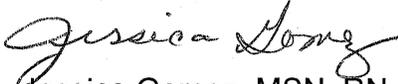




DATE: April 28, 2015

TO: Board Members

FROM: 
Jessica Gomez, MSN, RN
Nursing Education Consultant,

SUBJECT: American College of Nursing Vocational Nursing Program –
Consideration of Placement on Provisional Approval - (Director: Sheryl
Milton, Concord, Contra Costa County, Private)

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

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

On September 24, 2014, the Board received electronic correspondence from the school's Interim Administrator regarding the termination of the director, effective immediately, and the planned appointment of a new director the following day. Subsequently, the Board received several complaints regarding the program.

On October 14 – 15, 2014, Board representatives conducted an unannounced onsite inspection of the American College of Nursing Vocational Nursing Program. Twelve (12) violations were identified.

On January 20, 2014, the Executive Officer denied the program's request to admit students. Additionally, the Executive Officer required the director to correct the previously identified violations and submit correspondence confirming their correction by March 1, 2015.

On March 2, 2015, the assistant director submitted to the Board, a response to the violations for consideration of correction. Eight (8) violations remain uncorrected.

The program is presented to the Board for consideration of placement on provisional approval.

History of Prior Board Actions

(See Attachment A, History of Prior Board Actions)

Enrollment

Currently, the program offers full – time day classes and full – time evening classes that are 90 weeks in length. The program requires Board approval prior to the admission of each class.

The following table represents **current and projected** student enrollment based on current and proposed class starts and completions. The table indicates a **maximum enrollment of 59 students** for the period from **January 2013 through July 2015**.

ENROLLMENT DATA				
CLASS DATES		# Students Admitted	# Students Current or Completed	Total Enrolled
Start	Completed			
1/13 (AM Class)		21	21	21
6/13 (PM Class)		13	11	21 + 11 = 32
7/13 (AM Class)		24	18	32 + 18 = 50
	1/14 (1/13/AM Class)		-21	50 – 21 = 29
1/14 (PM Class)		12	12	29 + 12 = 41
1/14 (AM Class)		15	14	41 + 14 = 55
	6/14 (6/13 PM Class)		-11	55 – 11 = 44
	7/14 (7/13 AM Class)		-18	44 – 18 = 26
7/14 (AM Class)		11	12	26 + 12 = 38
9/14 (AM Class)		8	9	38 + 9 = 47
	Grad Date Undetermined; Awaiting Clinical (1/14 PM Class)		-12	47 – 12 = 35
	Grad Date Undetermined; Awaiting Clinical (1/14 AM Class)		-14	35 – 14 = 21
	7/15 (7/14 AM Class)	11	-12	21 – 12 = 9
	9/15 (9/14 AM Class)		-9	9 – 9 = 0

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 October 2011 through March 2015, specify the pass percentage rates for graduates of the American College of Nursing Vocational Nursing Program on the National Council Licensure Examination for Practical/Vocational Nurses (NCLEX-PN).

NCLEX-PN® Licensure Examination Data							
Quarterly				Annual Statistics*			
Quarter	# Candidates	# Passed	% Passed	State Quarterly Pass Rate	Program Average Annual Pass Rate	State Average Annual Pass Rate [CCR §2530(I)]	Variance from State Average Annual Pass Rate
Oct – Dec 2011	18	12	67%	74%	62%	75%	-13
Jan – Mar 2012	12	7	58%	77%	61%	74%	-13
Apr – Jun 2012	21	12	57%	72%	59%	74%	-15
Jul – Sep 2012	18	13	72%	74%	64%	75%	-11
Oct – Dec 2012	8	7	88%	70%	66%	74%	-8
Jan – Mar 2013	11	9	82%	75%	71%	73%	-2
Apr – Mar 2013	18	15	83%	78%	80%	73%	+7
Jul – Sep 2013	16	12	75%	75%	81%	74%	+7
Oct – Dec 2013	16	12	75%	76%	79%	76%	+3
Jan – Mar 2014	12	7	58%	74%	74%	76%	-2
Apr – Jun 2014	13	7	54%	66%	67%	73%	-6
Jul – Sep 2014	9	8	89%	72%	69%	73%	-4
Oct – Dec 2014	11	7	64%	72%	64%	72%	-8
Jan – Mar 2015	10	9	90%	73%	72%	71%	+1

California Code of Regulations Section 2530(I) states:

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

This data substantiates the program’s compliance with Section 2530 (I) of the Vocational Nursing Rules and Regulations for the previous ten (10) consecutive quarters.

Based on the most recent data available (January to March 2015) the program’s average annual pass rate is **72%**. 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 **71%**. The pass rate for the American College of Nursing Vocational Nursing Program is one (1) percentage point **above** 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 ten (10), including the program director. The director has 75% administrative responsibilities and duties. Of the total faculty, ten (10) are approved to teach in the clinical area.

Based on a maximum enrollment of 59 students, four (4) instructors are needed. Therefore, the number of current 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 **lacks 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.

Other Considerations:

On September 24, 2014, the Board received correspondence via email from the interim school administrator advising of the termination of the program's director, effective immediately. The correspondence specifically stated a new director would be in place the following day. As noted previously, the Board subsequently received a number of complaints regarding the program.

On October 8, 2014, the Board approved a new program director.

On October 14 and 15, 2014, Board representatives conducted an unannounced onsite inspection of the program. During the survey, twelve (12) violations of the Vocational Nursing Rules and Regulations were identified.

On January 9, 2015, the Board received notification that the director of the vocational nursing program had been placed on an extended medical leave of absence.

On January 21, 2015, the Executive Officer denied the program's request for approval to admit a new class. Further, the program was required to submit a report confirming correction of the cited violations. (See Attachment B)

On January 27, 2015, the Board approved a new assistant director of nursing for the program. On February 25, 2015, the Board received electronic correspondence regarding the resignation of the newly approved assistant director of nursing.

On March 2, 2015, the Board received the program's response to the violations as requested. (See Attachment C)

On March 25, 2015, the Board approved a new assistant director of nursing.

On March 27, 2015, the Board received notification regarding an extension of the director's medical leave until April 15, 2015.

On April 7, 2015, the assigned Nursing Education Consultant and Supervising Nursing Education Consultant met with the school administrator and newly appointed assistant director relative to the status of the program. Board representatives discussed the program's submitted responses addressing previously identified violations. Of particular note, Board representatives discussed the instability in program administration since September 24, 2014, during a time when students were enrolled. Due to the lack of correction of identified violations, program representatives were advised of the program's placement on the Board's agenda for consideration of placement on provisional approval.

On April 13, 2015, the Board approved a new program director.

On April 13, 2015, the new director submitted a written response to the violations. Upon analysis, the assigned consultant identified that the response consisted of forms, policies, attendance records, and remediation forms, each of which had been previously submitted by the preceding director. A detailed report was not included, and no information was provided to indicate actions taken by the program and any changes regarding the status of the violations.

Additionally, on April 13, 2015, the Board received correspondence from the new director and ten (10) applications for approval of clinical facilities to which enrolled students would be assigned clinical rotations in Pediatric and Maternity Nursing. As presented, each of the clinical sites limited the maximum number of rotations to two (2) to three (3) students per day and required an instructor on site at all times.

Given the number of approved faculty and specified facility limitations, the assigned consultant notified the director that if the applications were approved as submitted, the program would **lack adequate** faculty for supervision of students' clinical rotations.

On April 15, 2015, the director telephoned the consultant and requested a delay in processing the submitted applications until she obtained approval from facility site directors to increase the maximum number of students to be assigned per day.

Violations

The following summarizes previously identified violations and the status of corrective actions by the program.

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 files confirm that the program has a Board-approved instructional plan. However, the program was unable to provide a copy of the approved instructional plan during the survey visit or provide documentation confirming its implementation.

Status #1: This violation is **corrected**. On January 5, 2015, the director submitted documentation confirming utilization of the approved Instructional Plan and dissemination to each faculty member. Further, the director stated that the program’s approved instructional plan is available to each faculty member on the school’s computers.

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: Board files confirm that the program has an approved methodology and procedure for evaluation of the curriculum. However, during the visit the program representatives produced no evidence confirming that the curriculum had been evaluated to determine its effectiveness, currency, or need for revision.

Status #2: This violation is **not corrected**. The assistant director provided evidence of staff meeting minutes stating the evaluation of the program curriculum was discussed. On April 13, 2015, for the ten (10) faculty members, the new director submitted two (2) curriculum evaluation forms dated April 10, 2015 signed by the evaluating instructor. The information provided reflected the opinions and contained signatures of two (2) faculty members only. The forms had large areas redacted.

To date, the program failed to submit findings from the evaluation of the curriculum, including, but not limited to, its effectiveness, correlation of theory and clinical content, revisions, etc. Further, a timeline and plan for future evaluations was not submitted.

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

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

Violation #3: Program representatives were unable to provide documentation confirming implementation of its approved methodology for the evaluation of clinical facilities to which students are assigned.

Status #3: This violation is **not corrected**. The program has a Board approved methodology for evaluation of clinical sites. The director has submitted a plan for implementation of the approved methodology. According to the submitted, the clinical facility evaluation form was introduced at the January 2015 faculty meeting and the student evaluation forms were introduced to students on February 9, 2015. However, to date, the program has failed to submit a timeline of implementation, or evidence that any clinical sites have been evaluated by the director, or faculty members.

Section 2526(a) (16) of the Vocational Nursing Rules and Regulation 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 #4: The program failed to provide a list of resources for provision of counseling and tutoring services for students. No list of available resources for counseling or tutoring was found on campus or in the student handbook.

Further, students confirmed during interviews they were unaware of any counseling services available for mental health issues, or other life crises at the school or within the community.

Status #4: This violation is **corrected**. A list of counseling resources available at the college and within the community was developed and hung in the student lounge, and library. Photos of the list were sent for verification.

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 #5: The program failed to consistently report the termination of program faculty within ten (10) days as prescribed by existing regulations. According to the interim administrator and director, since September 2014, several instructors have been terminated or resigned. The program was unable to provide a list of currently faculty.

Status #5: This violation is **not corrected**. The program has submitted a list of current faculty and their utilization. The prior director submitted a

plan to evaluate faculty status **monthly** and notify the Board of any changes. As presented, the plan is noncompliant with the regulatory requirement to notify the Board within ten (10) days of termination or resignation of a faculty member.

On April 13, 2015, the newly approved director submitted a plan specifying that each employee will submit in writing their intentions to continue teaching at the American College of Nursing **weekly**. To date, the director has failed to indicate how the information and forms would be handled or when the Board would be notified of terminations or resignations was provided.

It is important to note that reported weekly notification of faculty intentions to continue teaching **does not** support the development of a consistent schedule for instruction and may negatively impact the delivery of quality education for enrolled students

Section 2530 (e) of the Vocational Nursing Rules and Regulation 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 #6: The program was unable to provide lesson plans as required by the regulation. Board representatives observed the director teaching a scheduled class and confirmed that instruction was provided from a syllabus rather than lesson plans derived from the Board – approved Instructional Plan.

Status #6: This violation is **corrected**. On February 2, 2015, the director submitted lesson plans for all classes taught in the program.

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

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

Violation #7: The program failed to have a copy of the approved instructional plan available for all faculty as prescribed by regulation. Further, an analysis of documents provided during the survey visit by the interim administrator and director confirmed that the program is not using the Board - approved instructional plan. Specifically, representatives provided copies of classroom syllabi; however, the provided documents **do not** correlate with the instructional plan.

Status #7: This violation is **corrected**. On March 2, 2015 the director submitted documentation confirming utilization of the approved instructional plan and dissemination to each faculty member. Further, the director stated that the program's approved instructional plan is available to each faculty member on the school computers.

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 program has an attendance policy published in the student handbook. However, the interim administrator confirmed that accurate attendance records had not been kept for students in the vocational nursing program and stated a new plan has been developed. An examination of program documents during and since the onsite inspection produced no evidence of follow-up for student absences from theory or clinical classes.

Status #8: The violation is **not corrected**. On December 13, 2014, the director submitted to the Board a revised attendance policy. The assistant director resubmitted the revised attendance policy on March 3, 2015, however, the assistant director failed to submit supporting documentation confirming implementation of the policy.

On April 13, 2015, the new director submitted the original Board approved attendance policy. Additionally, she submitted attendance sign – in sheets for the month of March for the MS-I course. Upon analysis, the consultant noted that one student had missed eight (8) days (64 hours) of theory classes 47% of the total scheduled hours of theory instruction.

According to policy, students must attend 90% of each class, and make up all missed time. Evidence that the program is following the approved attendance policy was not provided.

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

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

Violation #9: The program has a Board - approved curriculum that includes correlation between theory and clinical experiences offered to students. However, students interviewed during a scheduled **clinical rotation at an adult skilled nursing facility** reported that the program was currently providing students **didactic instruction in Pediatric Nursing**. As such, the course of instruction provided by

the program **lacked** a correlation between the theory and clinical instruction for the class.

Board representatives interviewed students, the director, and the interim administrator. All confirmed that the program **lacked** clinical facilities that offered clinical rotations in Maternity Nursing or Pediatric Nursing for the enrolled students.

Status #9:

The violation is **not corrected**. The program continues to lack a correlation in didactic and clinical instruction provided. Specifically, a lack of correlation is confirmed in Maternity Nursing and Pediatric Nursing. Twenty – six (26) students admitted in January 2014 day and evening classes were scheduled to graduate in January 2015. However, the students have been unable to complete clinical requirements for Maternity Nursing and Pediatric Nursing due to the programs lack of applicable clinical rotations. As a result, the students have been unable to complete program requirements for graduation.

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. Clinical objectives which students are expected to master shall be posted on patient care unit utilized for clinical experience.”

Violation #10:

The program failed to secure adequate clinical sites as to number, type, or variety of clients consistent with the approved curriculum. Specifically, the program failed to secure clinical facilities for Maternity, and Pediatric Nursing. During an interview with students, Board representatives were informed that all clinical experiences for Maternity and Pediatric Nursing are held in the Skills Lab observing both purchased DVDs and YouTube videos, and working with baby, child, and an adult mannequins. Board representatives confirmed the information with the Director.

Status #10:

The violation is **not corrected**. The program lacks clinical facilities adequate to provide clinical experiences of like character and quality that are consistent with the approved curriculum for the enrolled student population. Specifically, the program lacks adequate clinical facilities for students' clinical rotations in Maternity Nursing and Pediatric Nursing.

The Board has approved three (3) clinical facilities that offer clinical rotations in Pediatric Nursing and Maternity Nursing. However, the

facility offering rotations in Maternity Nursing is unavailable for student assignment until May 2015. Two (2) clinical facilities were approved on March 12, 2015 that can accommodate two (2) to three (3) students per day. To date, the program has failed to submit an instructional calendar that specifies a schedule that ensures clinical rotations consistent with the curriculum for all enrolled students.

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 #11: As Noted in Violation #3, program representatives were unable to provide documentation substantiating the evaluation of clinical facilities.

Status #11: This violations is **not corrected**. The director reports that a clinical site evaluation calendar has been developed. However, to date, the director has failed to submit evidence that any clinical facilities have been evaluated.

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 2525et seq.)”

Violation #12: On September 24, 2014, the Board received notification of the termination of the program director. On October 8, 2014, the Board approved a new director. On January 9, 2015, the Board was informed that the director had been placed on medical leave. To date, that medical leave continues. On April 13, 2015, the Board approved a new program director.

Observations by Board representatives during the onsite program inspection, and the analysis of critical elements, documents, materials, and information submitted by program representatives subsequent to the onsite inspection substantiate the lack of active program administration by a Board – approved director.

Status #11: This violation is **not corrected**. The program has failed to demonstrate consistent and active administration of the program by a Board – approved director. The new director was supplied the standard *New Director Orientation Packet*. The director stated that the orientation packet was inadequate and she would like to have at least a week of one-on-one orientation.

Status #12: This violation is **not corrected**. The program has failed to demonstrate consistent and active administration by a Board – approved director. The new director was supplied the standard *New Director Orientation Packet*. The Director stated that the orientation packet was inadequate and she would like to have at least a week of one-on-one orientation.

In summary, the program has corrected four (4) of the identified violations. To date, eight (8) violations remain uncorrected.

Recommendations:

1. Place the American College of Nursing, Vocational Nursing Program on provisional approval for the two year period from May 15, 2015 through May 31, 2017.
2. Require the program to admit no additional students without prior approval by the full Board.
3. Require the program director to submit, under penalty of perjury, the names of all enrolled students, date of admission, placement in the curriculum, and expected date of graduation by **June 1, 2015**.
4. Require the program to correct existing violations identified during the onsite inspection, and submit a report providing evidence of implemented interventions, to include the following no later than **June 30, 2015**.
 - a. Implementation of the approved methodology, including timeline for initial and ongoing evaluation of the curriculum.
 - b. Implementation of the approved methodology for evaluation of the clinical facilities.
 - c. Plan to ensure maintenance of accurate faculty data and Board notification of faculty terminations as prescribed by Section 2527 (b) of the Vocational Nursing Rules and Regulations.
 - d. Implementation of the approved attendance policy to include identification of students for whom absences are identified and assigned follow-up.
 - e. Instruction that demonstrates a correlation between theory and clinical experiences for enrolled students.
 - f. Identification and Board approval of clinical facilities that provide clinical experiences that are consistent with the curriculum and adequate to provide

- g. clinical experiences of like character and quality for the enrolled student population.
 - h. Implementation of the program's approved methodology including timeline for initial and ongoing evaluation of clinical facilities utilized for student clinical experiences.
 - i. Active administration by a Board - approved director.
 - j. Instructional calendar that specifies a schedule for the provision of theory and correlated clinical rotations consistent with the curriculum for enrolled students.
 - k. Documentation of the following is required for students admitted January 2014 who lack clinical rotations in Maternity Nursing and Pediatric Nursing:
 - 1) Name and classification of clinical facility to which students are assigned.
 - 2) Name of facility contact.
 - 3) Facility telephone number.
 - 4) Dates of assigned clinical rotations.
 - 5) Objectives to be achieved.
5. Require the program to submit a follow-up report regarding the effectiveness of all implemented interventions no later than **August 30, 2015**.
6. Require the program to submit follow-up reports in ten (10) months, but no later than **March 1, 2016**, and 22 months, but no later than **March 1, 2017**. 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.
7. Require the program to comply with all approval standards in Article 4 of the Vocational Nursing Practice Act, commencing at Business and Professions Code Section 2880, and Article 5 of the Board's Regulations, commencing at California Code of Regulations, Title 16, section 2525.

8. Require the program to demonstrate correction and sustain corrections in relation to the violations.
9. Failure to make any of these corrective actions may cause the full Board to revoke the program's approval.
10. Place the program on the **May 2017** Board agenda for reconsideration of provisional approval

Rationale: Board representatives conducted an unannounced onsite inspection of the program on October 14 and 15, 2014. Twelve (12) violations were identified.

Since September 23, 2014, the American College of Nursing, Vocational Nursing Program has lacked consistent and active administration by a Board approved director during a time when students are enrolled. That failure is evidenced by the termination of the director on September 23, 2014; appointment and approval of a new director on October 8, 2015; the director's medical leave commencing December 9, 2015; the director's termination effective April 13, 2015; and the appointment and approval of a new director who was approved on April 13, 2015.

As of April 16, 2015, four (4) of the twelve violations have been corrected; eight (8) violations remain uncorrected

The program's average annual pass rates is **72%** which is **one (1) percentage points above** the state average annual pass rate, and has consistently remained within **10 percentage points** of the state.

However, given the number and criticality of the identified violations, placement of the program on provisional approval is recommended.

Board staff will continue to monitor the program by tracking its licensure examination pass rate quarterly, and analyzing the program's resources and progress in correcting current violations.

Attachment A: History of Prior Board Actions.

Attachment B: Board Correspondence Dated January 22, 2015.

Attachment C: Program Correspondence Dated March 1, 2015; Received March 2, 2014

Agenda Item #7.B.2., Attachment A

American College of Nursing Vocational Nursing Program

History of Prior Board Actions

- On April 12, 2007, the Executive Officer approved American College of Nursing's request to begin a vocational nursing program with an initial class of 45 students commencing May 21, 2007, with a projected graduation of May 19, 2008; and approved the program curriculum for 1560 hours, including 596 theory, and 964 clinical hours.
- On March 4, 2008, the Executive Officer approved initial full accreditation for the American College of Nursing Vocational Nursing Program for the period March 4, 2008, through March 3, 2012, and issued a certificate accordingly. Additionally, the Executive Officer approved the program's request to admit a full – time class of 45 students beginning June 2, 2008 only, to **replace** students graduating on May 19, 2008.
- On November 5, 2008, the Executive Officer approved the program's request to admit an additional class of 45 students on December 1, 2008.
- The program delayed commencement of the class until December 15, 2008, with a projected graduation of December 11, 2009.
- On May 5, 2009, the Executive Officer approved the program's request to admit a full – time class of 45 students on June 1, 2009 only.
- On January 6, 2010, the Board notified the program that its pass rates on the NCLEX/PN® had fallen below 10 percentage points of the state average annual pass rate for **four** (4) consecutive quarters. The director was requested to submit a written plan for improving the program's pass rates by February 1, 2010.
- On January 7, 2010, the Executive Officer approved American College of Nursing Vocational Nursing Program's request to admit a full–time class of 45 students on January 11, 2010 only, with a projected graduation date of January 13, 2011, to **replace** students who graduated December 11, 2009.
- On April 30, 2010, the Executive Officer approved the program's request to admit a full – time class of 45 students on May 3, 2010 only, with a projected graduation date of April 23, 2011. Additionally, the program was required to obtain Board approval prior to the admission of all classes.
- On July 20, 2010, the Executive Officer approved the program's request to admit a full – time class of 60 students commencing July 12, 2010 only, with a projected graduation date

of July 22, 2011, to **replace** students graduating June 20, 2010; and required the program to obtain board approval prior to the admission of all classes.

- On January 28, 2011, the Executive Officer approved the program's request to admit a full-time class of 45 students commencing January 31, 2011 only, with a projected graduation date of February 2, 2012, to **replace** students who graduated January 22, 2011; and required the program to obtain Board approval prior to the admission of all classes.
- On May 13, 2011 the Board approved the program's admission of 45 students and 4 alternates into a full – time evening class commencing May 23, 2011, only, with a projected graduation date of May 30, 2012, to **replace** students scheduled to graduate May 18, 2011; **and**, denied the program's request for ongoing admissions of a full-time day class of 45 students two (2) times each year, commencing July 18, 2011; **and**, continued to require the program to obtain Board approval prior to the admission of each class.
- On February 1, 2012, the Board received the program's completed Program Records Survey for continued program approval.
- On June 7, 2012, the program was issued a Notice of Violation relative to noncompliance with California Code of Regulations Section 2530(k).
- On June 7, 2012, the Executive Officer approved the American College of Nursing Vocational Nursing Program for a four-year period from March 4, 2012 to March 3, 2016, and the Board issued a certificate accordingly; **and**, denied the program's request to admit 45 students and approved admission of an evening class of 45 students with a start date of June 18, 2012 and graduation date of June 22, 2013, only, to replace students graduating June 1, 2012; **and**, denied the program's request to admit 45 students; **and**, approved admission of a day class of 30 students with a start date of July 23, 2012 and graduation date of July 27, 2013, only, to replace students graduating July 20, 2012, only; and continued to require the program to obtain Board approval prior to the admission of each class.
- On August 28, 2012 the board received action plan regarding NCLEX-PN® pass rates.
- On May 20, 2013, the Executive Officer approved the program's request to admit an evening class of 30 students and 3 alternates on June 17, 2013, **only**, to **replace** students graduating on June 13, 2013; **and**, approved the program's request to admit a day class of 30 students and 3 alternates on July 15, 2013, **only**, to **replace** students graduating on July 11, 2013; **and**, continues to require the program to obtain Board approval prior to the admission of each class.
- On December 6, 2013, the Executive Officer approved the program's request to admit an evening class of 30 students and 3 alternates on January 2, 2014, with a graduation date of January 9, 2015. That class will be an additional class; **and**, approved the program's request to admit a day class of 30 students and 3 alternates on January 21, 2014, with a graduation

date of January 22, 2015. That class will **replace** students graduating on January 16, 2014; **and**, continued to require the program to obtain Board approval prior to the admission of each class.

- On May 22, 2014, the Executive Officer **approved** American College of Nursing Vocational Nursing Program's request to admit an evening class of 30 students and 3 alternates on July 16 2014, with a graduation date of July 23, 2015. That class will **replace** the students that are scheduled to graduate on June 21, 2014; **and**, approved the program's request to admit a day class of 30 students and 3 alternates on July 21, 2014, with a graduation date of July 30, 2015. That class will **replace** students scheduled to graduate on July 19, 2014; **and**, **continue** to require the program to obtain Board approval prior to the admission of each class.
- On September 23, 2014 the interim administrator notified the Board of Termination of the Director effectively immediately.
- On October 14 and 15, 2014, an unannounced program site visit was conducted.
- On November 26, 2014, the program was notified of violations.
- On December 15, 2014, Board received response of violations.
- On January 9, 2015 the Interim administrator resigned and the director was placed on an extended sick leave. On January 20, 2015 the Executive officer required the program to supply a report confirming correction of the violations and denied the requested class.
- On January 20, 2015, the Executive Officer **denied** the American College of Nursing Vocational Nursing Program's request for approval to admit a class of 30 evening students on January 27, 2015 and graduating on February 25, 2016. **Continued** to require the program to obtain Board approval prior to the admission of each class. **Required** the program to submit documentation confirming the program's active administration by a director as required by California Code of Regulations Section 2529 (b) by **February 1, 2015**. **Required** the program to submit for Board approval clinical facilities adequate as to number, type, and variety of patients treated to provide clinical experiences of like character and quality and consistent with the approved Maternity and Pediatric Nursing curriculum for the enrolled students by **February 1, 2015**. **Required** the program to correct deficiencies identified during the onsite visit and submit documentation confirming correction of the following no later than **March 1, 2015**.
 - a. Implementation of the program's approved methodology including a timeline for initial and ongoing evaluation of the curriculum.
 - b. Names of faculty terminated since September 1, 2014, including utilization and dates of termination.
 - c. Plan to ensure maintenance of accurate faculty data and Board notification of faculty terminations as prescribed by Section 2527 (b) of the Vocational Nursing Rules and Regulations.

- d. Lesson plans for the approved curriculum.
- e. Availability of the program's instructional plan for all approved faculty.
- f. Implementation of the program's attendance policy to include identification of students for whom absences are identified and assigned follow – up.
- g. Clinical facilities that offer clinical experiences consistent with the approved curriculum in Maternity Nursing and Pediatric Nursing including care of sick children.
- h. Implementation of the program's approved methodology including a timeline for the initial and ongoing evaluation of clinical facilities utilized for student clinical experience; **and**

Required the program to submit a report no later than **March 1, 2015**, regarding how, when, and where enrolled students will obtain clinical experiences in Maternity Nursing and Pediatric Nursing, including sick child experience, in approved clinical facilities prior to students' graduation. **Required** the program to submit an instructional calendar that substantiates theory and correlated clinical experience provided for enrolled students, including clinical facilities to which students are assigned by **March 1, 2015**.

- On January 27, 2015, the Board approved an assistant director of nursing
- On February 25, 2015, the Board received the resignation of the assistant director of nursing
- On March 2, 2015, the Board received the required response to violations.
- On March 25, 2015, the Board approved a new assistant director of nursing.
- On March 27, 2015, the Board received an extension of the director's medical leave until April 15, 2015.
- **On April 13, 2015, the Board approved a new Program Director.**

Agenda Item #7.B.2., Attachment B



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 www.bvnpt.ca.gov



CERTIFIED MAIL

January 22, 2015

Mr. Nieto Baluyut
Administrator
American College of Nursing
1855 Gateway Boulevard
Concord, CA 94520

SUBJECT: Request to Admit – Consideration of Violations

Dear Ms. Illicito,

On January 21, 2015 the Board of Vocational Nursing and Psychiatric Technicians (Board) considered the consultant's report relative to the ***American College of Nursing – Vocational Nursing Program – Request to Admit, Consideration of Violations***

The following decisions were rendered:

1. Deny the American College of Nursing Vocational Nursing Program's request for approval to admit a class of 30 evening students on January 27, 2015 and graduating on February 25, 2016.
2. Continue to require the program to obtain Board approval prior to the admission of each class.
3. Require the program to submit documentation confirming the program's active administration by a director as required by California Code of Regulations Section 2529 (b) by **February 1, 2015**.
4. Require the program to submit for Board approval clinical facilities adequate as to number, type, and variety of patients treated to provide clinical experiences of like character and quality and consistent with the approved Maternity and Pediatric Nursing curriculum for the enrolled students by **February 1, 2015**.
5. Require the program to correct deficiencies identified during the onsite visit and submit documentation confirming correction of the following no later than **March 1, 2015**.
 - a. Implementation of the program's approved methodology including a timeline for initial and ongoing evaluation of the curriculum.
 - b. Names of faculty terminated since September 1, 2014, including utilization and

Notice of Board Decision
American College of Nursing
Vocational Nursing Program
January 22, 2015

- dates of termination.
- c. Plan to ensure maintenance of accurate faculty data and Board notification of faculty terminations as prescribed by Section 2527 (b) of the Vocational Nursing Rules and Regulations.
 - d. Lesson plans for the approved curriculum.
 - e. Availability of the program's instructional plan for all approved faculty.
 - f. Implementation of the program's attendance policy to include identification of students for whom absences are identified and assigned follow – up.
 - g. Clinical facilities that offer clinical experiences consistent with the approved curriculum in Maternity Nursing and Pediatric Nursing including care of sick children.
 - h. Implementation of the program's approved methodology including a timeline for the initial and ongoing evaluation of clinical facilities utilized for student clinical experience.
 - i. Require the program to submit a report no later than **March 1, 2015**, regarding how, when, and where enrolled students will obtain clinical experiences in Maternity Nursing and Pediatric Nursing, including sick child experience, in approved clinical facilities prior to students' graduation.
 - j. Require the program to submit an instructional calendar that substantiates theory and correlated clinical experience provided for enrolled students, including clinical facilities to which students are assigned by **March 1, 2015**.

Rationale: As stated previously, on September 24, 2014, the Interim Administrator sent via email a detailed letter regarding the termination of the Vocational Nursing Program Director effective immediately. On October 14 and 15, 2014 an unannounced onsite program survey was conducted. Eleven (11) violations of the Vocational Nursing Rules and Regulations were identified. On November 26, 2014, the director was sent via certified mail a notification of the eleven violations and actions needed to correct the violations by December 15, 2014. The director responded to the violations. Two (2) of the eleven violation have been corrected.

The program has failed to obtain adequate clinical sites as to number, type and variety of patients treated to provide clinical experiences to students, specifically Pediatric and Maternity nursing clinical sites. The director was informed during the survey, and in the violation letter that clinical sites must be obtained and available for the current and proposed students. At this time, there remains no approved clinical sites for Pediatric or Maternity Nursing.

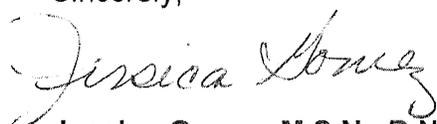
The program's average annual pass rates is **69%** which is **four (4) percentage points below** the state average annual pass rate, and has consistently remained within **10 percentage points** of the state.

Notice of Board Decision
American College of Nursing
Vocational Nursing Program
January 22, 2015

Given the foregoing, denying the program's request to admit students is warranted. Should the program fail to correct the identified violations, the program may be placed on the May 2015 agenda for the Board's consideration of placement on provisional approval.

Please contact your Nurse Education Consultant should further clarification be needed.

Sincerely,

A handwritten signature in cursive script that reads "Jessica Gomez".

Jessica Gomez M.S.N., R.N.
Nursing Education Consultant



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 www.bvnpt.ca.gov



DECLARATION OF SERVICE BY MAIL

Program Name: Angeles College, Vocational Nursing Program

Provider Name: Dr. Nieto Baluyut

Fax #: _____ Email Address _____

Address: 1855 Gateway Boulevard Tower II Suite 180, Concord, CA. 94520

I declare:

I am employed in the County of Sacramento, California, I am over the age of 18, and not a party to the within action. My business address is 2535 Capitol Oaks Drive, Suite 205, Sacramento, California 95833-2945.

On 1/22/2015, I served the following document(s) described as:

Certified Mail: Nieto Baluyut, American College of Nursing, Vocational Nursing Program
RE. Request to Admit – Consideration of Violations

By causing to be delivered a true and correct copy thereof to the addressee(s) as follows:

VIA U.S. MAIL:

By placing a copy in each of two separate sealed envelopes with postage thereon fully prepaid and causing them to be deposited in the mail at Sacramento, California for delivery by way of Certified Mail and First Class Mail.

Certified Mail Number:

VIA PERSONAL SERVICE:

I myself, or a designated courier, delivered such document(s) by hand to the offices of the addressee.

VIA FACSIMILE:

Such document(s) were transmitted to the facsimile number(s) listed above. The facsimile machine I used was in working order and no communication or delivery error was reported by the machine.

VIA ELECTRONIC TRANSMISSION:

I caused the documents to be sent to the persons at the e-mail address listed above. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that my transmission was unsuccessful.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. This declaration was executed at Sacramento, California on 1/22/2015.

Jessica Gomez
(Typed Staff Name)

Jessica Gomez
(Staff Signature)

Agenda Item #7.B.2., Attachment C



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Concord, CA 94520
Tel 925-689-9900 Fax 925-689-9909

March 1, 2015

BVNPT RECD EDU
ON 3/2/14 WITH JG, NEC VIA EMAIL

Jessica Gomez, MSN, RN
Nursing Education Consultant
Board of Vocational Nursing & Psychiatric Technicians
2535 Capital Oaks Drive, Suite 205
Sacramento, CA. 95833

Dear Ms. Gomez,

The purpose of this letter is to respond to the certified letter of January 22, 2015 Subject: Request to Admit Vocational Nursing Program- Consideration of Violations for at the American College of Nursing, Concord, CA.

- a.) Implementation of the program's approved methodology including a timeline for initial and ongoing evaluation of the curriculum.

Interim ADON-VN RESPONSE:

New forms were created to initiate Curriculum Evaluation in all academic programs. The intent is create a continual evaluation of curriculum across the spectrum of programs offered, utilize all faculty expertise and experiences, make reasonable and applicable curriculum changes in a timely manner expressly following a course and/or at the end of each level. A general gathering and discussion should occur during the summer 2015 and winter 2015-16 breaks when more unencumbered time is available to all persons involved.

*Attachments: VN Theory & Clinical Curriculum Evaluation forms (faculty & student) and Faculty Meeting minutes from January 2015 meeting.



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Insertion: Projected Curriculum Evaluation Timeline:

Curriculum Evaluation	How and Where Occurs?	Continual process.
Initial Curriculum Evaluation Discussion.	Jan. 7 th , 2015 held by Mrs. Ilicito, DON (see attached notes offered).	N/A Curriculum Discussed.
Secondary Meeting Scheduled	Feb. 26th, 2015	No VN faculty was able to attend this meeting.
Re-Schedule Faculty meeting specific to curriculum evaluation.	Proposed March 17 th , 2105 Faculty Meeting will be hosted by replacement ADON-VN.	Introduce Faculty to Curriculum Review Process, new forms and discuss value of input from students at end of Level I and end of program at Level II.
Students introduced to the Curriculum Evaluation forms during Level II Orientation class (VNE-F714).	Level II Orientation held on February 9, 2015. Anticipate student completion of Curriculum Evaluation forms at the end of Level II likely during first week of NCLEX Review series in September 2015.	N/A post-graduation.
Student Introduction to Curriculum Evaluation.	Anticipated for end of Level I (VNE-914) coursework in mid-April 2015.	VNE-914 cohort will evaluate Curriculum again at the end of Level II coursework in October 2015.



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b.) Names of faculty terminated since September 1, 2014, including utilization and dates of termination.

Interim ADON-VN RESPONSE:

As ACN does not have a Human Resources department, the Organizational Business Manager was requested to comply with a full list of names and dates of terminated faculty since September 2014. Following receipt of this information, the approved Faculty List was updated as much as possible. This task will need to be continued and finalized with the replacement ADON-VN.

*Attachment: Current updated approved VN Faculty List. (excel file)

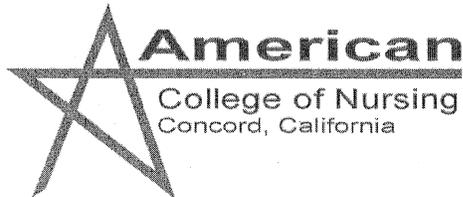
c.) Plan to ensure maintenance of accurate faculty data and Board notification of faculty terminations as prescribed by Section 22527 (b) of the Vocational Nursing Rules and Regulations.

Interim ADON-VN RESPONSE:

A routine accounting and update of the Faculty List will be accomplished on a monthly basis as well as with new any applications sent to the BVNPT by the Program Director, with personal or medical leave of absences longer than 30 days, resignations and/or termination of employment occurs. Information to correct the current Approved Faculty list was obtained from prior records and after viewing certain employee employment files.

*Inserted: Change of Status Graph for corrections to Approved Faculty list.

Name of Faculty & Changes	Date of Status Change	Faculty List Updated Y/N
Erickson Arado	Approved VN & PT	Yes- 6/6/14
Deepa Ulahannan	Last day worked 5/7/14 PT to Substitute 2/27/14	Yes- 2/27/15
Dennis Jvillonar (Term)	Last day worked 12/4/13	Term-12/4/13
Mabelle Joy Viera	Last day worked 7/23/13 PT to Substitute 2/27/15	Yes- 2/27/13



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Hatice Genc	Approved VN & PT	Yes- 9/15/14
Jerome Hiquian	Approved VN only	Yes- 1/12/15
Norman Factora	Approved	Yes- 01/12/15 corrected date
Mercedes Pilonos	PT to Substitute	Yes- 2/27/15
Erlinda Lopez	PT to Substitute	Yes- 2/27/15
Dr. Carolyn Harris-Muchell	Approval Date 2/7/13 (PT) VN (1/4/13)	Term/Resigned Yes- 10/1/14
Geraldine Plageria	PT to Substitute	Yes- 2/28/15

d.) Lesson Plans for the approved curriculum:

Interim ADON-VN RESPONSE:

Lesson Plans were created for each course in Level I and Level II VN Program and are based on the approved Instructional Plan (2007). These new Lesson Plan copies will be placed into two separate binders for the Director, copies available on a special faculty e-drive per IT, and copied to individual Instructor binders for use during teaching assignment. There are also addendum materials available to each faculty either through the associated text book(s) or those in the previous subject binders located in the Academic Leaders office.

Lesson Plan review and evaluation will occur at the end of each level and involved all involved faculty theory and clinical. Evaluation will also occur with the end of year program evaluation during the winter break off. New addendum materials, articles, selected video clips or movies, and student resources will be gathered, copied, and added to each daily lesson for use with the next scheduled cohort.

***Attachments: Level I and Level II daily VN Lesson Plan documents per the approved copy of VN Instructional Plan.**



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e.) Availability of the program's instructional plan for all approved faculty.

Interim ADON-VN RESPONSE:

The Level I and Level II approved Instructional Plans are attached to this communication. The Instructional Plans are now also held within a Program Director's binder, on a faculty e-drive, and provided in the faculty Instructor's binder who is teaching the course content.

A curriculum revision is overdue through the reworking of the Level I and II Instruction Plans from 2007. Textbooks were upgraded/changed during the past 1-2 years. That information is not provided on this IP copy but a copy of the current ACN textbook is attached.

*Attachments: Approved copy of Level I and Level II approved Instructional Plan.

Copy of the current ACN textbook List.

f.) Implementation of the program's attendance policy to include identification of students for whom absences are identified and assigned follow-up.

Interim ADON-VN RESPONSE:

Faculty is instructed to complete a daily Attendance form for both Theory and Clinical classes.

*Attachments: ACN Student Handbook Attendance & Remediation Policy.



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Insertion: Graphic of Suggested Remediation Plan of Action

Weekly Remediation	Faculty	Initiate & Outcomes
<ol style="list-style-type: none"> 1. Faculty determines at-risk students thru weekly test scores. 2. Student offered advice & counseling after each score of < 75%. 3. Remediation test offered per every two (2) failed tests. 4. Faculty to give weekly updates to Program Director and provide copy grade sheet. 5. Student to meet with Program Director prior to 	<p>List of at-risk (High and Low) to Program Director asap problem is evident.</p> <p>Continual update of list.</p> <p>Remedial scores to Program Director as they occur with notes on progress or lack of progress and prior to 10% of course content per Student Handbook.</p> <p>Director meeting with faculty to discuss progress and other possible alternatives to assist student.</p> <p>Official meeting with Director to determine viability or approach possible dismissal from program, tuition return, etc.</p>	<ol style="list-style-type: none"> a. Introduce during course Orientation day. b. Initiate Remediation form and use of Student Violation form



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- g.) Clinical facilities that offer clinical experiences consistent with the approved curriculum in Maternity Nursing and Pediatric Nursing including the care of sick children.

Interim ADON-VN RESPONSE:

When there are approved clinical sites for Pediatrics and Maternity, the clinical rotations will flow during the same week(s) As of this date, there are no active approved Pediatric or Maternity Clinical sites in place. It is understood that the in-progress VN cohort will complete this rotation but it will also require a facility contract allowing for either evening clinical rotation and/or a Saturday eight (8) to meet evening cohort student expectations. Any additional and available clinical hours will be selectively distributed among the graduate VN cohorts of VNE114 and M114 and is anticipated to follow based on:

1. First choice to students who passed the Exit Exam #1.
2. Second choice to students who passed the Exit Exam #2 and also based on scores.
3. Third choice to students who passed the Exit Exam #3 and also based on scores.
4. Additional accommodations based on actual student availability on approved dates, times, and location.
5. Each student will be accommodated through an entire rotation of Pediatrics and/or Maternity to its logical conclusion to allow for completion of the Exit Interview and submission of individual licensure application to the BVNPT.

- h.) Implementation of the program's approved methodology including a timeline for the initial and ongoing evaluation of clinical facilities utilized for student clinical experience.

Interim ADON-VN RESPONSE:

The Clinical Site Director/Coordinator are instructed to formulate a routine clinical site review and evaluation calendar rotation to provide oversight of all VN clinical facilities a minimum of every 4- 6 weeks continuously. The ADON-VN will also complete an initial site evaluation as part of orienting to each site and what it offers to particular objectives of the Level I versus the Level II student experience. This will begin in March 2015 and be a topic on the monthly VN Faculty Meeting agenda for follow-up and recommendations. Students will continue to evaluate the clinical sites at each level end and end-of-program and will be introduced to the new forms/expectations at the earliest convenience.



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***Attachments: Revised Faculty Clinical Evaluation forms and revised Student Clinical Evaluation forms.**

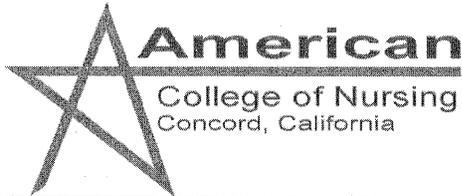
- i.) **Require program to submit a report no later than March 1, 2015, regarding how, when, and where enrolled students will obtain clinical experiences in Maternity Nursing and Pediatric Nursing, including sick child experience, in approved clinical facilities prior to students' graduation.**

Interim ADON-VN RESPONSE:

As of this date, there are no active approved Pediatric or Maternity Clinical sites in place. Below please find a brief list of sites under research during the past few months.

***Insertion: Graphic Representation of Clinical Site research during the past 4-5 months:**

Name of Approached Maternity/Peds Facility	Month/Year	Contract Outcome: Yes/No
WIC	October 2014	No
Conracosta Public Health Services		No
(Unknown Research)	November 2014	No
We Care	December 2014	No
Concord Care Center		No
Tiburcio Vasquez Health Center (Hayward & Union City)	January 2015	No- attempting to renew previous contract. Promise dates in late summer 2015.
Options for Women-Concord		No
Conracosta Regional Medical Center		No- contract out at site
La Clinica	February 2015	No
Planned Parenthood-Concord		No



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<p>West Oakland Healthcare (Peds Only)</p> <p>South of Market Health Center (SFO)</p>		<p>(Re-submitting for 5/1- 5/15/15 only)</p> <p>No- contract out at site</p>
	<p>March 2015</p>	

- j.) Require program to submit instructional calendar that substantiates theory and correlated clinical experience provided for enrolled students, including clinical facilities to which students are assigned by March 1, 2015.

Interim ADON-VN RESPONSE:

VN cohorts are provided with theory lecture in combination with clinical site experiences that match the skills set for selected courses in Level I and in Level II. Examples included on the attached calendar show Medical-Surgical theory content as completed from this point and students at one of several facilities (i.e. Lafayette Health, San Pablo Convalescent, or Ignacio Valley). The MSII Mental Health clinical rotation is limited but inclusive of at least three (3) clinical observation dates at Vacaville and/or continued MSII rotation at facilities with mental health diagnoses like at San Pablo Convalescent.

*Attachments: Student Calendar for VNE-914 day cohort. The Student Calendar for VNE-F714 unable this date but plan to submit tomorrow.

Sincerely,

***Brenda Beall-Boyer** (e-signature)*

Brenda D. Beall-Boyer, EDD/ET(c) RN LNC
 Director Psychiatric Technician, Interim ADON-VN & Online Curriculum
 1855 Gateway Blvd., Ste. 180
 Concord, CA 94520
925.689.9900