

Agenda Item # 19.B.5.

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



BOARD OF VOCATIONAL NURSING & PSYCHIATRIC TECHNICIANS
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DATE: February 9, 2017

TO: Board Members

FROM: Faye Silverman, RN, MSN/Ed., WOCN, PHN
Nursing Education Consultant

SUBJECT: North-West College, West Covina, Vocational Nursing Program – Request to Admit Students (Director: Adnan Mouazzen, West Covina, Los Angeles County, Private)

STAFF SUMMARY AND RECOMMENDATION(S):

The North-West College, West Covina, Vocational Nursing Program requests Board approval to admit one full-time class of 35 students on March 26, 2018, with a projected graduation date of May 31, 2019, to replace the full-time class which is scheduled to graduate on March 30, 2018. Approval of the requested class is recommended.

This program was placed on provisional approval for a two-year period from August 25, 2017, through August 31, 2019. That action was taken due to the program's noncompliance with regulatory requirements relative to the five violations discovered during the June 1, 2017, unannounced onsite inspection.

At this time, all five violations have been corrected. The documents submitted by the program indicate that the program is currently in compliance with all applicable regulations, including resources sufficient to support the current and proposed students.

RECOMMEND:

1. **Approve the request to admit one full-time class of 35 students on March 26, 2018.**
2. **Continue to require the program to obtain full Board approval prior to the admission of each class.**
3. **Continue to require the program to provide no less than one (1) instructor for every ten (10) students in clinical experiences.**
4. **Continue to require the director to submit follow-up reports in 10 months, but no later than June 1, 2018, and in 22 months but no later than June 1, 2019.**

History of Prior Board Actions

(See Attachment A, History of Prior Board Actions)

Enrollment

The program was previously approved for the ongoing admission of three (3) classes per year of 45 students to the 60-week full time course of instruction to **replace** graduating classes only. Effective **August 25, 2017**, the Board rescinded approval of the program's ongoing admissions and required the program to obtain Board approval prior to admitting students.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 class starts and completions. The table indicates **a maximum enrollment of 131 students** from **November 2016 through March 2018**.

ENROLLMENT DATA				
CLASS DATES		#Students Admitted	#Students Current or Completed	Total Enrolled
Start	Complete			
11/30/16 [Class # 26] (*3/30/18)		35	30	30
3/27/17 [Class # 27] (*6/6/18)		39	33	30 + 33 = 63
5/31/17 [Class # 28] (*9/14/18)		35	33	63 + 33 = 96
3/26/18 [Class # 29] (Proposed) (*5/31/19)		35	35	96 + 35 = 131
	3/30/18 [Class # 26] [Class of 11/30/16]		-30	131 - 30 = 101

*Indicates projected graduation date

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 2016 through December 2017, specify the pass percentage rates for graduates of the North–West College, West Covina, 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
Jan – Mar 2016	21	9	43%	73%	45%	72%	-27
Apr - June 2016	9	6	67%	75%	43%	74%	-31
July-Sep 2016	40	24	60%	76%	54%	75%	-21
Oct – Dec 2016	3	1	33%	70%	55%	74%	-19
Jan – Mar 2017	7	6	86%	72%	63%	73%	-10
Apr - June 2017	12	11	92%	68%	68%	74%	-6
July-Sep 2017	22	19	86%	74%	84%	71%	+13
Oct – Dec 2017	14	10	71%	69%	84%	71%	+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 (Code) §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 (Oct – Dec 2017), the program's average annual pass rate is **84%**. The State average annual pass rate for graduates from approved vocational nursing programs who took the NCLEX-PN® for the first time during the same period is **71%**. The pass rate for the North-West College, West Covina, Vocational Nursing Program is **thirteen (13)** percentage points **above** the state average annual pass rate.

Faculty and Facilities

Section 2534(d) of the Code states:

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

Based on the Board’s decision of August 25, 2017, the program is required to provide no less than one (1) instructor for every ten (10) students in clinical experiences.

The total number of Board - approved faculty is **21** including the program director and assistant director. The director has **100%** administrative duties. This program has **three (3)** instructors who teach theory only. This program has **one (1)** teacher assistant. Of the total faculty, **16** instructors are designated to teach in the clinical area.

Based on a maximum enrollment of 131 students, fourteen (14) instructors are needed. Therefore, the number of faculty is **adequate** for the current and proposed enrollment.

Section 2534(b) of the Code 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 clinical facilities that are **adequate** as to type and variety of patients treated to enable current and proposed students to meet clinical objectives, in accordance with Section 2534 (b) of the Vocational Nursing Rules and Regulations. This has been verified by the consultant.

Other Considerations

On May 19, 2017, the Board received a complaint, which stated the last class that graduated from North West College, West Covina, in April 2017 had not completed required maternal health and pediatric clinical rotations. As reported, the students had graduated, but were just finishing up their “Board approved maternal health and pediatric clinical hours.”

On June 1, 2017, an unannounced onsite inspection of the program was completed. Based on inspection findings, **five (5)** violations of the California Code of Regulations were identified. Analysis of published examination statistics substantiated an additional violation. As a result, **six (6)** total violations were identified. As of the date this report was written, **all six (6)** identified violations have been corrected.

Summary:

The approved program director has worked with the assigned NEC to submit documents to clear all violations. The documents submitted by the school substantiate that the school has adequate clinical facilities to provide an adequate daily census to afford a variety of clinical experiences consistent with competency – based objectives and theory being taught sufficient for enrolled students.

The documents submitted by the school demonstrate that the school is now providing theory and correlated clinical experience for all students as presented in the approved curriculum.

The documents submitted by the school demonstrate that the school has an approved admission policy and an action plan to ensure compliance with the approved admission policy and prevention of future violations.

As documented above the California Code of Regulations (Code) §2530(l) states:

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

For the most recent four quarters the school has been within compliance of the licensure examination pass rate regulations.

Recommendations:

1. Approve the request to admit one (1) full-time class of **35** students on **March 26, 2018**, with a projected graduation date of **May 31, 2019**, to replace the full-time class which is scheduled to graduate on **March 30, 2018**.
2. Continue to require the program to obtain full Board approval prior to the admission of each class.
3. Continue to require the program to provide no less than one (1) instructor for every ten (10) students in clinical experiences.
4. Continue to require the director to submit follow-up reports in 10 months, but no later than June 1, 2018, and in 22 months but no later than June 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 approved by the Board (Final Version)
 - f. Theory and Clinical Objectives for Each Course
 - g. Lesson Plans for Each Course
 - h. Textbooks as noted in course outlines and as library resources
 - 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. Documentation of adequate faculty
 - o. Documentation of adequate clinical facilities

5. 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.
6. Failure to take any of these corrective actions may cause the full Board to revoke the program's approval.

Rationale: The documents submitted by the program indicate that the program is currently in compliance with all applicable regulations, including resources sufficient to support the current and proposed students.

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

Agenda Item #19.B.5., Attachment A

North-West College, West Covina, Vocational Nursing Program

History of Prior Board Actions

- On September 16, 2005, the Executive Officer approved North - West College, West Covina's request to begin a vocational nursing program with an initial class of 45 students on September 26, 2005 only; and approved the program curriculum for 1,624 hours, including 664 theory and 960 clinical hours.
- On October 1, 2005, the director notified the Board that commencement had been delayed from September 26, 2005, to October 3, 2005, with a completion date of November 27, 2006.
- On August 9, 2006, the Executive Officer approved initial full accreditation for North -West College, West Covina, Vocational Nursing Program for the period September 8, 2006, through September 7, 2010, and issued a certificate accordingly.

The Executive Officer also approved the program's request to admit 45 students starting on October 2, 2006, with a projected graduation date of December 18, 2007; **and** approved the program's request to admit 45 students into a second full-time class starting on February 12, 2007, with a projected graduation date of May 10, 2008.

- **On July 16, 2007, a new program director was approved.**
- On January 28, 2008, the assigned consultant notified North - West College, West Covina, Vocational Nursing Program that the program's pass rates had fallen below 10 percentage points of the state average pass rates for the past four (4) quarters.
- On February 21, 2008, the director submitted a plan to improve pass rates.
- On April 22, 2008, the assigned consultant notified North - West College, West Covina, Vocational Nursing Program that the program's pass rates had fallen below ten (10) percentage points of the state average pass rates for the past five (5) quarters.
- On May 14, 2008, North - West College, West Covina, Vocational Nursing Program's request was approved to admit 45 students to a class commencing May 26, 2008, with an anticipated graduation date of July 26, 2009.

The Executive Officer approved ongoing admissions of two classes every 10 months, to **replace** graduating classes, only, for North - West College, West Covina, Vocational Nursing Program 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 two full-time classes with admission of 45 students every 10 months.
 - b. The director documents that adequate resources, i.e. faculty and facilities are available to support each admitted class of students.
- On August 28, 2008, the assigned consultant notified the director that the program's pass rates had fallen below ten (10) percentage points of the state average pass rates for the past six (6) quarters. The program was requested to submit documentation verifying implementation of elements of the program's plan of correction.
 - On November 13, 2008, the consultant notified the program that its pass rates had fallen below ten (10) percentage points of the state average pass rates for the past seven (7) quarters. The director was requested to submit current enrollment information; current faculty and facility information; documentation of clinical rotation schedules; and an analysis of the program's correctional plan indicating those elements that had been effective, those ineffective, and alterations made in the correctional plan based upon the analysis.
 - On December 8, 2008, North - West College, West Covina, Vocational Nursing Program's request to admit 30 students to a class commencing January 19, 2009, with an anticipated graduation date of March 23, 2010, was denied. The program's request for a change in its ongoing admissions pattern was denied. The ongoing admissions pattern of two classes every 10 months, to **replace** graduating classes, only, remains in effect for North - West College, West Covina, Vocational Nursing Program 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 two full-time classes with admission of 45 students every 10 months.
 - b. The director documents that adequate resources, i.e. faculty and facilities are available to support each admitted class of students.
 - On December 10, 2008, the director submitted a response to the Board's notification that the program's pass rates had fallen below 10 percentage points of the state average pass rates for the past seven (7) quarters.
 - On January 6, 2009, the director met with the Executive Officer, the supervising nursing education consultant, and the program's nursing education consultant relative to changes in program administration. The director requested re-consideration of the Executive Officer's decision on December 8, 2008, to deny an increase in frequency of admissions and an increase in pattern ongoing admissions.

After a review of all the circumstances, the Executive Officer approved the program's request to admit 30 students to a class commencing January 19, 2009, only, with an anticipated graduation date of March 23, 2010, but upheld the December 8, 2008, denial of an increase in the ongoing admissions pattern.

- On May 22, 2009, the Board placed the program on provisional accreditation for the two – year period from May 22, 2009, through May 21, 2011, 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; required the program to show documented progress by submitting a follow-up report in ten (10) months. The report must include a comprehensive analysis of the program, specific actions taken to improve program pass rates, timelines for expected results, and the effectiveness of corrective actions taken to address the following elements:
 - a. Current Student Enrollment.
 - b. Admission Criteria.
 - c. Screening and Selection Criteria.
 - d. Terminal Objectives.
 - e. Curriculum Objectives.
 - f. Instructional Plan.
 - g. Theory and Clinical Objectives for Each Course.
 - h. Lesson Plans for Each Course.
 - i. Textbooks.
 - j. Attendance Policy.
 - k. Remediation Policy.
 - l. Evaluations of Theory and Clinical Faculty.
 - m. Evaluations of Theory Presentations.
 - n. Evaluations of Clinical Rotations and Their Correlation to Theory Presentations.
 - o. Evaluation of Student Achievement.
- On June 18, 2009, the Board forwarded correspondence notifying the program of specific areas of noncompliance and requirements for correction as referenced in Section 2526.1 (e) of the Vocational Nursing Rules and Regulations.
- On March 29, 2010, the program submitted correspondence and documentation requesting reconsideration for early termination of its provisional accreditation.
- On July 20, 2010, the Executive Officer approved the program's request to admit 45 students commencing July 6, 2010, graduating September 25, 2011, to **replace** students who graduated April 23, 2010. Additionally, the Executive Officer continued the program's approved pattern of admissions to include the admission of two (2) classes every ten (10) months, 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 two (2) full – time classes with admission of 45 students every ten (10) months.

- b. The director documents that adequate resources, i.e., faculty and facilities are available to support each admitted class of students.
- On September 2010, The Board approved full accreditation of the North – West College, West Covina, Vocational Nursing Program for the four-year period from September 16, 2010 through September 15, 2014, **and** issue a certificate accordingly, and approved continued the program’s approved pattern of admissions 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 two (2) full – time classes of 45 students every ten (10) months to **replace** graduating classes only; and
 - b. The director documents that adequate resources, i.e., faculty and facilities are available to support each admitted class of students.
 - On February 20, 2014, the Director reported an increased number of applicants due to an augmented demand within the West Covina city and surrounding communities of approximately 50%. According to the Director changing the admission pattern to three classes each year would “remove the long gap between clinical rotations which are available throughout the year and increase efficiency.”
 - On May 22, 2014, the Board approved North West College, West Covina, Vocational Nursing Program’s requests to admit 45 students on July 7, 2014 and graduating on November 29, 2015. This is not a replacement class. Approve the program’s request to change the current pattern of ongoing admissions with the following stipulations:
 - a. No additional classes are added to the program’s current pattern of admissions without prior Board approval. The program’s current pattern of admissions includes three (3) full – time classes of 45 students every year to **replace** graduating classes only; **and**
 - b. The director documents that adequate resources, i.e., faculty and facilities are available to support each admitted class of students.
 - c. The program maintains an average annual pass rate that is compliant with Section 2530 (l) of the Code.
 - On August 25, 2017, the Board placed North West College, West Covina, Vocational Nursing Program on provisional approval for a two-year period from August 25, 2017 through August 31, 2019, and issue a certificate accordingly.
 - Place the program on the **August 2019** Board agenda for reconsideration of provisional approval.
 - Rescind the program’s ongoing admissions of three (3) full-time classes of 45 students per year immediately.
 - Require the program to obtain full Board approval prior to the admission of each class.

- Require the program to provide no less than one (1) instructor for every ten (10) students in clinical experiences.
- Require the program to submit documentation to correct all violations no later than September 15, 2017.
- Require the director to submit follow-up reports in 10 months, but no later than June 1, 2018, and in 22 months but no later than June 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:
 - Admission Criteria
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 - Evaluations of Theory Presentations
 - Evaluations of Clinical Rotations and Their Correlation to Theory Presentations
 - Documentation of adequate faculty
 - Documentation of adequate clinical facilities
- 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.
- Failure to take any of these corrective actions may cause the full Board to revoke the program's approval.
- 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.
- Failure to take any of these corrective actions may cause the full Board to revoke the program's approval.