

Agenda Item #27.C.6.



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

BOARD OF VOCATIONAL NURSING & PSYCHIATRIC TECHNICIANS

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COVER SHEET

SUBJECT: *Platt College, Alhambra, Vocational Nursing Program – Consideration of Request to Admit Students.* (Director: Rosemary Haggins, Alhambra, Los Angeles County, Private)

The Platt College, Alhambra, Vocational Nursing Program is presented to the Board for consideration of a request to admit one (1) class of 20 students beginning on **May 16, 2017**, only, graduating **August 18, 2018**. Approval of the requested class is recommended.

Recommendations:

1. Approve Platt College, Alhambra, Vocational Nursing Program's request to admit one (1) class of twenty (20) students to a class beginning on **May 16, 2017**, graduating **August 18, 2018, only**.
2. Continue the program's requirement to provide no less than one (1) instructor for every ten (10) students in clinical experiences.
3. Continue the program's requirement to admit no additional classes without prior approval by the full Board.
4. Continue the program's requirement 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.
5. Failure to take any of these corrective actions may cause the full Board to revoke the program's approval.

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DATE: January 23, 2017

TO: Board Members

FROM: Faye Silverman, R.N., M.S.N. /Ed., W.O.C.N., P.H.N.
Nursing Education Consultant

SUBJECT: Platt College, Alhambra, Vocational Nursing Program – Consideration of Request to Admit Students (Director: Rosemary Haggins, Alhambra, Los Angeles County, Private)

The Platt College, Alhambra, Vocational Nursing Program is presented to the Board for consideration of a request to admit one (1) class of 20 students beginning on **May 16, 2017**, only, graduating **August 18, 2018**. Approval of the requested class is recommended.

On August 21, 2015, the Board placed the Platt College, Alhambra, Vocational Nursing Program on provisional approval for the two (2) year period from **August 21, 2015** through **August 31, 2017**, and issued 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. Additionally, the Board approved the program's request to admit one (1) class of twenty (20) students beginning on **November 10, 2015**, graduating **January 30, 2017, only**.

The director confirmed that commencement of an approved class of twenty (20) students that was previously scheduled to begin on November 10, 2015, and graduate January 30, 2017, was **postponed**. The actual date of class commencement was **January 28, 2016**. Graduation is projected for **April 9, 2017**.

History of Prior Board Actions

(See Attachment A, History of Prior Board Actions)

Enrollment Data

The program offers full – time classes. Board approval is required prior to the admission of each class. The pattern of admissions for past, current, and proposed classes is seen in the enrollment table below.

The table indicates a **maximum enrollment of 20 students** for the period **November 2015 through August 2018**.

ENROLLMENT DATA				
CLASS DATES		#Students Admitted	#Students Current or Completed	Total Enrolled
Start	Complete			
6/14 FT		18	15	0 + 15 = 15
	11/15 (6/14 Class)		- 15	15 - 15 = 0
1/16 FT		14		0 + 7 = 7
	4/9/17 (1/16 FT Class)		-7	7 - 7 = 0
5/16/17 (Proposed)	8/18/18	20		0 + 20 = 20

Licensing Examination Statistics

The following statistics, furnished by Pearson VUE and published by the National Council of State Boards of Nursing as "Jurisdictional Summary of All First-Time Candidates Educated in Member Board Jurisdiction" for the period April, 2014 to December, 2016, specify the pass percentage rates for graduates of the Platt College, Vocational Nursing Program on the National Council Licensure Examination for Practical/Vocational Nurses (NCLEX-PN®).

NCLEX-PN® Licensure Examination Data							
Quarterly Statistics					Annual Statistics*		
Quarter	# Candidates	# Passed	% Passed	State Quarterly Pass Rate	Program Average Annual Pass Rate	State Average Annual Pass Rate [CCR §2530(I)]	Variance from State Average Annual Pass Rate
Apr – Jun 2014	2	1	50%	66%	50%	73%	-23
Jul – Sep 2014	7	2	29%	72%	38%	73%	-35
Oct – Dec 2014	4	2	50%	72%	39%	72%	-33
Jan – Mar 2015	No Candidates Tested			73%	38%	71%	-33
Apr – Jun 2015	No Candidates Tested			69%	36%	72%	-36
Jul – Sep 2015	No Candidates Tested			73%	50%	72%	-22
Oct – Dec 2015	No Candidates Tested			75%	N/A	72%	N/A
Jan – Mar 2016	No Candidates Tested			73%	N/A	72%	N/A
Apr – Jun 2016	4	4	100%	75%	100%	74%	+26
Jul – Sep 2016	7	5	71%	75%	82%	75%	+7
Oct – Dec 2016	No Candidates Tested			70%	82%	74%	+8

*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** (October 2016 through December 2016), no program candidates tested during Quarter 4 - 2016. The program's average annual pass rate is 82%.

The California average annual pass rate for graduates from approved vocational nursing programs who took the NCLEX-PN® Licensure Examination for the first time during the same period is 74%. The average annual pass rate for the Platt College Vocational Nursing Program is **10** percentage points **above** the state average annual pass rate. The program's average annual pass rate has been greater than 10 percentage points **below** the state average annual pass rate for six (6) of the past ten (10) quarters. It is also noted that the program has had no candidate tested during six (6) of the previous eight (8) 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 program's Board-approved faculty totals five (5) including the program director and one (1) Teacher Assistant. The director has 80% administrative responsibility. A total of four (4) instructors, including the director, are approved to teach in clinical areas.

Based on a maximum enrollment of 20 students, two (2) instructors are needed. Therefore, the program's approved faculty is **adequate** for the current and proposed enrollment.

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

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

The program 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 being taught.

Other Considerations

On February 6, 2014, noting a low number of graduates taking the licensure examination, the assigned consultant requested the program director submit a comprehensive analysis of the program's plan of correction, identification of problems negatively impacting student achievement, the effect of employed interventions, identification of required revisions, and a timeline for implementation.

On April 27, 2015, the Executive Officer approved the program's major curriculum revision, **and** continued to require the program to obtain Board approval prior to the admission of each class.

On August 21, 2015, the Board placed the Platt College, Alhambra, Vocational Nursing Program on provisional approval for the two (2) year period from **August 21, 2015** through **August 31, 2017**, and issued 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. At that time, the program's average annual pass rate was **36%**.

Recommendations:

1. Approve Platt College, Alhambra, Vocational Nursing Program's request to admit one (1) class of twenty (20) students to a class beginning on **May 16, 2017**, graduating **August 18, 2018, only**.
2. Continue the program's requirement to provide no less than one (1) instructor for every ten (10) students in clinical experiences.
3. Continue the program's requirement to admit no additional classes without prior approval by the full Board.
4. Continue the program's requirement to submit a follow up report no later than **May 1, 2017**. The report must include a comprehensive analysis of the program, specific actions taken to improve pass rates, timeline for implementation, and the effect of employed interventions. The following elements must be addressed in the analysis:
 - a. Admission Criteria
 - b. Screening and Selection Criteria
 - c. Terminal Objectives
 - d. Curriculum Objectives
 - e. Instructional Plan
 - f. Theory and Clinical Objectives for Each Course
 - g. Lesson Plans for Each Course
 - h. Textbooks
 - i. Attendance Policy
 - j. Remediation Policy
 - k. Evaluations of Theory and Clinical Faculty
 - l. Evaluations of Theory Presentations
 - m. Evaluations of Clinical Rotations and Their Correlation to Theory Presentations
 - n. Evaluation of Student Achievement
 - o. Current Enrollment
5. Continue the program's requirement to bring its average annual pass rate to no more than (10) ten percentage points below the State average annual pass rate.
6. Continue the program's requirement to demonstrate incremental progress in correcting the violations. If the program fails to satisfactorily demonstrate incremental progress the full Board may revoke the program's approval.
7. Continue the program's requirement to comply with all approval standards in Article 4 of the Vocational Nursing Practice Act, commencing at Business and Professions Code Section

2880, and Article 5 of the Board's Regulations, commencing at California Code of Regulations, Title 16, Section 2526.

8. Failure to take any of these corrective actions may cause the full Board to revoke the program's approval.
9. Continue the program's placement on the Board's **August 2017** agenda for reconsideration of provisional approval.

Rationale: Based on the most recent data available (October 2016 through December 2016), the program's average annual pass rate is **82%**, which is **10** percentage points **above** the state average annual pass rate. The program now has three **(3)** consecutive quarters **above** the state average annual pass rate.

An improvement plan was implemented by the program in late 2014, and again in early 2016. Since November 2015, the program's graduate population totals 15. The number of program graduates who have taken the NCLEX/PN® between November 2015 and December 2016 totals **11** or **73%** of the graduate population. Therefore, the number of graduates who take the licensing exam has improved compared to the last five consecutive quarters (January 2015 through March 2016) where no candidates tested.

The many significant changes implemented and planned by the program support the recommendation to approve the program's request to admit students at this time.

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

Attachment A: History of Prior Board Actions.

Agenda Item #27.C.6., Attachment A

PLATT COLLEGE VOCATIONAL NURSING PROGRAM

History of Prior Board Actions

- On April 10, 2008, the Board approved Anderson Medical Career College's request to begin a vocational nursing program at the City of Commerce campus with an initial class of 45 students on April 24, 2008 only, and a projected graduation date of April 24, 2010. The Board also approved the program curriculum for 1545.5 hours, including 585.5 theory and 960 clinical hours.
- **On January 12, 2010, a new program director was approved.**
- On June 17, 2010, the Board received the Program Records Survey and related materials.
- On June 21 – 22, 2010, the assigned consultant completed an onsite inspection to determine regulatory compliance for program approval.
- On July 20, 2010 the Executive Officer approved Anderson Medical Career College, Commerce City, Vocational Nursing Program's full initial accreditation for a four-year period from June 27, 2010 through June 26, 2014 and issued a certificate accordingly; **and**, approved the program's request to commence a part - time class of 35 students on August 15, 2010 to **replace** students scheduled to graduate June 27, 2010. The proposed class is scheduled to complete program requirements on August 30, 2012; **and** required the program to obtain Board approval prior to the admission of each class.
- On May 7, 2012 the program was sent a four (4) quarter notification of noncompliance with Section 2530 (l) failure to achieve required annual minimum pass rate.
- On June 7, 2012, the Executive Officer approved the following recommendations:
 1. Approve Anderson Medical Career College Vocational Nursing Program's request to admit a full-time class of 35 students commencing on June 4, 2012 and graduating on August 9, 2013, to **replace** students who will graduate September 23, 2012.
 2. Deny the program's request to admit a class of 25 students commencing January 5, 2013, and graduating June 28, 2015, at this time.
 3. Require the program to complete a comprehensive analysis of critical program elements and submit a written report by **June 30, 2012**. The report must include a summary of the program analysis, specific actions taken to improve program pass rates, timeline for implementation, and the effect of employed interventions. The following elements must be addressed in the analysis.

- a. Admission Criteria.
 - b. Screening and Selection Criteria.
 - c. Terminal Objectives.
 - d. Curriculum Objectives.
 - e. Instructional Plan.
 - f. Theory and Clinical Objectives for Each Course.
 - g. Lesson Plans for Each Course.
 - h. Textbooks.
 - i. Attendance Policy.
 - j. Remediation Policy.
 - k. Evaluations of Theory and Clinical Faculty.
 - l. Evaluations of Theory Presentations.
 - m. Evaluations of Clinical Rotations and Their Correlation to Theory Presentations.
 - n. Evaluation of Student Achievement.
 - o. Current Enrollment.
4. Continue to require the program to obtain Board approval prior to the admission of each class.
- **On February 27, 2013, Janice Montgomery was approved as the new director of the program.**
 - On June 1, 2013, the name of the program was changed to Platt College. The new offices are located in Alhambra, California, however, the school is associated with the Platt College, Los Angeles, campus.
 - On February 6, 2014, the Executive Officer approved the following recommendations:
 1. Approve Platt College, formerly Anderson Medical Career College, City of Commerce, Vocational Nursing Program's request to admit a full-time class of 35 students commencing on March 4, 2014 and graduating on June 17, 2015, to **replace** students who graduated January 16, 2014.
 2. Require the program to submit a follow-up report no later than **April 30, 2014**. The report must include a comprehensive analysis of the program's plan of correction, identification of problems negatively impacting student achievement, the effect of employed interventions, identification of required revisions, and a timeline for implementation.
 3. Continue to require the program to obtain Board approval prior to the admission of each class.
 - On May 23, 2014, new policies related to attendance, remediation, and evaluation of student progress were approved.
 - On May 28, 2014, updated documents related to the Program Record Survey were received.

- On February 18, 2015, the program was notified of four consecutive quarters more than 10 percentage points below the state average annual pass rate. An improvement plan was requested.
- On March 30, 2015, final revisions to the proposed philosophy, conceptual framework, and curriculum were accepted. The revised improvement plan was also received on this date.
- On April 17, 2015, the revised version of the Program Record Survey, containing all updated documents, including the proposed curriculum was received.
- On April 27, 2015, the Executive Officer rendered the following decisions:
 1. Approve the Platt College Vocational Nursing Program's request for a major curriculum revisions to include 1750 hours, including 671 theory hours and 1079 clinical hours.
 2. Continue to require the program to obtain Board approval prior to the admission of each class.
 3. Place the program on the Board's August 2015 agenda for consideration of placement on provisional approval.
- On May 13, 2015, the Board notified the school of five (5) consecutive quarters of program average annual pass rates greater than 10 percentage points below the state average annual pass rate and requested to submit documentation in preparation for presentation at the August 2015 Board meeting.
- On June 10, 2015, as requested by the program, the assigned consultant conducted a phone consultation with the program director and the school's president regarding presentation at the Board meeting.
- On August 21, 2015, the Board placed the Platt College, Alhambra, Vocational Nursing Program on provisional approval for the two (2) year period from August 21, 2015 through August 31, 2017, and issue a notice to the program to identify specific areas of non-compliance and requirements for correction as referenced in Section 2526.1 (e) of the California Code of Regulations. (See Attachment H); **and** Approved the Platt College, Alhambra, Vocational Nursing Program's request to admit one (1) class of twenty (20) students to a class beginning on November 10, 2015, graduating January 30, 2017, **only; and:**
 - a. Require the program to provide no less than one (1) instructor for every ten (10) students in clinical experiences.
 - b. Require the program to admit no additional classes without prior approval by the full Board.
 - c. 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 **September 15, 2015.**

- d. Require the program to submit follow up reports in nine (9) months, but no later than **May 1, 2016**, and 21 months, but no later than **May 1, 2017**. The reports must include a comprehensive analysis of the program, specific actions taken to improve pass rates, timeline for implementation, and the effect of employed interventions. The following elements must be addressed in the analysis:
 - p. Admission Criteria
 - q. Screening and Selection Criteria
 - r. Terminal Objectives
 - s. Curriculum Objectives
 - t. Instructional Plan
 - u. Theory and Clinical Objectives for Each Course
 - v. Lesson Plans for Each Course
 - w. Textbooks
 - x. Attendance Policy
 - y. Remediation Policy
 - z. Evaluations of Theory and Clinical Faculty
 - aa. Evaluations of Theory Presentations
 - bb. Evaluations of Clinical Rotations and Their Correlation to Theory Presentations
 - cc. Evaluation of Student Achievement
 - dd. Current Enrollment
 - e. 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.
 - f. 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.
 - g. 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.
 - h. Failure to take any of these corrective actions may cause the full Board to revoke the program's approval.
 - i. Place the program on the Board's **August 2017** agenda for reconsideration of provisional approval.
- The one (1) class of twenty (20) students to a class beginning on November 10, 2015, graduating January 30, 2017, was **postponed** and started on **January 28, 2016**, graduating **April 9, 2017**.