

Agenda Item #12.B.2.



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

BOARD OF VOCATIONAL NURSING & PSYCHIATRIC TECHNICIANS

2535 Capitol Oaks Drive, Suite 205, Sacramento, CA 95833-2945

Phone (916) 263-7800 Fax (916) 263-7855 Web www.bvnpt.ca.gov



COVER SHEET

SUBJECT: Casa Loma College, Van Nuys, Vocational Nursing Program – Consideration of Placement on Provisional Approval; Consideration of Request for Approval to Admit Students (Director: Brenda Beall, Van Nuys, Los Angeles County - Private)

The Casa Loma College, Van Nuys, Vocational Nursing Program is presented for consideration of placement on provisional approval. A limited term of provisional approval is recommended. Additionally, the program has requested approval to admit students. Denial of that request is recommended.

Recommendations:

1. Place the Casa Loma College, Van Nuys, Vocational Nursing Program on provisional approval for the three (3) month period from May 13, 2016 through August 31, 2016, 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 H)
2. Place the program on the Board's **August 2016** agenda for reconsideration of provisional approval.
3. **Deny** the program's request for approval to admit one (1) class of 30 students to begin July 11, 2016, graduating July 13, 2017.
4. Require the program to provide no less than one (1) instructor for every ten (10) students in clinical experiences.
5. Require the program to admit no additional classes without prior approval by the full Board.
6. 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, 2016**.
7. Require the program to submit the following, no later than **June 15, 2016**.
 - a. Revised Curriculum Objectives
 - b. A copy of the Board-approved Instructional Plan
 - c. Proposed methodology and timeline for evaluation of the curriculum

- d. A proposed policy for admission, selection, and screening of applicants to the program and steps to ensure consistent implementation of the policy
 - e. Plan for provision of resources to meet the objectives of the program
 - f. Allocation of Teacher Assistant hours and responsibilities in the program
 - g. Documentation that all faculty have access to the Board-approved Instructional Plan
 - h. Proposed policy for attendance and appropriate make-up and plan for consistent implementation of the policy
 - i. Proposed policy for evaluation of student progress and determination of the need for remediation or termination from the program
 - j. Documentation of posting of clinical objectives on patient care units utilized for clinical experience
 - k. Plan and timeline for correlating theory in clinical practice experiences
 - l. Plan for improvement of NCLEX-PN® pass rates
8. Submit clinical placement plans for all enrolled students throughout their program of study using the provided Faculty/Student Clinical Assignment Form, the Maternity Faculty/Student Clinical Assignment Form, and the Pediatric Faculty/Student Clinical Assignment Forms and completing them as instructed, **no later than June 15, 2016.**
9. Require the program to submit a comprehensive analysis of the program, specific actions taken to improve pass rates, timeline for implementation, and the effect of employed interventions. The report is due **no later than June 15, 2016.** 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
10. 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.
11. 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.

12. 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.
13. Failure to take any of these corrective actions may cause the full Board to revoke the program's approval.

Agenda Item #12.B.2.



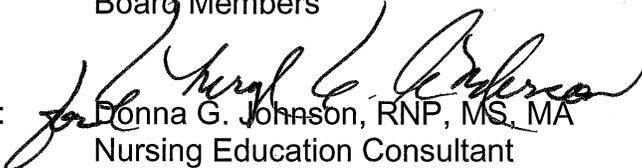
BUSINESS, CONSUMER SERVICES, AND HOUSING AGENCY • GOVERNOR EDMUND G. BROWN JR.

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



DATE: April 29, 2016

TO: Board Members

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

SUBJECT: Casa Loma College, Van Nuys, Vocational Nursing Program – Consideration of Placement on Provisional Approval; Consideration of Request for Approval to Admit Students (Director: Brenda Beall, Van Nuys, Los Angeles County - Private)

The Casa Loma College, Van Nuys, Vocational Nursing Program is presented for consideration of placement on provisional approval. A limited term of provisional approval is recommended. Additionally, the program has requested approval to admit students. Denial of that request is recommended.

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 February 17, 2016, when considering a report regarding an unannounced program inspection that identified a total of **11 violations**, and noting **four (4) consecutive quarters** of noncompliance with regulatory requirements related to licensure pass rates, the Acting Executive Officer referred the program to the Board for consideration of placement on provisional approval.

After the March 15, 2016 deadline, the program requested approval to admit one (1) class of 30 students to begin July 11, 2016, graduating July 13, 2017.

History of Prior Board Actions

(See Attachment A, History of Prior Board Actions)

Enrollment

The Casa Loma College, Van Nuys, Vocational Nursing Program **was** approved for the ongoing admission of 30 students per class five (5) times per year for its 54-week full-time day course of instruction and one (1) full – time evening class of 20 students admitted once per year. As of February 17, 2016, the program must obtain Board approval prior to admitting students. The pattern of admissions for current classes is seen in the enrollment table below.

The following table represents **current and projected** student enrollment based on current and projected class starts and completions. The table indicates a **maximum enrollment of 116 students** for the period **January 2013 through July 2016**. Currently, approximately 70 students are in three (3) classes.

ENROLLMENT DATA				
CLASS DATES		#Students Admitted	#Students Current or Completed	Total Enrolled
Start	Complete			
1/13 FT/Day		18	16	16
4/13 FT/Day		26	15	16 + 15 = 31
7/13 FT/Day		30	20	31 + 20 = 51
9/13 FT/Day		30	26	51 + 26 = 77
12/13 FT/Day		18	15	77 + 15 = 92
1/14 FT/Day		15	13	92 + 13 = 105
	1/14 (1/13 Class)		-16	105 – 16 = 89
4/14 FT/Day		30	20	89 + 20 = 109
	4/14 (4/13 Class)		-15	109 – 15 = 94
7/14 FT/Day		29	13	94 + 13 = 107
	7/14 (7/13 Class)		-20	107 – 20 = 87
9/14 FT/Day		30	13	87 + 13 = 100
	10/14 (9/13 Class)		-26	100 – 26 = 74

ENROLLMENT DATA				
CLASS DATES		#Students Admitted	#Students Current or Completed	Total Enrolled
Start	Complete			
12/14 FT/Day		20	13	$74 + 13 = 87$
	12/14 (12/13 Class)		-15	$87 - 15 = 72$
1/15 FT/Day		15	8	$72 + 8 = 80$
	2/15 (1/14 Class)		-13	$80 - 13 = 67$
4/15 FT/Eve		12	7	$67 + 7 = 74$
	4/15 (4/14 Class)		-20	$74 - 20 = 54$
4/15 FT/Day		20	24	$54 + 24 = 78$
7/15 FT/Day		24	27	$78 + 27 = 105$
	7/15 (7/14 Class)		-13	$105 - 13 = 92$
9/15 FT/Day	9/16	25	24	$92 + 24 = 116$
	10/15 (9/14 Class)		-13	$116 - 13 = 103$
	12/15 (12/14 Class)		-13	$103 - 13 = 90$
1/16 FT/Day	1/17	22	19	$90 + 19 = 109$
	1/16 (1/15 Class)		-8	$109 - 8 = 101$
	4/16 (4/15 Eve Class)		-7	$101 - 7 = 94$
	4/16 (4/15 Day Class)		-24	$94 - 24 = 70$
7/16/FT Day (Proposed)	7/17	30		$70 + 30 = 100$
	7/16 (7/15 Class)		-27	$100 - 27 = 73$

Licensing Examination Statistics

The following statistics, furnished by Pearson VUE, and published by the National Council of State Boards of Nursing as "Jurisdictional Summary of All First-Time Candidates Educated in Member Board Jurisdiction," for the period July 2012 through March 2016, specify the pass percentage rates for graduates of Casa Loma College, Van Nuys, 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 (I)]	Variance from State Average Annual Pass Rate
Jan – Mar 2012	13	8	61%	77%	69%	74%	-5
Apr – Jun 2012	18	9	50%	72%	62%	74%	-17
Jul – Sep 2012	47	25	53%	74%	56%	74%	-18
Oct – Dec 2012	18	12	67%	70%	56%	74%	-18
Jan – Mar 2013	18	14	78%	75%	60%	73%	-13
Apr – Jun 2013	20	14	70%	78%	63%	73%	-10
Jul – Sep 2013	25	19	76%	75%	73%	74%	-1
Oct – Dec 2013	23	20	87%	76%	78%	76%	+2
Jan – Mar 2014	19	16	84%	74%	79%	76%	+3
Apr – Jun 2014	23	13	57%	66%	76%	73%	+3
Jul – Sep 2014	17	13	76%	72%	76%	73%	+3
Oct – Dec 2014	14	6	43%	72%	66%	72%	-6
Jan – Mar 2015	14	8	57%	73%	59%	71%	-12
Apr – Jun 2015	21	7	33%	69%	52%	72%	-20
Jul – Sep 2015	29	12	41%	73%	42%	72%	-30
Oct – Dec 2015	15	9	60%	75%	46%	72%	-26
Jan – Mar 2016	10	2	20%	73%	40%	73%	-33

*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(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.”

Based on the most recent data available (January through March 2016), the program’s average annual pass rate is **40%**. The California average annual pass rate for graduates from approved vocational nursing programs who took the NCLEX-PN® for the first time during the same period is 73%. The pass rate for the Casa Loma College, Van Nuys, Vocational Nursing Program is **33** percentage points **below** the state average annual pass rate. The program’s average annual pass rate has been greater than ten (10) percentage points **below** the state average annual pass rate for the **past five (5) 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 totals 24, including the director. The director reports approximately 70 to 80% administrative responsibility. The program lists two (2) Teacher Assistants. A total of 24 instructors, including the director, are approved for clinical instruction. The list includes instructors currently on substitute status.

For a maximum enrollment of **116** students, eight (8) instructors are needed. Therefore, the total number of faculty is **adequate** for the current and proposed enrollment.

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

“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.”

At present, it **cannot be verified** that the program has adequate clinical facilities to afford the number, type, and variety of patients that will provide clinical experience consistent with competency-based objectives and theory for current and proposed enrollment. The program failed to provide complete information as required.

Other Considerations

The Casa Loma College, Van Nuys, Vocational Nursing Program was placed on provisional accreditation in September 2002 and then granted full accreditation in September 2004.

The program's last approval for a four (4) year period (from September 9, 2012 through September 8, 2016) was granted on October 4, 2012. At that time, the Board approved the program's request to discontinue the part-time evening class as the program reported that the part – time evening class was not conducive to the success of the students. A major curriculum revision was approved and the program's revised request for ongoing admissions was approved. Also on that date, the program's curriculum revision was approved. The new curriculum added 103 theory hours and 22 clinical hours. The program described a need for more time for students to learn and understand content and to integrate ATI throughout the curriculum.

On May 6, 2014, the Board received communication from the program director regarding the intention to request approval for a full – time evening class.

On February 13, 2015, the Board received a letter from the program identifying root causes of the decrease in licensing examination pass rates and outlining improvement plans being implemented to address the concern. The letter described an increase in admission requirements, the addition of HESI® practice and proctored exams throughout the curriculum, increased tutoring and remediation offered to students, and free, mandatory, live NCLEX® review at the end of the program. According to documentation provided by the program, the overall admission requirements went from a grade equivalent of 9.7 in August 2012 to a grade equivalent of 10.9 as of March 2015.

On April 1, 2015, the Executive Officer approved the program's request to admit one (1) class per year to the evening program.

In May 2015, a telephone consultation with the program director was facilitated to discuss falling pass rates. Based upon the director's descriptions, the consultant recommended that the program closely examine the curriculum, admissions/screening criteria, the remediation process, and strengthen critical thinking and faculty development.

On June 19, 2015, the Board approved a new program director.

In August 2015, the assigned consultant initiated a telephone consultation with the program director regarding further decline in the program's average annual pass rates. The director described making changes in faculty assignments and identified the following areas of focus to improve pass rates:

- Improving faculty development and mentoring;
- More use of HESI® including better integration into curriculum. It is now integrated starting with level 2 and students will have more accountability; and
- Enhancing NCLEX® review.

At that time, the director described some resistance to increasing admission criteria and the director identified the need to revise the curriculum but did not provide a specific plan or timeline.

On September 16, 2015, a *Notice of Violation* was forwarded to the program. The violation identified was failure to notify the Board of faculty terminations within ten (10) days, as prescribed by section 2527(b) of the Vocational Nursing Rules and Regulations. The program responded with a written plan regarding timely notification of faculty termination. Since that time, faculty notifications have been provided promptly. **Between June 2015 and March 22, 2016, a total of 18 faculty have been terminated from the program.**

With four (4) consecutive quarters of licensing examination pass rates substantially greater than ten (10) points **below** the state average annual pass rate, an unannounced program inspection was scheduled for February 3 and 4, 2016. As will be described, below, a total of 11 violations were identified during the inspection. A 12th violation, related to noncompliant pass rates, is also listed.

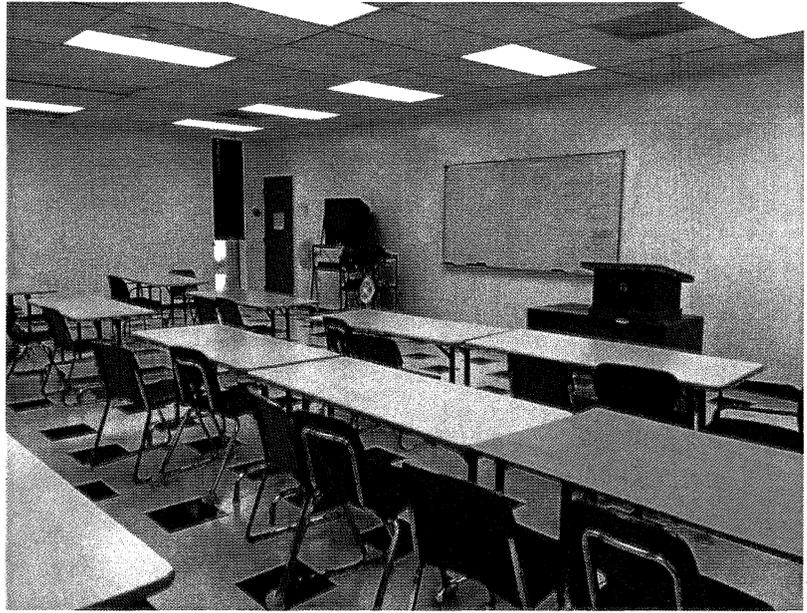
Program Inspection

On February 3 and 4, 2016, two (2) Board representatives conducted an unannounced program inspection. During the two (2) day inspection, physical resources were assessed; students were interviewed in classrooms and two clinical sites; faculty, director, and other program representatives were interviewed; and program records and student files were inspected. School and program staff facilitated the inspection process. The campus is located in a clean, modern, and well-appointed building.

An assessment of program resources is as follows.

Classroom Space:

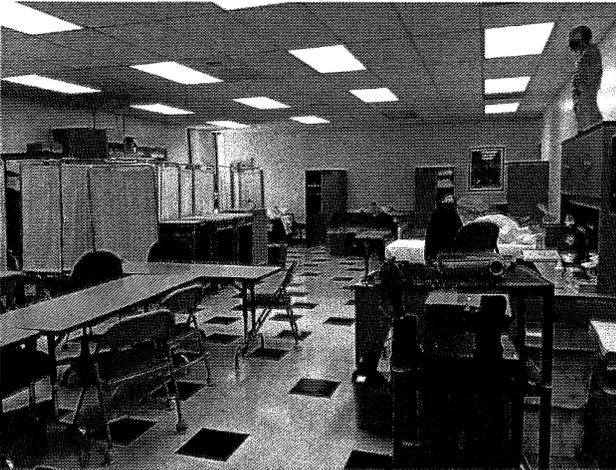
A total of four (4) classrooms are available for use by the Vocational Nursing Program. The program utilizes audio-visual carts with projectors and computers. Classrooms are furnished with chairs and tables, and white boards. A total of 25 to 29 chairs were counted in classrooms. Some classrooms contained learning aids on the walls, others did not.

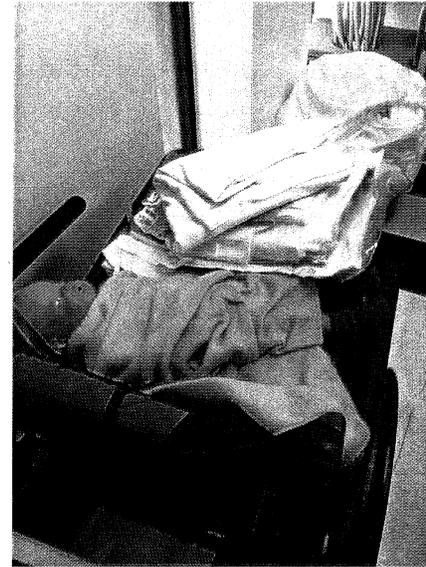


Classrooms

Skills Laboratory (Lab):

The skills laboratory was equipped with four (4) beds and four (4) mannequins that offer tracheostomy and catheterization skills. While some disorganization was noted, the skills laboratory was well equipped to meet program objectives, including for Maternity and Pediatric Nursing.

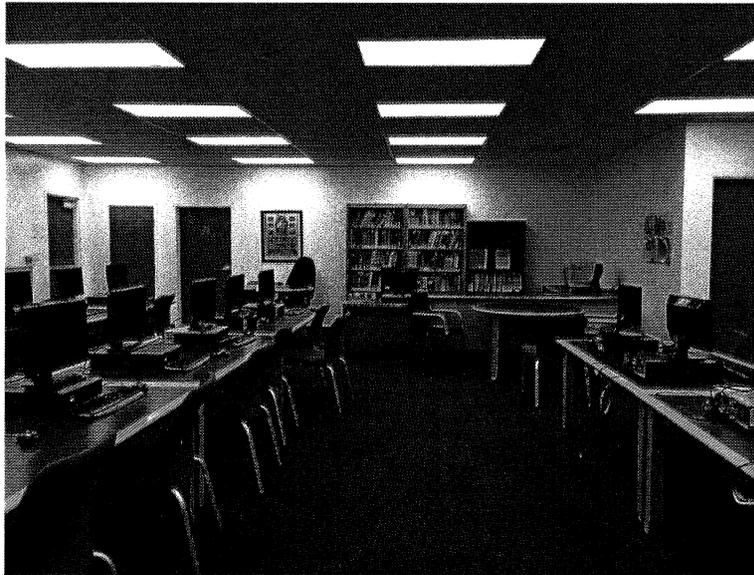




Skills Laboratory

Computer Laboratory and Hard Copy Library:

A total of 29 computers are available for student use in the library. Some physical resources are available in the library and students have access to Wi-Fi and online resources.



Computer Lab/Library

Student Interviews:

Students were interviewed in two (2) classrooms and two (2) clinical sites. In one of the classrooms, students voiced concerns regarding lack of organization at the school, lack of answers to their questions and concerns, and inadequate faculty with many recent changes in faculty. This group of students also noted that in some cases, clinical facilities offered little more than observation. In the other classroom, students reported positively regarding faculty and clinical facilities. However, this group of students also noted lack of organization in the school, lack of response to questions and concerns of students, and the students reported not receiving

texts and other resources more than one (1) month into the term. Students interviewed at a clinical facility reported positively on the experiences at the site. Some students at a clinical site reported that since a class can be repeated immediately after failing, they were able to spend time with family instead of studying more.

Clinical Site Visit:

While both of the facilities seen by the Board representative offered valuable experiences for the students, theory and clinical were not being correlated at either site. (See Below)

Faculty Interviews:

A faculty member described learning contracts and remediation plans she had developed and was using. While the contracts and plans were extensive and included follow-up by that faculty member, no review by the program director was identified. It was not identified that other faculty members were doing the same for students.

Student Records:

Student records were complete and well organized.

Based on the program inspection and published program examination statistics, a total of 12 violations were identified.

Section 2526(a)(4) 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 ...
(4) Curriculum objectives.”

Violation #1: Board records confirm the program has Board-approved curriculum objectives that describe clinical expectations of the student at the end of each term. During the program inspection, Board representatives requested a copy of the curriculum objectives. The program produced a copy of theory objectives and then detailed lists of clinical tasks. While generalized clinical objectives are provided for each course, in addition to the detailed lists of clinical tasks, curriculum objectives are not in use to assist faculty and students understand the progressive sequence of clinical expectations.

Status #1: This violation is **not** corrected.

After the inspection, Board staff provided additional consultation to the program regarding development of curriculum objectives that are consistent with the Board-approved Instructional Plan and the Board-approved Terminal Objectives. On March 22, 2016, the program submitted proposed curriculum objectives. The curriculum objectives will benefit from further revision, including drafting the objectives in measurable terms.

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 #2: Board records confirm that a major curriculum revision was approved in October 2012, to be implemented in January 2013. The Board-approved Instructional Plan was requested. The program produced an instructional plan with a date of 2006. The program could not provide a copy of the instructional plan that was approved in 2012.

Status #2: This violation is **not** corrected.

The program was required to submit documentation confirming implementation of the instructional plan approved by the Board in October 2012. On March 15, 2016, the program director reported the following:

“Regrettably, I was unable to reconstruct the CLC Instructional Plan in time to meet the designated deadline of March 15th, 2016.”

As of this writing, the program has failed to submit the required instructional plan.

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 #3: Board records confirm the program has a methodology for the evaluation of the curriculum. During the program inspection, Board representatives requested documentation of the evaluation of the curriculum. No documentation of evaluation of the curriculum was produced by the program, indicating the program has failed to evaluate the curriculum, despite significantly declining pass rates on the licensing examination.

Status #3: This violation is **not** corrected.

The program was required to submit a plan and timeline for evaluation of the curriculum, including an evaluation of its currency and consistency with the most recent NCLEX-PN® test plan. The program described an “anticipated” curriculum committee and proposed agenda topics. The proposed topics reflect ongoing program work, rather than evaluation of the curriculum for currency and consistency with the most recent licensure exam test plan. It is also of concern that the program described disbanding of the Leadership Team “several months ago.” (See page 3 of Attachment B)

Section 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.”

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 #4: Board records confirm the program has a methodology for the evaluation of clinical facilities. During the program inspection, Board representatives requested documentation of the evaluation of clinical facilities. No documentation of evaluation of the clinical facilities was produced by the program, indicating the program has failed to evaluate the clinical facilities being utilized for clinical instruction of the students.

Status #4: The program was required to submit for Board approval a plan and a timeline for evaluation of all clinical facilities, including oversight by the program director. The program reports clinical sites will be evaluated quarterly and included as an agenda topic during scheduled faculty meetings. In materials submitted March 22, 2016, the program provided copies of 10 clinical facility evaluations completed by faculty.

The program has submitted a plan that, if consistently implemented, would correct the violation.

Section 2526(a)(12) of the Vocational Nursing Rules and Regulations states:

“The institution shall apply to the Board for approval. Written documentation shall be prepared by the director and shall include:

... (12) Admission criteria.”

Section 2526(a)(13) of the Vocational Nursing Rules and Regulations states:

“The institution shall apply to the Board for approval. Written documentation shall be prepared by the director and shall include:

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

Violation #5: Board records confirm the program has approved policies for the admission, screening, and selection of applicants to the program. Examination of student files and other documents during the program inspection indicate that applicants without additional education and experience who scored below the stated minimum passing scores as listed on the assessment scoring sheets were admitted to the program. Minimum passing scores, according to the assessment scoring sheets are **below** high school level academics. Examination of the program’s School Catalog and Vocational Nursing Handbooks do not address

specific minimum scores or the frequency and number of allowed retakes of the assessment examination.

Status #5: This violation is **not** corrected.

The program was required to submit for Board approval a revised policy for the admission, screening, and selection of students. The program reports every student has documentation of completion of high school on file. This has not been disputed. The program did not address the program's failure to follow its own policy.

Documents received after the deadline describe two (2) classes for whom the minimum passing score on the entrance test was at **grade level 9.2**. More recently the minimum passing score on the entrance test has been at **grade level 11.1**. The program also identifies that students were admitted with below minimum passing level on the entrance examination. (See Attachment C) While the program reports the policy as allowing applicants with below minimum level "based on student's documented college education, related work experience, and/or personal interview, the Program Director may approve special consideration for enrollment," there was no documentation for special consideration found in student files when applicants scored below 9.2 or 11.1 grade level.

The program states the applicant may retake the entrance test a total of three (3) times. The program also states planning will begin immediately to identify and evaluate other entrance tests and to research admission criteria related to pre-nursing pre-requisites.

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

"The program shall have sufficient resources, faculty, clinical facilities, library, staff and support services, physical space, skills laboratory and equipment to achieve the program's objectives."

Violation #6: During the program inspection, two (2) different classes of students noted that after instruction of the specific term was underway, as yet, not all students were given textbooks, which were to be provided by the program. The class admitted in January 2016 had been scheduled to begin in November 2015 and textbooks still had not arrived for all students.

While the program stated that HESI computerized testing was to begin in Level 2, Level 2 students noted not all students had been given resources or begun computerized assessments. As noted in the LVN Handbook, HESI Remediation and Proctored Exam scores are listed as components for evaluation of student progress, including in Level 2.

Student interviews noted a shortage of faculty such that students could not attend clinical. The program director noted some faculty had been placed on furlough and more of her time was now devoted to teaching.

Faculty meeting minutes from January 2015 up to October 2015 were reviewed and included mention of cash flow and restricted resources.

Status #6: This violation is **not** corrected.

The program was required to:

1. Submit documentation of acquisition of textbooks and HESI resources for all applicable students; and
2. Submit documentation of adequate faculty resources to accomplish program objectives.

The program reported on the increased cost to the program for VN textbooks and a recent decision to have students purchase books via Amazon. The program also noted that the use of HESI has been **suspended**. The program referenced a financial credit to students. (See pages 6 and 7 of Attachment B) HESI has been a major component of the improvement plan the program identified last year.

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

“Each teacher assistant shall work under the direction of an approved instructor. No more than one teacher assistant may be assigned to each instructor. Each teacher assistant shall assist the instructor in skill lab and clinical teaching only. The instructor to whom the teacher assistant is assigned shall be available to provide direction to the teacher assistant as needed.”

Violation #7: Student files examined by Board representatives during the program inspection documented tutoring and counseling by a Board-approved Teacher Assistant as well as multiple instances of a “Test/Exam Counseling Form” signed by the Teacher Assistant. This indicates that the Teacher Assistant was assigned responsibilities outside of the scope of the regulation.

Status #7: This violation is **not** corrected.

The program was required to submit a written description of the utilization, responsibilities, and hours for a Teacher Assistant that are consistent with existing regulations by March 15, 2016.

After the deadline, the program submitted a job description for an Administrative Assistant position and a job description for a Teacher Assistant. **The program failed to describe the allocation of the Teacher Assistant hours and responsibilities.** The program reported that the Teacher Assistant, identified as the signee of documents related to tutoring

and counseling and the "Test/Exam Counseling Form," will function solely as an Administrative Assistant. A second Teacher Assistant is also listed on the faculty list submitted by the program on March 15, 2016.

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

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

Violation #8: The program failed to provide a current, Board-approved Instructional Plan that was available for all faculty. (See Violation #2)

Status # 8: This violation is **not** corrected.

The program failed to provide a copy of the Board-approved Instructional Plan or documentation that all faculty have access to and have reviewed the Instructional Plan.

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. Acceptable methods for make-up include:

- (1) Theory: case studies, independent study, written examination, attendance at seminars or workshops, auto-tutorial laboratory, and research reports.
- (2) Clinical: performance evaluation in skills laboratory or additional time in the clinical area with clients/patients."

Violation #9: Board records confirm the program has an approved policy regarding attendance. Examination of student and program files during the inspection revealed that the attendance policy listed in the LVN Handbook is not consistent with the regulation in that the policy fails to differentiate acceptable make-up methods for theory and clinical absences.

Further, examination of student files documented that the program did not follow its own policy when students exceeded attendance limits listed in the LVN Handbook and yet were not terminated from the program. In multiple instances, individual students were maintained in the program, and in some cases in the same term, despite exceeding the allowable amount of absences.

Status #9: This violation is **not** corrected.

The program's proposed policy, submitted on March 22, 2016, continues to list clinical make-up methods that are not consistent with regulations, allowing case studies for missed clinical time. Further, the proposed policy does not specify limits for students. For example, the policy states "or

misses more classes than the Director of Nursing deems advisable, the Director of Nursing will meet with the student.

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

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

Violation #10: Board records confirm the program has an approved policy for the evaluation of student performance. However, the policies listed in the School Catalog and LVN Handbook fail to note the number of times a student may fail a course and remain in the program.

Board representatives examined a total of 59 student files, representing approximately 63% of current students and the most recently graduated class. In some cases an entire class was examined and in other cases, a representative sampling of a class was examined.

A total of 28 student files documented one (1) or more classes had been failed and students remained in the program despite as many as three (3) terms failed. While the School Catalog describes an appeals process for academic failure and that there is to be documentation of “evidence that the circumstances precipitating the unsatisfactory performance have been remedied,” the program failed to follow their own policy as noted by students with multiple course failures repeating the courses, sometimes beginning the next day, with no evidence of an Administrative Committee (as described in the catalog), and no mention of, or correction of, factors precipitating academic failure.

Review of student files also indicated multiple instances of failing grades being rounded up. In one (1) instance, a student failed two levels and was found to be a danger to patients, as documented by more than one (1) clinical instructor; the student was allowed to continue in the program without evidence of involvement of an Administrative Committee or correction of circumstances precipitating unsatisfactory performance. While the student had failed the entrance examination twice, the individual was admitted without evidence of additional education or experience (see Violation #5).

Status #10: This violation is **not** corrected.

The program reported “it is apparent that not all faculty were not well versed in what it meant to “remediate” their student as evidenced by the numerous home grown remediation paper works and lack of the CLC policies. There were significant findings on low to no use of a formal remediation process.” The program submitted a form for use in remediation.

The program failed to provide a proposed policy for the evaluation of student progress. The program’s response does not address the significant concern

regarding failing students, including a student found to be a danger to patients, to continue in the program without “evidence that the circumstances precipitating the unsatisfactory performance have been remedied.”

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

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

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

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

Violation #11: During the program inspection a Board representative attended two (2) clinical facilities being utilized by current students. Clinical objectives were not posted at one (1) site. Neither clinical instructor was able to identify what students were covering in theory at the time. Interviews with the instructors and the students indicated that, while valuable experiences were available at both sites, theory content was not being correlated in the clinical setting.

Status #11: This violation is **not** corrected.

The program was required to provide documentation that current clinical objectives are posted in all clinical sites. Further, the program was required to submit a written plan and timeline for implementation that describes how faculty will begin correlating theory content and clinical experiences by March 15, 2016.

The program failed to provide documentation of posting of clinical objectives in all clinical sites. The program reported on a planned faculty in-service for the March 30, 2016 faculty meeting “to focus on how to improve implementation of correlating clinical aspects to theory content.” The program further reported on using role-playing to improve student outcomes.

The program has failed to provide a plan to describe how faculty will correlate theory in the clinical practice experiences.

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.”

Violation #12: Over the past five (5) quarters, the program’s average annual pass rate has been between 12 percentage points (in the first quarter of 2015) to 33

percentage points **below** the state average annual pass rate. For Quarter 4 – 2015, the program average annual pass rate was **26 percentage points below** the state average annual pass rate. Published examination statistics for Quarter 1 – 2016 confirm the program’s current average annual pass is **33 percentage points** below the state average annual pass rate.

Status # 12: This violation is **not** corrected.

The program was required to submit a written plan for improvement of the NCLEX-PN® pass rates. The program reported on-campus and on-line NCLEX review courses between June and December 2015. The program reports the courses were offered without charge to current and past graduates. The program also reported that, “based on lack of a qualified instructor” the review program was discontinued in January 2016. The program reported a plan to provide Capstone Review beginning approximately one month after graduation and provided a proposed sample schedule that begins in June 2016.

The program has failed to provide a comprehensive improvement plan. It is unclear how beginning a review course one month after graduation is likely to substantially improve outcome for the students. Further, previously proposed improvement plans were recently discontinued by the program.

On February 4, 2016, prior to the close of the program inspection, the program director was provided digital copies of the required forms to utilize in documenting adequacy of clinical facilities for enrolled students. This included copies of the Faculty/Student Clinical Assignment Form, the Maternity Faculty/Student Clinical Assignment Form, and the Pediatric Faculty/Student Clinical Assignment Form. Electronic communication from the program director on February 16, 2016 did not include enough information such that adequacy of clinical facilities to support all program objectives could be verified. The correspondence, in part, stated:

“I was/am unable to 100% complete everything you asked for partially due to the lack of necessary documents at home this weekend and partially because the next level calendars and clinical rotations are not/were not/have not all been pre-scheduled in the recent absence of our Clinical Coordinator.”

On February 17, 2016, the Acting Executive Officer rescinded the program’s approval for ongoing admissions and referred the program to the Board’s May 2016 agenda for consideration of provisional approval.

On February 18, 2016, the Board forwarded correspondence, including the required forms to utilize in providing the documentation, to the program regarding the decisions of the Acting Executive Officer, including the following decision (see Attachment D):

- Submit clinical placement plans for all enrolled students throughout their program of study using the provided Faculty/Student Clinical Assignment Form, the Maternity Faculty/Student Clinical Assignment Form, and the Pediatric Faculty/Student Clinical Assignment Forms and completing them as instructed, **no later than March 15, 2016.**

On February 18, 2016, the Board forwarded to the program a *Notice of Violations*. (See Attachment E)

On February 22, 2016, the Board forwarded correspondence to the program regarding the requirement to submit documentation in preparation for the May 2016 Board meeting. That correspondence included the required forms to document clinical placements. (See Attachment F)

On March 7, 2016, the Board provided detailed information regarding how to request approval to admit a class of students, including the required forms that would identify intended clinical placements. (See Attachment G)

On March 15, 2016, the Board received the program's response to the violations. With the exception of labeling the name of the attachment, the response is presented exactly as received from the program, including blank Appendices. This document was referred to above and is found in Attachment B. On this date, which was the deadline for submission of materials to be considered at the May 2016 Board meeting, the program failed to provide documentation regarding clinical placements or specific information regarding a request to admit students.

Based on the program's responses, the following additional violations are identified.

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

"All curricular changes that significantly alter the program philosophy, conceptual framework, content, objectives, or other written documentation as required in Section 2526, shall be approved by the Board prior to implementation . . .

Violation #13: Board records confirm that a major curriculum revision was approved in October 2012, to be implemented in January 2013.

It must be noted that in November 2012, as requested by the Casa Loma, Hawthorne (now Anaheim) Vocational Nursing Program, the Board approved the exact same changes to that program's curriculum as was approved for the Casa Loma, Van Nuys, Vocational Nursing Program in October 2012.

The Board-approved Instructional Plan was requested. The program produced an instructional plan with a date of 2006. **The program failed to provide a copy of the instructional plan that was approved in 2012.**

The program's response to violations, submitted on March 15, 2016, identified that "Regrettably, I was unable to reconstruct the CLC Instructional Plan in time to meet the designated deadline of March 15th, 2016."

The later submission, March 22, 2016, also failed to provide an Instructional Plan.

The program's March 15, 2016 response to violations also stated the following: *"Upon completion and reconstruction of the 2012 Instructional Plan, Casa Loma Theory faculty will be presented with a hard copy of their respective Level content. Additionally and in an All-VN Faculty email communication on March 14th, 2016, faculty were advised that the complete Instructional Plan was now located on the CLC share drive and represented as well in Binders located in the DON, Administration office, and with the Compliance Officer."*

Given that the program failed to submit a copy of the Board-approved Instructional Plan, given that the program director's statement that the instructional plan could not be reconstructed by the deadline, it is concluded that the program is not using the Board-approved Instructional Plan.

Status #13: This violation is **not** corrected.

Section 2526(g) of the Vocational Nursing Rules and Regulations and Section 2527(c) of the Vocational Nursing Rules and Regulations state:

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

Violation #14: The program's response to violations, as submitted on March 15, 2016, stated the Board-approved Instructional Plan was *"now located on the CLC share drive and represented as well in Binders located in the DON, Administration office, and with the Compliance Officer."*

The program's response also stated that, as of March 15, 2016, "Regrettably, I was unable to reconstruct the CLC Instructional Plan in time to meet the designated deadline of March 15th, 2016."

The program failed to submit the Board-approved Instructional Plan. The program has stated that an instructional plan that could not be "reconstructed" was available to faculty.

Status #14: This violation is **not** corrected.

On March 22, 2016, the Board received a flash drive with documents created on March 17, 2016. Following is a list of documents received on March 22, 2016.

- 1) 163 pages titled BVNP Board Meeting Documents that includes Enrollment Data Table, revised class calendars for currently enrolled students, and clinical placements for currently enrolled students.
- 2) 112 pages titled BVNPT Violation Appendices that includes Appendix A through K, detailed below; and a request for approval to admit students, including proposed clinical placements.
- 3) List of current faculty and clinical facilities.

As submitted on March 22, 2016, the proposed clinical placements in support of the request to admit students were **incomplete and, as such, a determination of adequacy cannot be made at this time.**

Also as submitted on March 22, 2016, the documentation regarding clinical placements for currently enrolled students, as was required by the Board on February 17, 2016, was **incomplete** in that the program did not submit data for all students enrolled and the program did not submit complete data for proposed placements. As such, a determination of adequacy cannot be made at this time. However, it was noted that for each class and each specialty rotation, one half of the students do not engage in skills lab practice until **after** the students have completed hours in clinical facilities.

On March 25, 2016, the Board received written notification from the program director of her resignation as program director effective April 1, 2016. The program does not have an assistant director. On April 2, 2016, the program director reported, via electronic correspondence, that she intended to continue as director "for a few more weeks."

On April 28, 2016, the program director sent electronic correspondence to the Board of her resignation, effective May 1, 2016 and with last date of work being April 29, 2016. The program did not forward a program director application for Board approval as of April 28, 2016.

Summary

The Casa Loma College, Van Nuys, Vocational Nursing Program's current average annual pass rate is **40%**, which is **33** 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 pass rate for the past **5 (five) consecutive** quarters.

An unannounced program inspection on February 3 and 4, 2016, identified a total of 12 violations. In examination and analysis of the program's response to the violations, two (2) additional violations, including misrepresentation of a material fact, were identified. Currently, the program has submitted a plan for evaluation of clinical facilities that, should the plan be consistently implemented, would correct the violation related to evaluation of clinical facilities. A total of **13** violations are **uncorrected**.

The violation of misrepresentation is further indication of serious concerns regarding the functioning of the program and critical deficits identified, including failure to provide instruction consistent with the Board-approved Instructional Plan.

Documentation submitted in support of the request for approval to admit students was incomplete. Therefore, adequacy of resources to support the objectives of the program and the proposed students cannot be verified.

The required documentation regarding clinical placements for currently enrolled students was incomplete. At this time, a determination of adequacy of clinical experiences and resources cannot be made. Further, as of this writing, the program is without a Board-approved director or assistant director.

Recommendations:

1. Place the Casa Loma College, Van Nuys, Vocational Nursing Program on provisional approval for the three (3) month period from May 13, 2016 through August 31, 2016, 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 H)
2. Place the program on the Board's **August 2016** agenda for reconsideration of provisional approval.
3. **Deny** the program's request for approval to admit one (1) class of 30 students to begin July 11, 2016, graduating July 13, 2017.
4. Require the program to provide no less than one (1) instructor for every ten (10) students in clinical experiences.
5. Require the program to admit no additional classes without prior approval by the full Board.
6. 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, 2016**.
7. Require the program to submit the following, no later than **June 15, 2016**.
 - a. Revised Curriculum Objectives
 - b. A copy of the Board-approved Instructional Plan
 - c. Proposed methodology and timeline for evaluation of the curriculum
 - d. A proposed policy for admission, selection, and screening of applicants to the program and steps to ensure consistent implementation of the policy
 - e. Plan for provision of resources to meet the objectives of the program
 - f. Allocation of Teacher Assistant hours and responsibilities in the program
 - g. Documentation that all faculty have access to the Board-approved Instructional Plan
 - h. Proposed policy for attendance and appropriate make-up and plan for consistent implementation of the policy
 - i. Proposed policy for evaluation of student progress and determination of the need for remediation or termination from the program
 - j. Documentation of posting of clinical objectives on patient care units utilized for clinical experience
 - k. Plan and timeline for correlating theory in clinical practice experiences
 - l. Plan for improvement of NCLEX-PN® pass rates
8. Submit clinical placement plans for all enrolled students throughout their program of study using the provided Faculty/Student Clinical Assignment Form, the Maternity Faculty/Student Clinical Assignment Form, and the Pediatric Faculty/Student Clinical Assignment Forms and completing them as instructed, **no later than June 15, 2016**.

9. Require the program to submit a comprehensive analysis of the program, specific actions taken to improve pass rates, timeline for implementation, and the effect of employed interventions. The report is due **no later than June 15, 2016**. 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
10. 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.
11. 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.
12. 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.
13. Failure to take any of these corrective actions may cause the full Board to revoke the program's approval.

Rationale:

A recent unannounced program inspection identified a total of 11 violations. Subsequently, three (3) additional violations were identified. Of the **14 identified violations**, a total of **13 violations remain uncorrected**. The number and nature of the violations indicate **serious deficiencies** in the program.

The program's current average annual pass rate is **40%**, which is **33 percentage points below** the state pass rate. The program has been greater than 10 percentage points **below** the state pass rate for the past **five (5) consecutive quarters**.

In combination with program pass rates that indicate first-time candidates pass the licensure examination only **40%** of the time, **13 substantial violations**, including failure to utilize the Board-approved Instructional Plan, **remain uncorrected**. Among the violations is a misrepresentation of fact. The number and nature of the violations warrant very close monitoring of the program. Therefore, the recommendation to place the program on provisional approval is offered.

With approximately 70 students currently enrolled in three (3) classes and with the inability to determine the adequacy of resources to support those students, it is also recommended to reconsider the program's status in three (3) months to better monitor the program's willingness and ability to correct the remaining violations.

With the substantial number and nature of the violations as yet uncorrected, including failure to identify the Board-approved Instructional Plan; with, as of this writing, failure of active administration of the program by a Board-approved director; and, in the interest of consumer protection, the recommendation to deny the program's request to admit students is also offered.

- Attachment A: History of Prior Board Action
- Attachment B: Program Correspondence Dated March 15, 2016
- Attachment C: Admission Criteria and TABE Exam Results
- Attachment D: Board Correspondence #1 Dated February 18, 2016
- Attachment E: Board Correspondence #2 Dated February 18, 2016
- Attachment F: Board Correspondence Dated February 22, 2016
- Attachment G: Board Correspondence Dated March 7, 2016
- Attachment H: Draft Notice of Change in Approval Status

Agenda Item #12.B.2., Attachment A

Casa Loma College Vocational Nursing Program

History of Prior Board Actions

- In March 1972, the Casa Loma College Vocational Nursing Program was granted initial accreditation. The initial class commenced in October 1971.
- On May 4, 1978, the Board granted approval to increase student enrollment from 45 to 60 students, effective June 19, 1978.
- On September 19, 1980, the Board granted approval to start a part-time vocational nursing program October 1980, with 468 theory hours, 1092 clinical hours for 18 months.
- On January 7, 1982, the Board granted approval to enroll 30 students each time a class is admitted, effective November 23, 1981; and discontinue using the evening shift in the program.
- On May 10, 1985, the Board approved the revised curriculum for 577 theory hours and 954 clinical hours.
- On June 24-26, 1986, an accreditation school survey was conducted at which time there were three violations related to credit granting, theory hours, and curriculum revisions.
- On September 12, 1986, the Board directed that the program submit curriculum revisions for review by October 1, 1986 for Nursing II; November 1, 1986 for Nursing III; December 1, 1986 for Nursing IV; and a follow-up report be presented at the January 1987 Board meeting.
- On March 6, 1987, the Board considered the follow-up report and approved that accreditation be continued for the Casa Loma College Vocational Nursing Program.
- On May 8, 1987, the Board ratified the authorization for revision of Nursing III; course description, content and objectives, effective February 1, 1987.
- On May 8, 1987, the Board considered the program's proposal to change the clinical grading system from a percentage to pass/fail for all classes, and requested the program submit criteria substantiating the rationale, with a follow-up report at the July Board meeting.
- On July 10, 1987, the Board approved the program's proposal to change the clinical grading system from a percentage to pass/fail for all classes.

- On February 25-28, 1992, an accreditation survey was conducted.
- On May 8, 1992, the Board approved that accreditation be continued for the Casa Loma College Vocational Nursing Program.
- On January 22, 1993, the Board ratified the authorization to decrease class size enrollment from 30 to 15 students and admit six times per year, effective January 4, 1993.
- On March 17, 1995, the Board granted approval for admission of 19 additional students on a one time basis, only.
- On September 22, 1995, the Board granted approval to change the admission schedule and increase student enrollment; i.e., Full-time program - Admit 24 students in September, 1995 and Part-time program - Admit 24 students in October, 1995; and requested a report be submitted by October 25, 1995, that addressed the rate of attrition for the full-time and part-time programs, the availability and student utilization of a remediation program, the number of faculty that had been hired and terminated and reasons for termination for the period January 1, 1994, through August 31, 1995; the current number of faculty, listing the status of each relative to full-time or part-time employment and whether the individuals teach theory and/or clinical; the training/orientation for new and substitute faculty, and assessment of the students' performance complete by the clinical facilities, changes that the Program Director has implemented to improve the students' pass rate on the National Council Licensure Examination for Practical Nurses (NCLEX-PN); and changes that the faculty have implemented to improve students' pass rate on the National Council Licensure Examination for Practical Nurses (NCLEX-PN); and a follow-up report, to include third quarter examination statistics and the school's plan to increase the pass percentage rate on the National Council Licensure Examination for Practical Nurses (NCLEX-PN) be presented at the November 1995 meeting.

The Board will consider the program's request to increase enrollment for the January, April and July 1996 classes at its November 1995 meeting.

- On November 17, 1995, the Board approved the admission of 24 full-time students in January, 1996, one time only; requested the program submit to the Board, in writing, on a monthly basis, the attrition rate and reasons for such attrition; and requested a follow-up report be presented at the March 1996 Board meeting to include updated attrition data and examination statistics.

The Board will consider the program's request to admit classes in April, July and September 1996 at its March 1996 meeting.

- On March 22, 1996, the Board approved admission of 24 full-time students in April, July, September and January; admission of 24 part-time students in April, 1996 and, thereafter, admission of 24 students every 20 months.
- **In August 1996, an interim program director was approved.**
- **In November 1996, a new program director was approved.**

- **In May 1997, a new program director was approved.**
- On August 12, 1997, the current program director was no longer affiliated with the college.
- **On August 28, 1997, an interim program director was approved.**
- **On January 15, 1998, a new program director was approved.**
- **On November 2, 1999, a new program director was approved.**
- **On March 9, 2000, a new program director was approved for the Van Nuys campus. The program now has a director at both the Van Nuys and Los Angeles campuses.**
- On September 29, 2000, the Board denied the program's request to admit a class of 36 full-time students on October 2, 2000, and directed the school to adhere to the admission schedule for the part-time program, as approved by the Board at its March 22, 1996, meeting.
- On November 17, 2000, the Board approved the program's request to admit a second part-time class (#2) with 24 students on December 4, 2000.
- On April 27, 2001, the Board approved the program's request to admit a part-time class (#1) with 24 students on August 15, 2001, only.
- **On January 18, 2002, the director at Casa Loma College Los Angeles campus was approved as director for both the Los Angeles and Van Nuys campuses.**
- **On August 1, 2002, a new program director was approved.**
- On September 6, 2002, the Board placed the program on provisional accreditation for the two (2) year period from September 6, 2002, through September 5, 2004 and issued a notice to the program to identify specific areas of noncompliance and requirements for correction as referenced in section 2526.1(e) of the Vocational Nursing Rules and Regulations.
- On May 14, 2004, the Board extended the program's provisional accreditation for a period of one (1) year for the period from May 14, 2004, through May 13, 2005, and approved ongoing admissions to **replace** graduating classes, only, in the Track II part-time class for the Casa Loma College, Van Nuys, Vocational Nursing Program with the stipulation that no additional classes are to be added to the program's current pattern of admissions without prior Board approval. The program's current pattern of admissions for all classes, including the classes previously approved for ongoing admissions, is:
 - a. The 12-month full-time class that admits 24 students four (4) times per calendar year in January, April, July and October;
 - b. The 17.5-month part-time Track I class that admits 24 students every 20 months; and
 - c. The 17.5-month part-time Track II class that admits 24 students every 24 months.

- On September 20, 2004, the Board reinstated full accreditation for the Casa Loma College, Van Nuys, Vocational Nursing Program for the four-year period from September 10, 2004, through September 9, 2008, and issued a certificate accordingly.
- On August 17, 2005, the Board approved the Casa Loma College, Van Nuys, Vocational Nursing Program's request to increase admission from 24 students per class to 30 students per class for all Board-approved classes changing the program's pattern of admissions to the following:
 - a. The 12-month full-time class admits 30 students four (4) times per calendar year in January, April, July and October;
 - b. The 17.5-month part-time Track I class admits 30 students every 20 months; and
 - c. The 17.5-month part-time Track II class admits 30 students every 24 months.
- On June 4, 2008, the Executive Officer approved continued full accreditation of the Casa Loma College, Van Nuys, Vocational Nursing Program for a four-year period from September 9, 2008, through September 8, 2012, and the Board issued a certificate accordingly.
- **On July 31, 2012, a new director was approved and subsequently completed New Director Orientation.**
- On October 4, 2012, the following recommendations were approved by the Executive Officer:
 1. Continue approval of the Casa Loma College, Van Nuys, Vocational Nursing Program for a four-year period from September 9, 2012, through September 8, 2016, and issue a certificate accordingly.
 2. Approve the program's proposed curriculum revision to include 680 theory hours and 976 clinical hours for a total of 1656 program hours.
 3. Approve discontinuance of the part-time evening class.
 4. Approve the program's request to change their approved ongoing admission pattern from 30 students each to full-time classes admitted every January, April, July and October to 30 students each to full-time classes admitted every January, March, June, August and October.
 5. Approve this request for ongoing admissions to **replace** graduating students with the following stipulations:
 - a. No additional classes are added to the program's approved pattern of admissions without prior Board approval. The program's pattern of admissions includes admission of five day classes of 30 students per year, admitting in January, March, June, August and October.

- 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 compliant with regulatory requirements.
- **On February 12, 2014, Elena Barolet was approved as program director.**
- On February 4, 2015, the Board received the completed packet regarding a request to begin a full – time evening class.
- On February 13, 2015, the Board received correspondence from the program regarding steps being taken to improve licensure examination pass rates.
- On April 1, 2015, the Executive Officer approved the following:
 1. Approve the program's request to admit one (1) full – time evening class of 20 students to start April 6, 2015 and to graduate March 30, 2016, only.
 2. Approve the program's request to change their ongoing pattern of admissions to **replace** graduating students with the following stipulations:
 - a) No additional classes are added to the program's approved pattern of admissions without prior Board approval. **The program's approved pattern of admissions is full – time day classes of 30 students admitted five (5) times per year and one (1) full – time evening class of 20 students admitted once 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 compliant with regulatory requirements.
- **On June 19, 2015, the Board approved a new program director.**
- On September 16, 2015, the Board issued a Notice of Violation to the program.
- On February 3 and 4, 2016, an unannounced program inspection was conducted by two (2) Board representatives.
- On February 17, 2016, the Acting Executive Officer approved the following:
 1. Effective immediately, rescind approval for ongoing admissions for the Casa Loma College, Van Nuys, Vocational Nursing Program.
 2. 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.

3. Require the program to correct violations identified during the onsite inspection and submit a report identifying proposed revisions and implemented interventions to include the following no later than **March 15, 2016**.
 - a. Curriculum Objectives
 - b. Implementation of and availability to faculty of the current Board-approved Instructional Plan
 - c. Evaluation of the curriculum
 - d. Evaluation of clinical facilities
 - e. Admission, screening, and selection criteria
 - f. Adequacy of resources to meet program objectives
 - g. Responsibilities of a Teacher Assistant consistent with regulations
 - h. Attendance
 - i. Evaluation of student performance and the need for remediation or termination from the program
 - j. Correlation of theory and clinical objectives.
4. Submit a written plan for improvement of the program's NCLEX-PN® pass rates no later than **March 15, 2016**.
5. Submit clinical placement plans for all enrolled students throughout their program of study using the provided Faculty/Student Clinical Assignment Form, the Maternity Faculty/Student Clinical Assignment Form, and the Pediatric Faculty/Student Clinical Assignment Forms and completing them as instructed, **no later than March 15, 2016**.
6. Place the Casa Loma College, Van Nuys, Vocational Nursing Program on the Board's May 2016 agenda for consideration of provisional approval.

March 15, 2016

Donna Johnson
Nurse Education Consultant
Board of Vocational Nursing and Psychiatric Technicians
2535 Capitol Oaks Drive, Suite 205
Sacramento, CA 95833-2945

RE: Casa Loma College Vocational Nursing Program - Van Nuys

Good morning Donna Johnson and Board members:

Below and attached are the documents, explanations, graphics, and Appendices representing Director Responses to the list of BVNPT Violations.

VIOLATION #1

Section 2526(a)(4) 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 ...

(4) Curriculum Objectives.”

Violation #1: Board records confirm the program has Board-approved curriculum objectives that describe clinical expectation of the student at the end of each term. During the program inspection, Board representatives requested a copy of the curriculum objectives. The program produced a copy of theory objectives and then detailed lists of clinical tasks. While generalized clinical objectives are provided for each course, in addition to the detailed lists of clinical tasks, curriculum objectives are not in use to assist faculty and students understand the progressive sequence of clinical expectations.

Required Correction: Submit for Board approval curriculum objectives that are consistent with the Board-approved Instructional Plan and the Board-approved terminal objectives.

Director Response: *(Appendix: A- New form Curriculum Objectives).*

During the site visit, documents presented were considered outdated and unique in format or content as related to the Terminal Objectives of the VN program. It was later

discovered that another form was in currently in use for this purpose. That unique form is presented within the body of this information for the Board's review. +

Proposed Action Plan:

Attached and per the design of the example presented, please find the CLC Terminal Objectives and explanations of purpose in Levels 1 through 5. It is likely that the new Curriculum Committee, during an in-service of content, would choose to reevaluate these objectives based on the Clinical Site Evaluations of what exactly is probable to accomplish each level per environment of the facility.

As this is a new form and different process, it will be revisited again during the 2nd quarter of 2016 for additions or adjustments.

VIOLATION #2

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 #2: Board records confirm that a major curriculum revision was approved in October 2012, to be implemented in January 2013. The Board-approved Instructional Plan was requested. The program produced an instructional plan with a date of 2006. The program could not provide a copy of the instructional plan that was approved in 2012. Required Correction: Submit a copy of the instructional plan approved by the Board in October 2012.

VIOLATION #3

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 #3: Board records confirm the program has a methodology for the evaluation of the curriculum. During the program inspection, Board representatives requested documentation of the evaluation of the curriculum. No documentation of evaluation of the curriculum was produced by the program, indicating the program has failed to evaluate the curriculum, despite significantly declining pass rates on the licensing examination.

Required Correction: Submit a plan and a timeline for evaluation of the curriculum, including an evaluation of the currency and consistency with the most recent NCLEX-PN® test plan.

Director Response: (Appendix: Leadership Team meeting minutes examples and 2016 meeting dates).

The Leadership Team (consisted of Lead Faculty for Level 2, 3, 4, and DON/ADON) was disbanded several months ago as prep and special project hours were reduced in house. The Team met informally every 1-2 weeks on Wednesday afternoon to discuss various issues in each level and focused on how to improve study habits, homework specific to main theory content, testing plans (textbook Test Banks versus HESI questions versus Saunders questions and/or a combination), and generally how to gradually improve overall student outcomes level to level. A major focus was on the development of standardized instructional materials and testing plans tailored to each level and all saved in Level Binders plus on the CLC Share Drive. As an example, the initial discussion about creating a Clinical Evaluation form came on Sept. 9th but was met with mild enthusiasm as compared to the other topics. A big conversation about using HESI questions on weekly tests occurred on Novem. 10th.

Proposed Action Plan: A new Curriculum Committee will be established with Quarterly meetings beginning on March 30th, 2016. The Committee will consist of the DON/ADON, two (2) seasoned Theory and two (2) expert Clinical faculties. Theory-Clinical collaboration will be key.

2016 CURRICULUM COMMITTEE MEETING SCHEDULE

Anticipated Curriculum Committee faculty members:	DON/ADON Arlene Sobel, RN Rajni Thakur, RN Sylvia Pacis, RN (Lead CI) Lourdes Antay, RN
Wednesday March 30 th , 2016	Proposed agenda topic: Capstone Post-Graduation NCLEX Review Course for 1504-A and 1504-PM approximately the week of June 6 th , 2016. Integration process/protocol of Saunders NCLEX text in an official program Testing Policy. This also to be discussed in the March VN Faculty Meeting and In-service.
Wednesday May 18 th , 2016	Proposed agenda topic: Progress report on Capstone N-CLEX course. Progress report(s) on the integration of

	Saunders for Homework, Practice Questions, and Exit Exam student outcomes/results of the April graduates. Revision of Level 2 Pharmacology Medical Administration Skills competency discussion.
Wednesday, September 21 st , 2016	Proposed agenda topic: TBD
Wednesday, December 14 th , 2016	Proposed agenda topic: TBD

VIOLATION #4

Section 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.”

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 #4: Board records confirm the program has a methodology for the evaluation of clinical facilities. During the program inspection, Board representatives requested documentation of the evaluation of clinical facilities. No documentation of evaluation of the clinical facilities was produced by the program, indicating the program has failed to evaluate the clinical facilities being utilized for clinical instruction of the students.

Required Correction: Submit for Board approval a plan and a timeline for evaluation of all clinical facilities, including oversight by the program director. Due no later than March 15, 2016.

Director Response: *(Appendix: D- Sample of new Clinical Site Evaluation form and several completed examples for 4th Quarter 2015 and 2016 1st Quarter.)*

Proposed Action Plan: *Effective first quarter (January-March 2016) very Clinical Site will be on maintenance evaluation on a Quarterly basis for appropriateness of level skills, objectives and explore student satisfaction and subsequent learned/acquired competency in accomplishing those listed objectives. This evaluation may be completed by either the DON/ADON or their designee of clinical instructor(s). The results of such*

evaluations will then be presented as an agenda topic during scheduled VN faculty meetings.

VIOLATION #5

Section 2526(a)(12) of the Vocational Nursing Rules and Regulations states:

“The institution shall apply to the Board for approval. Written documentation shall be prepared by the director and shall include:

... (12) Admission criteria.”

Section 2526(a)(13) of the Vocational Nursing Rules and Regulations states:

“The institution shall apply to the Board for approval. Written documentation shall be prepared by the director and shall include:

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

Violation #5: Board records confirm the program has approved policies for the admission, screening, and selection of applicants to the program. Examination of student files and other documents during the program inspection indicate that applicants without additional education and experience who scored below the stated minimum passing scores as listed on the assessment scoring sheets were admitted to the program. Minimum passing scores, according to the assessment scoring sheets are below high school level academics. Examination of the program’s School Catalog and Vocational Nursing Handbooks do not address specific minimum scores or the frequency and number of allowed retakes of the assessment examination.

Required Correction: Submit for Board approval a revised policy for the admission, screening, and selection of candidates to the program.

Director Response: *(Appendix: E- TABE Table)*

The Board of Vocational Nursing, General Requirements (2530g) states that each school must have on file proof that each student enrolled has completed a general education course of study through the 12th what I grade or evidence of completion or equivalent thereof. Equivalency is determined by the Department of Education in any of the United States or by a nationally recognized regional accrediting body.

The vocational nursing program adheres strictly to this rule and requirement. Completion of the 12th grade is one of the admissions requirements not only for the vocational nurse program but all programs at Casa Loma College. Proof of the completion of 12th grade is documented in all student files either by an official transcripts or diploma. As a checks and balances to this requirement for admissions, financial aid department will not process any applicant without proof of high school completion.

In neither the Vocational Nursing California Code of Regulations nor the Vocational Nursing Business and Professions Code does it state that a school must give to nursing applicants an admissions test for entry into the program. The allegation that we are admitting students at below 9th grade is not correct and not supported by the evidence.

The College requires that applicants to all of our programs take and pass an admissions test as one of several criteria for admission.

Applicants wishing to enroll in the Vocational Nurse Program are required to sit for the TABE Exam. This exam is one of the most comprehensive and reliable academic assessment tests and has been utilized at Casa Loma College for more than 26 years.

Proposed Action Plan:

This campus-wide Attendance policy decision was ultimately determined for approval by the Executive Administrative team at CLC. With slight adjustments to the prior policy, this protocol must be rolled out to the entire student population with appropriate orientation and in-depth explanations to any/all changes and a signature acknowledgement page for student files. Theory faculty, previously in-serviced require an update and written step-by-step process to ensure fair treatment.

VIOLATION #6

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

“The program shall have sufficient resources, faculty, clinical facilities, library, staff and support services, physical space, skills laboratory and equipment to achieve the program’s objectives.”

Violation #6: During the program inspection, two (2) different classes of students noted that after instruction of the specific term was underway, as yet, not all students were given textbooks, which were to be provided by the program. The class admitted in January 2016 had been scheduled to begin in November 2015 and textbooks still had not arrived for all students. While the program stated that HESI computerized testing was to begin in Level 2, level 2 students noted not all students had been given resources or begun computerized assessments. As noted in the LVN Handbook, HESI Remediation and Proctored Exam scores are listed as components for evaluation of student progress, including in Level 2. Student interviews noted a shortage of faculty such that students could not attend clinical. The program director noted some faculty had been placed on furlough and more of her time was now devoted to teaching. Faculty meeting minutes from January 2015 up to October 2015 were reviewed and included mention of cash flow and restricted resources.

Required Correction: Submit documentation of acquisition of textbooks and HESI resources for all applicable students. Submit documentation of adequate faculty resources to accomplish program objectives.

Director Response: (Appendix: F- HESI Addendum forms for each level)

Textbook pricing has increased over 50% in the vocational nurse program since 2009 and over 82% nationally over the last decade. Keeping the books in the tuition and fee

schedule has not allowed CLC students the option of purchasing their textbooks elsewhere, new or used, at more affordable pricing. After considerable investigation into the options CLC could provide to the students, the College has recently opened its' Amazon Bookstore which will give the students an option of purchasing from Amazon or continue to purchase through the college. As the College textbook inventory decreases, more and more students will purchase books from the Amazon Bookstore to eventually having all students purchasing from the bookstore. Students now have an option to purchase new or used helping to decrease their costs.

During the BVNPT Site visit, the College was in the transition phase of switching to Amazon Bookstore for many of our program textbooks, which created an unfortunate lapse in receiving the regular delivery from J.A. Majors, the College's primary book source. Continuing to increase the inventory of books during the phase of setting up Amazon was counterproductive. The students were never without the textbook information and/or resources necessary to be successful in the levels. Until the textbooks arrived and/or the Amazon Bookstore was set up, chapters in the books were copied as well as the copied book put into the learning management system, Moodle, for student use. Of the five students in 1509A Level 2 that failed, three had not received their Pharmacology textbooks. Of these, only one failed the level due to a Pharmacology fail. The other two failed medical surgical nursing.

1601A students have received all textbooks for Level 1. As shown on the textbook spreadsheet, 12 students in 1509A class did not receive the Pharmacology textbook. Again, these students have access via Moodle to this book. If these students chose to purchase these textbooks through Amazon Bookstore, they were provided financial credit.

In January 2014, with the 1401A class, the VN Program implemented the nationally-branded HESI testing and remediation resource along with its' Comprehensive Exam, Live Review for N-CLEX, and inclusive of a 12 month Saunders-HESI N-CLEX Review study program. After more than two years utilizing but not implementing the HESI program, Casa Loma College's N-CLEX Pass Rates did not increase as predicted with this resource. Therefore, the VN Program suspended use of this resource until a complete analysis can be conducted. The 1601A and 1509A classes have been given full financial credit for this package; 1507A and 1504A classes were given partial financial credit; and the 1504PM class will have received the full resources of HESI upon program completion. An email was sent by the DON on March 11, 2016 to Elsevier, Ms. Lauren Armstrong, for cancellation of all HESI services. In the interim while the analysis is being conducted, students will have the benefits of the Saunders Comprehensive Review for the NCLEX-PN.

Proposed Action Plan:

The correction to this violation required the program to submit documentation of receipt of HESI Resources. However, due to the cancellation of HESI, there will be no documentation. There is however documentation of the enrollment addendum giving financial credit to those students affected by this decision.

NOTE: This decision, impacting the VN program, was ultimately determined by the Executive Administrative team at CLC.

VIOLATION #7

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

“Each teacher assistant shall work under the direction of an approved instructor. No more than one teacher assistant may be assigned to each instructor. Each teacher assistant shall assist the instructor in skill lab and clinical teaching only. The instructor to whom the teacher assistant is assigned shall be available to provide direction to the teacher assistant as needed.”

Violation #7: Student files examined by Board representatives during the program inspection documented tutoring and counseling by a Board-approved Teacher Assistant, as well as multiple instances of a “Test/Exam Counseling Form” signed by the Teacher Assistant. This indicates that the Teacher Assistant was assigned responsibilities outside of the scope of the regulation.

Required Correction: Submit a written description of responsibilities for a Teacher Assistant that is within the scope of the regulation. Describe the allocation of the Teacher Assistant’s hours and responsibilities.

Director Response: *(Appendix: G- Vocational department TA and Administrative Assistant Job Descriptions).*

The Teaching Assistant in question, Jonathan Boyer, has a dual job description inclusive of also being an LVN and essentially functions as an Administrative Assistant in the VN department. Questions were raised about and related to Mr. Boyer perhaps “working out of his scope of practice” during the BVNPT survey visit. In defense of Mr. Boyer, he has not proceeded to do anything outside his scope of practice as an Administrative Assistant in the VN department. The confusion may have occurred because he has more than one “hat” of tasks and duties.

There are two different Job Descriptions attached to Appendix G for the Board’s review. Please note that an Administrative Assistant at CLC is authorized to be present and participate and sign off as a Math Tutor and test proctor.

Proposed Action Plan: *It is possible for CLC to be more explicit in our job descriptions especially related to the TA position. It is also not problematic should the Board determine that it is more appropriate for the COLLEGE to determine which position is most appropriate and unique to the individual. In this case, CLC would not be opposed to assuring that, in the future, Mr. Boyer will function solely as an Administrative Assistant within the VN department and have that specifically stated in his HR personnel file.*

VIOLATION #8

Section 2530(f) of the Vocational Nursing Rules and Regulations states:
“The program’s instructional plan shall be available to all faculties.”

Violation #8: The program failed to provide a current, Board-approved Instructional Plan that was available for all faculties. (See Violation #2)

Required Correction: Provide documentation that each faculty member has received a copy of the Board approved Instructional Plan.

Director Response: *Upon completion and reconstruction of the 2012 Instructional Plan, Casa Loma Theory faculty will be presented with a hard copy of their respective Level content. Additionally and in an All-VN Faculty email communication on March 14th, 2016, faculty were advised that the complete Instructional Plan was now located on the CLC share drive and represented as well in Binders located in the DON, Administration office, and with the Compliance Officer.*

Proposed Action Plan:

The reviewed copy of the CLC Level 1 to Level 5 Instructional Plan (IP) is attached. Future actions include an annual review of each level content to determine correctional or revision action. The suggested time frame for this review is during the month of December when class schedules would permit more in-service and faculty development opportunities.

VIOLATION #9**Violation # 9**

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. Acceptable methods for make-up include:

- (1) Theory: case studies, independent study, written examination, attendance at seminars or workshops, auto-tutorial laboratory, and research reports.*
- (2) Clinical: performance evaluation in skills laboratory or additional time in the clinical area with clients/patients.”*

Board records confirm the program has an approved policy regarding attendance. Examination of student and program files during the inspection revealed that the attendance policy listed in the LVN Handbook is not consistent with the regulation in that the policy fails to differentiate acceptable make-up methods for theory and clinical absences. Further, examination of student files documented that the program did not follow its own policy when students exceeded attendance limits listed in the LVN Handbook and yet were not terminated from the program. In multiple instances,

individual students were maintained in the program and in some cases in the same term, despite exceeding the allowable amount of absences.

Required Correction: *Submit for Board approval a proposed policy regarding attendance and acceptable methods of make-up. Describe the steps to be taken and a time-line for upholding consistent implementation of the policy, once it is approved by the Board.*

Director Response:

The vocational nurse program has an attendance policy which allows 24 hours to be missed in combination of class/clinical. Yet, the policy also states that at the discretion of the Director of Nursing, a student may be allowed to exceed those absences.

Upon a review of the attendance for classes 1409A through 1601A, very few of our students exceed the 24 hours allowed. Out of a class of 25 students, an average of four students will exceed 24 hours in any one level.

The Director of Nursing is in close communication with the Registrar's Office following student attendance. When a student exceeds the current absences permitted, they are given a warning letter from the Registrar's Office. If they again are absent the Director of Nursing will meet with the student to determine based on the students grades, number of absences, contributions to class and reasons for absence, if the student will remain in the program.

Students who miss hours in either clinical or classroom are required to make up these hours before progressing forward in the program. These make up hours are tracked by the Registrar's Office and the Director of Nursing. As per Board policy students are given assignments based on the approved board methods. Due to the shortage of clinical facilities outside of our normal rotations, students cannot always make up those hours in a clinical facility and alternate assignments are given such as assignments in the skills lab or assigned case studies pertinent to their level of nursing care.

We are proposing a new attendance policy that gives our students more flexibility while at the same time allowing the Director of Nursing and Administrative Committee to make decisions based on a student's overall performance and not just one criterion.

The policy will be implemented at the beginning of each new class level. For the current classes this would be:

- 1504AM *Policy will not be changed from current*
- 1504PM *Policy will not be changed from current*
- 1507A *June 6*
- 1509A *June 6*
- 1601A *April 18*

Proposed Action Plan:

Given the short timeframe to gather and interpret information for this report, it would be prudent to continue this conversation over the next few months through committee and seek out additional information perhaps even investigate what other schools in this area are utilizing.

VIOLATION #10

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

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

Violation #10: Board records confirm the program has an approved policy for the evaluation of student performance. However, the policies listed in the School Catalog and LVN Handbook fail to note the number of times a student may fail a course and remain in the program. Board representatives examined a total of 59 student files, representing approximately 63% of current students and the most recently graduated class. In some cases an entire class was examined and in other cases, a representative sampling of a class was examined.

A total of 28 student files documented one (1) or more classes had been failed and students remained in the program despite as many as three (3) terms failed. While the School Catalog describes an appeals process for academic failure and that there is to be documentation of “evidence that the circumstances precipitating the unsatisfactory performance have been remedied,” the program failed to follow their own policy as noted by students with multiple course failures repeating the courses, sometimes beginning the next day, with no evidence of an Administrative Committee (as described in the catalog), and no mention of or correction of factors precipitating academic failure.

Review of student files also indicated multiple instances of failing grades being rounded up. In one (1) instance, a student failed two levels and was found to be a danger to patients, as documented by more than one (1) clinical instructor; the student was allowed to continue in the program without evidence of involvement of an Administrative Committee or correction of circumstances precipitating unsatisfactory performance. While the student had failed the entrance examination twice, the individual was admitted without evidence of additional education or experience (see violation #5).

Required Correction: Submit for Board approval a revised policy for the evaluation of student performance to determine the need for remediation or removal from the program. Submit a written plan, with a specific timeline, for how the policy, once approved, will be implemented.

Director Response: *(Appendix: I- New Remediation form).*

It is apparent that not all faculty were not well versed in what it meant to “remediate” their student as evidenced by the numerous home grown remediation paper works and lack of the CLC policies. There were significant findings on low to no use of a formal remediation process. Many faculty admitted to not being oriented or in-serviced and some were attempting to implement procedures used at another school!

Student outcomes suffer greatly under this kind of disorganization. It should be noted that final scores are a compilation of routine testing, quizzes, exams, homework, and special projects or tutorials. Once all scores are tallied if the GPA is at .5 or greater, the final score is rounded up which, in some instances, looks like a student was passed on a 74 % rather than a 75%. This fact often confuses students and is misinterpreted.

Current protocol is to identify all students at risk at the beginning of each level of study. Those with long absences like a leave of absence for pregnancy or those who recently were unsuccessful in the previous level are invited to attend a meeting with the DON/ADON and faculty to discuss how to improve study habits this time and are encouraged to attend after class and weekend Zoom tutorials on practice test-taking strategy sessions and “how to study in nursing school” sessions.

Proposed Action plan:

The Remediation policy is extremely valuable tool at all levels and must be explained, observed, and measurable through the interactions between faculty, students, and the DON/ADON. It is a delicate process to monitor and move a student through the process of low-risk status to high-risk status and back to satisfactory during a course and/or a level. Successfully accomplished it is a rewarding experience for the student(s).

A specific Remediation Plan form has been designed (see attached) which provides a multi-step approach to improving individual student outcomes. It requires faculty and/or DON/ADON intervention, a correction plan, timeline requirements with the opportunity to revisit the issue/problem over a period of time. It also requires for acknowledgment signatures of everyone involved. Ultimately, a final correction is obtained inclusive of successful remediation or possible termination from the program.

VIOLATION #11

Section 2533(a) of the Vocational Nursing Rules and Regulations states:
“Vocational nursing programs shall include theory and correlated clinical experience.”
Section 2534(b) of the Vocational Nursing Rules and Regulations states:
“...Clinical objectives which students are expected to master shall be posted on patient care units utilized for clinical experience.”

Violation #11: During the program inspection a Board representative attended two (2) clinical facilities being utilized by current students. Clinical objectives were not posted at one (1) site. Neither clinical instructor was able to identify what students were covering

in theory at the time. Interviews with the instructors and the students indicated that, while valuable experiences were available at both sites, theory content was not being correlated in the clinical setting.

Required Correction: Provide documentation that current clinical objectives are posted in all clinical sites. Submit a written plan and timeline for implementation that describes how faculty will begin correlating theory content and clinical experiences.

Director Response: *Theory and Clinical faculty were in-serviced during a special Faculty meeting on August 25th, 2015 presented by a Guest educator and professional tutor, Janice Mosely Owens, RN as lecturer. (Appendix: K). Each faculty member received a tailored binder inclusive of all necessary CLC theory and clinical nursing documents, forms, calendars, and objectives specific to their teaching assignment(s). Additionally, all faculties received a copy level calendar syllabus outlining the daily theory content, testing, homework, and clinical assignments. It was accented that theory and clinical must work closer together with suggestion made on how to initiate the process, i.e. review which system was in progress, how to involve students proactively in client-care assignments relative to that system, recommended projects on associated drug medications, and the use of patient-care teaching and/or care plan review. Theory faculty were encouraged to maintain constant weekly communication on attendance, behavioral issues, student progress or at risk, and to each receive copies of all content presentations or addendum handouts used in theory.*

Proposed Action plan:

In lieu of the site visit results, a secondary faculty in-service is planned for the March 30th Faculty VN Meeting to focus on how to improve implementation of correlating clinical aspects to theory content. Examples will be provided and role-playing used to emphasize how to gradually improve student outcomes. All faculties will be required to report updates directly to the DON and copy DON on email communications.

VIOLATION #12

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.”

Violation #12: Over the past four (4) quarters, the program’s average annual pass rate has been between 12 percentage points (in the first quarter of 2015) to thirty percentage points below the state average annual pass rate. The program’s current average annual pass rate is 26 percentage points below the state average annual pass rate.

Required Correction: Submit a written plan for improvement of the NCLEX-PN® pass rates.

Director Response:

Formal campus and online post-graduation N-CLEX Review courses were initiated between mid-June and early December 2015 at four (4), nine (9), and fifteen (15) week durations and held 1-2 times weekday and/or weekend sessions. The courses were offered on campus as well as in an Online platform on Moodle. These courses were open and offered free for all previous cohorts (inclusive of Hawthorne, Anaheim, and Van Nuys campus) as far back to 2012 after verification of multiple past graduates who still had not taken/made a first attempt at the licensure exam. Further N-CLEX courses were scheduled within 2-4 weeks following completion and graduation of cohorts starting with 1407-A.

Students received weekly/daily agendas of full VN content topics along with mini-lectures with presentation materials and a series of weekly/Cumulative content Practice N-CLEX questions and answer keys with rationales. Initially, there was relatively a high success rate for attendance and completing the Practice exercises for the first three (3) months then a gradual drop off was noted as graduates reported the “need to make working a higher priority than studying”. Many felt “they already knew enough, referenced passing the HESI Exit on the first attempt, and wished they could take the exam sooner”. Retention of content was discussed and new grads had an opportunity to “brain storm” with peers who had taken the N-CLEX within a 3-6 month period and either passed or failed. It is the director’s belief this partially contributed to slight increase (from 33% to 66%) in the 4th Quarter pass rate at Van Nuys. The Review schedule was discontinued during the holiday season due to lack of attendance and was not resumed in January 2016 based on lack of a qualified instructor.

Multiple faculty changes occurred from July 2015 inclusive of detailed evaluations of faculty lecture materials/binders, individual level preparation, testing materials, and student grade outcomes of two previous levels. Decisions were made quickly to move faculty to a more appropriate level to provide a higher teaching experience of certain theory content and an observed environment of competence and classroom organization, and implementation of available HESI and Saunders materials.

Proposed Action Plan:

Post-Graduate Capstone Review (a 3-4 week intensive N-CLEX –PN Review to begin approximately one month after graduation and initialize with both the 1504-A and 1504-PM. Suggested Capstone Review calendar for 2016 inclusive of:

2016 CAPSTONE N-CLEX-PN REVIEW COURSE (PROPOSAL SAMPLE)

Week One June 6 th to June 10 th , 2016	Proposed for Campus : M-T-W-Th 1000 to 1600 Daily & Weekly Cumulative Practice Exams
---	---

Week Two June 13 th to June 17 th , 2016	Proposed for Campus : M-T-W-Th 1000 to 1600 Daily & Weekly Cumulative Practice Exams
Week Three June 20 th to June 24 th , 2016	Proposed for Campus : M-T-W-Th 1000 to 1600 Daily & Weekly Cumulative Practice Exams
Week Four (Recommended for grads unable to successfully pass course Cumulative Practice exams in Week 3) June 28 th & 30 th , 2016	Proposed for Campus : T- Th 1000 to 1600 Daily & Weekly Cumulative Practice Exams

In conclusion, thank-you for the opportunity to share these details, documents, and graphics representative of our collective efforts to answer the stated violations regarding the Vocational Nursing program at Casa Loma College- Van Nuys campus. Certainly it is challenging to address serious issues in a short period of time and to respond in volume of pertinent content but that attempt has been made.

Regrettably, I was unable to reconstruct the CLC Instructional Plan in time to meet the designated deadline of March 15th, 2016. Nonetheless, it is in progress and will be submitted to the Board as soon as possible.

Please advise if there is any issue with our submission this evening. Further, all requested documents are additionally being scanned to a flash drive for mailing to the BVNPT tomorrow.

Kindly,

Brenda Beall-Boyer e/s

Brenda Beall-Boyer, VN Program Director
EDD/ET RN LNC

APPENDIX: A

Violation #1: Curriculum Objectives

APPENDIX: B

Violation #2: Instructional Plan Level 1- 5

APPENDIX: C

Violation #3: Curriculum Review Committee

APPENDIX: D

Violation #4: Clinical Site Evaluation Form & Examples

APPENDIX: E

Violation #5: Admission Criteria & TABE Exam Results

APPENDIX: F

Violation #6: Resources, HESI Addendum forms and Saunders

APPENDIX: G

Violation #7: Teaching Assistant/Administrative Assistant Job Descriptions

APPENDIX: H

Violation #8: Copies of Instructional Plan Available to Theory VN Faculty Team

APPENDIX: I

Violation #9: Attendance Policy Change Proposal

APPENDIX: J

Violation #10: New Remediation Form

APPENDIX: K

**Violation #11: Clinical Objectives Posted and Relationship of Clinical to Theory
Faculty In-Service Brochure**

APPENDIX: L

Request for New Class Admission- 1607-A

APPENDIX: E

Violation #5: Admission Criteria & TABE Exam Results

In response to Violation #5, eight vocational nurse classes were analyzed for student admissions scores and current standing in the program.

Score Table for Classes 1409A and 1412A

Test	Reading	Grade Equiv	Math Comp	Grade Equiv	Math Applied	Grade Equiv	Language	Grade Equiv	Total Scale Score	Final Grade Level
Passing	19	10	18	7.8	14	8	18	8.8	563	9.2

1409A:

- 32 enrolled in class (3 alternates)
- 0 scored below the VN Program's set standard (shown above) for passing
- Based on a score of 10th grade - 14 scored in one component below the 10th grade level (highlighted in yellow and red on attached spreadsheet)
- Of the 14 students scoring below 10th grade, 12 of the students have either graduated or remain in the program. Only two did not reenroll and continue. (yellow highlight)
- Ten students met the minimum standard in all components (VN program as well as the 10th grade level) of the test and scored an overall total grade/score of 12 to 12.9+. Of these 10 students, six graduated without failing a level; three failed one or more levels and graduated and one remains in school. (highlighted in purple)

1412A:

- 24 enrolled in class
- One scored below the VN program's set standard (shown above) in language
- Nine students scored below the 10th grade level in one component of the test (yellow highlight)
- Of these nine students, three remain in the program and six did not re-enroll upon failing
- Seven students who met the minimum standard in all components of the test (VN program as well as the 10th grade level) and scored an overall total grade/score of 12 to 12.9+ failed one or more levels during the program (highlighted in purple). Five out of the seven remain in school.

New passing scores were initiated with all applicants enrolling into the 1501A class and forward. These are shown below.

Test	Reading	Grade Equiv	Math Comp	Grade Equiv	Math Applied	Grade Equiv	Language	Grade Equiv	Total Scale Score	Total Grade Equiv
------	---------	-------------	-----------	-------------	--------------	-------------	----------	-------------	-------------------	-------------------

Score	20	11.1	20	9.1	16	10.1	19	10.0	586	11.1
-------	----	------	----	-----	----	------	----	------	-----	------

1501A:

- 9 students enrolled
- Two students scored below the minimum VN program standard in one or more components of the test – both of these students are currently in school. (highlighted in yellow)
- Two students scored an overall total grade/score of 12.9. Of the two students, one scored below VN standard in one component and failed three levels and did not re-enroll after third fail with the second student currently in school after failing two times.

1504A AM:

- 19 students
- Eight students scored below the minimum VN program standard and/or below the 10th grade level. (highlighted in yellow)
- Of these students two students withdrew in L2 and L3 for personal reasons and six students remain in the program

1504A PM:

- 9 students
- Six students scored below the VN standard and/or 10th grade level.
- All six students remain in school in level 5

1507A:

- 18 students
- Six students scored below the minimum VN standard and/or below the 10th grade level.
- Of the six students, two failed level one and repeated and remain in school; one student withdrew for family reasons; three remain in school in original class L3

1509A:

- 19 students
- Nine students scored below the minimum VN standard and/or 10th grade level.
- Of these nine students, three withdrew for personal reasons; two failed L2 and may re-enroll with next class; and four students remain in the program with original class
- Two students who passed all components of the test and scored an overall grade of 12.9+ failed L2 and may re-enroll with next class

1601A:

- 17 students
- Two students scored below the minimum VN standard and/or 10th grade level
- These two students remain in the program in L1

- 14 out of the 17 students had an overall grade of 12.9+

Based on the above analyses, neither the admissions test scores alone, regardless of the level of achievement, are not sufficient to determine success in the program. Many factors play into an applicant's success other than the admissions test, from early schooling, cultural differences, or English as a second language.

The VN Program re-enrolls those students who the Program Director determines can be successful, after addressing the factors which lead to their initial termination. Academics being only one factor. When a student fails, the student meets with the Program Director – if the Program Director believes the student has legitimate reasons as to why they failed and have addressed those issues satisfactorily, that student is allowed re-enrollment. The College does not charge any repeat fees.

Below is the revised admissions policy addressing the minimum test scores necessary and the frequency of taking the tests.

General Admissions Requirements

To be considered for admission to Casa Loma College, you must meet the following minimum requirements, although completing these requirements does not guarantee admissions.

1. Meet with an Admissions Representative
2. Complete a questionnaire for application
3. Graduate of an accredited High School; or have received their GED from an accredited testing organization or have had foreign transcripts evaluated and state on the evaluation that "United States High School requirements have been met."
4. Achieve the minimum or higher passing score on the admissions test.
 - a. Candidates must meet the minimum math and reading proficiency scores required for their program of choice:

Test Section	DMS	MRI	PTA	VN
Reading	20/25	20/25	21/25	20/25
Math Comp	22/25	22/25	22/25	20/25
Math Applied	17/25	17/25	19/25	16/25
Language	20/25	20/25	22/25	19/25
Total	594 / 11.2 grade	594 / 11.2 grade	615 / 12.9+	586 / 11.1 grade

5. Applicants who fail to pass the admissions test on the first attempt may retake those section/s failed after a seven day waiting period. If after the second try, the applicant has not passed, the applicant may try a third time, however, is required to retake the entire admissions test. The applicant must wait the required 30 day waiting period.
6. If the admission test score falls below the minimum score allowable for enrollment, and based on the student's documented college education, related work experience, and/or personal interview, the Program Director may approve special consideration for enrollment
7. **For Re-enrollments** - If the date on the entrance test exceeds two years from the re-enroll start date, the student must retake the entrance exam. Or if the entrance exam scoring table has changed in grading criteria by two or more points per section, the student must retake the entrance exam.
8. Complete the Enrollment Application.
9. Complete all financial arrangements with the financial aid department or student accounts. All financial arrangements must be completed prior to admission. (Some circumstances may prevent completion prior to admission)
10. Sign an Enrollment Agreement

If Casa Loma College has reason to believe that the high school diploma submitted by a candidate for enrolment is not valid or was not obtained from an institution that provides secondary school education, we will evaluate the validity of the candidate's high school completion. Resources utilized to check the validity of high school diplomas are the California Department of Education, Western Association of Schools and Colleges and National Center for Educational Statistics. If a diploma, transcript or credentials, is determined to be not valid, the student will be denied admission into the College.

In addition to the above, refer to specific program admissions requirements below.

Program Requirements

To be considered for admission into any program, you must meet not only the general requirements, but also the requirements for your program. The enrollment process is considered complete when all requirements, as identified in the general and program specific admissions criteria have been met.

Vocational Nurse Program

1. Fulfillment of all general required admissions criteria.
2. Clearance on consumer background check and drug test—completed after the start of the program; however, if the criminal background report required for clinical placement discloses violations, even if expunged, the finding may prevent the student from being

placed in clinical or become licensed as an LVN, or the student may be terminated from the program.

3. Meet the essential functions of a vocational nurse student and Licensed Vocational Nurse.

Proposed Action Plan: Development and planning will begin immediately to identify and evaluate other tests. Effective with the next cohort enrollment the plan will be implemented:

1. Research the validity and use of the TEAS, CNET and NET examinations in place of the currently used TABE Exam for admissions testing
2. Research admissions criteria related to "pre-nursing prerequisite"
3. Incorporate panel interviews into the admissions process focusing on assessment of motivation, attitude and preparedness
4. Develop a plan for identification and advising of high risk students admitted to the program
5. Calculate and analyze retention rates per level
6. Evaluate strategies for NCLEX-PN success



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

February 18, 2016

Brenda Beall, Director
Vocational Nursing Program
Casa Loma College, Van Nuys
6725 Kester Avenue
Van Nuys, CA 91405

Subject: Notice of Decisions

Dear Ms. Beall,

On February 17, 2016, the Acting Executive Officer considered the consultant's report regarding Consideration of Findings of Program Inspection relative to the *Casa Loma College, Van Nuys, Vocational Nursing Program*. The following decisions were rendered.

Recommendations:

1. **Effective immediately**, rescind approval for ongoing admissions for the Casa Loma College, Van Nuys, Vocational Nursing Program.
2. 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.
3. Require the program to correct violations identified during the onsite inspection and submit a report identifying proposed revisions and implemented interventions to include the following no later than **March 15, 2016**.
 - a. Curriculum Objectives
 - b. Implementation of and availability to faculty of the current Board-approved Instructional Plan
 - c. Evaluation of the curriculum
 - d. Evaluation of clinical facilities
 - e. Admission, screening, and selection criteria
 - f. Adequacy of resources to meet program objectives
 - g. Responsibilities of a Teacher Assistant consistent with regulations
 - h. Attendance
 - i. Evaluation of student performance and the need for remediation or termination from the program

- j. Correlation of theory and clinical objectives.
4. Submit a written plan for improvement of the program's NCLEX-PN® pass rates no later than **March 15, 2016**.
 5. Submit clinical placement plans for all enrolled students throughout their program of study using the provided Faculty/Student Clinical Assignment Form, the Maternity Faculty/Student Clinical Assignment Form, and the Pediatric Faculty/Student Clinical Assignment Forms and completing them as instructed, **no later than March 15, 2016**.
 6. Place the Casa Loma College, Van Nuys, Vocational Nursing Program on the Board's May 2016 agenda for consideration of provisional approval.

Rationale: With four (4) consecutive quarters of average annual pass rates substantially greater than 10 percentage points below the state average, the program's current average annual pass rate is now **46%**, which is **26** percentage points **below** the state average annual pass rate.

In the face of such poor performance on the licensing examination, an unannounced program inspection identified a total of **11 additional violations**, all of which are **uncorrected** at this time.

The number and significance of the violations, in combination with pass rates that are in violation of the regulations and the need for consumer protection, warrant immediate rescission of the program's approval for ongoing admissions and referral to the full Board for consideration of provisional approval.

Please refer to the *Notice of Violations*, sent separately, for more detailed instructions regarding items listed in number 3, above. Enclosed please find forms for use in providing documentation of proposed placements.

Do not hesitate to contact me regarding questions or concerns. Separate correspondence will follow regarding presentation at the May 2016 Board meeting.

Sincerely,

Donna G. Johnson

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

Enclosures: Faculty/Student Clinical Assignment Form, Maternity Faculty/Student Clinical Assignment Form, and Pediatric Faculty/Student Clinical Assignment Form



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



Faculty/Student Clinical Assignments

Complete for all currently enrolled and all proposed students.

Extend this table as necessary to allow for all clinical experiences for all students in a given class.

PROGRAM: _____

BOARD APPROVED CLINICAL HOURS for this TERM _____ DATE of IP APPROVAL _____ # of TERMS in PROGRAM _____

PROVIDE CLASS CALENDARS FOR ALL ROTATIONS LISTED.

CLASS: Individual Student (List numerically-do not list names)	Dates of Experience	Assigned Faculty	Assigned Facility	# of Students Allowed / Instructor	# of Students Actually in Facility	Level/ Terms	Days of Week	Time of Day	# of Hours Per Week	# of Weeks In Facility	Total Hours/ Facility



BUSINESS, CONSUMER SERVICES, AND HOUSING AGENCY • GOVERNOR EDWARD 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



Pediatric – Faculty/Student Clinical Assignments

Complete for all currently enrolled and all proposed students.

Extend this table as necessary to allow for all Pediatric clinical experiences for all students in a given class.

PROGRAM: _____

OF BOARD APPROVED CLINICAL HOURS FOR PEDIATRICS _____ DATE OF IP APPROVAL _____ TERM _____

OF BOARD APPROVED THEORY HOURS FOR PEDIATRICS _____ PROVIDE CLASS CALENDARS FOR PEDIATRICS

<u>CLASS:</u> Individual Student (list numerically-do not list names)	Dates of Experience	Assigned Faculty	Assigned Facility	# of Students Allowed / Instructor	# of Students Actually in Class	Days of Week	Time of Day	# of Hours Per Week	# of Weeks in Facility

Agenda Item #12.B.2., Attachment E



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

February 18, 2016

Brenda Beall, Director
Vocational Nursing Program
Casa Loma College, Van Nuys
6725 Kester Avenue
Van Nuys, CA 91405

Subject: Notice of Violation

Dear Ms. Beall,

On February 3 and 4, 2016, two (2) Board representatives conducted an unannounced program inspection. Physical resources were assessed; students were interviewed in classrooms and two clinical sites; faculty, director, and other program representatives were interviewed; and program records and student files were inspected. Based on the findings of the inspection, the following violations were identified.

Section 2526(a)(4) 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 ...
(4) Curriculum objectives.”

Violation #1:

Board records confirm the program has Board-approved curriculum objectives that describe clinical expectation of the student at the end of each term. During the program inspection, Board representatives requested a copy of the curriculum objectives. The program produced a copy of theory objectives and then detailed lists of clinical tasks. While generalized clinical objectives are provided for each course, in addition to the detailed lists of clinical tasks, curriculum objectives are not in use to assist faculty and students understand the progressive sequence of clinical expectations.

Required Correction:

Submit for Board approval curriculum objectives that are consistent with the Board-approved Instructional Plan and the Board-approved terminal objectives. **Due no later than March 15, 2016.**

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 #2: Board records confirm that a major curriculum revision was approved in October 2012, to be implemented in January 2013. The Board-approved Instructional Plan was requested. The program produced an instructional plan with a date of 2006. The program could not provide a copy of the instructional plan that was approved in 2012.

Required Correction: Submit a copy of the instructional plan approved by the Board in October 2012. **Due no later than March 15, 2016.**

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 #3: Board records confirm the program has a methodology for the evaluation of the curriculum. During the program inspection, Board representatives requested documentation of the evaluation of the curriculum. No documentation of evaluation of the curriculum was produced by the program, indicating the program has failed to evaluate the curriculum, despite significantly declining pass rates on the licensing examination.

Required Correction: Submit a plan and a timeline for evaluation of the curriculum, including an evaluation of the currency and consistency with the most recent NCLEX-PN® test plan. **Due no later than March 15, 2016.**

Section 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.”

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 #4: Board records confirm the program has a methodology for the evaluation of clinical facilities. During the program inspection, Board representatives requested documentation of the evaluation of clinical facilities. No documentation of evaluation of the clinical facilities was produced by the program, indicating the program has failed to evaluate the clinical facilities being utilized for clinical instruction of the students.

Required Correction: Submit for Board approval a plan and a timeline for evaluation of all clinical facilities, including oversight by the program director. **Due no later than March 15, 2016.**

Section 2526(a)(12) of the Vocational Nursing Rules and Regulations states:

“The institution shall apply to the Board for approval. Written documentation shall be prepared by the director and shall include:
... (12) Admission criteria.”

Section 2526(a)(13) of the Vocational Nursing Rules and Regulations states:

“The institution shall apply to the Board for approval. Written documentation shall be prepared by the director and shall include:
... (13) Screening and selection criteria.”

Violation #5: Board records confirm the program has approved policies for the admission, screening, and selection of applicants to the program. Examination of student files and other documents during the program inspection indicate that applicants without additional education and experience who scored below the stated minimum passing scores as listed on the assessment scoring sheets were admitted to the program. Minimum passing scores, according to the assessment scoring sheets are below high school level academics. Examination of the program’s School Catalog and Vocational Nursing Handbooks do not address specific minimum scores or the frequency and number of allowed retakes of the assessment examination.

Required Correction: Submit for Board approval a revised policy for the admission, screening, and selection of candidates to the program. **Due no later than March 15, 2016.**

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

“The program shall have sufficient resources, faculty, clinical facilities, library, staff and support services, physical space, skills laboratory and equipment to achieve the program’s objectives.”

Violation #6: During the program inspection, two (2) different classes of students noted that after instruction of the specific term was underway, as yet, not all students were given textbooks, which were to be provided by the program. The class admitted in January 2016 had been scheduled to begin in November 2015 and textbooks still had not arrived for all students. While the program stated that HESI computerized testing was to begin in Level 2, level 2 students noted not all students had been given resources or begun computerized assessments. As noted in the LVN Handbook, HESI Remediation and Proctored Exam scores are listed as components for evaluation of student progress, including in Level 2. Student interviews noted a shortage of faculty such that students could not attend clinical. The program director noted some faculty had been placed on furlough and more of her time was now devoted to teaching. Faculty meeting minutes from January 2015 up to October 2015 were reviewed and included mention of cash flow and restricted resources.

Required Correction: Submit documentation of acquisition of textbooks and HESI resources for all applicable students. Submit documentation of adequate faculty resources to accomplish program objectives. **Due no later than March 15, 2016.**

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

“Each teacher assistant shall work under the direction of an approved instructor. No more than one teacher assistant may be assigned to each instructor. Each teacher assistant shall assist the instructor in skill lab and clinical teaching only. The instructor to whom the teacher assistant is assigned shall be available to provide direction to the teacher assistant as needed.”

Violation #7: Student files examined by Board representatives during the program inspection documented tutoring and counseling by a Board-approved Teacher Assistant, as well as multiple instances of a "Test/Exam Counseling Form" signed by the Teacher Assistant. This indicates that the Teacher Assistant was assigned responsibilities outside of the scope of the regulation.

Required Correction: Submit a written description of responsibilities for a Teacher Assistant that is within the scope of the regulation. Describe the allocation of the Teacher Assistant's hours and responsibilities. **Due no later than March 15, 2016.**

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

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

Violation #8: The program failed to provide a current, Board-approved Instructional Plan that was available for all faculty. (See Violation #2)

Required Correction: Provide documentation that each faculty member has received a copy of the Board approved Instructional Plan. **Due no later than March 15, 2016.**

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. Acceptable methods for make-up include:

- (1) Theory: case studies, independent study, written examination, attendance at seminars or workshops, auto-tutorial laboratory, and research reports.
- (2) Clinical: performance evaluation in skills laboratory or additional time in the clinical area with clients/patients."

Violation #9: Board records confirm the program has an approved policy regarding attendance. Examination of student and program files during the inspection revealed that the attendance policy listed in the LVN Handbook is not consistent with the regulation in that the policy fails to differentiate acceptable make-up methods for theory and clinical absences. Further,

examination of student files documented that the program did not follow its own policy when students exceeded attendance limits listed in the LVN Handbook and yet were not terminated from the program. In multiple instances, individual students were maintained in the program, and in some cases in the same term, despite exceeding the allowable amount of absences.

Required Correction: Submit for Board approval a proposed policy regarding attendance and acceptable methods of make-up. Describe the steps to be taken and a time-line for upholding consistent implementation of the policy, once it is approved by the Board.
Due no later than March 15, 2016.

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

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

Violation #10: Board records confirm the program has an approved policy for the evaluation of student performance. However, the policies listed in the School Catalog and LVN Handbook fail to note the number of times a student may fail a course and remain in the program.

Board representatives examined a total of 59 student files, representing approximately 63% of current students and the most recently graduated class. In some cases an entire class was examined and in other cases, a representative sampling of a class was examined.

A total of 28 student files documented one (1) or more classes had been failed and students remained in the program despite as many as three (3) terms failed. While the School Catalog describes an appeals process for academic failure and that there is to be documentation of “evidence that the circumstances precipitating the unsatisfactory performance have been remedied,” the program failed to follow their own policy as noted by students with multiple course failures repeating the courses, sometimes beginning the next day, with no evidence of an Administrative Committee (as described in the catalog), and no mention of or correction of factors precipitating academic failure.

Review of student files also indicated multiple instances of failing grades being rounded up. In one (1) instance, a student failed two levels and was found to be a danger to patients, as documented by more than one (1) clinical instructor; the student was allowed to continue in the program without evidence of involvement of an Administrative Committee or correction of circumstances precipitating unsatisfactory performance. While the student had failed the entrance examination twice, the individual was admitted without evidence of additional education or experience (see violation #5).

Required Correction: Submit for Board approval a revised policy for the evaluation of student performance to determine the need for remediation or removal from the program. Submit a written plan, with a specific timeline, for how the policy, once approved, will be implemented. **Due no later than March 15, 2016.**

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

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

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

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

Violation #11: During the program inspection a Board representative attended two (2) clinical facilities being utilized by current students. Clinical objectives were not posted at one (1) site. Neither clinical instructor was able to identify what students were covering in theory at the time. Interviews with the instructors and the students indicated that, while valuable experiences were available at both sites, theory content was not being correlated in the clinical setting.

Required Correction: Provide documentation that current clinical objectives are posted in all clinical sites. Submit a written plan and timeline for implementation that describes how faculty will begin correlating theory content and clinical experiences. **Due no later than March 15, 2016.**

February 18, 2016
Notice of Violations
Casa Loma College, Van Nuys
Vocational Nursing Program
Page 8 of 8

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.”

Violation #12: Over the past four (4) quarters, the program’s average annual pass rate has been between 12 percentage points (in the first quarter of 2015) to thirty percentage points below the state average annual pass rate. The program’s current average annual pass rate is 26 percentage points below the state average annual pass rate.

Required Correction: Submit a written plan for improvement of the NCLEX-PN® pass rates. **Due no later than March 15, 2016.**

Be informed that such violations jeopardize the approval status of the program.

Should you have questions, please contact the Board.

Sincerely,

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

Agenda Item #12.B.2., 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



February 22, 2016

Brenda Beall, Director
Vocational Nursing Program
Casa Loma College, Van Nuys
6725 Kester Avenue
Van Nuys, CA 91405

Subject: Program Approval Status

Dear Ms. Beall,

The Board of Vocational Nursing and Psychiatric Technicians (Board) is scheduled to consider the following elements relative to the Casa Loma College, Van Nuys, Vocational Nursing Program on **May 13, 2016**:

- Consideration of Placement on Provisional Approval

In preparation for that meeting, information is requested relative to the program's enrollment, approved faculty, clinical resources, and other critical program resources. Please complete and submit the attached forms, and any other materials you wish considered, **no later than March 15, 2016**.

Should you have questions, please do not hesitate to contact me at (916) 263-7842.

Sincerely,

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

Attachments:

1. Enrollment Data Table
2. Faculty and Facility Forms
3. Faculty/Student Clinical Assignment Form
4. Maternity Faculty/Student Clinical Assignment Form
5. Pediatric Faculty/Student Clinical Assignment Form



BUSINESS, CONSUMER SERVICES, AND HOUSING AGENCY • GOVERNOR EDMLIND 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



Faculty/Student Clinical Assignments

Complete for all currently enrolled and all proposed students.

Extend this table as necessary to allow for all clinical experiences for all students in a given class.

PROGRAM: _____

BOARD APPROVED CLINICAL HOURS for this TERM _____ DATE of IP APPROVAL _____ # of TERMS in PROGRAM _____

PROVIDE CLASS CALENDARS FOR ALL ROTATIONS LISTED.

CLASS: Individual Student (List numerically-do not list names)	Dates of Experience	Assigned Faculty	Assigned Facility	# of Students Allowed / Instructor	# of Students Actually in Facility	Level/ Terms	Days of Week	Time of Day	# of Hours Per Week	# of Weeks In Facility	Total Hours / Facility



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



Pediatric – Faculty/Student Clinical Assignments

Complete for all currently enrolled and all proposed students.

Extend this table as necessary to allow for all Pediatric clinical experiences for all students in a given class.

PROGRAM: _____

OF BOARD APPROVED CLINICAL HOURS FOR PEDIATRICS _____ DATE OF IP APPROVAL _____ TERM _____

OF BOARD APPROVED THEORY HOURS FOR PEDIATRICS _____ PROVIDE CLASS CALENDARS FOR PEDIATRICS _____

<u>CLASS:</u> Individual Student (list numerically-do not list names)	Dates of Experience	Assigned Faculty	Assigned Facility	# of Students Allowed / Instructor	# of Students Actually in Class	Days of Week	Time of Day	# of Hours Per Week	# of Weeks in Facility

Agenda Item #12.B.2., Attachment G

Johnson, Donna@DCA

From: Johnson, Donna@DCA
Sent: Monday, March 07, 2016 2:37 PM
To: brenda.beall@casalomacollege.edu
Subject: FW: Requesting Admissions
Attachments: Blank Enrollment Data Table.doc; Copy of Blank Faculty and Facilities Form 7-26-10.xls; FACULTY STUDENT CLINICAL ASSIGNMENTS 8.11.14.doc; MATERNITY FACULTY STUDENT CLINICAL ASSIGNMENTS 8.11.14.doc; PEDIATRIC FACULTY STUDENT CLINICAL ASSIGNMENTS 8.11.14.doc

Brenda –

I am sending this email in response to your inquiry regarding admission of students.

As you know, based on the decisions rendered on February 18, 2016, the program may not admit students at this time. The program must request to admit students. Because the program has been referred to the May 2016 Board agenda, a request to admit students would be heard by the full Board at that meeting.

The email I have forwarded to you explains the process of requesting to admit students and provides the required forms for documentation. That email also describes what documentation is required.

HOWEVER, because your program is being considered for placement on provisional approval, the next opportunity to request approval to admit students will be at the Board meeting on May 13, 2016. All documentation for that request to admit students must be received by the Board (meaning via electronic correspondence with me, as your NEC) *no later than March 15, 2016.*

Please contact me should you have any questions.

Donna

Donna G. Johnson, RNP, MS, MA
Nursing Education Consultant
Board of Vocational Nursing and Psychiatric Technicians
2535 Capitol Oaks Drive, Suite 205
Sacramento, CA 95833
Email: donna.johnson@dca.ca.gov
Phone: 916-263-7842
Fax: 916-263-7866

From: Johnson, Donna@DCA
Sent: Wednesday, August 26, 2015 5:26 PM
Subject: Requesting Admissions

Director:

As a consultant I am frequently asked about how to request approval to admit students or change the ongoing pattern of admissions. This email is an attempt to answer those questions.

Board regulations (Section 2530(k) of the Vocational Nursing Rules and Regulations) state:

"The program shall have prior Board approval to increase the number of students per class and/or increase the frequency of admission of classes. Criteria to evaluate a school's request to increase the number of students per class and/or increase the frequency of class admissions include but are not limited to:

- (1) Sufficient program resources as specified in Section 2530(a).
- (2) Adequacy of clinical experience as specified in Section 2534.
- (3) Licensure examination pass rates as specified in Section 2530(l)."

In general, allow approximately two months for processing of a request to admit students or to change the ongoing pattern of admissions. At a minimum, the following data is required (see attached forms).

- 1) Enrollment Data Table. The data is requested for a period of time which is dependent upon several factors. Please contact me, your NEC, for clarification of the time period to include on the Enrollment Data Table.
- 2) List CURRENT faculty and facilities. Only include current faculty and currently utilized facilities.
- 3) Complete the Faculty/Student Clinical Assignment forms for all proposed students throughout the length of their educational program.
- 4) Complete the Maternity Faculty/Student Clinical Assignment forms for all proposed students.
- 5) Complete the Pediatric Faculty/Student Clinical Assignment forms for all proposed students.
- 6) Depending on the current student enrollment, it will be necessary to document adequacy of faculty and facilities during the time of overlap of current and proposed students. Contact me, your NEC, for clarification on this. Save time and ask before submitting incomplete data.
- 7) A brief explanation of the following:
 - a. Date of desired admission(s)
 - b. Date of graduation(s)
 - c. Exact number of students being requested
 - d. If the request is to change pattern of admission, provide rationale.

Please do not hesitate to contact me for questions or clarification.

Donna

Donna G. Johnson, RNP, MS, MA
Nursing Education Consultant
Board of Vocational Nursing and Psychiatric Technicians
2535 Capitol Oaks Drive, Suite 205
Sacramento, CA 95833
Email: donna.johnson@dca.ca.gov
Phone: 916-263-7842
Fax: 916-263-7866



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

May XX, 2016

Brenda Beall, Director
Vocational Nursing Program
Casa Loma College, Van Nuys
6725 Kester Avenue
Van Nuys, CA 91405

Subject: Notice of Change in Approval Status

Dear Ms. Beall:

Pursuant to the action of the Board of Vocational Nursing and Psychiatric Technicians (Board) on May 13, 2016, the Casa Loma College, Van Nuys, Vocational Nursing Program has been placed on provisional approval for the three-month period from May 13, 2016 through August 31, 2016.

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 **XXXX**

AREAS OF NON-COMPLIANCE (VIOLATIONS(S))

Section 2526(a)(4) of title 16 of the California Code of Regulations states:

"The institution shall apply to the Board for approval. Written documentation shall be prepared by the director and shall include ...
(4) Curriculum objectives."

Section 2526(a)(7) of title 16 of the California Code of 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"

Section 2526(a)(8) of title 16 of the California Code of 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.”

Section 2526(a)(11) of title 16 of the California Code of 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.”

Section 2534(c) of title 16 of the California Code of 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.”

Section 2526(a)(12) of title 16 of the California Code of Regulations states:

“The institution shall apply to the Board for approval. Written documentation shall be prepared by the director and shall include:
... (12) Admission criteria.”

Section 2526(a)(13) of title 16 of the California Code of Regulations states:

“The institution shall apply to the Board for approval. Written documentation shall be prepared by the director and shall include:
... (13) Screening and selection criteria.”

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

“Each teacher assistant shall work under the direction of an approved instructor. No more than one teacher assistant may be assigned to each instructor. Each teacher assistant shall assist the instructor in skill lab and clinical teaching only. The instructor to whom the teacher assistant is assigned shall be available to provide direction to the teacher assistant as needed.”

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

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

Section 2530(h) of title 16 of the California Code of 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. Acceptable methods for make-up include:

- (1) Theory: case studies, independent study, written examination, attendance at seminars or workshops, auto-tutorial laboratory, and research reports.
- (2) Clinical: performance evaluation in skills laboratory or additional time in the clinical area with clients/patients.”

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

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

Section 2533(a) of title 16 of the California Code of Regulations states:

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

Section 2534(b) of title 16 of the California Code of Regulations states:

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

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.”

Section 2533(f) of title 16 of the California Code of Regulations states:

“All curricular changes that significantly alter the program philosophy, conceptual framework, content, objectives, or other written

documentation as required in Section 2526, shall be approved by the Board prior to implementation . . .

Section 2526(g) of title 16 of the California Code of Regulations and Section 2527(c) of title 16 of the California Code of Regulations states:

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

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 Casa Loma College, Van Nuys, Vocational Nursing Program for the past 17 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 2012	74%	69%	-5
Apr – Jun 2012	74%	62%	-17
Jul – Sep 2012	74%	56%	-18
Oct – Dec 2012	74%	56%	-18
Jan – Mar 2013	73%	60%	-13
Apr – Jun 2013	73%	63%	-10
Jul – Sep 2013	74%	73%	-1
Oct – Dec 2013	76%	78%	+2
Jan – Mar 2014	76%	79%	+3
Apr – Jun 2014	73%	76%	+3
Jul – Sep 2014	73%	76%	+3
Oct – Dec 2014	72%	66%	-6
Jan – Mar 2015	71%	59%	-12
Apr – Jun 2015	72%	52%	-20
Jul – Sep 2015	72%	42%	-30
Oct – Dec 2015	72%	46%	-26
Jan – Mar 2016	73%	40%	-33

REQUIRED CORRECTION(S)

1. Place the Casa Loma College, Van Nuys, Vocational Nursing Program on provisional approval for the three (3) month period from May 13, 2016 through August 31, 2016, 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.
2. Require the program to provide no less than one (1) instructor for every ten (10) students in clinical experiences.
3. Require the program to admit no additional classes without prior approval by the full Board.
4. 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, 2016**.
5. Require the program to submit the following, no later than June 15, 2016
 - a. Curriculum Objectives
 - b. A copy of the Board-approved Instructional Plan
 - c. Proposed methodology and timeline for evaluation of the curriculum
 - d. Documentation of evaluation of clinical facilities
 - e. A proposed policy for admission, selection, and screening of applicants to the program and steps to ensure consistent implementation of the policy
 - f. Plan for provision of resources to meet the objectives of the program
 - g. Description of responsibilities of a Teacher Assistant and allocation of Teacher Assistant hours and responsibilities in the program
 - h. Documentation that all faculty have access to the Board-approved Instructional Plan
 - i. Proposed policy for attendance and appropriate make-up and plan for consistent implementation of the policy
 - j. Proposed policy for evaluation of student progress and determination of the need for remediation or termination from the program
 - k. Documentation of posting of clinical objectives on patient care units utilized for clinical experience
 - l. Plan and timeline for correlating theory in clinical practice experiences
 - m. Plan for improvement of NCLEX-PN® pass rates
6. Submit clinical placement plans for all enrolled students throughout their program of study using the provided Faculty/Student Clinical Assignment Form, the

Maternity Faculty/Student Clinical Assignment Form, and the Pediatric Faculty/Student Clinical Assignment Forms and completing them as instructed, **no later than June 15, 2016.**

7. Require the program to submit a comprehensive analysis of the program, specific actions taken to improve pass rates, timeline for implementation, and the effect of employed interventions. The report is due **no later than June 15, 2016.** 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
8. 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.
9. 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.
10. 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.
11. 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 **August 2016** 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 4 through 6, you must submit this documentation by the fifteenth day of the second month prior to the Board Meeting.

OTHER IMPORTANT INFORMATION

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

Kameka Brown, PhD, MBA, NP
Executive Officer

Enclosures

cc: Board Members

KB: dgj