

Agenda Item #19.B.7.



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

BOARD OF VOCATIONAL NURSING & PSYCHIATRIC TECHNICIANS
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DATE: February 9, 2018

TO: Board Members

FROM: Beth DeYoung, RN, MPH
Nursing Education Consultant

SUBJECT: West Coast Ultrasound Institute, Beverly Hills, Vocational Nursing Program.
Consideration of Request to Admit Students. (Director: Hany Nashed, Beverly Hills, Los Angeles County, Private)

STAFF SUMMARY AND RECOMMENDATIONS:

The West Coast Ultrasound Institute, Beverly Hills, Vocational Nursing Program is presented for consideration of a request to admit one full-time evening class of 20 students commencing on April 2, 2018, and graduating June 23, 2019. Approval of the requested class is recommended.

The Board initially placed the program on provisional approval on May 13, 2016, for a two (2) year period from May 13, 2016, through May 31, 2018. That action was taken due to the program's noncompliance with regulatory pass rate requirements. At that time, the program's average annual pass rate was 58%.

Based on published examination statistics, the program's average annual pass rate has been compliant with regulatory requirements for the last seven (7) quarters (April 2016 – December 2017).

RECOMMEND:

- 1. Approval of one (1) full-time evening class of 20 students commencing on April 2, 2018.**
- 2. Continue the program's requirement to obtain Board approval prior to the admission of each class.**
- 3. Place the program on the Board's May 2018 agenda for reconsideration of provisional approval.**

History of Prior Board Actions

(See Attachment A, History of Prior Board Actions)

Enrollment

The program currently offers a 15-month full-time and an 18-month part-time course of instruction. Board approval is required prior to the admission of each class.

The following table represents **current and projected** student enrollment based on the current and proposed class starts and completions. The table indicates a **maximum enrollment of 57 students** for the period from **November 2016 through April 2018**.

ENROLLMENT DATA				
CLASS DATES		# Students Admitted	# Students Current or Completed	Total Enrolled
Start	Complete			
11/16 Eve FT *[2/18]		15	7	7
2/17 Eve FT *[5/18]		13	7	7 + 7 = 14
4/4/17 Eve FT *[6/18]		15	5	14 + 5 = 19
10/17 Eve FT *[12/18]		8	5	19 + 5 = 24
	2/18 (11/16 Eve FT)		-7	24 - 7 = 17
2/18 Eve FT *[4/19] Approved 8/25/17		20		17 + 20 = 37
4/18 Eve FT *[6/19] Proposed		20		37 + 20 = 57

* [] Indicates projected completion 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 West Coast Ultrasound Institute, Beverly Hills, 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 Quarterly Pass Rate	Program Average Annual Pass Rate	State Average Annual Pass Rate [CCR § 2530(l)]	Variance from State Average Annual Pass Rate
Jan – Mar 2016	1	0	0%	73%	58%	72%	-14
Apr – Jun 2016	9	8	89%	75%	70%	74%	- 4
Jul – Sep 2016	2	1	50%	76%	67%	75%	-8
Oct – Dec 2016	1	1	100%	70%	77%	74%	+3
Jan – Mar 2017	2	2	100%	72%	86%	73%	+13
Apr – Jun 2017	4	4	100%	68%	89%	74%	+15
Jul – Sep 2017	1	1	100%	74%	100%	71%	+29
Oct – Dec 2017	1	0	0%	69%	88%	71%	+17

*The Annual Pass Rate changes every quarter. It is calculated by dividing the number of candidates who passed during the current and previous three (3) quarters by the number of candidates who tested during the same period. If no data is available for the relevant period, the statistic is carried over from the last quarter for which data is available.

California Code of Regulations Section 2530(l) states:

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

Based on the most current data available (October through December 2017), the program’s average annual pass rate is **88%**. 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 **71%**. The average annual pass rate for West Coast Ultrasound Institute, Beverly Hills, Vocational Nursing Program is **seventeen (17) percentage points above** the state average annual pass rate.

Of note, the program had one (1) class of seven (7) students who graduated in March of 2017. The low number of students who have taken the NCLEX-PN® for the first time in 2017 is due to the low number of graduates in 2017.

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 number of Board-approved faculty totals 11, including the director and one additional faculty. Of these instructors, 9 are designated to teach clinical. The director has 80% administrative and 20% teaching responsibilities. Submitted information confirms the stability of program faculty.

Based on a maximum proposed enrollment of **57** students, four (4) instructors are required for clinical supervision. Therefore, the number of 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 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.

Other Considerations

With three (3) quarters of compliant pass rates, on April 27, 2015, the Executive Officer continued approval of the program for a four (4) year period, from July 9, 2015 through July 8, 2019, and continued the program’s requirement to obtain Board approval prior to the admission of future classes.

With the pass rate improvement plan in place for over a seven (7) month period, the program’s average annual rates substantially declined during Quarters 1 - 2015 through Quarter 1 – 2016.

On March 7, 2016, an unannounced onsite program inspection was conducted. A total of six (6) violations were identified. In addition, the program had failed to maintain an average annual pass rate that was compliant with regulatory requirements.

On April 27, 2016, the Board approved a new director.

On May 13, 2016, with an annual average pass rate of 58% and a total of six (6) violations identified, in addition to pass rates that were noncompliant with regulatory requirements, the Board placed the program on provisional approval for two (2) years from May 13, 2016 through May 31, 2018. The Board denied the program’s request to admit students.

On September 29, 2016, the program director submitted the requested documentation and worked with the consultant to correct four (4) of the six (6) violations.

On November 30, 2016, the program director submitted the required program analysis report.

As of December 2016, the program has corrected all six (6) violations identified during the unannounced onsite program inspection on March 7, 2016.

On December 12, 2017, the program director responded to the NEC's request to address the retention rate for each cohort. The following are the reasons why students have been dropped from the program as stated by the program director:

- Students determine that the nursing field is not for them or the program is not as easy as they thought it would be.
- Work schedules end up not working well with the program schedule.
- Students have financial or personal issues.
- Students cannot comply with the strict school attendance policy.
- After remediation, students may fail the class due to low test scores and/or low final ATI exam scores.

On January 29, 2018, the program director submitted the required comprehensive program analysis report.

Recommendations:

1. Approve West Coast Ultrasound Institute, Beverly Hills, Vocational Nursing Program's request to admit one (1) full-time evening class of 20 students commencing on April 2, 2018, and graduating June 23, 2019.
2. Continue the program's requirement to admit no additional classes without prior approval by the full Board.
3. Place the program on the **May 2018** Board agenda for reconsideration of provisional approval.
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.

Rationale: Based on published examination statistics, the program's average annual pass rate has been compliant with regulatory requirements for the last seven (7) quarters (April 2016 – December 2017).

Due to the low student numbers within each current class, the program is requesting an additional class which is not a replacement class.

The program has provided documentation of adequate faculty and clinical facilities to meet the program's clinical objectives and student learning needs to accommodate the proposed classes.

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

Attachment A: History of Prior Board Actions

Agenda Item #19.B.7., Attachment A

WEST COAST ULTRASOUND INSTITUTE, BEVERLY HILLS VOCATIONAL NURSING PROGRAM

History of Prior Board Actions

- On February 3, 2006, the Executive Officer approved West Coast Ultrasound Institute's request to begin a vocational nursing program with an initial class of 30 students on April 3, 2006, only; and approved the program curriculum for 1536 hours, including 578 theory, and 958 clinical hours.
- On May 22, 2007, the assigned consultant completed an onsite inspection of the program to determine compliance with Article 5 of the Vocational Nursing Rules and Regulations. Five (5) violations were noted.
- On July 10, 2007, the Executive Officer approved initial full approval for West Coast Ultrasound Institute Vocational Nursing Program for the period from July 10, 2007, through July 9, 2011, and issued a certificate accordingly; **and** approved the program's request to admit a full-time class of 30 students to start on October 1, 2007, only, to **replace** students graduating on September 20, 2007.
- On December 12, 2007, the Executive Officer approved the program's request to admit a full-time class of 20 students on January 3, 2008, only.
- On July 30, 2008, the Executive Officer approved the program's request to admit a full-time class of 30 students on October 1, 2008, to **replace** students graduating on September 18, 2008.

Additionally, the Executive Officer approved the program's request for **ongoing** admissions to **replace** graduating classes, only, for the West Coast Ultrasound Institute 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 admission of one class of 20 full-time students in January and July of each year, commencing January 2, 2009.
 - b. The director documents that adequate resources, i.e. faculty and facilities, are available to support each admitted class of students.
- On November 4, 2009, the Executive Officer rendered the following decisions relative to the program's requests.
 - a. Approved the West Coast Ultrasound Institute, Beverly Hills, Vocational Nursing Program's request to begin a part-time class.

- b. Approved the program's request to admit a class of 30 students into a part-time class commencing January 8, 2010 with an anticipated graduation date of June 27, 2011.
- c. Approved the West Coast Ultrasound Institute, Beverly Hills, Vocational Nursing Program request to change its pattern of admissions to include one (1) part-time class of 30 students every 18 months, to **replace** graduating classes, with the following stipulations:
 - 1) 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 admission of one class of 20 full-time students two (2) times per year, to **replace** graduating classes; and one (1) part-time class every 18 months, to **replace** graduating classes.
 - 2) The director documents that adequate resources, i.e. faculty and facilities, are available to support each admitted class of students.
- On November 15, 2010, the assigned consultant issued the program a Notice of Violation for noncompliance with Vocational Nursing Rules and Regulations Section 2530 (k). Specifically, the program admitted a full – time class on October 5, 2010, without prior Board approval.
- On November 24, 2010, the program submitted requested documents related to the Notice of Violation of Section 2530(k) of the Vocational Nursing Rules and Regulations.
- On December 21, 2010, the Executive Officer approved the West Coast Ultrasound Institute, Beverly Hills, Vocational Nursing Program's request to terminate the 18-month part time class effective June 27, 2011; **and** approved the program's request to modify the length of the full – time class from 12 to 15 months.

Additionally, the Executive Officer **denied** the program's request to increase the size of admitted classes from 20 to 30 students to **replace** graduating students only; **and**,

- a. **Approved** the program's admission of a full-time class of 20 students on January 5, 2011, to **replace** students that graduated December 23, 2010, only.
- b. **Denied** approval of the program's request to admit a full – time class in January, April, July and October of each year, to **replace** graduating students only.
- c. **Approved** the program's admission of a full-time class of 20 students on April 4, 2011, only.
- d. **Rescinded** the program's approval for ongoing admissions effectively immediately and required the program to obtain Board approval prior to the admission of each class.

- On January 21, 2011, the program director notified the Board that the program would not be starting the approved January 2011 class, because they started an unapproved class October 2010.
- On June 8, 2011, the Executive Officer approved continued full accreditation for the West Coast Ultrasound Institute, Beverly Hills, Vocational Nursing Program for the period July 10, 2011 through July 9, 2015, and issued a certificate accordingly; **and**, approved the program's request to admit a full-time class of 20 students on July 6, 2011, graduating September 27, 2012, only, to **replace** students who are scheduled to graduate June 26, 2011; **and**, approved the program to admit a full-time class of 20 students on October 6, 2011, graduating December 23, 2012, only, to **replace** students who are scheduled to graduate June 26, 2011; **and**, required the program to obtain Board approval prior to the admission of future classes.
- On November 22, 2011, the Executive Officer approved the program's request to admit a full-time class of 20 students on January 4, 2012, graduating March 27, 2013, only, to **replace** students who are scheduled to graduate December 23, 2011; **and**, required the program to perform an analysis related to the program's declining licensure pass rates and submit a written plan to identify deficiencies and corresponding corrective action by December 16, 2011; **and**, required the program to obtain Board approval prior to the admission of future classes.
- On December 19, 2011, the Board received the program's analysis and plan to increase the program's licensure pass rates.
- On June 22, 2012, the Executive Officer approved the program's request to admit a full-time class of 20 students on July 2, 2012, graduating September 26, 2013, only, to **replace** students who are scheduled to graduate June 24, 2012; **and**, required the program to continue to obtain Board approval prior to the admission of future classes.
- On December 6, 2012, the Executive Officer approved West Coast Ultrasound Institute, Beverly Hills, Vocational Nursing Program to admit a full-time, evening, class of 20 students on December 10, 2013, only, graduating March 15, 2014 to **replace** students who graduated on September 27, 2012; and, approved the program to admit a full-time class of 20 students on January 2, 2013, only, graduating April 3, 2014 to **replace** students who will graduate December 23, 2012; and, continued the program's requirement to obtain Board approval prior to the admission of future classes.
- On June 13, 2013, the Executive Officer approved West Coast Ultrasound Institute, Beverly Hills, Vocational Nursing Program's request to admit a full-time evening class of 20 students on July 2, 2013, only, graduating September 21, 2014, to **replace** students who graduated on March 27, 2013; **and**, approved the program to admit a full-time day class of 20 students on January 2, 2014, only, graduating April 3, 2015 to **replace** students who will graduate December 23, 2013; **and**, continue the program's requirement to obtain Board approval prior to the admission of future classes.
- On September 19, 2013, the Executive Officer **denied** West Coast Ultrasound Institute, Beverly Hills, Vocational Nursing Program's request to admit a full-time evening class of 20 students on September 30, 2013, graduating December 21, 2014, to **replace** students

who will graduate on December 21, 2013; and, **approved** West Coast Ultrasound Institute, Beverly Hills, Vocational Nursing Program's request to admit a full-time evening class of 15 students on September 30, 2013, only, graduating December 21, 2014, to **replace** students who will graduate on December 21, 2013; **and**, required the program to investigate the root cause(s) of the decline in the licensure pass rates and submit a written report by October 18, 2013; **and**, to continue the program's requirement to obtain Board approval prior to the admission of future classes.

- On October 21, 2013, the Board received a report from the director relative to a root cause analysis of the program's noncompliant pass rates on the licensing examination.
- On January 17, 2014, the Board received an updated report from the director relative to a root cause analysis of the program's noncompliant pass rates on the licensing examination.
- On April 10, 2014, The Executive Officer **denied** West Coast Ultrasound Institute, Beverly Hills, Vocational Nursing Program's request to admit a full-time evening class of 20 students on April 14, 2014, graduating July 5, 2015, to **replace** students who will graduate on April 3, **2014**; **and, Continued** the program's requirement to obtain Board approval prior to the admission of future classes.
- On June 6, 2014, the Board received an update of the January 17, 2014 report submitted by the director.
- On July 18 2014, the Executive Officer **approved** West Coast Ultrasound Institute, Beverly Hills, Vocational Nursing Program's request to admit a full-time evening class of 15 students on September 29, 2014 only, graduating December 20, 2015, to **replace** students who graduated on April 3, 2014; **and, denied** West Coast Ultrasound Institute, Beverly Hills, Vocational Nursing Program's request to admit a full-time day class of 15 students on September 29, 2014 only, graduating December 20, 2015 to **replace** the students who graduated June 26, 2014; **and, continued** the program's requirement to obtain Board approval prior to the admission of future classes.
- On December 15, 2014, the Executive officer approved West Coast Ultrasound Institute, Beverly Hills, Vocational Nursing Program's request to **admit** a full-time **day** class of 15 students on January 5, 2015, graduating March 24, 2016, **only**, to **replace** students who will graduate on December 21, 2014; and, continued the program's requirement to obtain Board approval prior to the admission of future classes.
- On February 25, 2015, the Executive Officer approved West Coast Ultrasound Institute, Beverly Hills, Vocational Nursing Program's request to admit a full-time evening class of 15 students on April 7, 2015, graduating June 26, 2016, only, to **replace** students scheduled to graduate on April 3, 2015; **and**, continued the program's requirement to obtain Board approval prior to the admission of future classes.
- On April 27, 2015, the Executive Officer Continue approval of the West Coast Ultrasound, Beverly Hills Campus, Vocational Nursing Program for the four – year period from July 9, 2015 through July 8, 2019, and issue a certificate accordingly. Continued the program's requirement to obtain Board approval prior to the admission of future classes.

- On August 6, 2015, the Acting Executive Officer **denied** West Coast Ultrasound, Beverly Hills, Vocational Nursing Program's request to admit 15 students into a 15-month full-time program commencing on October 5, 2015, projected to graduate on December 21, 2016; **and**, continued the program's requirement to obtain Board approval prior to the admission of future classes. Additionally, he required the Director to submit a report to the Board no later than **October 30, 2015**. The report must include a comprehensive analysis of the program, identification of elements negatively impacting student achievement, specific actions taken previously to improve program pass rates, the effect of employed interventions, revised plan to correct identified deficiencies, and a timeline for implementation.
- On December 9, 2015, the Acting Executive Officer **approved** West Coast Ultrasound, Beverly Hills, Vocational Nursing Program's request to admit 15 students into a 15-month full-time program commencing on January 4, 2016 projected to graduate on March 26, 2017, only, **replacing** a class scheduled to graduate in December 2015; and **continued** the program's requirement to obtain Board approval prior to the admission of each class.
- On May 13, 2016, the Board placed West Coast Ultrasound Institute, Beverly Hills, Vocational Nursing Program on provisional approval for two (2) years from May 13, 2016 through May 31, 2018 and issue a notice to the program to identify specific area of noncompliance and requirements for correction as referenced in Section 2526.1 (c) of the California Code of Regulations; **and denied** the program's request to admit a class of students to commence on July 5, 2016, and expected to graduate on September 24, 2017; and required the program to admit no additional classes without prior approval by the full Board; **and required** the program to bring its average annual pass rate to no more than ten (10) percentage points below the State average annual pass rate; **and** required the program director to correct all violations identified during the onsite inspection, and submit a report identifying implemented interventions and timelines no later than July 1, 2016. The report shall include the following:
 - a. Implementation of a methodology, and include a timeline and evidence of correction verifying only Board approved instructors conduct skills lab, or assists and evaluates students with clinical or theory make-up time.
 - b. Implementation of a methodology, and include a timeline for correction to provide all faculty with assess of the instructional plan.
 - c. Implementation of the program remediation policy to include identification of students who are at risk of failure from either academic or code of conduct issues, identification of deficiencies, remediation plan, and follow-up
 - d. Implementation of the methodology, including timeline for initial and ongoing evaluation of clinical facilities

Additionally, the program was required to submit a report to the Board within six (6) months, but no later than **November 30, 2016**, and twenty – one (21) months, but no later than **February 1, 2018**. The report must include a comprehensive analysis of the program, 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.
- 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.
 - 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.
 - Failure to take any of these corrective actions may cause the full Board to revoke the program's approval.
 - Place the program on the **May 2018** Board agenda for reconsideration of provisional approval.
- On November 4, 2016, the Board approved West Coast Ultrasound Institute, Beverly Hills, Vocational Nursing Program's request to admit a class of 15 students to Commence on November 8, 2016, graduating February 4, 2018; **and**, continued the program's requirement to admit no additional classes without prior approval by the full Board; **and**, continued the program's requirement to bring its average annual pass rate to no more than 10 percentage points below the State average annual pass rate; **and**, continued the program's requirement to submit a report to the Board within six (6) months, but no later than November 30, 2016, and 21 months, but no later than February 1, 2018; **and**, continued 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; **and**, continued the program's placement on the May 2018 Board agenda for reconsideration of provisional approval.
 - On February 10, 2017, the Board approved West Coast Ultrasound Institute, Beverly Hills, Vocational Nursing Program's request to admit one (1) full-time evening class

of 15 students beginning February 13, 2017, graduating May 6, 2018, to replace the class that graduated on June 26, 2016; **and**, approved program's request to admit one (1) full-time evening class of 15 students beginning April 4, 2017, graduating June 24, 2018, to replace the class that graduates on March 27, 2017; **and**, continued the program's requirement to admit no additional classes without prior approval by the full Board; **and**, continued the program's requirement to bring its average annual pass rate to no more than 10 percentage points below the State average annual pass rate; **and**, continued the program's requirement to submit a report to the Board no later than February 1, 2018; **and**, continued 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; **and**, continued the program's placement on the May 2018 Board agenda for reconsideration of provisional approval.

- On August 25, 2017, the Board approved West Coast Ultrasound Institute, Beverly Hills, Vocational Nursing Program's request to admit one (1) full-time evening class of 20 students commencing on October 2, 2017 and graduating December 23, 2018 and the program's request to admit one (1) full-time evening class of 20 students commencing on February 6, 2018, graduating April 28, 2019, to replace the class that graduates on February 4, 2018; **and**, continued the program's requirement to admit no additional classes without prior approval by the full Board; **and**, continued the program's placement on the May 2018 Board agenda for reconsideration of provisional approval; **and**, continued the program's requirement, from the February 2017 Board meeting, to submit a report to the Board no later than February 1, 2018. The report must include a comprehensive analysis of the program, specific actions taken to improve program pass rates, timeline for implementation, and the effect of employed interventions; **and**, continued 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. Failure to take any of these corrective actions may cause the full Board to revoke the program's approval.