Notice of Violation letter dated August 08, 2014

In response to your emailed dated 9/24/2014 regarding you wrote #1 The timeline indicates "3 weeks to lay down the foundation for excellence" but I need you to create a timeline for the correction of EACH violation listed."

I wrote the timeline for each violation when I addressed and responded to each violation dated August 28, 2014. But for better clarity I will lay it out as stated below:

**Violation #1** : Based upon an analysis of school files the school failed to follow its Board approved admission Criteria for past and currently enrolled students. The approved criterion specifies that applicants for program

**admission must complete the Test of Essential Academic Skills (TEAS) achieving an overall score of 52% and a score of 62% on the mathematics section.**

Timeline: Effective immediately upon candidacy testing of all potential students, Bethesda University will strictly adhere to established HESI entrance exam scoring policy and select the most qualified candidates to ensure program/candidate success.

The 2014 revised student handbook on page 8 states it is recommended that a candidate strive to obtain a score of 80% or greater on the HESI English Language entrance exams and a score of 80% on the Math entrance exam on the first attempt. The exams may be repeated a second time at the expense of the candidate. A candidate is not eligible for the program if they score below 75% on either of the exams.

**Violation #2: Based on an analysis of program files, the program failed to consistently follow its Board approved screening and selection criteria when selecting candidates for program admission. In so doing, the program admitted students that did not meet the established screening and selection criteria. As such, these students were at increased risk of failure.**

Timeline: Effective immediately upon candidacy selection of all potential students, Bethesda University will strictly adhere to established screening and selection criteria and select the most qualified candidates to ensure program/candidate success. We look for evidence of ability to succeed at the entry level of nursing. Our candidate selection interview performed by the DON and HESI entrance exam are aimed to determine those with compassion, commitment and sensitivity to client care. Other attributes to be assessed are communication skills/style, ability to work with faculty and medical environments, academic aptitude, attitude toward

change and stress response, study habits, and time management. We are looking for students with the commitment and personality that would likely support working in this industry. The student handbook policy on page 8 described the guidelines.

**Violation #3: The program failed to notify the Board of the termination of multiple faculty members within the ten (10) days as required by existing regulations.**

Timeline: Effective immediately, Bethesda University will abide by 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."

Currently staff is adequate and are listed on the School Faculty Excel document (see faculty attachment).

**Violation #4: During a review of documents and interaction with the director and staff, it became evident that the director had failed to administer the program.**

**Clinical site visits had not been made in order to evaluate the effectiveness of the clinical experience and the ability for the clinical site to provide student' achievement of clinical objectives or the correlation of theory to clinical. Class schedules were made by the secretarial staff with very little input from the program director. The director failed to evaluate instructor to determine if the instructional plan was being implemented or if instruction was effective.**

Timeline: Effectively immediately, the current DON has and will continue to administer the program in its entirety to include each student's weekly academic progress, attendance, areas of concerns or deficiencies, monitor clinical sites on a

bi-monthly basis to detect any concerns and to determine if clinical objectives are being met, create class schedules, and evaluate the instructors on a quarterly basis and as deemed necessary.

<sup>6</sup>  
**Violation #5:** During a review of documents, the director was asked to show the REG's the program's library and provide a list of resources required for achievement of program objectives. The director failed to provide the list of resources required to support the program.

Timeline: Please see the VN program book list to be used, library book list attachment and photos of library and the VN book section. Additional resources will be added when determined necessary.

<sup>7</sup>  
**Violation #6:** Based on a review of documents and discussion with the director, consultants identified that the program failed to have regular faculty meetings. The program had three (3) faculty meetings in 2013 while students were enrolled in classes.

Timeline: Effective immediately, VN staff meeting will be held monthly. The Nursing Office Manager will take notes which will be reviewed by the director then typed and inserted in a binder for easy retrieval. The VN staff and academic dean will have access to all meetings and follow-through plan for corrective action.

<sup>8</sup>  
**Violation #7:** The NEG's requested lesson plans for selected topics. The director indicated that she was unable to locate any lesson plans.

Timeline: Lesson plans are in place, Please see lesson plans attachment. Lesson plans are maintained in Term 1-3 notebooks located in the VN office, directors

office, and intranet for easy access. They may also be obtained from a word document for daily modification which is accessible to all VN staff.

**Violation #8:** The NEG's requested specific attendance records for which students had been absent and makeup was required. The director failed to provide the requested documents.

Timeline: Effective immediately, theory and clinical attendance will be monitored and recorded on a daily basis by the DON's office manager. The director and instructors are responsible to monitor and address attendance issues. All VN staff and students will have daily access to the spreadsheet to immediately address any attendance issues, follow related policy and ensure all time has been made up. Page 11 of the student handbook policy will be followed consistently.

**Violation #9:** Although the program had a remediation policy in place, program documents substantiate several students were identified as having academic or attendance issues. The remediation plans found were minimal and the school failed to follow through to ensure resolution of the identified problem.

Timeline: Effective immediately upon entrance of all future students, the goal is to serve the diverse needs of students. Our intent is for remediation to provide additional academic help, encourage and motivate students to vision themselves as progressing and succeeding. Many students who may have been successful in some courses may reach a course that presents them with a challenge they can't overcome alone. The components of remediation are to assess, prescribe a plan, instruct, and benchmark progress.

**Violation #10:** On February 13, 2008, the Board approved the program's request to begin a full-time program. The full - time curriculum was approved to include 1590 hours, including 622 theory and 968 clinical.

Information provided by the director confirmed the commencement of a part- time program without prior approval by the Board. The director was unable to supply Board representatives with the full - time or part - time curriculum implemented.

Timeline: The full-time curriculum was emailed to consultant Pam Hinckley on August 06, 2014 per her request. It was last updated June 2012. It has been included in this report.

Bethesda does not plan to have a part-time program at the present time, and will not start a part-time program without the Board's prior consent. Bethesda University is aware this is an unacceptable violation and it will not be repeated.

The current plan is to update the curriculum instructional plan by November 28, 2014. Key changes include:

- change each term from 15 weeks to 17 weeks
  - update textbook to Elsevier Foundations of Nursing by Cooper & Gosnell, 7th Edition.
  - incorporate HESI Learning System
  - update textbook to Elsevier Adult Health by Cooper & Gosnell, 7th Edition.
  - Convert some of the clinical hours to skills lab hours in each term. Currently there are insufficient skills lab hours in each term which are need to better prepare students for clinical.
- 
- better align with current NCLEX-PN test plan

<sup>12-</sup>  
**Violation #11:** Based on an analysis of program documents, the program failed to provide documents substantiating clinical facilities adequate as to number, type, and variety of patients treated, to provide clinical experience for all students in the areas of the curriculum. The program lacked Maternity and Pediatric clinical sites adequate to provide clinical experience for incoming students. The director provided consultants a list of clinical facilities at which students were assigned clinical experience. An analysis of the program's Board approved clinical facility applications revealed that many of the applications listed "College of Medical Arts" as the school name, not Bethesda University. Board records substantiate that the program's name was changed to Bethesda Christian University on September 17, 2009.

Additionally, it was found that the clinical site the director indicated was used for the last graduating classes for Maternity and Pediatric clinical experience did not list Maternity or Pediatrics as services they offer to this school on the Board approved application.

Timeline: Effective immediately, Bethesda University will only use clinical sites approved by the BVNPT under the name of Bethesda University. Clinical sites approved

under the name "College of Medical Arts" will not be used, and these documents have been be archived.

Please see attached list of approved clinical sites.

Currently, we have 2 pediatric clinics where one student at a time can rotate and all hours will be completed prior to each cohorts' grad date. One of the sites has been submitted to the Board for approval. I will obtain the clinical contract and approval form from the other peds clinic as soon as the pediatrician returns from his vocation during the third week of October.

The director is actively seeking OB clinical sites. The timeline to have sufficient sites is November 19, 2015.

<sup>13</sup>  
**Violation #12: Based on a review of documents and interaction with the director, consultants identified that the director had failed to evaluate the adequacy of clinical facilities since March of 2012. No evidence of the evaluations the director stated she made in March of 2012 was provided to the NEC's.**

Timeline: Effective immediately, the current DON will visit each clinical group/site/instructor bi-monthly to assess that the site is appropriate to meet the students' learning needs and the student/instructor relationships, communication, and expectations are appropriate to meet the learning outcomes of the clinical course.

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At the end of each term, the instructor and student will be provided with an evaluation form. If evaluations indicate an area for improvement, the director will review and discuss strategies and expectations with the instructor. Bethesda is committed to students' ongoing professional development.