

Agenda Item #8.C.3.



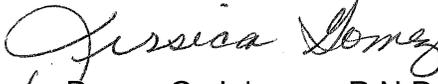
BUSINESS, CONSUMER SERVICES, AND HOUSING AGENCY • GOVERNOR EDMUND G. BROWN JR.

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DATE: January 30, 2015

TO: Board Members

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

SUBJECT: InterCoast College, Fairfield, Vocational Nursing Program – Consideration of Request to Admit Students (Director: Carla Carter, Fairfield, Solano County, Private)

On September 12, 2014, the InterCoast College, Fairfield, Vocational Nursing Program was placed on provisional approval due to noncompliance with regulatory requirements relative to pass rates on the licensing examination and also due to the number and type of violations identified on an unannounced program inspection that was conducted July 8 and 9, 2014.

On December 15, 2014, the Board received correspondence from the director requesting approval to admit a class of thirty (30) students to a full – time class to begin on February 26, 2015 and graduating on June 9, 2016.

On January 26, 2015, the Board received, verbally from the program director, a revised request to admit a class of fifteen (15) students to a full – time class to begin on February 26, 2015 and graduating on June 9, 2016. As of January 27, 2015, correspondence confirming a revision of the program's original request has not been received.

History of Prior Board Actions

(See Attachment A for History of Prior Board Actions)

Enrollment

The program currently is offering full-time classes of 66 weeks in length. The program is required to obtain approval by the full Board prior to the admission of each class.

The following table represents **projected** student enrollment based on current and proposed class starts and completions. The table indicates a **maximum enrollment of 129 students** for the period from **May 2012 through June 2016**.

ENROLLMENT DATA				
CLASS DATES		#Students Admitted	#Students Current or Completed	Total Enrolled
Start	Complete			
2/12 Day Class		16	11	11
5/12 Eve Class		11	7	11 + 7 = 18
9/12 Day Class		13	13	18 + 13 = 31
11/12 Eve Class		18	11	31 + 11 = 42
3/13 Day Class		22	21	42 + 21 = 63
4/13 Eve Class		12	7	63 + 7 = 70
	5/13 (2/12 Day Class)		-11	70 - 11 = 59
8/13 Day Class		30	19	59 + 19 = 78
	9/13 (5/12 Eve Class)		-7	78 - 7 = 71
9/13 Eve Class		30	30	71 + 30 = 101
	12/13 (9/12 Day Class)		-13	101 - 13 = 88
12/13 Day Class		25	21	88 + 21 = 109
	2/14 (11/12 Eve Class)		-11	109 - 11 = 98
2/14 Eve Class	6/15	30	9	98 + 9 = 107
5/14 Day Class	8/15	30	22	107 + 22 = 129
	6/14 (3/13 Day Class)		-21	129 - 21 = 108
	8/14 (4/13 Eve Class)		-7	108 - 7 = 101
	1/15 (8/13 Day Class)		-19	101 - 19 = 82
	2/15 (9/13 Eve Class)		-30	82 - 30 = 52
2/15 (Proposed)	6/16	30		52 + 30 = 82
	5/15 (12/13 Class)		-21	82 - 21 = 61

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 January 2011 through December 2014, specify the pass percentage rates for graduates of the InterCoast College, Fairfield, Vocational Nursing Program on the National Council Licensure Examination for Practical/Vocational Nurses (NCLEX-PN®).

NCLEX-PN® Licensure Examination Data							
Quarterly Statistics					Annual Statistics*		
Quarter	# Candidates	# Passed	% Passed	State Average Quarterly Pass Rate	Program Average Annual Pass Rate	State Average Annual Pass Rate [CCR §2530 (I)]	Variance from State Average Annual Pass Rate
Jan-Mar 2011	12	11	92%	80%	92%	77%	+15
Apr-Jun 2011	4	1	25%	71%	75%	76%	+1
Jul-Sep 2011	1	1	100%	77%	76%	76%	0
Oct-Dec 2011	No Candidates Tested			80%	76%	75%	-1
Jan-Mar 2012	No Candidates Tested			77%	40%	74%	-34
Apr-Jun 2012	No Candidates Tested			72%	100%	74%	+26
July-Sep 2012	No Candidates Tested			74%	N/A	74%	N/A
Oct-Dec 2012	3	3	100%	70%	100%	74%	+26
Jan-Mar 2013	4	4	100%	75%	100%	73%	+27
Apr-Jun 2013	No Candidates Tested			78%	100%	73%	+27
July-Sep 2013	4	4	100%	75%	100%	74%	+26
Oct-Dec 2013	6	3	50%	76%	79%	76%	+3
Jan-Mar 2014	10	3	30%	74%	50%	76%	-26
Apr-Jun 2014	5	3	60%	66%	52%	73%	-21
Jul - Sep 2014	7	1	14%	72%	36%	73%	-37
Oct - Dec 2014	7	0	0%	72%	24%	72%	-48

*The Annual Pass Rate changes every quarter. It is calculated by dividing the number of candidates who passed during the current and previous three quarters by the number of candidates who tested during the same period. If no data is available for the relevant period, the statistic is carried over from the last quarter for which data is available.

California Code of Regulations section 2530(l) states:

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

It noted that for the most recent **four (4)** consecutive quarters, the program’s average annual pass rate has been substantially **below** the state annual average pass rate. It is also noted that since placement on provisional approval on September 12, 2014, the program’s average annual pass rate has **decreased**.

Based on the most recent data available (October through December, 2014), the program’s average annual pass rate is **24%**. 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 **72%**. The pass rate for the InterCoast College, Fairfield, Vocational Nursing Program is **48 percentage points below** the state average annual pass rate.

Faculty and Facilities

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

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

The number of Board-approved faculty totals 16, including the program director. The director has 100% administrative responsibilities. Of the 16 Board – approved faculty, six (6) are actively available for clinical instruction and another six (6) faculty are listed as substitute status.

Based on the Board's September 12, 2014 decision requiring the program to provide no less than one (1) instructor for every ten (10) students in all clinical experiences and the program's maximum enrollment of **129** students, 13 instructors are required for supervision of clinical experience at a ratio of one (1) instructor per 10 students. Therefore, using the maximum enrollment number of 129 students, the program **lacks** adequate faculty to support the proposed students. However, should a class of 30 students be admitted, the **actual** enrollment would be **82** students, in which case, **nine (9)** faculty are required and the current faculty would be adequate.

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 **lacks** sufficient clinical facilities to afford the number, type, and variety of patients that will provide clinical experience consistent with competency-based objectives for the number of students requested.

Other Considerations

As previously noted, on September 12, 2014, the Board placed the InterCoast Colleges, Fairfield, Vocational Nursing program on provisional approval for a two – year period. On that date, the Board also required the program to submit a follow – up comprehensive analysis of the program no later than December 31, 2014.

On September 19, 2014, the program director and assistant director met with Board representatives at the Board's Sacramento headquarters. A copy of the 2011 Board – approved instructional plan and the 2012 modification of maternity and pediatric clinical objectives was given to the director. Board representatives discussed requirements to correct violations.

On December 1, 2014, the program submitted a comprehensive analysis, response to violations, and a request to admit students beginning in January 2015. On December 2 and 4, 2014, the assigned consultant held teleconferences with the program director. The purpose of the teleconferences was to:

1. Identify deficits in the submitted comprehensive analysis;
2. Identify outstanding violations and required corrections;
3. Inform the program regarding process, procedures, and timelines regarding a request to admit students.

On December 15, 2014, the program submitted a revised comprehensive analysis (see Attachment B), strategic improvement plan (see Attachment C), documentation relative to the outstanding violations, and a request to admit students.

The following documents, relative to correcting violations, were received, as hard copy, on December 15, 2014 and are not attached:

1. List of Admission Criteria from 2006 with 2013 revision
2. List of Screening and Selection Criteria from 2012
3. Terminal Objectives from 2006
4. Theory Objectives from 2006
5. Current Faculty Signatures Regarding Instructional Plan
6. Course Outlines from 2012
7. Clinical Objectives, undated
8. Lesson Plans
9. List of Textbook Title, undated
10. Attendance Policy from 2012
11. Attendance Make – Up Grids
12. Remediation Policy from 2006
13. Student Remediation/Probation form from 2006
14. Evaluation Plan for the Program, undated, with 2014 – 2016 Implementation Calendar
15. Clinical Evaluation Summary for Five (5) Instructors, Signed by Director and Instructors, October 2014
16. Course Evaluations for Three (3) Instructors, Signed by Director and Instructors, October 2014
17. Clinical Facility Evaluations from Fall 2014 (see below)
18. Faculty Evaluations by Program Director, November 2014
19. Overview of Clinical Sites and Instructors
20. Schedule of Academic Progress Monitoring dated July 2014
21. Academic Progress Form
22. Photo of One Bookcase Documenting Library/LRC
23. Purchase Orders for Four (4) Nursing Magazine Subscriptions
24. Faculty Meeting Minutes

On December 30, 2014, the assigned consultant notified the program director of deficits in the requested documentation, which was due December 15, 2014, to support the request to admit students. On January 5, 2015, partial documentation was received.

After analyzing proposed pediatric and maternity clinical experiences for the requested 30 students, it was noted that, due to restrictions on the number of students allowed in placements and the available hours in clinical facilities for the pediatric and maternity students, it would take from November 16, 2015 until February 6, 2016 for the 30 proposed students to complete pediatric and maternity clinical experiences. This includes clinical experiences throughout the holiday periods. Specifically, it would take nine (9) weeks for students to complete pediatric

clinical experiences and it would take ten (10) weeks for students to complete maternity clinical experiences. The experiences overlap, with pediatrics experiences beginning the week before maternity experiences and maternity experiences ending 2 weeks after pediatric experiences.

According to the Board – approved Instructional Plan, students have four (4) weeks of pediatric clinical experiences (starting in Week 2 of pediatric theory content), one week of overlap with maternity theory content and pediatric clinical experience, and then five (5) weeks of maternity clinical experience.

Therefore, the proposed plan is not consistent with the Board – approved instructional plan and does not maintain a theory to clinical correlation.

On January 7, 2015, the assigned consultant informed the program director of this issue. The director restated the desire to admit 30 students to the program. (See Attachment D).

On January 26, 2015, via telephone, the program director requested a revision of the request to admit. The stated request was to admit 15 students. The requested written revision was not received as of January 27, 2015.

Violations

The violations described in the September 2014 report to the Board are listed below, along with the **current status of the plan of action to correct** those violations.

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

“The institution shall apply to the Board for approval. Written documentation shall be prepared by the director and shall include:
... (7) Instructional Plan.”

Violation #1: Board records confirm approval of the program’s instructional plan. During the program inspection, the director was unable to provide a copy of an instructional plan that was approved by the Board.

Status: This violation is **corrected**. On September 19, 2014, the director and assistant director met with Board staff at Board headquarters. A copy of the last Board – approved Instructional Plan was provided to the program. The director reports this Instructional Plan has now been implemented at the program, including updating of related texts and assignments.

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

“The institution shall apply to the Board for approval. Written documentation shall be prepared by the director and shall include:
... (8) Evaluation methodology for curriculum.”

Violation #2: The director was unable to identify or provide documents substantiating implementation of the program’s Board - approved methodology for evaluation of the Board - approved curriculum.

Status: This violation is **corrected**.

On December 1, 2014, the Board received documents from the program, including a new Systematic Evaluation Plan, which the program intends to utilize to evaluate the curriculum.

Section 2526(a)(16) 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:

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

Violation #3: The submitted 2012 Program Record Survey included a list of program resources, including counseling and tutoring services to assist students in achievement of educational objectives.

Neither the Vocational Nursing Program Student Handbook, nor the InterCoast Colleges School Catalog (both provided to Consultants during the survey visit) contain information informing students of such services. Notices of these services were not posted.

When asked for the list provided to students, the director produced the document from the 2012 Program Record Survey.

Status: This violation is **corrected**.

On December 1, 2014, the Board received documents from the program, including a comprehensive list of resources available to students.

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 #4: The program failed to consistently report to the Board the termination of faculty within the time prescribed by regulation.

During the visit, Consultants requested files for all current faculty members. Based on information provided, four (4) faculty listed on the most recently submitted annual report are no longer employed by the program. The Board received notification for only two (2) terminations.

Status: This violation is **corrected**.

An updated list of program faculty has been received by the Board, including recent faculty terminations.

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: Based on the Consultants' observation, the program does not have sufficient resources for the enrolled population to achieve the program's objectives.

At the time of the visit, a total of 121 students were enrolled in the program. The program has thirteen (13) computer stations available for student use. The program does not have a physical library. The program has no offices for faculty members.

Status: This violation is **corrected**.

On December 1, 2014, the Board received photos of additional resources, including the computer lab, Learning Resources Center, and faculty offices. The director reports there are now offices for faculty and a total of 31 computer stations available for student use. Evidence of a physical library was submitted on December 15, 2014, (see Attachment E) along with purchase orders for four (4) nursing magazines/journals that were subscribed for one year.

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: Consultants did not observe evidence that the program has held regular faculty meetings as prescribed by regulation.

Documents provided by the director included minutes for faculty meetings dated May 13, 2014 and July 2, 2014. Minutes for a faculty meeting dated June 5, 2013, held by InterCoast Colleges about all of its programs were also provided.

Status: This violation is **corrected**.

On December 15, 2014, the program director submitted minutes of vocational nursing faculty meetings, including attendance, held October 9 and 28, 2014 and November 11, 2014.

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 program did not provide lesson plans that correlate theory and clinical experience offered to the student. Consultants requested specific lesson plans from various parts of the curriculum. No lesson plans were produced.

The program provided a document titled "VN Lesson Plan Grid" and noted as "InterCoast Colleges ©2012 All Rights Reserved." The provided document is an incomplete listing of content by week of the program. It is not a lesson plan.

Status: This violation is **corrected**.

On December 15, 2014, the director submitted lesson plans.

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

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

Violation #8: The director was unable to provide Consultants a copy of the Instructional Plan approved by the Board.

The director provided a document titled, "VN Lesson Plan Grid" and noted as "Intercoast Colleges ©2012 All Rights Reserved." The document lacked notation of the hours of theory and clinical instruction, theory and correlated clinical objectives, content outline, and methods of instruction. The presented document was not approved by the Board.

Status: This violation is **corrected**.

As previously stated, the program director was given a copy of the Board – approved Instructional Plan on September 19, 2014. On December 15, 2014, the Board received a copy of signatures of faculty members reporting confirmation of receipt of a copy of the Board – approved Instructional Plan.

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

"Each school shall have on file proof that each enrolled student has completed a general education course of study through the 12th grade or evidence of completion of the equivalent thereof. Equivalency is determined by the Department of Education in any of the United States or by a nationally-recognized regional accrediting body."

Violation #9: Consultants examined program records for 121 students. Information contained therein did not provide proof of 12th grade completion or the equivalent thereof for each enrolled student, as prescribed by regulation.

Eight (8) files did not contain documents substantiating proof of completion of high school or the equivalent thereof. Ten (10) student files contained foreign transcripts. However, no evidence was observed that the transcripts had been evaluated by an established agency for equivalency to graduation from a US high school.

Status: This violation is **corrected**.

In the documents the Board received on December 1, 2014, the director states, "As of September 30, 2014, files for each enrolled student at InterCoast Colleges of Vocational Nursing, Fairfield campus contains documents substantiating proof of completion of high school or equivalent. Foreign transcripts are evaluated by Independent Credentialing Agencies for certification for equivalency to graduation from a United States high school. The records are maintained in the office of the AA and are available to the NEC upon request."

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 #10: Consultants observed that the program had failed to consistently implement and follow its approved attendance policy. Program records did not contain documents identifying specific course objectives for which student make-up time was required, nor that acceptable methods of make-up time had been planned or completed.

Status: This violation is **corrected**.

On December 15, 2014, the program submitted grids of monthly tallies of both theory and clinical hours for five (5) cohorts. The grids include totals of make – up hours for both theory and clinical hours.

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 #11: Program records did not contain documentation confirming the consistent evaluation of students to determine the need for remediation or removal from the program. Further, files did not document the remediation, establish dates for and reevaluation of students for compliance, nor adherence with the program's grading policy.

Status: This violation is **not corrected**. However, if implemented as presented, the submitted plan will prevent future violations of this regulation.

The program provided documents, previously approved by the Board and not in use at the time of the survey visit, related to student remediation. As of this time, evidence indicating implementation of previously approved policies and tools has not been provided other than the director's statement that, "remediation activities and re-evaluations are monitored by faculty."

Section 2530(j) (1) of the Vocational Nursing Rules and Regulations states:

“Each school shall advise students, in writing, of the following:
(1) Right to contact the Board of program concerns...

Violation #12: The program failed to notify students, per on-site posting or in the InterCoast Colleges Vocational Nursing Program Student Handbook, of the right to contact the Board relative to program concerns

Status: This violation is **corrected**.

Documents submitted by the program include a screen shot of the Board’s website. The program director reports this is posted on the bulletin board in the student center.

Section 2530(j)(4) of the Vocational Nursing Rules and Regulations states:

“Each school shall advise students, in writing, of the following:
... (4) List of Board approved clinical facilities.”

Violation #13: The program failed to notify students, per on-site posting or in the student handbook, of the program’s list of Board – approved clinical facilities.

Status: This violation is **corrected**.

Documents submitted by the program include a list of Board – approved clinical facilities and a statement from the program director that this list is posted on nursing program bulletin board on the campus.

Section 2532(b) of the Vocational Nursing Rules and Regulations states:

“The minimum hours required shall be as follows: Theory Hours - 576, which shall include a minimum of 54 hours in pharmacology; Clinical Hours - 954.”

Violation #14: The program failed to provide instruction consistent with the Board – approved curriculum. In addition, the program failed to meet the standards of 2532(b) of the regulations. Specifically, the program failed to provide the required number of clinical hours, as noted by interviews with students and acknowledged by the director. The director was unable to identify how many hours were spent in clinical sites and how many hours were spent in the skills lab because of a lack of clinical sites.

Status #14: This violation is **corrected**.

The program reports that with implementation of the Board – approved instructional plan after September 19, 2014, students are now completing more than the minimum hours specified in the regulations. It is noted that graduations have been delayed for four (4) cohorts of students so that hours and required clinical experiences will meet program requirements and regulations.

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

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

Violation #15: Based on observation and analysis of provided program documents and materials, the program failed to implement its Board – approved curriculum. The instruction provided to students also lacks correlation of provided clinical experience to presented theory instruction. For example, based on provided documents, students are assigned to Skills Laboratory only during the first 19 weeks of the program and begin experience in clinical facilities during week 20. No clinical experience is provided in Obstetrical Nursing and no clinical experience in Pediatric Nursing was available to the students at the time of the survey visit. For theory content related to Medical-Surgical Nursing, students were assigned to clinical sites that provided or allowed students to perform fundamental nursing skills only.

Status: This violation is **corrected**.

The program director reports that since implementation of the Board – approved instructional plan, students now enter clinical facilities in week 8 of Term 1.

With the addition of Board – approved clinical facilities for maternity and pediatric nursing, students are now completing clinical hours in these specialty areas, in accordance with the Board – approved instructional plan. A document indicating that recent graduates had returned to complete external obstetrical and pediatric clinical assignments was received by the Board on December 1, 2014.

However, clinical facilities now being utilized for Pediatric and Maternity Nursing experience have limitations in the number of students allowed at one time and limitations in the days per week the facilities are available to students. **This limits the number of students that can be served by the available facilities and still maintain correlation to theory content.**

According to the director, “For theory content related to medical-surgical nursing, students are strategically scheduled clinical rotations that are congruent with theory and course objectives.” Faculty and Student Clinical Assignment forms submitted on January 5, 2015 indicate students are being rotated to facilities providing experiences beyond only fundamental nursing skills.

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

“Curriculum content shall be taught in a sequence that results in students’ progressive mastery of knowledge, skills and abilities.”

Violation #16: The curriculum implemented by the program fails to provide instruction that is taught in a sequence that results in students’ progressive mastery of

knowledge, skills, and abilities as prescribed by regulation. Consultants observed that students in Term III were assigned to clinical experience including only the most basic nursing care. Such assignment does not provide the level of clinical experience necessary for students' successful progressive mastery of curriculum content in Term III, which includes intermediate and advanced vocational nursing.

Status: This violation **is corrected** at this time.

As previously noted, the program director indicates that the Board – approved instructional plan was implemented after she received the document from Board staff on September 19, 2014. Faculty and Student Clinical Assignment forms submitted on January 5, 2015 indicate students are being rotated to facilities providing experiences beyond only fundamental nursing skills.

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 #17: Based on documents provided during the survey, the curriculum implemented by the program is significantly different from that approved by the Board. The program failed to obtain Board approval prior to the implementation of the “VN Lesson Plan Grid” described in Violation 8, above.

Status: This violation **is corrected**.

As previously noted, the program has now implemented the Board – approved instructional plan.

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

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

Violation #18: Board files substantiate approval of clinical facilities adequate as to the type and variety of patients treated to provide clinical experience for all students in areas of the Board - approved curriculum. However, based on the number of the current student population, the approved facilities are inadequate. Further, the program's utilization of the facilities is inconsistent with the Board's approval.

At the time of the survey visit, the program had no approved clinical facilities that provide experience in Maternity/Obstetrical Nursing or care of sick children. The director confirmed that the program did not provide Pediatric clinical experiences until an observational experience at a pre-school became available in mid June 2014. That experience is noncompliant with statutory and regulation requirements. Further, the Pediatric clinical experience is not correlated to presented theory content.

Program representatives informed Consultants that students are assigned to **Skills Laboratory, only**, during Term I. Term I includes Fundamental of Nursing. In subsequent terms, cohorts of students are being split between a clinical site and skills lab due to an inadequate number of clinical placements.

Consultants observed that the program is assigning Term II and Term III students to a clinical facility that offers clinical experience consistent with objectives in Term I and Term II. As noted during the NEC's observations at this clinical site, this facility allows students to function only at the most basic level when providing patient care. As such, the clinical experience provided is inconsistent with competency – based clinical objectives for the site or with the Board - approved curriculum.

Status: This violation is **corrected**.

The program now has Board – approved clinical facilities providing Maternity and Pediatric Nursing clinical experiences. However, clinical facilities now being utilized for Pediatric and Maternity Nursing experience have limitations in the number of students allowed at one time and limitations in the days per week the facilities are available to students. **This limits the number of students that can be served by the available facilities.**

Since the survey visit, additional clinical facilities accommodating Term II and Term III students have been approved as clinical facilities. In addition, the program has submitted fall 2014 clinical facility evaluations for skilled nursing facilities describing opportunities for students to accomplish competency – based objectives.

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

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

Violation #19: The director acknowledged that neither she nor faculty were evaluating clinical facilities to determine if clinical objectives can be achieved, as prescribed by regulation. Students are asked to complete an evaluation of clinical sites. Examples of these documents were reviewed. There is no evidence of follow-up with the student evaluation nor evaluation by program instructors or the director.

Status: This violation is **corrected**.

As noted in Violation #18, above, the program has submitted clinical facility evaluations conducted by the assistant director.

Section 2535 of the Vocational Nursing Rules and Regulations states:

“Each school shall have a policy, approved by the Board for giving credit toward the curriculum requirements.”

Violation #20: Consultant review and analysis of program materials and student files provided no evidence that the program granted credit for prior education and experience as prescribed by regulation. The program’s Vocational Nursing Program Student Handbook provided during the survey contained no mention of credit granting. No evidence of granting of credit or waiver of request could be found in the student files.

Further, a section of the InterCoast College’s School Catalog, provided during the survey visit, titled “Credit for Previous Training” is not the previously approved Board policy. The InterCoast Vocational Nursing Program Student Handbook, with a publication date of May 12, 2014 and provided to the Board by the director on August 11, 2014, does not contain a credit-granting policy. This document lists a director, assistant director, and faculty not located in California, and this document refers to policies and curriculum **from Maine**.

Status: This violation is **corrected** at this time.

The program provided a copy of a page from a school catalog said to be published on July 1, 2014. This page describes a credit-granting policy that is compliant with Section 2535 of the Vocational Nursing Rules and Regulations. According to the director, no students have requested credit be granted.

Section 2882 of the Business and Professions Code 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, sick children, and such other clinical experience as from time to time may be determined by the board.”

Violation # 21: The program fails to provide instruction that includes clinical experiences including the care of obstetrical patients or sick children.

Additionally, as acknowledged by the director, the current cohorts are not receiving the required number of hours in clinical experience, as outlined in the Board - approved instructional plan. As a result, current students are not scheduled to nor receive the required curriculum.

Status: This violation is **corrected**.

The program director reports that with the implementation of the Board – approved instructional plan and the addition of maternity and pediatric clinical sites, students are now receiving both the required number of hours and the required types of clinical experiences.

However, clinical facilities now being utilized for Pediatric and Maternity nursing experience have limitations in the number of students allowed at one time and limitations in the days per week the facilities are available to students. **This limits the number of students that can be served by the available facilities.**

Summary

The program has made progress with adding clinical facilities, correcting violations, and implementing the curriculum and policies that had been Board – approved but were not being utilized. While follow – up is required for three (3) of the violations, as noted above, with implementation of the proposed plans, the violations will be corrected.

Pass rates on the licensure examination continue to decline, as would be expected, given that current candidates have not received the benefit of recent efforts to correct the violations and improve the program. The program has delayed graduation of four (4) classes of students in order for the students to complete all requirements and gain the necessary clinical experiences. The first of those classes graduated January 2015.

A class of 30 students are scheduled to graduate in February 2015. At that time, the program's remaining enrollment would include three (3) classes, totaling 52 students.

Recommendations:

1. Deny the request to admit one class of thirty (30) students to a full – time class to begin on February 26, 2015 and graduating on June 9, 2016.
2. Approve the program's admission of **fifteen (15)** students to a full – time class to begin on February 26, 2015 and graduating on June 9, 2016, **only**.
3. Continue to require the program to provide no less than one (1) clinical instructor for every ten (10) students in all clinical experiences.
4. Continue to require the program to admit no additional classes without prior approval by the full Board.

Rationale: The program has made progress with correction of the identified violations. Improvement in licensure pass rates is not yet expected as the candidates over the past two (2) quarters graduated before implementation of improvements.

However, limitations on availability of clinical placements for pediatric and maternity nursing limit the number of students that can be served at this

time. The proposed placement plans demonstrate ability to provide adequate clinical facilities sufficient for 15 students. Therefore, the recommendation is to admit a smaller group of students. The program must identify additional resources to support accomplishment of the competency – based objectives and maintain correlation with theory content.

Board staff will continue to closely monitor licensure pass rates, implementation of the plan for improvement, and adherence to Board – approved policies and curriculum.

- Attachment A: History of Prior Board Actions
- Attachment B: Program Correspondence: Comprehensive Analysis
- Attachment C: Program Correspondence: Strategic Plan of Improvement
- Attachment D: Board Correspondence dated January 7, 2015
- Attachment E: Program Correspondence: Photo of Library/LRC

Agenda Item #8.C.3., Attachment A

INTERCOAST COLLEGE, FAIRFIELD VOCATIONAL NURSING PROGRAM

History of Prior Board Actions

- On August 1, 2007, the Executive Officer approved the request of the College of Medical Arts, El Cerrito, to begin a vocational nursing program with an initial class of 20 students on September 10, 2007, only; and approved the program curriculum for 1590 hours, including 622 theory, and 968 clinical hours.
- **On March 20, 2008, a new director was approved.**
- On June 25, 2008, the Board approved initial full accreditation for the College of Medical Arts, El Cerrito, Vocational Nursing Program for the period from June 25, 2008, through June 24, 2012, and issued a certificate accordingly.

The Board approved the program's request to admit a full-time class of 25 students on September 8, 2008, to **replace** students graduating on August 15, 2008.

The Board approved the program's request to admit a full-time class of 25 students on January 5, 2009, thereby increasing the program's frequency of admissions.

- **On March 2, 2009, a new program director was approved.**
- On October 20, 2009, the Executive Officer approved the College of Medical Arts Vocational Nursing Program's request, to admit a full-time **replacement** class for students that graduated August 15, 2008, with 18 students, plus two (2) alternates, to start on October 20, 2009, only, with an anticipated graduation date of September 24, 2010.
- On December 29, 2009, the Board representative notified the program director that the average annual pass rates for the College of Medical Arts Vocational Nursing Program had fallen more than ten (10) percentage points below the state average annual pass rate for the past four (4) quarters. The Board requested a written plan for improving the program's NCLEX-PN® pass rates by January 29, 2010.
- On January 25, 2010, the Board representative notified the program director that the average annual pass rates for the College of Medical Arts Vocational Nursing Program had fallen more than ten (10) percentage points of the state average annual pass rate for the past five (5) quarters. Receipt and review of the program's plan of correction is pending.
- On March 1, 2010, the Executive Officer approved the College of Medical Arts Vocational Nursing Program's request, to increase the frequency of admissions, by admitting an additional full-time class of 30 students, plus three (3) alternates, to start on March 1, 2010, only, with an anticipated graduation date of February 25, 2011.

- On March 3, 2010, the director notified the Board that the full-time class that was scheduled to start March 1, 2010 was not started due to student's inability to procure financial aid.
- On December 20, 2010, the director notified the NEC that the program will submit a new request when they plan to start the full-time class.
- On February 11, 2011, the Executive Officer **denied** the College of Medical Arts Vocational Nursing Program's request, to start a part-time class of **30 students, plus three (3) alternates**, commencing on March 29, 2011, and graduating on August 19, 2012, only; and, **approved** the College of Medical Arts Vocational Nursing Program to start a part-time class of **20** students, commencing on March 29, 2011, and graduating August 19, 2012, only. Additionally, the program was required to obtain Board approval prior to the admission of each class
- On August 19, 2011, the Executive officer approved the College of Medical Arts Vocational Nursing Program to admit 30 students and three (3) alternates to the part – time class commencing August 23, 2011 and graduating January 12, 2013, only; **and** continued the program's requirement to obtain Board approval prior to the admission of each class.
- On December 28, 2011, the Board was notified regarding a change in ownership of the school.
- On February 12, 2012, the program notified the Board that they finally had sufficient students to begin a class of 16 students who had been previously approved to begin on August 23, 2011.
- On April 18, 2012, the Executive Officer denied the program's request to admit thirty (30) students and three (3) alternates **and** approved the program's admission of twenty (20) students and two (2) alternates into a part-time class commencing April 16, 2012, only, and graduating August 5, 2013; **and** required the program to obtain Board approval prior to the admission of each class.
- **On July 3, 2012, a new program director was approved and subsequently completed New Director Orientation.**
- On August 14, 2012, the Executive Officer continued approval of the College of Medical Arts Vocational Nursing Program for a four-year period from June 24, 2012 through June 23, 2016, and the Board issued a certificate accordingly; approved the program's request to admit 24 students and two (2) alternates into a part-time day class commencing September 24, 2012, only, and graduating January 24, 2014; and required the program to obtain Board approval prior to the admission of each class.
- **On August 16, 2012, the Board received notification of the programs name change to InterCoast Colleges, Fairfield, Vocational Nursing Program.**
- **On September 12, 2012, a new program director was approved and subsequently completed New Director Orientation.**

- On October 23, 2012, the Executive Officer approved the program's request to admit 24 students and two (2) alternates into a part-time day class commencing November 27, 2012, only, and graduating April 22, 2014; and continued to require the program to obtain Board approval prior to the admission of each class
- On February 13, 2013, the Executive Officer approved the following recommendations:
 - a. Approve the InterCoast Colleges, Fairfield, Vocational Nursing Program's request for the following class admissions of 30 students per class:
 1. First Day Class: Admit on March 25, 2013; graduate on August 8, 2014
 2. First Evening Class: Admit on April 23, 2013; graduate on September 21, 2014
 3. Second Day Class: Admit on July 1, 2013; graduate on November 14, 2014
 4. Second Evening Class: Admit on September 9, 2013; graduate on February 8, 2015
 5. Third Day Class: Admit on November 18, 2013; graduate on April 10, 2015
 - b. Deny the program's request for ongoing admission of 30 students per class to replace graduating classes.
 - c. Continue to require the program to obtain Board approval prior to the admission of each class.
- On January 24, 2014, the Executive Officer approved the following recommendations:
 - a. Deny the InterCoast College, Fairfield, Vocational Nursing Program's request for the following class admissions of 30 students per class:
 1. First Evening Class: Admit on February 13, 2014; graduate on May 23, 2015
 2. First Day Class: Admit on May 12, 2014; graduate on August 21, 2015
 3. Second Evening Class: Admit on June 16, 2014; graduate on September 22, 2015
 4. Second Day Class: Admit on September 22, 2014; graduate on January 2, 2016
 5. Third Evening Class: Admit on October 27, 2014; graduate on February 2, 2016
 - b. Approve the InterCoast College, Fairfield, Vocational Nursing Program's request to admit an evening class of 30 students on February 13, 2014, **only**.
 - c. Approve the InterCoast College, Fairfield, Vocational Nursing Program's request to admit a day class of 30 students on May 12, 2014, **only**.
 - d. Continue to require the program to obtain Board approval prior to the admission of each class.
- **On April 22, 2014 a new Program Director was approved and subsequently completed New Director Orientation.**
- On May 22, 2014, the Executive Officer approved the following recommendations:

- 1) Deny the InterCoast College, Fairfield, Vocational Nursing Program's request to admit thirty (30) students and three alternates to an evening class on June 16, 2014.
- 2) Deny the InterCoast College, Fairfield, Vocational Nursing Program's request to admit thirty (30) students and three alternates to a day class on September 22, 2014.
- 3) Continue to require the program to obtain Board approval prior to the admission of each class.
- 4) Require the program director to prepare a comprehensive analysis of the program, specific actions that will be taken to improve program pass rates, and timelines for expected results. The following elements must be addressed in the analysis:
 - a. Current Student Enrollment.
 - b. Admission Criteria.
 - c. Screening and Selection Criteria.
 - d. Terminal Objectives.
 - e. Curriculum Objectives.
 - f. Instructional Plan.
 - g. Theory and Clinical Objectives for Each Course.
 - h. Lesson Plans for Each Course.
 - i. Textbooks.
 - j. Attendance Policy.
 - k. Remediation Policy.
 - l. Evaluations of Theory and Clinical Faculty.
 - m. Evaluations of Theory Presentations.
 - n. Evaluations of Clinical Rotations and Their Correlation to Theory Presentations.
 - o. Evaluation of Student Achievement.

- On June 3, 2014 the Board sent the program, via electronic communication, a complaint received regarding the Vocational Nursing program.
- On June 30, 2014 the Board received via electronic communication the program's response to a complaint.
- On July 8 and 9, 2014, an unannounced survey visit was conducted by representatives of the Board.
- On August 4, 2014, the Board sent the program a letter regarding complaints received.
- On August 11, 2014, the Board received via electronic communication the program's response to complaints.
- On August 12, 2014, the Board sent, via certified mail, a notice of violations.
- **On August 19, 2014, Catherine Hartwig was approved as program director.**

- **On August 27, 2014, Carla Carter was approved as program director.**
- On September 2, 2014, the Board received correspondence from the InterCoast Colleges, Fairfield, Vocational Nursing program titled "August 2014 Response Report."
- On September 12, 2014, the Board approved the following recommendations:
 1. Place the InterCoast College, Fairfield, Vocational Nursing Program on provisional approval for a two (2) year period from September 12, 2014, through September 30, 2016 and issue a notice identifying specific areas of noncompliance and requirements for correction as referenced in Section 2526.1 (e) of the California Code of Regulations (see Attachment F).
 2. Require the program to admit no additional classes without prior approval by the full Board.
 3. Require the program to bring its average annual pass rate to no more than ten (10) percentage points below the State average annual pass rate.
 4. Require the program to provide no less than one (1) clinical instructor for every ten (10) students in all clinical experiences.
 5. Require the program to submit a **follow-up** report in three (3) months, but no later than **December 31, 2014**, nine (9) months, but no later than **June 1, 2015**, and 21 months, but no later than **June 1, 2016**. The report must include a comprehensive analysis of the program, specific actions taken to improve program pass rates, timeline for implementation, and the effect of employed interventions. The following elements must be addressed in the analysis.
 - a. Current Student Enrollment.
 - b. Admission Criteria.
 - c. Screening and Selection Criteria.
 - d. Terminal Objectives.
 - e. Curriculum Objectives.
 - f. Instructional Plan.
 - g. Theory and Clinical Objectives for Each Course.
 - h. Lesson Plans for Each Course.
 - i. Textbooks.
 - j. Attendance Policy.
 - k. Remediation Policy.
 - l. Evaluations of Theory and Clinical Faculty.
 - m. Evaluations of Theory Presentations.
 - n. Evaluations of Clinical Rotations and Their Correlation to Theory Presentations.
 - o. Evaluation of Student Achievement.
 6. Require the program to comply with all approval standards in Article 4 of the Vocational Nursing Practice Act, commencing at Business and Professions Code section 2880, and Article 5 of the Board's Regulations, commencing at California Code of Regulations, Title 16, section 2525.

7. Require the program to demonstrate incremental progress in correcting the violations. If the program fails to satisfactorily demonstrate incremental progress, the full Board may revoke the program's approval.
 8. Failure to take any of these corrective actions may cause the full Board to revoke the program's approval.
 9. Place the program on the **September 2016** Board agenda for reconsideration of provisional approval.
- On September 19, 2014, the program director and assistant director met with two NECs at Board headquarters. The assigned consultant provided a copy of the Board – approved instructional plan to the director and discussed program concerns.
 - On December 1, 2014, the program submitted a comprehensive analysis, response to violations, and a request to admit students beginning in January 2015.
 - On December 2 and 4, 2014, the assigned consultant held teleconferences with the program director.
 - On December 15, 2014, the program submitted a revised comprehensive analysis, strategic improvement plan, documentation relative to the outstanding violations, and a request to admit students.
 - On December 30, 2014, the assigned consultant notified the program director of deficits in the requested documentation, which was due December 15, 2014, to support the request to admit students.
 - On January 5, 2015, partial documentation was received.
 - On January 7, 2015, the assigned consultant conferred via telephone and then email with the program director regarding deficits in the plans for clinical placements for proposed students. The director restated the desire to admit 30 students to the program.
 - On January 26, 2015, via telephone, the program director requested a revision of the request to admit. The stated request was to admit 15 students. The requested written revision was not received as of January 27, 2015.

Agenda Item #8.C.3., Attachment B



December 15, 2014

INTERCOAST
COLLEGES

BVNPT
2014 DEC 15 AM 10:53

Education Unit
BVNPT
2535 Capital Oaks Drive, Suite 205
Sacramento, CA 95833

Dear Education Unit,

The Vocational Nursing Program at InterCoast Colleges Fairfield campus respectfully submits this comprehensive analysis with supporting documentation. As required by the Board, this comprehensive program analysis will cover elements A through O showing specific actions taken to improve pass rates, timeline for implementation, and the effect of the employed interventions to demonstrate commitment to full compliance with the BVNPT's rules and regulations.

History:

On August 22, 2014, InterCoast Colleges, Fairfield campus submitted an approval application to the BVNPT for a new Program Director (PD), Carla Carter. After Board approval, on August 25, 2014, Carla Carter was appointed the official PD for the campus. The new PD accepted the permanent position and relocated to California, demonstrating the institution's and the PD's commitment to stability in program leadership. On September 12, 2014, the new PD attended the Board meeting. The PD voiced to the Board her intent to bring the program to full compliance.

On September 19, 2014 the PD and Assistant Director (AD) met with the NEC at the BVNPT office in Sacramento. At that meeting, the NEC released to the PD a copy of the approved instructional plan (IP), along with course and program documents submitted upon initial program approval. The PD informed the NEC that a comprehensive analysis will be completed addressing elements "a" through "o" as required by the Board.

The need for the program analysis was evident after the September 19, 2014 meeting with the NEC and the PD's receipt of the approved instructional plan (IP). Prior to this, a different version of the IP was being used at the Fairfield campus meanwhile; approved clinical facilities were insufficient in number to support enrolled students beyond the fundamental and intermediate levels. The following report addresses each specific action(s) taken to improve program pass rates, and to meet BVNPT compliance.

Element a: Current Student Enrollment

Current Vocational Nursing students:

31 enrolled: in Term I

21 enrolled: in Term II

49 enrolled: in Term III

Total currently enrolled students: 101

Element b: Admission Criteria

Admission requirements are established to help provide reasonable assurance that students admitted into the Vocational Nursing Program have the capacity to succeed. Upon the student's satisfaction of all requirements (a-k) listed on InterCoast Colleges admission criteria (**Exhibit b**) with respect to the Vocational Nursing program, the school will promptly notify the student whether he or she is admitted into that program of study at the school. In the event that the number of applicants for admission to the Nursing program exceeds the enrollment capacity for that program, the applicants for admission will be selected based upon the date of application. Since the program has been assigned to "provisional approval", InterCoast Colleges Vocational Nursing Program is not currently enrolling new students. A formal request to enroll new students will be made to the Full Board on the February 13, 2015 meeting

Element c: Screening and Selection Criteria

Upon meeting minimum requirements for admission, InterCoast Colleges Vocational Nursing Program Screening and Selection Criteria (**Exhibit c**) identifies the procedures that are followed by all responsible parties listed on exhibit C1. Final acceptance recommendations are issued by the program Director. Since the program has been assigned to "provisional approval", InterCoast Colleges Vocational Nursing Program is not currently enrolling new students.

Element d: Terminal Objectives

InterCoast Colleges Vocational Nursing Programs' Terminal objects (**Exhibit d**) lists expected student outcomes upon successful completion of the program. The listed objectives guide the program director and faculty to assure lesson plan and instructional activities support the expected student outcomes. Lesson plans have been amended to meet the terminal and course objectives listed on the approved instructional plan (IP). The approved IP is currently implemented beginning October 2014 after assuring nursing faculty are oriented to the course contents and instructional methods.

Element e: Curriculum Objectives

InterCoast Colleges Vocational Nursing Program's curriculum objectives (**Exhibit e**) are derived from the schools' philosophy and conceptual framework. The curriculum objectives identify student outcomes based on major groupings of courses or levels within the program. The curriculum coordinates clinical and theoretical objectives in the major areas of nursing. Curriculum objectives have been matched with the approved IP and with the NCLEX Test Plan for accuracy, relevance and currency, and are currently used beginning October, 2014.

Element f: Instructional Plan

The Board approved instructional plan outlines curriculum that is being taught in a sequence that results in students' progressive mastery of knowledge, skills, and abilities. The courses include theory and correlated clinical experience necessary to care for patients across the life-span in current healthcare settings. InterCoast Colleges Vocational Nursing program, Fairfield campus has implemented the approved instructional plan that was provided to the PD, by the NEC, on September 19, 2014. The approved instructional plan was amended to reflect the use of current text editions. The amended instructional plan was distributed for immediate use to current faculty members at a faculty meeting on October 9, 2014. Signed confirmation forms showing evidence faculty received the approved IP (**Exhibit f**) are maintained in faculty files.

Element g: Theory and Clinical Objectives for Each Course

InterCoast Colleges Vocational Nursing Programs' course outline (**Exhibit g1**) identifies specific objectives for essential elements with separate courses that reflect instruction of entry-level competencies that are within the vocational nurse scope of practice.

Clinical objectives (**Exhibit g2**), identify the essential elements required to meet objectives and correlate theory with clinical experiences. Currently, six approved clinical sites meet pediatric nursing care, growth and developmental and maternity nursing care objectives, providing current student population adequate type and variety of clinical experiences consistent with competency-based clinical objectives. Obstetrical and pediatric clinical experiences include systematically rotating students through the six Board approved clinical sites to ensure achievement of maternal/pediatric course objectives and student learning outcomes.

Eight approved clinical facilities are currently used to meet nursing fundamentals, Gerontologic nursing, medical-surgical and advanced medical-surgical nursing objectives. For theory content related to these nursing areas, students are strategically scheduled clinical rotations that are congruent with theory and course objectives.

Element h: Lesson Plans for Each Course

Lesson plans (**Exhibit h**) developed by the PD outline how the curriculum is being taught in a sequence that results in student's progressive mastery of knowledge, skills, and abilities. The courses include theory and correlated skills lab and clinical experiences necessary to care for patients of all ages in current healthcare settings. Lesson plans have been distributed to faculty for immediate use.

Element i: Textbooks

InterCoast Colleges Vocational Nursing Program uses textbooks which are current and relevant, and congruent with program learning objectives (**Exhibit i**). The updated textbooks editions were distributed to students in October, 2014.

Element j: Attendance Policy

InterCoast Colleges of Vocational Nursing, Fairfield campus consistently follows its approved attendance policy identifying acceptable methods of make-up time (**Exhibit j1**). Planned make-up objectives remain specific for the course in which the time is being made-up. Student attendance tracking grids for both theory and clinical (**Exhibit j2**) is updated daily to assure student and school adherence to policy and to track follow-up procedures are meeting course objectives.

Element k: Remediation Policy

InterCoast Colleges Vocational Nursing programs' remediation policy (**Exhibit k**) monitors student progression and retention. Student academic progress monitoring and clinical skill competencies are **consistently** evaluated to determine the need for remediation, or removal from the program. Remediation needs are assigned with established dates for re-evaluation. Remediation activities and re-evaluations are monitored by faculty. Documents confirming remediation activities (**Exhibit k2**), student compliance, adherence with the programs' grading policy, and clinical skill competency check lists are located in student files and are maintained in the Administrative Assistant's office.

Element l: Evaluation of Theory and Clinical Faculty

In addition to the Board approved methodology for program evaluation, and to demonstrate evidence of achievement in meeting program objectives, the PD has developed and implemented a new Systematic Evaluation Plan (**Exhibit l1**). The plan contains six standards evaluated on a custom-made time-line. The six standards include: Standard 1, Mission and Administrative Activity. Standard 2, Faculty and Staff. Standard 3, Students. Standard 4, Curriculum. Standard 5, Resources. Standard 6, Outcomes.

End of term evaluations are being completed by students and by faculty to determine if clinical objectives are being achieved (**Exhibit l2**). Annual clinical faculty evaluations are being completed (**Exhibit l3**) and records are maintained in the office of the AA and are available to the NEC upon request. In the event clinical issues are identified or course objectives are not being met, the PD makes necessary adjustment to achieve a timely resolution. Based on the September/October, 2014 student evaluation results, the PD has made necessary faculty and site adjustments.

Element m: Evaluations of Theory Presentations

The PD evaluates faculty in the classroom to monitor meeting course objectives on a regular basis (**Exhibit m**). New faculty is evaluated by the PD or by the campus President at 30-60-90 day intervals then, quarterly, to assure theory presented meets individual student learning styles and program outcomes.

Element n: Evaluations of Clinical Rotations and Their Correlation to Theory Presentation

Beginning December, 2014 annual clinical facility evaluations are completed by the AD to assure continued correlation to theory and skill levels to theory content (see Exhibit I3). Beginning in September, 2014 Clinical site visits are being made weekly. Student clinical assignments (**Exhibit n**) are made based on theory content and course and clinical objectives. Communication between theory instructors and clinical instructors is ongoing to provide students clinical experiences that relate to the weeks' theory focus and meet course and clinical objectives.

Element o: Evaluation of Student Achievement

Student progress reports are monitored maintaining high expectations for our students. The evaluation schedule (**Exhibit o1**) is monitored by Faculty who evaluates student academic progress and clinical performance in a defined timeline (**Exhibit o2**). Student not meeting the evaluation criteria may be placed on probation, assigned remedial activities, or may be dismissed from the program. Documentation is maintained in the student file.

Additional Evidence requested by NEC

Learning Resources

Fiscal, physical, technological, and learning resources are sufficient to meet the needs of faculty and students engaged in alternative methods of delivery. InterCoast Colleges of Vocational Nursing, Fairfield campus has added a new computer lab, a Learning Resource Center (LRC), and faculty offices. The program now has 31 computer stations available for student use, a physical library (LRC) (**Appendix A**) and workspace for faculty members. In December, 2014 the LRC has ordered four periodicals (purchase orders attached - **Appendix B**) and added more current and relevant resources to meet the needs of vocational nursing students and all InterCoast Colleges, Fairfield campus students.

NCLEX-PN Pass Rates

InterCoast Colleges has taken the necessary steps to identify factors contributing to the declining passing rate and has implemented an action plan to achieve the desired outcomes. A Strategic Improvement Plan (**Appendix C**) has been developed and implemented beginning October, 2014 which incorporates ATI testing modules. In addition to the improvement plan a live Kaplan© Review Course is held, at no cost to students, several times per term. The PD has developed a "lecture series" which students attend for support instruction on individual body systems and illness/disease processes. The lectures are held for 1-2 days per week each month, are offered at various times to accommodate student attendance, and are presented by nursing faculty. Lastly, NCLEX preparation sessions are held each Friday evening and Saturday mornings

providing students the opportunity to take mock NCLEX exams, and to review answer rationales while lecture materials are presented by qualified nursing instructors. These strategies to increase first-time NCLEX-PN pass rates will continue throughout 2015 at which time, results will be re-assessed.

Clinical/Theory Make-Up Assignments

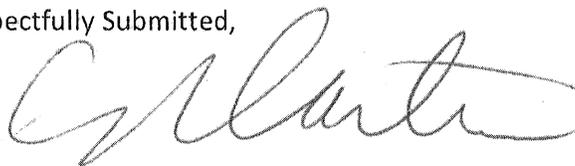
InterCoast Colleges nursing faculty have created make-up sessions for theory and clinical course portions to assure attainment of clinical and course objectives (Refer to Exhibit j2). Communication between theory instructors and clinical instructors is ongoing to provide students clinical experiences that relate to the weeks' theory focus and meet course and clinical objectives. Make-up hours are assigned to cover missed material and skill/clinical experiences presented in regular scheduled times so the absentee student will meet course requirements for program completion.

Nursing Faculty Meeting Minutes

InterCoast Colleges, Fairfield holds bi-monthly faculty meetings keeping faculty current with college items, student academics, curriculum recommendations and clinical site evaluations are discussed to measure student learning outcomes and program objectives. Meeting minutes (**Appendix D**) are maintained in the administrative assistance office and are available to the NEC upon request.

Thank you for the opportunity to substantiate the progress InterCoast Colleges Vocational Nursing Program is making to improve licensing examination pass-rates, and toward bringing the program to full compliance.

Respectfully Submitted,



Carla J. Carter, MSN, M.Ed, BSN, RN
InterCoast Colleges, Fairfield Campus
Program Director, Vocational Nursing
707-421-9700 Phone
707-421-9725 Fax

Agenda Item #8.C.3., Attachment C

InterCoast Colleges Vocational Nursing NCLEX-PN® Strategic Improvement Plan

InterCoast Colleges of Vocational Nursing Program appreciates the opportunity given by the BVNPT to present our remediation plan to improve the NCLEX pass rates of students enrolled in our nursing program. InterCoast has taken necessary steps to identify factors contributing to the declining passing rate and implemented an action plan to achieve the desired outcomes. The faculty and Program Director at InterCoast Colleges are fully aware that this action plan to improve student learning outcomes is a continuing process that goes through revisions to address the various needs of students and the program. This report shows the actions currently in progress as well as future plans.

Strategic Improvement Plan Objective:

To improve student's first-time NCLEX-PN exam pass rates to maintain a yearly minimum pass rate that does not fall below 10 percentage points of the state average.

Current Action Plan:

1. Critical thinking, clinical reasoning and test-taking strategies are introduced in the first term and instructor-led workshops are offered to better develop and enhance these skills.
2. The nursing program offers faculty tutoring for any nursing student who needs support in their nursing and/or general education courses.
3. Nursing faculty present NCLEX-style questions in theory courses that support the theory topic of the day. The instructor walks students through the rationale of why certain answers are correct and others are incorrect; to promote critical thinking. NCLEX questions are assigned for homework weekly.
4. Nursing faculty are assigned to teach courses based on their academic background and subject matter expertise. Each faculty member implements a variety of teaching strategies appropriate to the learner's needs; grounded in adult learning and nursing theories.
5. Students are provided with the following NCLEX preparatory tools; a campus-based Integrated Testing with NCLEX Exam Review Course by Kaplan Nursing and Lippincott Williams & Wilkins.
6. Our third-term students are paired with a nursing faculty mentor. The faculty mentor and the student meet to establish guidelines for the student and mentor to follow. The faculty mentor works closely with the student throughout the term to offer guidance and support.
7. In addition to classroom resources, students are offered and encouraged to utilize a comprehensive list of resources. These resources include NCLEX-PN exam prep websites, supplemental reading materials and smartphone apps.

Proposed Action Plan

1. Prospective nursing students will attend an information session where they gain information about the program's admission, progression and graduation requirements. Prospective students will meet with a faculty member or program director individually for an informal interview. Through the informal interview process prospective students can be screened for potential academic risks, assessed for college readiness, their commitment to the learning process and available support systems. Through this process potential challenges can be identified and interventions implemented prior to the student starting the program. This will also enable faculty to better prepare to provide needed resources and support to students early on; resulting in improved student outcomes.
2. The implementation of early identification and early interventions for students at risk for academic failure.
3. Once a student is identified as high risk for academic failure, the student will meet with their theory course instructor to develop a student study plan. The study plan will include a review of all exams, quizzes, coursework, and homework assignments in an effort to determine the student's weaknesses and strengths. The student and instructor will meet bi-weekly until the student's course grade increases.
4. A remediation process will be initiated for students scoring less than the recommended benchmark score on their specialty ATI exams. The student will be required to remediate for two weeks and then retake the final comprehensive exam.
5. The third term student will work with their faculty mentor to develop an NCLEX Readiness plan. This plan will be used to assess the students' readiness to take and pass the NCLEX – PN exam on the first attempt.
6. Each student will be encouraged to work collaboratively with their faculty mentor after graduation to optimize their NCLEX readiness plan. The student's participation will be strictly voluntary and as part of the plan, the student will be offered an opportunity to take a Pre-NCLEX style assessment exam. The outcome of the pre-exam will determine the Students' readiness to take the NCLEX-PN examination. If the student and faculty mentor determine the student is not yet ready to take the exam additional resources and referrals will be offered to the student. The students' progress and preparation for the NCLEX-PN exam will be closely monitored until he/she sits for the exam.

It is our belief here at InterCoast Colleges that education is a process that involves students, faculty, the institution and the public at large. We would like to assure the California Board of Nursing that we stand firm in our commitment to deliver the best quality education to our students in order to prepare them for the demands of the advanced and challenging health care systems.

Attachments:

1. NCLEX-PN Exam Study Plan
2. Remediation Record
3. Additional Resources

NCLEX-PN Study Plan

Fundamental of Nursing: Basic Care and Comfort
Fundamentals of Nursing: Reduction of Risk Potential

Nutrition

Physiological Adaptation

Fluids & Electrolytes: Imbalances

Approximately 6 hours

Pharmacology:

Parenteral Therapies

Blood and Blood Products

Medications: Part 1 and Part 2

Approximately 6 hours

Reproductive

Psych/Mental Health: Psychopathology

Coping and Adaptation

Cardiovascular: Part 1 and Part 2

Approximately 4 hours

Maternity: Part 1 and Part 2

Pediatric: Pharmacological & Parenteral Therapies

Medications: Side Effects

Approximately 4 hours

Respiratory: Part 1 and Part 2

Endocrine: Part 1 and Part 2

Renal

Elimination

Approximately 5 hours

GI: Part 1 and Part 2

Musculoskeletal: Mobility & Immobility

Trauma

Approximately 4 hours

Immune/Hematology: Part 1 and Part 2

Neurological: Part 1 and Part 2

Approximately 4 hours

Oncology: Part 1 and Part 2

Sensory & Perceptual Alterations

Perioperative Care

Chemical Dependency

Abuse and Neglect

Approximately 3 hours

List of Additional Resources

- <http://evolve.elsevier.com>
- Simplenursing.com
- Kaptest.com/NCLEX-PN
- Examcram.com
- Remarreview.com
- Rxselect.com
- Reviewfornurses.com
- [NCLEX-PN \(smart-phone app\)](#)
- PearsonVUE.com/NCLEX-practice

Agenda Item #8.C.3., Attachment D

Johnson, Donna@DCA

From: Johnson, Donna@DCA
Sent: Wednesday, January 07, 2015 11:32 AM
To: Carla Carter
Subject: Regarding Your Request to Admit Students

Importance: High

Carla –

This email will summarize our phone conversation of this morning.

After analyzing your proposed pediatric and maternity clinical experiences for the requested 30 students, it is noted that, due to restrictions on the number of students allowed in placements and the available hours in clinical facilities for the pediatric and maternity students, it would take from November 16, 2015 until February 6, 2016 for the 30 requested students to complete pediatric and maternity clinical experiences. Specifically, it would take nine weeks for students to complete pediatric clinical experiences and it would take 10 weeks for students to complete maternity clinical experiences. The experiences overlap, with pediatrics experiences beginning the week before maternity experiences and maternity experiences ending 2 weeks after pediatric experiences.

According to the Board – approved Instructional Plan, students have 4 weeks of pediatric clinical experiences (starting in week 2 of pediatric theory content), one week of overlap with maternity theory content and pediatric clinical experience, and then 5 weeks of maternity clinical experience.

Therefore, your proposed plan is not consistent with the Board – approved instructional plan and it does not maintain a theory to clinical correlation.

With this in mind, I described that I could not recommend a total of 30 students for admission. I noted that it would, in theory, be possible to get approximately 15 students through pediatric and maternity experiences utilizing the current clinical facilities, adhering to the Board – approved Instructional Plan, and maintaining better correlation between theory and clinical.

Your decision was to continue to proceed with a request to admit 30 students.

Please let me know if you have any questions or require clarification.

Donna G. Johnson

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Agenda Item #8.C.3., Attachment E

