

Agenda Item #16.B.1.



BUSINESS, CONSUMER SERVICES, AND HOUSING AGENCY • GOVERNOR EDMUND G. BROWN JR.
BOARD OF VOCATIONAL NURSING & PSYCHIATRIC TECHNICIANS
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COVER SHEET

SUBJECT: Carrington College, San Jose, Vocational Nursing Program.
Consideration of Placement on Provisional Approval; Consideration of
Request to Admit Students (Director: Janice Montgomery, San Jose, Santa Clara
County, Private)

The Carrington College, San Jose, Vocational Nursing Program is presented to the Board for consideration of placement on provisional approval.

Recommendations:

1. Place the Carrington College, San Jose, Vocational Nursing Program on provisional approval for the two (2) year period from November 20, 2015 through November 30, 2017, and issue a notice to the program to identify specific areas of non-compliance and requirements for correction as referenced in Section 2526.1 (e) of the California Code of Regulations. (See Attachment K)
2. Approve the Carrington College, San Jose, Vocational Nursing Program's request to admit one (1) class of thirty (30) students to a class beginning on January 4, 2016, graduating December 16, 2016, **only**.
3. Require the program to provide no less than one (1) instructor for every ten (10) students in clinical experiences.
4. Require the program to admit no additional classes without prior approval by the full Board.
5. 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 **January 15, 2016**.
6. Require the program to submit follow up reports in nine (9) months, but no later than **August 1, 2016**, and 21 months, but no later than **August 1, 2017**. The reports must include a comprehensive analysis of the program, specific actions taken to improve 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 bring its average annual pass rate to no more than (10) ten percentage points below the State average annual pass rate.
 8. Require the program to demonstrate incremental progress in correcting the violations. If the program fails to satisfactorily demonstrate incremental progress the full Board may revoke the program's approval.
 9. Require the program to comply with all approval standards in Article 4 of the Vocational Nursing Practice Act, commencing at Business and Professions Code Section 2880, and Article 5 of the Board's Regulations, commencing at California Code of Regulations, Title 16, Section 2526.
 10. Failure to take any of these corrective actions may cause the full Board to revoke the program's approval.
 11. Place the program on the Board's **November 2017** agenda for reconsideration of provisional approval.

Rationale: The data substantiates that the program's current average annual pass rate is **53%**, which is **19** percentage points **below** the state average annual pass rate. The data also substantiates that the program has been non-compliant with requirements relative to pass rates, as specified in Vocational Nursing Rules and Regulations Section 2530 (l), for the past **seven (7)** consecutive quarters. In addition, a total of **four (4)** violations of the Vocational Nursing Rules and Regulations were identified in the course of investigating a consumer complaint submitted in August 2015. This supports the recommendation to place the program on provisional approval.

Documentation submitted by the program since February 2015 indicates that an improvement plan, with the goal of improving pass rates on the licensure examination and improving several aspects of the program, has been developed, is now in place, and is being evaluated by the program. In addition, with the Board approval of additional clinical facilities and the most

recent documentation submitted regarding clinical placements, **all violations have now been corrected.** This supports the recommendation to approve the request to admit students at this time.

Board staff will continue to monitor the program's effectiveness by tracking the program's follow-up reports, the effectiveness of employed interventions, and the program's licensure examination pass rates each quarter.

Agenda Item #16.B.1



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DATE: November 4, 2015

TO: Board Members

FROM: 
Donna G. Johnson, RNP, MS, MA
Nursing Education Consultant

SUBJECT: Carrington College, San Jose, Vocational Nursing Program. Consideration of Placement on Provisional Approval; Consideration of Request to Admit Students (Director: Janice Montgomery, San Jose, Santa Clara County, Private)

The Carrington College, San Jose, Vocational Nursing Program is presented to the Board for consideration of placement on provisional approval.

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

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

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

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

On August 13, 2015, when considering a report of violations identified in the course of investigating a complaint, and when considering the consecutive quarters of non-compliance with regulations related to licensure pass rates, the Acting Executive Officer referred the program to the Board for consideration of placement on provisional approval.

In addition, the program has requested approval to admit one (1) class of 30 students beginning January 4, 2016 and graduating December 16, 2016.

History of Prior Board Actions

(See Attachment A, History of Prior Board Actions)

Enrollment

The full-time program had been approved for ongoing admission of 30 students three (3) times per year, to **replace** graduating classes. Approval for ongoing admissions was rescinded on August 13, 2015 and the program must request approval prior to the admission of students.

The following table represents **current** and **proposed** student enrollment based on current and proposed class starts and completions. The table indicates a **maximum enrollment of 73 students** for the period **April 2011 through January 2016**.

ENROLLMENT DATA				
CLASS DATES		#Students Admitted	#Students Current or Completed	Total Enrolled
Start	Complete			
4/11		12	8	8
8/11		21	19	8 + 19 = 27
12/11		11	9	27 + 9 = 36
4/12		21	12	36 + 12 = 48
	8/12 (4/11 Class)		-8	48 - 8 = 40
8/12		27	18	40 + 18 = 58
	11/12 (8/11 Class)		-19	58 - 19 = 39
12/12		19	15	39 + 15 = 54
	4/13 (12/11 Class)		-9	54 - 9 = 45
4/13		8	9	45 + 9 = 54
	8/13 (4/12 Class)		-12	54 - 12 = 42
8/13		21	20	42 + 20 = 62
	12/13 (8/12 Class)		-18	62 - 18 = 44
12/13		20	24	44 + 24 = 68
	4/14 (12/12 Class)		-15	68 - 15 = 53
4/14		26	20	53 + 20 = 73
	8/14 (4/13 Class)		-9	73 - 9 = 64

ENROLLMENT DATA				
CLASS DATES		#Students Admitted	#Students Current or Completed	Total Enrolled
Start	Complete			
	8/14 (8/13 Class)		-20	64 – 20 = 44
8/14		25	23	44 + 23 = 67
	12/14 (12/13 Class)		-24	67 – 24 = 43
12/14		21	17	43 + 17 = 60
	4/15 (4/14 Class)		-15	60 – 15 = 45
4/15	4/16	28	26	45 + 26 = 71
	10/15 (8/14 Class Delayed from 8/15)		-23	71 – 23 = 48
	12/15 (12/14 Class)		-17	48 – 17 = 31
1/16 (Proposed)	12/16	30		31 + 30 = 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 September 2015, specify the pass percentage rates for graduates of the Carrington College, San Jose, Vocational Nursing Program on the National Council Licensure Examination for Practical/Vocational Nurses (NCLEX-PN®), and the variance from state average annual pass rates.

NCLEX-PN® Licensure Examination Data							
Quarterly Statistics					Annual Statistics*		
Quarter	# Candidates	# Passed	% Passed	State Average Quarterly Pass Rate	Program Average Annual Pass Rate	State Average Annual Pass Rate [CCR § 2530 (l)]	Variance from the State Average Annual Pass Rate
Jan – Mar 2011	20	12	60%	80%	73%	77%	-4
Apr – Jun 2011	10	6	60%	71%	69%	76%	-7
Jul – Sep 2011	6	3	50%	74%	64%	76%	-12
Oct – Dec 2011	11	7	64%	74%	60%	75%	-15
Jan – Mar 2012	21	14	67%	77%	63%	74%	-11
Apr – Jun 2012	11	7	64%	72%	63%	74%	-11
Jul – Sep 2012	19	11	58%	74%	63%	74%	-11
Oct – Dec 2012	11	8	73%	70%	65%	74%	-9
Jan – Mar 2013	3	2	67%	75%	64%	73%	-9
Apr – Jun 2013	14	12	86%	78%	70%	73%	-3

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 the State Average Annual Pass Rate
Jul – Sep 2013	9	6	67%	75%	76%	74%	+2
Oct – Dec 2013	2	1	50%	76%	75%	76%	-1
Jan – Mar 2014	9	3	33%	74%	65%	76%	-11
Apr – Jun 2014	18	10	56%	66%	53%	73%	-20
Jul – Sep 2014	12	6	50%	72%	49%	73%	-24
Oct – Dec 2014	25	14	56%	72%	52%	72%	-20
Jan – Mar 2015	11	4	36%	73%	52%	71%	-19
Apr – Jun 2015	20	12	60%	69%	53%	72%	-19
Jul – Sep 2015	14	7	50%	73%	53%	72%	-19

*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.”

Based on the **most recent data available** (July through September 2015), the program’s average annual pass rate is **53%**. 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 average annual pass rate for the Carrington College, San Jose, California, Vocational Nursing Program is **19** percentage points **below** the state average annual pass rate. The program’s average annual pass rate has been **greater** than 10 percentage points **below** the state average annual pass rate for the **past seven (7) consecutive quarters**.

Faculty and Facilities

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

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

The total number of Board-approved faculty is 15, including the program director, and one (1) Additional Faculty. A total of 14 faculty are approved to teach in the clinical area. The director has 90% administrative responsibility.

For a maximum enrollment of 73 students, five (5) instructors are needed. Therefore, the number of current faculty is **adequate** for current and proposed students.

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 now has **adequate** clinical facilities to afford the number, type and variety of patients that will provide clinical experiences consistent with competency-based objectives and theory being taught for current and proposed students.

Other Considerations

Board staff have been monitoring the program due to non-compliant pass rates on the licensure examination. The program now has seven (7) consecutive quarters of non-compliant pass rates on the examination.

With the resignation of the program director, on February 11, 2015, an interim program director, a current faculty member, was approved by the Board.

On February 18, 2015, the program was notified of four (4) consecutive quarters of non-compliant pass rates and a written improvement plan was requested. On March 26, 2015, the program submitted an improvement plan. (See Attachment B). The program reported implementation of the improvement plan beginning December 2014. The program's plan, as summarized, follows:

NCLEX Review enhanced:

- Increased time for 1 faculty member
- Outreach to prior and existing cohorts
- Biweekly NCLEX-PN® review
- Additional NCLEX-PN® review materials
- ATI® virtual review support
- In-person review sessions before graduation
- 6 weeks on-line assistance

Admission Process – to be completed by June 1, 2015:

- Assess possible correlation between admission process and final outcome of 2011-2014 cohorts
- Develop recommendations to implement before 12/15 enrollment

Curriculum and Instruction – to be completed by August 30, 2015:

- Review/evaluate curriculum, faculty teaching practices, SLO, resources
- Faculty development and follow – up after development activities
- Summarize evaluation data and review with faculty
- Pre – term faculty meetings regarding objectives and expectations

Remediation and NCLEX Preparation – to be completed by September 30, 2015:

- Examine remediation process
- Establish student progress reviews

Establish meeting process with at – risk students
Utilize Student Success Team
Increase consistency of use of ATI® CARP
Evaluate faculty regarding NCLEX® prep
Expand outreach process
Evaluate use of ATI® throughout curriculum

On March 17, 2015, a new program director was approved.

On May 12, 2015, the program was notified of the fifth quarter of non-compliant pass rates. On August 3, 2015, the program was notified of the sixth quarter of non-compliant pass rates and documentation of the implementation of the improvement plan was requested.

On August 6, 2015, the Board received an anonymous complaint regarding the program. The anonymous complaint was outlined in a letter to the program on August 6, 2015. (See Attachment C).

On August 10, 2015, as requested, the Board received documentation from the program regarding the complaint. The documentation submitted by the program (See Attachment D) identified deficits in the Carrington College, San Jose, Vocational Nursing Program.

On August 11, 2015, the Carrington College Provost and Vice President of Academic Affairs notified the Board that the Carrington College, San Jose, Vocational Nursing Program had voluntarily suspended admissions until such time as the deficits had been corrected. (See Attachment E).

On August 13, 2015, the Board forwarded correspondence to the program regarding the identified violations and the decisions rendered by the Acting Executive Officer on that day. (See Attachments F and G).

On August 18, 2015, the Board was notified of the termination of the program director.

On August 24, 2015, the Board approved a faculty member and previous interim director as the new program director.

On September 1, 2015, the new director submitted the required report (which is dated August 28, 2015) regarding implementation of the program's plan for improving pass rates on the licensure examination. (See Attachment H). The program's report is summarized as follows:

Improvement Plan Status Report

- One nursing faculty member provides focused time on NCLEX-PN® preparation to existing and former students
- Beginning August 10, 2015, faculty members conduct biweekly review sessions on campus for existing and former students
- 35 campus-based sessions have been provided
- Individual coaching sessions are being provided for existing and former students
- Career Services staff perform outreach to promote participation in review activities

- ATI® 3 day live review sessions are provided at the end of each final term of the program
- All sessions and materials are provided at no cost to participants
- Faculty members have completed initial orientation to existing ATI® NCLEX® materials.
- Former students receive access to ATI® Virtual Review support

Admission Process

- The program identified that changes are not needed
- Comprehensive review of all academic policies planned prior to November 1, 2015

Curriculum and Instruction

- Since April 2015 it was identified that faculty needed to increase the consistency with which course objectives were integrated into course activities and meetings have been conducted
- Faculty members provided access to faculty development resources providing web-based training resources
- Review determined the need for curriculum revision (specifics outlined in the report) with plan to submit a revised curriculum for Board review prior to March 31, 2016. This includes all Carrington College Vocational Nursing Programs and the Carrington College Dean for Nursing

Remediation and NCLEX-PN® Preparation

- Currently being conducted: remediation processes during each course, faculty conducting student progress reviews during each semester, meetings with students identified as at risk, meetings with Student Success Team to implement remediation plans.
- Evaluation of current faculty performance related to NCLEX-PN® preparation, serving as content expert for remediation, and NCLEX-PN® review to be completed by October 30, 2015.

On September 25, 2015 the program moved to a new location and provided documentation of adequate physical resources to meet program objectives.

On September 30, 2015, the program submitted documentation regarding required corrective actions. (See Attachment I). Additional documentation was submitted on October 2, 2015. (See Attachment J).

The violations identified and current status are as follows:

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.

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 units utilized for clinical experience.”

Violation #1: The program lacks adequate clinical facilities such that all students are afforded opportunities consistent with competency-based objectives and theory being taught and with correlation between theory and clinical content. No Maternity Nursing clinical facilities were available to the students and all clinical hours were conducted in the simulation laboratory. Further, the only Pediatric Nursing clinical facility listed in the documentation provided by the program is one pre-school facility that does not provide care of sick children.

Required Action: Submit for Board approval clinical facility applications for maternity and pediatric nursing rotations. Following approval of additional clinical facility applications, submit, **prior to graduation of those students**, verifiable plans for clinical placements for maternity and pediatric nursing for students who were to have completed all hours on August 10, 2015. In addition, submit verifiable plans for clinical placements for maternity and pediatric nursing for current students, no later than **September 30, 2015**. The submitted plans for continuing students must be consistent with the Board-approved Instructional Plan and must ensure a correlation between theory and clinical content.

Current Status #1: This violation is now **corrected**. Additional clinical facilities were approved by the Board and the program submitted documentation of adequate and verifiable placement plans.

Section 2882 of the Vocational Nurse Practice Act 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 #2: The program failed to provide clinical experiences in the care of sick children for the enrolled student population. The program failed to provide clinical experiences in Maternity nursing outside of the simulation laboratory.

Required Action: Submit for Board approval clinical facility applications for maternity and pediatric nursing rotations. Following approval of additional clinical facility applications, submit, **prior to graduation of those students**, verifiable plans for clinical placements for maternity and pediatric nursing for students who were to have completed all hours on August 10, 2015. In addition, submit verifiable plans for clinical placements for maternity and pediatric nursing for current students, no later than **September 30, 2015**. The submitted plans for continuing students must be consistent with the Board-approved Instructional Plan and must ensure a correlation between theory and clinical content.

Current Status #2: This violation is now **corrected**. Additional clinical facilities were approved by the Board and the program submitted documentation of adequate and verifiable placement plans.

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

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

Violation #3: Without clinical facilities providing experience in the care of sick children, there are no clinical experiences related to the care of sick children and, therefore, no clinical correlation with the sections of the Board-approved Instructional Plan that describe didactic content related to the care of sick children.

Required Action: Submit for Board approval clinical facility applications for pediatric nursing rotations. Following approval of additional clinical facility applications, submit, **prior to graduation of those students**, verifiable plans for clinical placements for maternity and pediatric nursing for students who were to have completed all hours on August 10, 2015. In addition, submit verifiable plans for clinical placements for maternity and pediatric nursing for current students, no later than **September 30, 2015**. The submitted plans for continuing students must be consistent with the Board-approved Instructional Plan and must ensure a correlation between theory and clinical content.

Current Status #3: This violation is now **corrected**. Additional clinical facilities were approved by the Board and the program submitted documentation of adequate and verifiable placement plans.

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 report the termination of approved faculty within the ten days prescribed by existing regulations. The faculty list submitted on August 10, 2015 does not include a total of nine (9) faculty

who were listed on the 2013 – 2014 Annual Report or approved by the Board since that time. Board files contain documentation of notification of termination of only two (2) of those faculty members.

Required Action: Submit a written policy and plan that ensures notification of the Board within 10 days of faculty termination. **Due no later than September 30, 2015**

Current Status #4: This violation is now **corrected**. The program submitted a plan that, if implemented, will prevent future occurrence of this violation.

On October 16, 2015, a new program director was approved. According to the program, the new director was to begin working on October 27, 2015.

Recommendations:

1. Place the Carrington College, San Jose, Vocational Nursing Program on provisional approval for the two (2) year period from November 20, 2015 through November 30, 2017, and issue a notice to the program to identify specific areas of non-compliance and requirements for correction as referenced in Section 2526.1 (e) of the California Code of Regulations. (See Attachment K)
2. Approve the Carrington College, San Jose, Vocational Nursing Program's request to admit one (1) class of thirty (30) students to a class beginning on January 4, 2016, graduating December 16, 2016, **only**.
3. Require the program to provide no less than one (1) instructor for every ten (10) students in clinical experiences.
4. Require the program to admit no additional classes without prior approval by the full Board.
5. 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 **January 15, 2016**.
6. Require the program to submit follow up reports in nine (9) months, but no later than **August 1, 2016**, and 21 months, but no later than **August 1, 2017**. The reports must include a comprehensive analysis of the program, specific actions taken to improve 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 bring its average annual pass rate to no more than (10) ten percentage points below the State average annual pass rate.
 8. Require the program to demonstrate incremental progress in correcting the violations. If the program fails to satisfactorily demonstrate incremental progress the full Board may revoke the program's approval.
 9. Require the program to comply with all approval standards in Article 4 of the Vocational Nursing Practice Act, commencing at Business and Professions Code Section 2880, and Article 5 of the Board's Regulations, commencing at California Code of Regulations, Title 16, Section 2526.
 10. Failure to take any of these corrective actions may cause the full Board to revoke the program's approval.
 11. Place the program on the Board's **November 2017** agenda for reconsideration of provisional approval.

Rationale: The data substantiates that the program's current average annual pass rate is **53%**, which is **19** percentage points **below** the state average annual pass rate. The data also substantiates that the program has been non-compliant with requirements relative to pass rates, as specified in Vocational Nursing Rules and Regulations Section 2530 (l), for the past **seven (7)** consecutive quarters. In addition, a total of **four (4)** violations of the Vocational Nursing Rules and Regulations were identified in the course of investigating a consumer complaint submitted in August 2015. This supports the recommendation to place the program on provisional approval.

Documentation submitted by the program since February 2015 indicates that an improvement plan, with the goal of improving pass rates on the licensure examination and improving several aspects of the program, has been developed, is now in place, and is being evaluated by the program. In addition, with the Board approval of additional clinical facilities and the most recent documentation submitted regarding clinical placements, **all violations have now been corrected**. This supports the recommendation to approve the request to admit students at this time.

Board staff will continue to monitor the program's effectiveness by tracking the program's follow-up reports, the effectiveness of employed interventions, and the program's licensure examination pass rates each quarter.

Attachment A: History of Prior Board Actions
Attachment B: Program Correspondence Dated March 26, 2015
Attachment C: Board Correspondence Dated August 6, 2015
Attachment D: Program Correspondence Dated August 10, 2015
Attachment E: Program Correspondence Dated August 11, 2015
Attachment F: Notice of Violations Dated August 13, 2015
Attachment G: Board Correspondence Dated August 13, 2015
Attachment H: Program Correspondence Dated August 28, 2015
Attachment I: Program Correspondence Dated September 30, 2015
Attachment J: Program Correspondence Dated October 2, 2015
Attachment K: Draft Notice of Change in Approval Status

Agenda Item #16.B.1., Attachment A

CARRINGTON COLLEGE, SAN JOSE VOCATIONAL NURSING PROGRAM

History of Prior Board Actions

- On October 3, 2006, the Executive Officer approved a request from Western Career College, San Jose, to begin a vocational nursing program with an initial class of 45 students on October 23, 2006, only; **and** approved the program curriculum for 1599 hours, including 645 theory, and 954 clinical hours.
- On November 7, 2007, the Executive Officer approved initial full accreditation for the Western Career College, San Jose, Vocational Nursing Program for the period from November 7, 2007, through November 6, 2011, and the Board issued a certificate accordingly; approved the program to admit a full-time class of 30 students to start on March 17, 2008, only, to replace students graduating on February 29, 2008; and approved the program to admit a full-time class of 30 students to start on November 12, 2007, only, thereby increasing the program's frequency of admissions.
- July 16, 2008, the Executive Officer approved the Western Career College, San Jose, Vocational Nursing Program's request to admit a full-time class of 30 students to start on July 28, 2008, **only**. Approval would result in an increase of the program's frequency of admissions.
- On October 8, 2008, the Executive Officer approved the program's request for ongoing admissions to **replace** graduating classes, only, with the following stipulations:
 - a. No additional classes are added to the program's current pattern of admissions without prior Board approval. The program's current pattern of admissions includes three classes per year. The first replacement class will commence on April 6, 2009.
 - b. The director documents that adequate resources, i.e. faculty and facilities, are available to support each admitted class of students.
- **On April 14, 2009, the Board approved a new Program Director.**
- On May 27, 2010, the Board was notified of the program's name change from Western Career College, San Jose, Vocational Nursing Program to Carrington College California, San Jose, Vocational Nursing Program.
- On April 18, 2012, the Executive Officer approved the following:
 1. Approve the Carrington Career College, San Jose Vocational Nursing Program for a four-year period from November 6, 2011 to November 5, 2015, and issue a certificate accordingly.

2. Approve the program's major curriculum revision from a four (4) term to a three (3) term program to include 1530 total hours, Theory - 576 hours, Clinical – 954.
 3. Continue approval of the program's current pattern of admissions of three (3) classes of thirty (30) students per year to **replace** graduating classes only, with the following stipulations:
 - a. No additional classes are added to the program's current pattern of admissions without prior Board approval. The program's current pattern of admissions includes three (3) classes of thirty (30) students per year.
 - b. The director documents that adequate resources, i.e. faculty and facilities, are available to support each admitted class of students.
 - c. The program's average annual pass rates remain no more than ten (10) percentage points below the state average annual pass rate.
- On July 21, 2014, the Board was notified of the change of name from Carrington College California to Carrington College.
 - **On February 11, 2015, an interim program director, a current faculty member, was approved.**
 - On February 18, 2015, the program was notified of four quarters of non-complaint pass rates and a written improvement plan was requested.
 - **On March 17, 2015, a new program director was approved.**
 - On March 26, 2015, the Board received the program's written improvement plan.
 - On May 7, 2015, the Board requested documentation related to the Program Record Survey.
 - On May 12, 2015, the program was notified of five quarters of non-complaint pass rates.
 - On August 3, 2015, the program was notified of six quarters of non-complaint pass rates and documentation of implementation of the improvement plan was requested.
 - On August 6, 2015, the Board received an anonymous complaint regarding the program and sent written correspondence regarding the complaint to the program.
 - On August 10, 2015, the Board received documentation from the program in response to the complaint and four violations were identified.
 - On August 11, 2015, the program forwarded written correspondence stating they were voluntarily suspending admissions until deficits could be corrected.
 - On August 13, 2015, the Acting Executive Officer rendered the following decisions:

1. Require the Carrington College, San Jose, Vocational Nursing Program to submit verifiable plans for clinical placements for Maternity and Pediatric Nursing for students who were to have completed program requirements on August 10, 2015 **prior to graduation.**
 2. Require the program to submit verifiable plans for clinical placements for Maternity and Pediatric Nursing for currently enrolled students, no later than **September 30, 2015.**
 3. Require the program to submit a written policy and plan that ensures notification to this Board within 10 days of faculty termination. Due no later than **September 30, 2015.**
 4. Effective immediately, rescind approval for ongoing admissions and require the program to obtain Board approval prior to the admission of any students. The program must document adequacy of faculty and facilities to support the objectives of the program prior to the admission of students.
 5. Place the program on the November 20, 2015 agenda for consideration of placement on provisional approval due to noncompliance with requirements specified in California Code of Corrections.
- On August 24, 2015, the Board approved a long-time faculty member as the new program director.



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March 26, 2015

Donna Johnson, RNP, MS, MA
Nursing Education Consultant
Board of Vocational Nursing & Psychiatric Technicians
2535 Capitol Oaks Drive, Suite 205
Sacramento, CA 95833

Dear Ms. Johnson:

Please accept the following Improvement Plan in response to the February 2015 letter requesting information from the Carrington College San Jose campus to improve NCLEX-PN pass rates.

In December 2014, the Carrington College San Jose campus was aware, based on the available information, that the VN program 2014 NCLEX-PN pass rates would be less than the required standard and began implementing multiple steps to attain improvement. The Improvement Plan briefly summarizes the steps implemented prior to receiving the BVNPT request and presents the existing and planned steps. The goal is to improve and maintain NCLEX-PN pass rates that exceed the level to maintain compliance with BVNPT regulations and share with all faculty, Carrington College leadership, and San Jose campus leadership.

San Jose Vocational Nursing NCLEX-PN Improvement Plan

January – March 2015

- The San Jose Executive Director transferred one part-time nursing faculty member to a full-time instructor role and released her from a portion of her teaching load in order to focus the release time exclusively on providing NCLEX-PN review sessions, support, and materials to VN graduates from prior cohorts and existing students who were in their final term.
- The NCLEX-PN Review instructor and Mr. Felix Levy, a San Jose Nursing Instructor (who served in the Program Director in February and March), initiated bi-weekly NCLEX-PN review sessions at the campus. Review sessions focused on the content areas covered within the NCLEX-PN, types of test items used in the NCLEX-PN and strategies for NCLEX-PN preparation.

- The VN program was approved to purchase and distribute additional NCLEX-PN review materials (Saunders NCLEX-PN) and more than 40 copies of the book were provided to potential NCLEX-PN testers.
- The NCLEX-PN Review Instructor and Mr. Levy were also provided orientation to the existing ATI NCLEX review materials. This included providing access to weekly reports on the degree to which the San Jose VN graduates were utilizing the ATI Virtual Review support. ATI Virtual Review Support is an ATI instructor facilitated on-line resource made available to all VN graduates and provides specific NCLEX-PN review content and strategies.
- The San Jose Career Services staff utilizes outreach activities. In January the San Jose Executive Director, NCLEX Review Instructor and Mr. Levy began a process for contacting prior VN graduates that did not sit for the test and notify the graduates of the NCLEX-PN Review Sessions were available at the campus.
- With the implementation of the ATI NCLEX-PN review system, each cohort of graduates is provided on campus in-person review sessions prior to the end of their final term. The graduates are then provided access to the ATI virtual NCLEX-PN review, which provides 6 weeks of on-line assistance with developing and following study plans.

Admission Process

Complete the following by June 1, 2015:

- Assess data from prior VN cohorts (2011-2014) to identify potential relationships between the existing admission processes and the final learner/graduate outcomes (academic success and passing NCLEX-PN).
 - Evaluate cohort admission and outcome data from the prior VN cohorts to identify if other factors identified at enrollment appear to impact student/graduate outcomes (examples may include prior GPA, applicant's life circumstances, etc.)
 - If assessment data indicates other factors at present at admission are likely to impact student/graduate outcomes (academic success/passing NCLEX-PN):
 - Develop recommendations for revisions to admission policy.
 - Submit recommendations for revisions to admission policies and processes to Carrington College Education Committee prior to scheduled June meeting.
 - Schedule any approved admission policy and process revisions for implementation prior to the December 2015 enrollment.

Curriculum and Instruction

Complete the following by August 30, 2015:

- Evaluate the degree to which faculty teaching practices and student-learning experiences reinforce the curriculum objectives across instruction provided in the didactic, lab and clinical settings.
 - Evaluate faculty practices related to integrating course objectives into course activities

- Review existing curriculum tools (syllabi, instructional plans, student assessment and NCLEX review materials) to determine degree of alignment with BVNPT approved VN curriculum

- Evaluate the learning resources and teaching practices related to each of the program objectives

- Evaluate student/graduate awareness of on-campus resources and computer-based resources that present content supporting program objectives.

- Evaluate information provided to students related to academic and clinical performance expectations.

- Obtain student/graduate feedback on their perceptions of the teaching and curriculum.

- Conduct meetings with all faculty and with individual faculty regarding practices that support attainment of program objectives
 - Provide faculty development programs to faculty as a group and to individual faculty members as indicated by evaluation data.
 - Evaluate faculty performance post-development program sessions and as part of end-of-term reviews.

- Evaluate methods used to assess students' attainment of curriculum objectives for relevancy, i.e., that methods reflect integration of course content and curriculum objectives (including testing materials and assignments/rubrics)
 - Evaluate the degree to which the curriculum delivery effectively aligns with the NCLEX-PN Blueprint.

- Summarize evaluation data and provide to faculty for review.

- Conduct sessions with all faculty to review VN program curriculum, including course objectives, all instructional materials, testing and evaluation methods, and the teaching standards.
- Implement “Pre-term Faculty Meetings” prior to each term to review course objectives and teaching expectations.

Remediation and NCLEX-PN Preparation

Complete the following by September 30, 2015:

- Assure that remediation processes are present and being utilized during each course (use individual student success contracts and planned assessments for each student requiring remediation)
- Establish process to conduct student progress reviews with faculty during each semester for each course being taught.
- Conduct meetings with students identified as at risk for not attaining academic goals.
- Collaborate with student, Student Success team, and faculty to implement remediation plans.
- Review existing processes and achieve consistent use of the ATI Comprehensive Assessment and Remediation Program (CARP) in each course (provides measure of students’ knowledge base as related to NCLEX-PN content areas).
- Evaluate the current faculty performance related to providing NCLEX-PN preparation and serving as content expert for remediation and NCLEX-PN review.
- Continue offering and providing NCLEX-PN review of content/concepts to former graduates and senior nursing students.
- Expand the newly developed outreach process for notifying former graduates (phone calls, emails, and mail) who have not taken the NCLEX-PN.
 - Monitor responses to the invitations for NCLEX-PN review sessions sent to potential testers regarding the NCLEX – PN review offerings.
 - Send follow-up to invitations until contact is made or potential tester declines or reports has made other arrangements.

- Assure students progressing into final term are provided personalized plan for areas of development and NCLEX-PN review prior to course start.
- Plan and support ATI on-site live reviews for all graduating students
- Assure each final term student and new graduate have information and access to virtual NCLEX-PN review resources.
- Evaluate the existing placement of the ATI materials throughout the curriculum (includes electronic materials offered to students through the ATI website).

Summary:

The San Jose VN Program implemented multiple steps in December 2014, prior to receiving the BVNPT request for information. The steps implemented in December and those presented in the San Jose Vocational Nursing NCLEX-PN Improvement Plan are expected to make a significant positive impact on the 2015-2016 NCLEX-PN pass rates.

Bi-monthly NCLEX Improvement Progress meetings will be conducted to assure that appropriate progress is made in completing each element of the NCLEX Improvement Plan. The VN Program Director, San Jose Academic Dean, and the Dean of Nursing will be facilitating the meetings. The bi-monthly Progress will be reported to the Carrington College Provost.

Carrington College San Jose is dedicated to the success of our vocational nursing students and we are committed to improving our pass rates to ensure our students success.

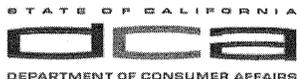
Thank you for your guidance, I look forward to sharing our NCLEX-PN pass rate improvement with you. Please contact me if you require further information.

Sincerely,



Dr. Bill Hutchison, RN, MSN, EdD
Carrington College – San Jose, Vocational Nursing Program Director
#408-960-0209
BHutchison@carrington.edu

Agenda Item #16.B.1., Attachment C



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



Board of Vocational Nursing and Psychiatric Technicians
2535 Capitol Oaks Drive Suite 205, Sacramento, CA 95833-2945
Phone 916-263-7800 Fax 916-263-7855 Web www.bvnpt.ca.gov

Certified Mail

August 6, 2015

B. Hutchison, Director
Vocational Nursing Program
Carrington College, San Jose
6201 San Ignacio Ave
San Jose, CA 95119

Subject: Notice of Complaint Received

Dear Dr. Hutchison,

On August 6, 2015, the Board of Vocational Nursing and Psychiatric Technicians (Board) received an anonymous complaint via a phone call to this consultant. Fearing reprisal, the complainant was very concerned regarding the need to remain anonymous.

According to the complainant, there are no clinical facilities for Maternity or Pediatric Nursing experiences and students who just completed Term 3 had no clinical experience in Maternity or Pediatric Nursing outside of the school. The complainant alleges that students are "very concerned" about the quality of education, the instructor turn-over, and the lack of communication between instructors who teach theory and instructors who teach clinical ("nobody knows what they are supposed to do"). Further, the complainant reported that "morale is very low."

With the allegation of no clinical facilities for Maternity or Pediatric Nursing available to students who are supposed to have completed clinical hours within the last week, this is of great concern to the Board and requires an **immediate response** from the program. Therefore, this letter is being sent both via certified mail and electronic mail.

With this letter, please find the following forms to complete and return, via email, to my attention **no later than close of business on Monday, August 10, 2015.**

- 1) Enrollment Data Table – please follow instructions on the form
- 2) Faculty and Facility Worksheets, listing only CURRENT faculty and facilities
- 3) Maternity and Pediatric Faculty/Student Clinical Assignment Forms – complete these for the class of students who are closest to graduation and are said to have just completed clinical hours. Carefully follow directions on the forms.

Be informed that if students did not have clinical experience in Maternity and Pediatric Nursing, an **accurate** *Record of Nursing Program* for the Licensure Application Packet

would reveal the lack of required experience and render the applicant ineligible for the licensing examination.

Please contact me should you have any questions.

Sincerely,

Donna G. Johnson

Donna G. Johnson, RNP, MS, MA

Nursing Education Consultant

donna.johnson@dca.ca.gov

916-263-7842



**CARRINGTON
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August 10, 2015

Dear Ms. Johnson,

This letter and attachments are in response to your communication dated August 6, 2015, requesting information to address a complaint which was submitted to the Board of Vocational Nursing and Psychiatric Technicians (BVNPT) based on a phone call from an anonymous complainant.

On April 3, 2015, the clinical affiliation agreement for Vocational Nursing between Carrington College San Jose and the Gardner Family Health Network was cancelled by the facility with little notice. In order to provide the 23 students who were beginning their Term 3 courses on April 20, 2015 with the Maternity and Pediatric clinical instruction that had been previously scheduled at Gardner Family Health Network, the San Jose faculty scheduled and provided those hours of instruction using simulation experiences in the campus nursing simulation lab. The clinical learning experiences in the simulation lab setting were provided according to the Maternity and Pediatric course objectives and organized in alignment with the syllabus.

In addition to the Gardner Family Health location, the San Jose Vocational Nursing program also had an affiliation agreement with a separate pediatric clinical site, Kiddie Academy. The 23 students did complete 16 hours of pediatric clinical experience at the Kiddie Academy. However, due to the loss of the Gardner Family Health Network affiliation the students did not complete 4 hours of pediatric experience that would have been provided at the Gardner Family Health Network.

During the course of the semester, the Vocational Nursing program attempted to find additional clinical sites and was unable to obtain an additional agreement. The issue of obtaining additional clinical placements was escalated at the campus and the Vocational Nursing program was assisted in recruiting for a full-time Clinical Coordinator. On June 29, 2015, Mr. Javelosa was hired to serve as the clinical coordinator and his application for approval to also serve as a faculty member (on a limited basis) has been submitted to the BVNPT.

We have continued to seek new affiliation agreements and as of August 10, have received confirmation from the following locations that they will consider establishing affiliation agreements to assure that the clinical learning experiences are provided for the 23 students who completed the program on August 10, 2015 and for the 19 students that are starting their final term and are scheduled to graduate in December 2015. (please see below)

Carrington College is committed to fulfilling its academic mission and providing clinical experiences that meet the academic expectations of the program. It is understood that Carrington must work in close partnership with the BVNPT to ensure that there is compliance around said clerkships. Carrington stands committed to working alongside the BVNPT with the recommendations provided to Carrington to ensure students receive a compliant and rigorous clinical experience.

Washington Township Medical Foundation
San Jose Regional Medical Center
Dr. Clementina Mania, Pediatrician South San Francisco
Mission Neighborhood Health Center
San Mateo Medical Center

Sincerely,



sQ ison, RN, MSN, EdD.
Director of VN Programs
Carrington College, San Jose
bhutchison@carrington.edu
#408-960-02029

Agenda Item #16.B.1., Attachment E.



CARRINGTON
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Dear Ms. Johnson,

On behalf of Carrington College, I would like to thank you for taking the time to speak with me today regarding the Vocational Nursing programs in California. As part of our ongoing dedication to high quality VN programs and student success, Carrington feels that the program in San Jose requires additional resources to ensure that it is not vulnerable. We also feel that the challenges the BVNPT has identified around loss of faculty and clinical sites, need more time to be adequately addressed for the long term success of the program.

As discussed on our call, I am writing to inform you that Carrington will be voluntarily suspending the enrollments in our vocational nursing program in San Jose until we have addressed, in partnership with the BVNPT, the challenges previously noted. Carrington intends to make leadership changes, increase the capacity of our clinical sites, increase the number of faculty within the programs and ultimately support the program with additional resources. As Provost I feel that with the BVNPT's ongoing support in conjunction with these changes, we can improve academic quality and NCLEX scores at San Jose.

As a commitment to our partnership, Carrington will keep you informed as to our progress.

Sincerely,

Danika Bowen

Agenda Item #16.B.1., Attachment F.



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

Board of Vocational Nursing and Psychiatric Technicians
2535 Capitol Oaks Drive Suite 205, Sacramento, CA 95833-2945
Phone 916-263-7800 Fax 916-263-7855 Web www.bvnpt.ca.gov



CERTIFIED MAIL

August 13, 2015

B. Hutchison, Director
Vocational Nursing Program
Carrington College, San Jose
6201 San Ignacio Ave
San Jose, CA 95119

Subject: Notice of Violation

Dear Dr. Hutchison,

On August 10, 2015, the Board of Vocational Nursing and Psychiatric Technicians (Board) received documentation from you, as requested, following a complaint to the Board regarding the Carrington College, San Jose, Vocational Nursing Program. The anonymous complaint was outlined in a letter to you on August 6, 2015.

The documentation identifies deficits in the Carrington College, San Jose, Vocational Nursing Program.

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.

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 units utilized for clinical experience."

Violation #1:

The program lacks adequate clinical facilities such that all students are afforded opportunities consistent with competency-based objectives and theory being taught and with correlation between theory and clinical content. No Maternity Nursing clinical facilities were available to the students and all clinical hours were conducted in the simulation laboratory. Further, the only Pediatric Nursing clinical facility listed in

the documentation provided by the program is one pre-school facility that does not provide care of sick children.

Required Action: Submit for Board approval clinical facility applications for maternity and pediatric nursing rotations. Following approval of additional clinical facility applications, submit, **prior to graduation of those students**, verifiable plans for clinical placements for maternity and pediatric nursing for students who were to have completed all hours on August 10, 2015. In addition, submit verifiable plans for clinical placements for maternity and pediatric nursing for current students, no later than **September 30, 2015**. The submitted plans for continuing students must be consistent with the Board-approved Instructional Plan and must ensure a correlation between theory and clinical content.

Section 2882 of the Vocational Nurse Practice Act 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 #2: The program failed to provide clinical experiences in care of sick children for the enrolled student population. The program failed to provide clinical experiences in Maternity nursing outside of the simulation laboratory.

Required Action: Submit for Board approval clinical facility applications for maternity and pediatric nursing rotations. Following approval of additional clinical facility applications, submit, **prior to graduation of those students**, verifiable plans for clinical placements for maternity and pediatric nursing for students who were to have completed all hours on August 10, 2015. In addition, submit verifiable plans for clinical placements for maternity and pediatric nursing for current students, no later than **September 30, 2015**. The submitted plans for continuing students must be consistent with the Board-approved Instructional Plan and must ensure a correlation between theory and clinical content.

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

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

Violation #3: Without clinical facilities providing experience in the care of sick children, there are no clinical experiences related to the care of sick children and, therefore, no clinical correlation with the sections of the Board-approved Instructional Plan that describe didactic content related to the care of sick children.

Required Action: Submit for Board approval clinical facility applications for pediatric nursing rotations. Following approval of additional clinical facility applications, submit, **prior to graduation of those students**, verifiable plans for clinical placements for maternity and pediatric nursing for students who were to have completed all hours on August 10, 2015. In addition, submit verifiable plans for clinical placements for maternity and pediatric nursing for current students, no later than **September 30, 2015**. The submitted plans for continuing students must be consistent with the Board-approved Instructional Plan and must ensure a correlation between theory and clinical content.

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 report the termination of approved faculty within the ten days prescribed by existing regulations. The faculty list submitted on August 10, 2015 does not include a total of nine (9) faculty who were listed on the 2013 – 2014 Annual Report or approved by the Board since that time. Board files contain documentation of notification of termination of only two (2) of those faculty members.

Required Action: Submit a written policy and plan that ensures notification of the Board within 10 days of faculty termination. **Due no later than September 30, 2015**

Please contact me should you have any questions.

Sincerely,
Donna G. Johnson
Donna G. Johnson, RNP, MS, MA
Nursing Education Consultant
donna.johnson@dca.ca.gov
916-263-7842

Agenda Item #16.B.1., Attachment G.



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

Board of Vocational Nursing and Psychiatric Technicians
2535 Capitol Oaks Drive Suite 205, Sacramento, CA 95833-2945
Phone 916-263-7800 Fax 916-263-7855 Web www.bvnpt.ca.gov



August 13, 2015

B. Hutchison, Director
Vocational Nursing Program
Carrington College, San Jose
6201 San Ignacio Ave
San Jose, CA 95119

Subject: Consideration of Violations

Dear Dr. Hutchison,

On August 13, 2015, the Acting Executive Officer rendered the following decisions for the Carrington College, San Jose, Vocational Nursing Program.

Recommendations:

1. Require the Carrington College, San Jose, Vocational Nursing Program to submit verifiable plans for clinical placements for Maternity and Pediatric Nursing for students who were to have completed program requirements on August 10, 2015 **prior to graduation.**
2. Require the program to submit verifiable plans for clinical placements for Maternity and Pediatric Nursing for currently enrolled students, no later than **September 30, 2015.**
3. Require the program to submit a written policy and plan that ensures notification to this Board within 10 days of faculty termination. Due no later than **September 30, 2015.**
4. Effective immediately, rescind approval for ongoing admissions and require the program to obtain Board approval prior to the admission of any students. The program must document adequacy of faculty and facilities to support the objectives of the program prior to the admission of students.
5. Place the program on the Board's November 2015 agenda for consideration of placement on provisional approval.

Rationale

A complaint regarding the program has led to the identification of critical violations of the Vocational Nursing Rules and Regulations and the Vocational Nurse Practice Act, as noted, above. Currently,

the program lacks adequate clinical facilities for the current enrollment. Administrative officials of the College voluntarily suspended Vocational Nursing Program admissions at the San Jose campus until deficits are corrected.

In addition, the program now has six (6) consecutive quarters of non-compliant pass rates on the licensure examination. Documentation of implementation of the improvement plan is pending.

Given the as yet uncorrected violations and the six (6) consecutive quarters of non-compliant pass rates, it is reasonable to rescind ongoing admissions and require the program to document the adequacy of resources to support the students and the objectives of the program prior to the admission of more students. It is also reasonable to place the program on the November 2015 agenda for consideration of provisional approval.

As your Nursing Education Consultant, I look forward to working with you. In the very near future I will forward materials to you regarding requesting approval to admit students and submission of documentation prior to presentation to the Board at the November meeting.

Please contact me should you have any questions.

Sincerely,

Donna G. Johnson

Donna G. Johnson, RNP, MS, MA

Nursing Education Consultant

donna.johnson@dca.ca.gov

916-263-7842

Agenda Item#16.B.1., Attachment H.

August 28, 2015

Donna Johnson, RNP, MS, MA
Nursing Education Consultant
Board of Vocational Nursing & Psychiatric Technicians
2535 Capitol Oaks Drive, Suite 205
Sacramento, CA 95833

Dear Ms. Johnson:

Please accept the following Status Report regarding the Carrington College San Jose campus Vocational Nursing NCLEX-PN Improvement Plan. This Status Report is in response to the BVNPT letter dated August 3, 2015 instructing the San Jose Vocational Nursing (VN) program to submit documentation verifying implementation of the previously described improvement plan.

The Carrington College San Jose campus VN program submitted its original NCLEX-PN Improvement Plan on March 26, 2015.

San Jose Vocational Nursing NCLEX-PN Improvement Plan Status Report

- In January 2015 the San Jose campus Executive Director transferred one part-time nursing faculty member to a full-time instructor position and released her from a portion of her teaching load in order to focus the release time exclusively on providing NCLEX-PN to existing and former San Jose VN students. This faculty member continues to provide support to the current and former students.
- As of August 10, 2015 the San Jose faculty members have conducted biweekly review sessions at the campus. The attendees have included prior San Jose VN graduates and students that are currently enrolled in the VN Program. Sessions have been provided during the week at the campus as well as on weekends to increase the options for participants.
- Former and current students have participated in 35 campus-based sessions. Each session has included content areas relevant to preparation for the NCLEX-PN (types of test questions and recommendations for study activities). Information listed on the NCLEX Campus Session Summary (see attachment A).
- Individual coaching sessions have also been provided to students and former students. These sessions have been provided based on the individual learning needs of the student/former student.
- The San Jose Career Services staff continues to perform outreach activities (calls, e-mails, on-campus sessions) to promote participation in NCLEX review activities. The staff also monitor the former students' participation in the ATI virtual NCLEX review sessions and regularly (usually weekly) make contact with the former students to encourage participation in the ATI sessions. The Career Services team also are identifying if former students require additional support to invest time for NCLEX preparation.

- At the conclusion of each term, the San Jose campus has hosted ATI 3 day Live Review sessions to students completing Term 3 (graduating students).
 - 20 of the spring 2015 cohort students attended the March 30-April 1, 2015 ATI Live Review.
 - 23 of the summer 2015 cohort students attended the July 27-29, 2015 ATI Live Review.
- All review sessions and materials have been provided at no cost to the participants.
- Members of the VN faculty have completed initial orientation to the existing ATI NCLEX review materials.
- Former students continue to receive access to ATI Virtual Review support (an ATI instructor facilitated on-line resource made available to all VN graduates) provides specific NCLEX-PN review content and strategies. The support is provided for 6 weeks and can be extended if needed.

Admission Process

~~Review of the Admission process for the Carrington College San Jose VN program did not result in recommendations to revise the Admissions policy at this time. The San Jose VN program has established a process that identifies and admits students based on their academic and other qualifications that are consistent with successful completion of the program.~~

As part of the Carrington College internal academic review processes, the nursing education programs will complete a comprehensive review of all academic policies prior to November 1, 2015 and submit recommendations to the College Education Committee for review of proposed changes.

Based on the comprehensive nursing program review, any proposed academic policy changes for the Vocational Nursing program will also be submitted to the BVNPT for review prior to changes.

Curriculum and Instruction

Since April 2015, evaluations of the existing faculty identified opportunities to increase the level of consistency with which the faculty are integrating the specific course objectives into course activities. Meetings have been conducted with faculty regarding the resources available to students and former graduates for preparation for NCLEX-PN.

The San Jose campus nursing faculty members have been provided access to the faculty development resources available through Carrington College's subscription to the "Nurse Tim" programs. The NurseTim materials provide multiple web-based resources including training for faculty specific to evaluation of student learning and preparation for NCLEX.

Review of the curriculum and instructional tools was completed and it was identified that the existing BVNPT approved curriculum implemented after May, 2013 has several areas that faculty and students have identified as areas for improvement:

- The amount of content currently included in Term 2 is being delivered in a time frame that is challenging for the students in terms of the amount and complexity of the material.
- Feedback from students and faculty support that reorganizing the Term 2 course content will provide more time for instruction and reinforcement of application of new knowledge.
- Materials used by faculty in providing instruction align with the curriculum
- Opportunities were identified to assure that faculty members are presenting instruction in the classroom, skills lab and clinical settings in a manner that aligns with the curriculum. This is being addressed in faculty development activities and will be re-evaluated prior to November 16, 2015.

The existing Carrington College VN program curriculum is also being delivered at the Sacramento and Pleasant Hill campuses. The VN program directors and Dean for nursing met to review recommendations about the curriculum. A plan has been developed to have the entire Carrington College VN faculty and Program Directors participate in preparing a curriculum revision proposal for presentation to the BVNPT prior to March 31, 2016.

- Proposed curriculum revision will address the following:
 - Information provided to students related to academic and clinical performance expectations.
 - Methods used to assess students' attainment of curriculum objectives for relevancy, i.e., that methods reflect integration of course content and curriculum objectives (including testing materials and assignments/rubrics).

Remediation and NCLEX-PN Preparation

These actions are currently being conducted:

- Use of remediation processes during each course (developing individual student success contracts and planned assessments for each student requiring remediation)
- Faculty conducting student progress reviews during each semester for each course being taught.
- Meetings with students identified as at risk for not attaining academic goals.
- Meetings with students, Student Success team, and faculty to implement remediation plans.

The evaluation of the current faculty performance related to providing NCLEX-PN preparation and serving as content expert for remediation and NCLEX-PN review will be completed no later than October 30, 2015.

Summary:

Since the March 26, 2015 submission of the San Jose Vocational NCLEX Improvement Plan, multiple meetings have been held regarding the Improvement Plan interventions including increasing the use of the ATI resources and the implementation of the HESI evaluation resources.

The recent change in the VN Program Director position (the departure of Dr. Hutchison on August 7, 2015) has not interrupted the activity being conducted at the campus and the Carrington College Dean for Nursing, Dr. Burke, the San Jose Dean, Ms. Gear, and the San Jose Executive Director, Mr. Holland and I will meet prior to September 11, 2015 to review the Improvement Plan activities.

Effective as of September 18, 2015 the San Jose VN program will be implementing the NCLEX Improvement activities that have been implemented at the Carrington College Pleasant Hill VN program. These activities will provide the following:

- Delivery of NCLEX review content (developed at Pleasant Hill) to the San Jose students that completed the VN program on August 7, 2015 (delivery to be provided during the NCLEX Review Sessions held at the campus and with individual students as appropriate for their learning needs and schedules).
-
- Delivery of the NCLEX review content (developed at Pleasant Hill) to the San Jose students currently in their Term 3 and expected to graduate in December 2015. The Term 3 students will be provided the content during the final 6-7 weeks of the term.

Carrington College San Jose is dedicated to the success of our Vocational Nursing students and we are committed to improving our pass rates to ensure our students' success.

Thank you for your guidance. Please contact me if you require further information.

Sincerely,



Felix Levy, MSN
Carrington College San Jose
Vocational Nursing Program Director

Attachment A

San Jose NCLEX Campus Session Summary

January 2015 – August 2015

- San Jose campus Vocational Nursing faculty and staff have provided bi-weekly NCLEX Review sessions at the campus.
- Former and current students have participated in 35 sessions.

August 2014 cohort:

- These graduates had been out of the VN program 5 months when the review sessions were implemented.
- Seven graduates have been identified as having passed NCLEX on their first attempt.
 - Two graduates had used the San Jose NCLEX resources.
 - Five graduates had not used the San Jose NCLEX resources.

- Three graduates have been identified as having failed NCLEX on their first attempt
 - None of these graduates had used San Jose NCLEX resources.

December 2014 cohort

- Ten graduates have been identified as having passed NCLEX on their first attempt.
 - Eight graduates had used the San Jose NCLEX resources (attended sessions, used Saunders and ATI coaching).
 - Two graduates had not used San Jose NCLEX resources.

April 2015 cohort:

- Six graduates have been identified as having passed NCLEX on their first attempt
 - Four graduates had used the San Jose NCLEX resources (attended sessions and used the Saunders NCLEX Review Manual).
 - One graduate did not attend the NCLEX review sessions but did use the Saunders NCLEX Review Manual.
 - One graduate did not use the San Jose NCLEX resources.

August 2015 cohort:

- All graduates are being provided access to all of the existing NCLEX resources and will also receive NCLEX review materials that have been prepared and implemented at the Pleasant Hill VN Program. The Pleasant Hill VN program has achieved improved NCLEX pass rates for 2 consecutive quarters.



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September 30, 2015

Donna Johnson
Nursing Education Consultant
Board of Vocational Nursing & Psychiatric Technicians
2535 Capitol Oaks Drive, Suite 205
Sacramento, CA 95833

Dear Ms. Johnson,

Please accept this correspondence as the formal response to the letter dated August 13, 2015 titled Notice of Violations. The Notice of Violation stated deficits had been identified in the Carrington College San Jose Vocational Nursing Program.

Violation #1:

The program lacks adequate clinical facilities such that all students are afforded opportunities consistent with competency-based objectives and theory being taught and with correlation between theory and clinical content. No Maternity Nursing clinical facilities were available to the students and all clinical hours were conducted in the simulation laboratory. Further, the only Pediatric Nursing clinical facility listed in the documentation provided by the program is one pre-school facility that does not provide care of sick children.

Response:

Affiliation agreements were obtained with San Jose Regional and the pediatric practice of Dr. Clementina Manio were obtained to provide appropriate settings to meet the clinical facility requirements for August 10, 2015 students. The August 10, 2015 student cohort will complete all required clinical rotations by October 2, 2015 and currently enrolled Term 3 cohort will completed their clinical requirements by December 4, 2015.

- The BVNPT approved facility applications are attached
- Verifiable plans (Faculty Student Clinical Assignments) for clinical placements for maternity and pediatrics for August 10, 2015 attached
- Verifiable plans (Faculty Student Clinical Assignments) for clinical placements for maternity and pediatrics for December 2, 2015 attached

The schedule was created without conflict of the two cohorts of students using two pediatric clinical

sites to offset the schedule. One of the two pediatric sites met the required sick child requirements also listed in the violation.

Additional clinical rotation schedules are attached for the proposed student start beginning January 4, 2016. There are no scheduling conflicts for any current or proposed student clinical rotations for the approved Facilities and Faculty all previously approved by the BVNPT.

Violation #2:

The program failed to provide clinical experiences in care of sick children for the enrolled student population. The program failed to provide clinical experiences in Maternity nursing outside of the simulation laboratory.

Response:

On August 25, 2015 the BVNPT approved the use of Dr. Clementina Manio's pediatric physician practice setting as a facility appropriate for providing the clinical education experiences aligning with the sick child component of the didactic curriculum. The instruction provided during the clinical experiences were consistent with the above mentioned Instructional Plans, specific to sick child learning experiences.

On August 25, 2015 the BVNPT approved the use of San Jose regional Medical Center as a facility appropriate for providing the clinical education experiences aligning with the maternity component of the didactic curriculum. The instruction provided during the clinical experiences were consistent with the above mentioned Instructional Plans, specific to maternity and obstetrics learning experiences.

San Jose Regional Medical center continues to support all current students for maternity and sick child rotations, as well as the other approved sites.

Violation #3:

Without clinical facilities providing experience in the care of sick children, there are no clinical experiences related to the care of sick children and, therefore, no clinical correlation with the sections of the Board-approved Instructional Plan that describe didactic content related to the care of sick children.

Response:

Affiliation agreements were obtained with Dr. Clementina Manio's pediatric physician practice. Faculty facilitated a clinical experience with the Board approved Instructional Plans that including but not limited to the assessment of sick child, sick newborns, vision and hearing tests, immunizations, in alignment with clinical learning objectives and approved instructional plans. Students maintained documentation of their clinical experience, as well as faculty completing student assessments of all student learning outcomes.

Violation #4:

The program failed to report the termination of approved faculty within the ten days prescribed by existing regulations. The faculty list submitted on August 10, 2015 does not include a total of nine

(9) faculty who were listed on the 2013 – 2014 Annual Report or approved by the Board since that time. Board files contain documentation of notification of termination of only two (2) of those faculty members.

Response:

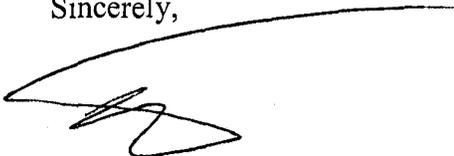
All changes in faculty employment (resignation or termination for any reason) shall be communicated in writing no less than 10 days and submitted in compliance with the applicable regulatory requirements. Notification will be submitted in accordance with specific regulatory agency forms, where applicable.

The Carrington College Vocational Nursing (VN) Programs Directors will be responsible for submitting written documentation to the Board of Vocational Nursing & Psychiatric Technicians (BVNPT) for changes in faculty employment related to the Carrington College VN programs. In the event of a VN Program Director change in employment, the Carrington College Dean of Nursing will be responsible for submitting appropriate written notification to the BVNPT within 10 days of the change.

As of September 28, 2015, 18 out of the 23 students that originally were expected to complete the Vocational Nursing program on August 6, 2015 have completed all clinical rotation requirements addressing violations 1, 2 and 3. The remaining 5 students will complete the Maternity clinical rotation on October 2, 2015.

I appreciate the opportunity to respond to the about violations. Carrington College-San Jose has worked hard to correct and prevent any further issues regarding the above matter. Please don't hesitate to contact me if you have any questions (408) 960-0164 or via email at flevy@carrington.edu.

Sincerely,



Felix Levy
Vocational Nursing Program Director
Carrington College-San Jose CA



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October 2, 2015

Donna Johnson
Nursing Education Consultant
Board of Vocational Nursing & Psychiatric Technicians
2535 Capitol Oaks Drive, Suite 205
Sacramento, CA 95833

Dear Ms. Johnson,

The Carrington College San Jose campus Vocational Nursing program is submitting a clarification of the pediatric and maternity experiences provided to the 23 students that had been scheduled to complete the program in August 2015 and had been identified as requiring further clinical experiences in order to assure compliance with the required clinical education related to pediatrics and maternity.

The 2 facilities, San Jose Regional Medical Center and Dr. Manio's pediatric practice, were utilized starting in August. Each of the 23 students participated in the care delivered to sick children that was provided at Dr. Manio's location including bone fractures (clavicle), viral infection, asthma, spider bite, evaluation of eating disorder (bulimia), and allergies.

In addition, the students participated in the physician's health assessments for children regarding the following:

- Required immunizations per age group—Dr. Manio discussed the rationale and effects of immunizations and the necessity of vaccinations, including required travel vaccinations
- Physical changes common to common newborn illnesses; dehydration, ear infections, diarrhea, etc.
- School age related issues related to sports injuries, falls, playground accidents, asthma
- Adolescent health issues including altered body image, eating disorders (anorexia, obesity, and bulimia) etc.
- Young adult health issues, including pregnancy, sexually transmitted diseases, asthma, and allergies

During the clinical experiences, the physician described and discussed medications and treatments specific for the pediatric diagnoses. Each student was provided the opportunity to complete a head to toe assessment on a specific patient that was being treated at the practice site.

Throughout the clinical experience hours at San Jose Regional Medical Center, these students participated in the care of maternity patients and were also able to participate in select experiences

with hospitalized pediatric patients. The clinical experiences were consistent with the course objectives. Of the 23 students, 5 are completing their final required hours today, October 2, at the San Jose Regional Medical Center.

Attached with this description of the clinical activities are the Faculty Student Clinical Assignments for the students.

Thank you for your assistance and attention in this matter. Should you have any questions or require further information, please feel free to contact me at (408) 960-0164 or at flevy@carrington.edu.

Sincerely,

A handwritten signature in black ink, appearing to read 'Felix Levy', with a long horizontal flourish extending to the right.

Felix Levy
Vocational Nursing Program
Carrington College-San Jose



Board of Vocational Nursing and Psychiatric Technicians
2535 Capitol Oaks Drive Suite 205, Sacramento, CA 95833-2945
Phone 916-263-7800 Fax 916-263-7855 Web www.bvnpt.ca.gov

CERTIFIED MAIL

November X, 2015

Janice Montgomery, Director
Vocational Nursing Program
Carrington College, San Jose
6201 San Ignacio Avenue
San Jose, CA 95119

Subject: Notice of Change in Approval Status

Dear Ms. Montgomery:

Pursuant to the action of the Board of Vocational Nursing and Psychiatric Technicians (Board) on November 20, 2015, the Carrington College, San Jose, Vocational Nursing Program has been placed on provisional approval for the two – year period from November 20, 2015 through November 30, 2017.

The purpose of this letter is to explain the areas of noncompliance identified and the corrections required of your program to avoid losing approval completely.

Once you have reviewed this letter, please sign and return the enclosed "Acknowledgement of Change in Approval Status" form by **Friday, December 18, 2015.**

AREAS OF NON-COMPLIANCE (VIOLATIONS(S))

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

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

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

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

The program pass rates for the Carrington College, San Jose, Vocational Nursing Program for the past 19 quarters are set forth in the following table:

NCLEX-PN® Licensure Examination Pass Rates			
Quarter	State Average Annual Pass Rate	Program Average Annual Pass Rate	Variance from State Average Annual Pass Rate
Jan – Mar 2011	77%	73%	-4
Apr – Jun 2011	76%	69%	-7
Jul – Sep 2011	76%	64%	-12
Oct – Dec 2011	75%	60%	-15
Jan – Mar 2012	74%	63%	-11
Apr – Jun 2012	74%	63%	-11
Jul – Sep 2012	74%	63%	-11
Oct – Dec 2012	74%	65%	-9
Jan – Mar 2013	73%	64%	-9
Apr – Jun 2013	73%	70%	-3
Jul – Sep 2013	74%	76%	+2
Oct – Dec 2013	76%	75%	-1
Jan – Mar 2014	76%	65%	-11
Apr – Jun 2014	73%	53%	-20
Jul – Sep 2014	73%	49%	-24
Oct – Dec 2014	72%	52%	-20
Jan – Mar 2015	71%	52%	-19
Apr – Jun 2015	72%	53%	-19
Jul – Sep 2015			

REQUIRED CORRECTION(S)

1. Require the Carrington College, San Jose, Vocational Nursing Program to provide no less than one (1) instructor for every ten (10) students in clinical experiences.
2. Require the program to admit no additional classes 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 **January 15, 2016**.
4. Require the program to a submit follow up reports in nine (9) months, but no later than **August 1, 2016**, and 21 months, but no later than **August 1, 2017**. The reports must include a comprehensive analysis of the program, specific actions taken to improve 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
5. Require the program to bring its average annual pass rate to no more than (10) ten percentage points below the State average annual pass rate.
 6. 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.
 7. Require the program to comply with all approval standards in Article 4 of the Vocational Nursing Practice Act, commencing at Business and Professions Code Section 2880, and Article 5 of the Board's Regulations, commencing at California Code of Regulations, Title 16, Section 2526.
 8. Failure to take any of these corrective actions may cause the full Board to revoke the program's approval.

FUTURE BOARD ACTION

Your program will be placed on the **November 2017** Board Meeting agenda, at which point the Board may revoke or extend the program's approval. If you have additional information that you wish considered beyond the required corrections listed on pages 2 and 3, you must submit this documentation by the fifteenth day of the second month prior to the Board Meeting.

OTHER IMPORTANT INFORMATION

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

Carrington College, San Jose
Vocational Nursing Program
Notice of Change in Approval Status
November X, 2015
Page 4 of 4

as follows: **Approval by the full Board is required prior to the admission of additional students.**

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

The program may not advertise that it has full approval, and should take steps to correct any ongoing advertisements or publications in that regard.

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

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

Sincerely,

JOHN BROOKS
Acting Executive Officer

Enclosures

cc: Board Members

JB: dgj