

Agenda Item #5.B.



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

Board of Vocational Nursing and Psychiatric Technicians
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DATE: April 18, 2017

TO: Board Members

FROM: Beth DeYoung, RN, MPH
Nursing Education Consultant

SUBJECT: Angeles Institute Vocational Nursing Program – Consideration of Placement on Provisional Approval; Consideration of Request to Admit Students (Director: Brandy Coward, Artesia, Los Angeles County – Private)

The Angeles Institute Vocational Nursing Program is presented to the Education Committee for consideration of placement on provisional approval due to non-compliance with regulatory requirements. Provisional approval is recommended.

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

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

Section 2530 (l) of the Code 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.”

In addition, the program requests to admit a full-time class of 45 students commencing on July 17, 2017, graduating on May 18, 2018, to **replace** the class that graduates on July 21, 2017.

The following table shows the variance of the program’s pass rates from state average annual pass rates of first time graduates of approved vocational nursing programs for the past eight (8) quarters. This data substantiates the program’s noncompliance with Section 2530 (l) of the California Code of Regulations.

NCLEX-PN®			
Quarter	State Annual Average Pass Rate	Program Annual Average Pass Rate	Variance from State Annual Average Pass Rate
Jan – Mar 2015	71%	58%	-13
Apr – Jun 2015	72%	59%	-13
Jul – Sep 2015	72%	59%	-13

NCLEX-PN®			
Quarter	State Annual Average Pass Rate	Program Annual Average Pass Rate	Variance from State Annual Average Pass Rate
Oct – Dec 2015	72%	53%	-19
Jan – Mar 2016	72%	55%	-17
Apr – Jun 2016	74%	52%	-22
Jul – Sep 2016	75%	60%	-15
Oct – Dec 2016	74%	61%	-13

History of Prior Board Actions

(See Attachment A)

Enrollment

The program offers full-time day classes that are nine (9) months in length. The program is approved to admit a class of 45 students four (4) times per year only, to **replace** graduating students.

The following table represents **current** and **projected** student enrollment based on class starts and completions. The table indicates a **maximum enrollment of 129 students** for the period **July 2016 through July 2017**.

ENROLLMENT DATA				
CLASS DATES		# Students Admitted	# Students Current or Completed	Total Enrolled
Start	Complete			
7/16 FT	04/17	45	31	31
10/16 FT	07/17	45	45	31 + 45 = 76
1/17 FT	10/17	43	39	76 + 39 = 115
	4/17 (7/16 Class)		-31	115 – 31 = 84
4/17	1/18	45		84 + 45 = 129
	7/17 (10/16 Class)		-45	129 – 45 = 84
7/17 (Proposed)	4/18	45		84 + 45 = 129

Licensing Examination Statistics

The following statistics, furnished by Pearson VUE and published by the National Council of State Boards of Nursing as “Jurisdictional Summary of All First-Time Candidates Educated in Member Board Jurisdiction” for the period January 2014 through December 2016 specify the pass percentage rates for graduates of the Angeles Institute 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 the State Average Annual Pass Rate
Jan – Mar 2014	40	32	80%	74%	79%	76%	+3
Apr – Jun 2014	17	10	59%	66%	78%	73%	+5
Jul – Sep 2014	16	8	50%	72%	73%	73%	0
Oct – Dec 2014	10	8	80%	72%	70%	72%	-2
Jan – Mar 2015	9	4	44%	73%	58%	71%	-13
Apr – Jun 2015	19	12	65%	69%	59%	72%	-13
Jul – Sep 2015	25	13	54%	73%	59%	72%	-13
Oct – Dec 2015	8	3	38%	75%	53%	72%	-19
Jan – Mar 2016	17	10	59%	73%	55%	72%	-17
Apr – Jun 2016	14	7	50%	75%	52%	74%	-22
Jul – Sep 2016	23	17	74%	76%	60%	75%	-15
Oct – Dec 2016	36	21	58%	70%	61%	74%	-13

*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.”

This data substantiates the program’s non-compliance with regulatory requirements for the previous eight (8) quarters (January 2015 through December 2016).

Based on the most recent data available (October through December 2016), the program’s average annual pass rate is **61%**. The California average annual pass rate for graduates from accredited 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 Angeles Institute Vocational Nursing Program is **thirteen** percentage points **below** the state average annual pass rate.

Faculty and Facilities

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

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

The program’s Board-approved faculty totals twelve (12) including the director and two (2) teaching assistants. The director has 90% administrative responsibility and 10% teaching duties. Nine (9) instructors and the director are approved for clinical instruction. Faculty stability is

evident with employment periods of two (2) to eleven (11) years for seven (7) faculty. Three (3) faculty were added in 2016 and two (2) new faculty have been added in 2017.

Based on a maximum enrollment of 129 students, nine (9) instructors are required for clinical supervision. Therefore, 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.”

The program has **sufficient** clinical facilities to afford the number type and variety of patients that will provide clinical experience consistent with competency-based objectives and theory.

Other Considerations

On October 14, 2010, the Executive Officer approved continued full accreditation for the Angeles Institute Vocational Nursing Program for the period November 2, 2010 through November 1, 2014 and issued a certificate accordingly; **and** continued the program’s approval for ongoing admissions of four (4) full-time day classes of 45 students each per year to replace graduating students, only.

In reviewing the program’s Board approved instructional plan, it was noted that the three (3) term curriculum concentrates didactic content in Term 2 and clinical content in Term 3 as follows:

Hours Provided	Term 1	Term 2	Term 3
Theory	196	380	0
Skills Lab	96	104	34
Clinical	200	0	520

On December 11, 2014, the program director submitted a letter describing rationale for this approach, as well as a description of mandatory on campus review of didactic content from Term 2 during Term 3. The letter was accompanied by a syllabus of the video review and the NCBSN review program that students complete during Term 3. Correlation between theory and clinical is maintained throughout the program.

On February 27, 2015, the Executive Officer approved continued approval for the Angeles Institute Vocational Nursing Program for the period November 2, 2014 through November 1, 2018, and issued a certificate accordingly; and continued the program’s current approval for ongoing admissions of four (4) full-time day classes of 45 students each per year to replace graduating students, only.

On February 25, 2016, the program director submitted a written plan to increase the program’s NCLEX pass rates. The plan included a mandatory NCLEX-PN® review for students who completed the program, inclusion of *Coursepoint* as a student resource, and the development

of a re-entry committee to determine readiness for students re-entering the program after an academic fail.

On August 22, 2016, the director was notified that the program's average annual pass rate had fallen below ten (10) percentage points of the state average annual pass rate for the past six (6) quarters.

On November 13, 2016, the director was notified that the program's average annual pass rate had fallen below ten (10) percentage points of the state average annual pass rate for the past seven (7) quarters. During a phone conversation following receipt of the notification, the program director verbalized the importance of improving the NCLEX-PN® pass rates and was confident the recently implemented interventions would improve the pass rates for quarter 4 (October - December 2016).

On February 15, 2017, the program was notified of placement on the May 2017 Board meeting agenda for Consideration of Provisional Approval due to the program's non-compliance with regulatory requirements.

On March 8, 2017, the program director submitted a plan to increase the NCLEX-PN® pass rates. (See Attachment B). The program report includes interventions implemented since September 2014 to improve the NCLEX-PN® pass rate. The following are the most recent interventions implemented:

- Review of curriculum (September 2016)
- Implementation of an NCLEX-PN® live review course (October 2016)
- Implementation of the SOAR student counseling program (October 2016)
- Adjustment of passing score for the admissions testing (November 2016)
- Update of terminal objectives and application questionnaire (November 2016)
- NCSBN NCLEX-PN® review increased to 15 weeks (January 2017)
- Update of the NCLEX-PN® review to include 2017 test plan additions (March 2017)
- Scheduling of a campus-wide meeting quarterly to improve the program (March 2017)

Given the foregoing, the following violation was identified:

Section 2530(I) 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: The program's average annual pass rates for first time candidates has remained noncompliant for the previous eight (8) consecutive quarters (January 2015 through December 2016).

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

Recommendations:

1. Place the Angeles Institute Vocational Nursing Program on provisional approval for a two year period from May 12, 2017 through May 31, 2019, and issue a certificate accordingly.
2. Place the program on the **May 2019** Board agenda for reconsideration of provisional approval.
3. Rescind the program's ongoing admissions of four (4) full-time classes of 45 students per year immediately.
4. Deny the program's request to admit a full-time class of 45 students commencing on July 17, 2017.
5. Require the program to obtain Board approval prior to the admission of each class.
6. 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 within the two-year period of provisional approval.
7. Require the director to submit follow-up reports in 10 months, but no later than April 1, 2018, and in 22 months but no later than April 1, 2019. The report must include a comprehensive analysis of the program, specific actions taken with revisions 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
8. 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 California Code of Regulations, Title 16 commencing at Section 2526.
9. Failure to take any of these corrective actions may cause the full Board to revoke the program's approval.

Rationale: The program's annual pass rates substantiate noncompliance with requirements set forth in Article 5 Section 2530 (I) of the Vocational Nursing Rules and Regulations.

The program's average annual pass rates for first time candidates has remained noncompliant for eight (8) consecutive quarters (January 2015 through December 2016).

Since November 2014, the program has implemented interventions to increase the NCLEX-PN® pass rates. Based on the most recent eight quarters of NCLEX-PN® examination data, those interventions appear to have been ineffective. Denial of the July 2017 class will allow the program to focus on the current student enrollment, evaluate the interventions implemented and make any necessary changes to improve the NCLEX-PN® pass rate.

Board staff will continue to closely monitor the program by tracking class admissions, program reports, resources, and the program's quarterly annual average pass rates.

Attachment A: History of Prior Board Actions

Attachment B: Program Correspondence

Agenda Item #5.B., Attachment A

Angeles Institute Vocational Nursing Program

History of Prior Board Actions

- On August 17, 2005, the Executive Officer approved the Angeles Institute request to begin a full-time vocational nursing program with an initial class of 30 students on October 3, 2005, only. The program's curriculum was approved to include a total of 1,530 hours, including 576 theory and 954 clinical hours.
- On October 3, 2005, the director notified the Board that commencement of the initial class was delayed to April 27, 2006, due to low student recruitment. The projected graduation date is January 26, 2007.
- On November 2, 2006, the Executive Officer approved initial full accreditation for the Angeles Institute Vocational Nursing Program for the period from November 2, 2006, through November 1, 2010, and issued a certificate accordingly.
- The Executive Officer approved the program's request to admit 30 students into a full-time class starting January 27, 2007, only, to **replace** students graduating January 26, 2007. The projected completion date for the replacement class is October 26, 2007. The Executive Officer also approved the program's request to admit 30 students starting November 27, 2006, only with a completion date of August 31, 2007, thereby increasing frequency of admissions.
- On April 12, 2007, the Executive Officer approved program's request to admit 30 students into a full-time class starting on April 23, 2007, only with a projected completion date of January 25, 2008.
- On July 10, 2007, the Board approved the Angeles Institute Vocational Nursing Program's request to admit 30 students into a full-time class starting on July 23, 2007, with a projected completion date of April 25, 2008, to **replace** students graduating August 31, 2007.
- On October 10, 2007, the Executive Officer approved the program's request to admit 30 students into a full-time class starting October 22, 2007, with a projected graduation date of July 25, 2008, to **replace** students graduating October 26, 2007; **and** approved ongoing admissions to **replace** graduating classes with the following stipulations:
 - a. No additional classes are added to the program's current pattern of admissions without prior Board approval. The program's current pattern of admissions includes a class of 30 students four (4) times in a calendar year (January, April, July, and October).

- b. The director documents that adequate resources, i.e. faculty and facilities are available to support each admitted class of students.
- On January 28, 2008, the director was notified that the program's average annual pass rate had fallen below ten (10) percentage points of the state average annual pass rate for the past four (4) quarters. The director responded with a plan of correction.
- On April 28, 2008, the director was notified that the program's average annual pass rate had fallen below ten (10) percentage points of the state average annual pass rate for the past five (5) quarters.
- On November 8, 2008, the Executive Officer approved the program's request to increase class size from 30 students to 45 students per class in their ongoing admission pattern of admitting a class four times in a calendar year (January, April, July, and October). The revision to the ongoing admission pattern was approved to allow the program to **replace** graduating classes, only, with the following stipulations:
 - a. No additional classes are added to the program's current pattern of admissions without prior Board approval. The program's current pattern of admissions includes a class admission of 45 students four times in a calendar year (January, April, July, and October).
 - b. The director documents that adequate resources, i.e. faculty and facilities are available to support each admitted class of students
- On August 31, 2010, the program submitted the Programs Record Survey and related documents.
- On October 14, 2010, the Executive Officer approved continued full accreditation for the Angeles Institute Vocational Nursing Program for the period November 2, 2010 through November 1, 2014 and issued a certificate accordingly; **and** continued the program's current approval for ongoing admissions of 45 students to replace graduating classes, only.
- On February 27, 2015, the Executive Officer approved continued approval for the Angeles Institute Vocational Nursing Program for the period November 2, 2014 through November 1, 2018, and issued a certificate accordingly; **and** continued the program's current approval for ongoing admissions of four (4) full-time day classes of 45 students each per year to replace graduating students, only.