

BUSINESS CONSUMER SERVICES AND HOUSING AGENCY + GAVIN NEWSOM, GOVERNOR

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DATE	November 8, 2025
TO	Board Members
REVIEWED BY	Judith D. McLeod DNP, CPNP, RN
	Supervising Nursing Education Consultant (SNEC)
PREPARED BY	Roberta Thomson Ed.D. RN
	Nursing Education Consultant (NEC)
SUBJECT	Consideration of Removal from the Approved Program List
PROGRAM	California Healthcare Skills Center Vocational Nursing Program
	(Program)
	(Program Director: Edith Amadi, Riverside, Riverside County,
	Private)

Please note: Board Nursing Education Consultants make recommendations. The recommendations are forwarded to the Education and Practice Committee for review and recommendation or to the Executive Officer or full Board for action.

BACKGROUND:

On May 3, 2022, the Program was approved as a new program and approved to admit an initial class of 15 students. The first class commenced on June 27, 2022, with nine students; seven students graduated on August 31, 2023. The students that graduated in the first cohort took NCLEX-PN® during the fourth quarter of 2023. Seven graduates tested with four passing the exam. The Program's pass rate was 57 percent which was 24 percentage points below the state average annual pass rate of 81 percent.

On February 27, 2023, a virtual site visit was conducted for the initial review for approval to admit a second class. One violation was identified. The Program failed to adhere to the approved admission policy. During the virtual site visit, the Program Director submitted documents that had been used for the admission of the seven students remaining in the current cohort. The required ATI test score for admission was 70 and the students' ATI test scores ranged from 37.3 to 64. None of the current students for this program had an ATI score of 70 or higher. The Program Director submitted a revised admissions policy stating that 50 would be the new ATI test requirement. The new policy was approved, and the violation was corrected.

On March 14, 2023, the Executive Officer approved the Program's request to admit a class of 15 full-time students to commence on September 11, 2023, with a graduation date of September 30, 2024. This was the second class for this program.

On September 25, 2023, the second class commenced with 11 students, with a projected graduation date of October 3, 2024.

On October 3, 2024, the second cohort graduated. Of the 11 admitted students, 10 were graduates and one student was considered a non-graduate, who would test by

Method Three. These students completed the NCLEX-PN® during quarter four 2024 and quarters one and two of 2025. Of the 10 first time testers, three passed. The Program has been out of compliance for all eight quarters since the Program has had graduates eligible to test.

On February 24, 2025, the NEC received a request from the Program Director along with supporting documents to admit student to a third cohort.

On March 4, 2025, the Executive Officer deferred the Program request to the full board due to NCLEX-PN® average annual pass rates below ten percent of the state average annual pass rates for six consecutive quarters and the Program had three uncorrected violations.

The Program attributed current annual pass rate of 25 percent, 58 percentage points below the state average annual pass rate to:

- Students admitted to the first two cohorts that were not strong academically. A
 revision to admission policy was submitted, decreasing the minimum score on
 the ATI-TEAS entrance test.
- 2. Faculty failed to utilize the supplemental study and exam materials because of lack of proper training from HESI.
- NCLEX-PN preparation was not effective for the first two cohorts because student engagement was lower than expected. Students stopped communicating with the Program and the Program was unable to provide assistance to students.
- 4. The Program identified a lack of dedicated faculty for NCLEX-PN® preparation, little student feedback and a lack of additional funding for graduates to cover the NCLEX-PN® fees to prevent delays in testing.

On May 5, 2025, a report was submitted to the full board for consideration of provisional approval and request to admit a fulltime class of 15 students to commence on June 2, 2025, with a graduation date of June 6, 2026. This is the third cohort for the Program.

On June 2, 2025, the third cohort of students was admitted with a graduation date of June 6, 2026. Of the approved 15 students only five were admitted. This replaced the class that graduated September 30, 2024.

On May 29, 2025, the Program Director informed the NEC by email of a change of graduation date, from June 6, 2026, to July 5, 2026, to accommodate federal and school holidays that were not considered when the cohort was requested. On June 11, 2025, the Program Director submitted the required documentation regarding the third cohort. A review of documents submitted revealed:

1. A List of students admitted with their admission test scores including the name of the identified test. ATI TEAS, a standardized test, was taken by two students

and the Pre-Nursing Assessment test was taken by three students. The Pre-Nursing Assessment was not identified as to where it was developed. Admission and selection criteria list were provided. The list did not provide individual student information.

- 2. Attendance verification was submitted for June 2 June 10 class time and day was printed on the form along with student names. Students' signatures were on the form, but there was no indication of arrival or exit times. There was no sign in or out for breaks or lunch. There was no indication of whether the time was for theory or clinical/skills days.
- 3. There was no indication of grading during these days.

On June 12, 2025, the Program Director provided an addendum to the attendance records that indicated break times. Individual students signed the form in their own handwriting but the start and end times, and break times were entered in the handwriting of one person. The admission check lists were submitted for each student. The additional documents were submitted as a response to identified deficiencies of the original submission.

On June 20, 2025, the Program Director informed the NEC by email that one of the five students enrolled in the cohort had withdrawn from the Program for personal reasons. The Program Director explained that the School Pre-nursing Assessment is actually Pre-Nursing Assessment Test developed by the Center for Nursing Education and Testing INC. not an internal exam. At a later date, the Program Director indicated at the Pre-Nursing Assessment Test was developed by the Program. The choice of exam was left to the students. The cost of each test differs, and the majority of students opted for the less expensive test.

On July 1, August 1, and August 29, 2025, grade reports were submitted for the four enrolled students. The Program Director reported that all students have a 90% or above in their grades. No attendance records have been submitted as required at the time the Program was placed on provisional approval.

On September 9, 2025, the Program Director requested that the annual report documents be sent to her. She stated that 2024 documents were sent to her with the annual report notice in May of 2025. The annual report due date is September 15, 2025.

On September 11, 2025, the Program Director submitted the annual report for July 1, 2024, through June 30, 2025. The Program Director failed to include form 55M-2E Summary of Instructional Plan Hours as requested. The enrollment table was submitted and reported that one student was considered a non-graduate, but it was reported in the Annual report that no students completed as non-graduates. The faculty and facilities form did not report current information. The Program had no students between September 2024 and June 2, 2025, and does not plan to admit a new cohort until September 2026. The faculty and facilities form should be updated to provide currently

employed instructors. No facility has not been used since August 29, 2024. The form needs to be updated to validate that the facilities can still accommodate the Program.

A Facility verification form was returned for correction. Clinical objectives were not from the psychomotor domain and did not demonstrate progression of knowledge and skills in clinical experiences is subsequent terms. The Program Director stated that she required the NEC to provide a template for how Facility Verification forms should be completed and how objectives need to be written. The Program Director was provided links to in-service training for Program Directors to review and if there were still questions, a meeting would be scheduled for further clarification.

STAFF ANALYSIS:

The NEC reviewed and analyzed the documents required of the Program Director at the time of Provisional Approval status was conferred. The Program Director has not produced the following required documents.

- 1. The Plan of Correction for non-compliance with NCLEX-PN® pass rates has not been received. The Program has been non-compliant for eight consecutive quarters of NCLEX-PN®.
- 2. The NEC has requested that the Program Director submit documents that would demonstrate progression in an analysis of the Program. The NEC has not received documents that verify adequate resources or experiences.
- 3. A complete program analysis is due December 1, 2025. The Program Director has not taken ownership of the inherent problems that contribute to the overall poor performance of the graduates on NCLEX-PN®.

STAFF RECOMMENDATIONS:

- 1. Remove California Healthcare Skills Center from the approved programs list.
- 2. Require the Program to comply with all requirements listed below.

PROGRAM REQUIREMENTS:

- 1. Submit a Custodian of Records for the Program.
- Any material changes in circumstances affecting any information contained in the documents submitted by the Program to the Board, require the Program to notify the NEC immediately, in writing, per California Code of Regulations, Title 16, Section 2526(g).

RELEVANT PROGRAM ELEMENTS

Enrollment

California Code of Regulations, Title 16, Section 2530(k) states:

The program shall have prior Board approval to increase the number of students per class and/or increase the frequency of admission of classes. Criteria to evaluate a school's request to increase the number of students per class and/or increase the frequency of class admissions include but are not limited to: (1) Sufficient program resources as specified in Section 2530(a). (2) Adequacy of clinical experience as specified in Section 2534. (3) Licensure examination pass rates as specified in Section 2530(I).

The Program is approved to offer a 52-week full-time class. Board approval is required prior to the admission of each class.

The following table represents current student enrollment based on current class starts and completion dates. The table indicates a maximum enrollment of four students for the period June 2025 through June 2026.

ENROLLMENT DATA TABLE

Class Start Dates	Class Completion Dates	Number of Students Admitted	Number of Students Current	Number of Graduated	Total Enrolled
6/2/2025 FT Day (6/6/2026)		5	4		4

^{*}Indicates projected graduation date

Licensing Examination Statistics

California Code of Regulations, Title 16, 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.

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 October 2023 through September 20256, specify the pass percentage rate or graduates of the Program on the National Council Licensure Examination for Practical/Vocational Nurses (NCLEX-PN®) and the variance from the state average annual pass rates.

NCLEX-PN® LICENSURE EXAMINATION DATA

Quarterly Statistics					Annual Statistics		
	#	#	%	State	Program	State	Variance
Quarter	Candidate	Passe	Passe	Quarterly	Average	Average	from State
	s in	d in	d in	Pass	Annual	Annual	Average
	Quarter	Quarte	Quarte	Rate	Pass Rate	Pass Rate	Annual
		r	r			CCR §2530(I)	Pass Rate
Oct – Dec 2023	7	4	57%	84%	57%	81%	-24
Jan - Mar 2024	No tests this quarter				57%	86%	-29
Apr – Jun 2024	No tests this quarter				57%	85%	-28
Jul – Sep 2024	No test this quarter				57%	85%	-28
Oct -Dec 2024	7	1	14%	81%	14%	84%	-70
Jan -Mar 2025	1	1	100%	82%	25%	83%	-58
Apr- Jun 2025	2	1	50%	81%	30%	82%	-53
Jul - Sep 2025	No test this quarter				30%	82%	-52

*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.

Based on the most current data available (July – September 2025), the Program's average annual pass rate is 30 percent. 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 82% percent. The average annual pass rate for the Program is 52 percentage points below the state average annual pass rate.

Faculty and Facilities

California Code of Regulations, Title 16, Section 2534(d) states:

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

The current number of approved faculty totals seven, including the Program Director. The Program Director has 50 percent administrative duties and 50 percent teaching responsibilities. Of the total faculty, seven are designated to teach clinical. Based upon a maximum proposed enrollment of four students, one instructor is required for clinical supervision. The utilization of faculty at clinical facilities is such that clinical instruction is covered adequately.

California Code of Regulations, Title 16, Section 2534(b) 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. Clinical objectives which students are expected to master shall be posted on patient care units utilized for clinical experience.

Submitted documentation indicates the Program has sufficient clinical facilities to afford the number, type and variety of patients that will provide clinical experience consistent with Board-approved competency-based objectives and theory being taught for current student enrollment. Verification of facility available to the Program since it has been over a year since they were last used.

ATTACHMENTS:

Attachment A: Program History

Agenda Item 6.H.I.

Attachment A

CALIFORNIA HEALTHCARE SKILLS CENTER VOCATIONAL NURSING PROGRAM

Program History

- On May 3, 2022, the Executive Officer rendered the following decisions:
 - 1. Granted initial approval to California Healthcare Skills Center Vocational Nursing Program for the four-year period beginning May 3, 2022, and issued the certificate accordingly.
 - 2. Approved the Program's 52-week full-time curriculum. Each of the four terms are 13 weeks in length including 670 theory hours and 954 clinical, totaling 1624 Program hours.
 - 3. Approved the California Healthcare Skills Center Vocational Nursing Program's request to begin a vocational nursing program with an initial full-time class of 15 students on June 27, 2022, only, and graduating August 31, 2023.
 - 4. Required the Program to comply with all Program requirements listed below.

PROGRAM REQUIREMENTS:

- 1. Submit Facility Approval Applications for Obstetrics in final form no later than December 31, 2022.
- Required the Program to obtain prior BVNPT approval before admission of subsequent classes to maintain compliance with California Code of Regulations, Title 16, Section 2526(c) that states:
 - A Board representative shall make a survey visit prior to graduation of the initial class. A Program shall not commence another class without prior Board approval.
- 3. The Director documents that adequate resources i.e., faculty and facilities, are available to support the proposed class of students.
- 4. Notify the NEC in the event a current class is displaced from clinical sites.
- 5. Board staff will monitor the Program by tracking its licensure examination pass rate each quarter, the number of graduates taking the licensure examination,

- reviewing Annual Reports submitted by the Program director, and conducting Program Record Surveys.
- Required the Program to comply with all approval standards in Article 4 of the Vocational Nursing Practice Act, commencing at California Business and Professions Code Section 2880, and Article 5 of the California Code of Regulations, Title 16, commencing at Section 2525.
- On February 7, 2023, a revised admission criteria for approval to correct the violation for students being admitted without achieving the minimum score on the ATI TEAS entrance exam. Minimum was decreased from 70 to 50.
- On March 14, 2023, the Executive Officer rendered the following decisions:
 - 1. Approved the Program's request to admit a class of 15 full-time students to commence on September 11, 2023, with a graduation date of September 30, 2024. This will be the second class for this program.
 - 2. Required the Program to comply with all requirements listed below.

PROGRAM REQUIREMENTS:

- 1. Notify the NEC in the event a current class is displaced from clinical sites.
- 2. Obtain BVNPT approval prior to the admission of each class.
- 3. Continued to require the Program, when requesting approval to admit students, to:
 - Submit all documentation in final form, using forms provided by the BVNPT, no later than two months prior to the requested start date for the class.
 - b. Provide documentation that adequate resources, i.e., faculty and facilities, are available to support each admitted class of students.
 - c. Maintain an average annual pass rate that is compliant with Section 2530(I) of the California Code of Regulations, Title 16.
- 4. Comply with all approval standards in Article 4 of the Vocational Nursing Practice Act, commencing at California Business and Professions Code Section 2880, and Article 5 of the California Code of Regulations, Title 16, commencing at Section 2530(*I*).

- 5. Board staff will continue to monitor the Program's effectiveness by tracking class admissions, the effectiveness of employed interventions, and the Program's licensure examination pass rates each quarter
- On May 1, 2023, the Program submitted a minor curriculum revision and a change in graduation date for the second cohort from 9/30/2024 to 10/23/2024. The curriculum revision was to implement simulation. The request was denied due to lack of resources to for simulation approval. The Program altered their request to replace eight direct patient care clinical days with skills lab: Two-eight-hour days in Term 2; two eight hours days in Term 3; two eight-hour days in maternity and two-eight hours days in pediatrics.
- On May 5, 2023, The Program was assigned to a new Nursing Education Consultant.
- The Program reported the Programs tuition as \$28,000 on the annual report submitted August 20, 2024, The Tuition on the 2024-2025 Annual report was listed as \$36,700.
- On January 13, 2025, five quarters of noncompliance NCLEX-PN annual pass-rate letter was sent to the Program, requiring a plan of correction by February 13, 2025.
- Plan of correction submitted on January 23, 2025
 - 1. Identified Problems:
 - a. ATI pre-assessment requesting a score of 50%m for screening and selection policy was unofficial and was used internally to assess student's academic strength. Statement was not consistent with approved admission policy and screening and selection criteria.
 - b. The Program has designed an internal pre-nursing assessment exam modeled after the ATI TEAS to evaluate student during the admission process, with 150 questions on comprehensive, grammar, math, and general science. The Program Director later identified the test as a standardized test.
 - c. NCLEX preparation as a group switched from HESI to ATI NCVLEXC prep, stating ATI has better pass rates consistently.
 - d. Student needed more preparation for NCLEX-PN. Initiated an NCLEX-PN "Boot Camp" Them Program stated, "This strategy was not affective. Students experienced burnout after graduation, were uncooperative and refused to respond to calls and messages."
 - e. Program stated they requested approval for a part-time program of 18 months for full time working students. This program would be in addition to the full time 13-month program. No evidence in the school's files that a part time

- curriculum was submitted or reviewed. The Annual report stated that a curriculum revision was not planned.
- f. Increase Next Gen NCLEX resources. By the school paying for ATI and ReMar review to increase student's practice and pass rates.
- g. Program Director's involvement in teaching. More students are needed to make the school financially viable to help pay for more faculty to assist in the NCLEX pass rate increase effort.
- h. Identification of "At Risk" students and assisting with appropriate support.
- i. One-to-one meetings with students by Program Director or instructor throughout the program to discuss academic progress.
- On February 21, 2025, a virtual site inspection in which three violations were identified.

Violation 1

During record review, the attendance record showed a total of seven students starting on September 11, 2023. The final graduating number of students in the cohort that was submitted by the Program Director was ten; one student dropped in the final term because of financial concerns. There were seven students enrolled and attending class until week four of the term One.

During the interview, the Program Director confirmed that four students were added to the cohort on October 2, 2023, week four of term One. The Program Director stated she had no criteria in writing for admitting a student "late" into the Program. The students admitted on October 2,2023 had missed 27 hours of skills and 69 hours of theory.

During review of the school's Attendance Policy, it states that missing more than 16 hours of the Program is cause for dismissal. However, the four students admitted late into the Program missed a total of 96 hours and were allowed to continue; the Program did not follow their own policy.

Violation 2

During record review, four students who were making up theory hours missed were attending make-up time on Friday and Saturday for eight hours/day. This was after attending class full-time Monday through Thursday. The total weekly hours for these four students were 48 hours/week. Three of the students made up a total of 64 hours, according to the sign-in sheets provided by the Program Director; the number of hours missed was 69 theory hours, so these three students were deficient in 5 theory hours per their Instructional Plan.

During the interview, the Program Director confirmed that three "Late starts" did make-up their hours over a course of four weeks, while the

fourth student had a schedule two/three weeks longer as he was "not a CNA" and needed to make-up more hours.

Violation 3

During record review, four out of eleven students was admitted to the class as a "late start". The class start date was September 11, 2023. The students were officially started on October 2, 2023, week 4 in the 13-week Term 1 of the full-time program. During record review, the make-up sheets did not indicate educational objectives for the time in attendance. There was no evidence of the method of how the make-up was accomplished.

During the interview, the Program Director confirmed that the four students were admitted on week 4 of Term 1 and did not receive the term one content in sequential order. On Monday through Thursday, these students were learning week four material, then on Friday and Saturday of the same week, the admitted-late students were learning week one material. The Program Director stated that they do not have a policy regarding admitting students in the middle of the term and do not have a process to ensure that the curriculum is taught in a sequence that results in progressive mastery of knowledge, skills, and abilities for the students who started approximately three weeks after the class start date. During record review, the make-up sheets did not indicate educational objectives for the time in attendance.

- On March 4, 2025, a request to admit was presented to the Executive Officer for consideration.
 - 1. Denied the Program's request to admit a full-time class of 15 students to commence on March 10, 2025, with a graduation date of March 8, 2026, to replace the class that graduated on September 30, 2024.
 - 2. Require the Program to comply with all requirements listed below.

PROGRAM REQUIREMENTS:

- 1. Require the Program to submit corrective action for the Notice of Violation letter dated March 4, 2025.
- 2. Require the Program to submit:
 - a. An alignment of the curriculum with ATI NextGen materials.
 - b. Documentation of attempts to contact and work with the three-graduates who have not tested until they have successfully tested.
- 3. Obtain BVNPT approval prior to the admission of each class.

- 4. Continue to require the Program, when requesting approval to admit students, to:
 - a. Submit all documentation in final form, using forms provided by the BVNPT, no later than two months prior to the requested start date for the class.
 - b. Provide documentation that adequate resources, i.e., faculty and facilities, are available to support each admitted class of students.
 - c. Maintain an average annual pass rate that is compliant with California Code of Regulations, Title 16, Section 2530(I).
- 5. Comply with all the approval standards set forth in Article 4 of the Vocational Nursing Practice Act, commencing with California Business and Professions Code Section 2880, and in Article 5 of the California Code of Regulations, Title 16, commencing with Section 2525.
- 6. Board staff will continue to monitor the Program's effectiveness by tracking class admissions, the effectiveness of employed interventions, and the Program's licensure examination pass rates each quarter.
- There is no evidence in the file that Program requirements have been accomplished documents submitted on April 24, 2025, do not meet the requirements of a comprehensive program analysis.
- On April 30, 2025, new Nursing Education Consultant was assigned to the Program.
- On the May 16, 2025, Boasrd meeting the following decisions were rendered.
 - 1. Placed the Program on provisional approval for two years effective May 16, 2025.
 - 2. Placed the Program on the agenda for the May 2027 Board meeting.
 - 3. Approved the Program's request to admit a full-time class of 15 students to commence on June 2, 2025, with a graduation date of June 6, 2026, to replace the class that graduated on September 30, 2024.
 - 4. Require the Program to comply with all requirements listed below.

PROGRAM REQUIREMENTS:

1. Require the Program to submit a comprehensive analysis report in six months but no later than December 1, 2025, in twelve months but no later than June 1, 2026, and in eighteen months, but no later than December 1, 2026. The report must include a comprehensive analysis of the Program, timeline for

implementation, and the effect of employed interventions. The following elements must be addressed in the analysis.

- a. Terminal objectives
- b. Evaluation of current curriculum including:
 - 1- Instructional plan
 - 2- Theory objectives for each term
 - 3- Clinical objectives for each term
 - 4- Lesson plans for each term
- c. Student Policies including:
 - 1) Admission policy
 - 2) Screening and selection policy
 - 3) Attendance policy
 - 4) Remediation policy
 - 5) Evaluation of student achievement
 - 6) Credit granting policy
- d. Evaluations of approved clinical facilities which determine adequacy in number and variety of patients to accommodate current and projected students
- e. Evaluations of faculty
- f. Methodologies for:
 - 1) Faculty meetings
 - 2) Clinical evaluations
- g. Documentation of required clinical resources for all terms for all current cohorts.
- 2. Require the Program to submit documentation of the third class of admitted students, which will be due by June 12, 2025, ten days into the start of the new cohort. The following elements must be addressed in the tracking documentation:

- a. A list of all students admitted to the class, including name, admission test scores (which test was selected) as well as each item required on the admission and screening and selection policy.
- b. Unredacted attendance records, indication of start and stop times, individual student signatures and the signature of the faculty with the dates of theory and clinical days.
- c. Detailed records of student grades, remediation and make-up attempts sent to the NEC monthly on the first of the month, until the class graduation date.
- 3. Require the Program to provide one instructor for every ten students in clinical experiences. The California Code of Regulations, Title 16, Section 2534(d) states: "for supervision of clinical experience, there shall be a maximum of 15 students for each instructor." Recommendation of one instructor for a maximum of ten students in clinical experiences will enable more focused instruction and enhanced learning to closely monitor and evaluate the clinical performance of students.
- 4. Notify the NEC, in writing, within five calendar days, in the event a current class is displaced from clinical sites.
- 5. Admit no additional classes without prior approval by the Board.
- 6. Continue to require the Program, when requesting approval to admit students, to:
 - a. Submit all documentation in final form, using forms provided by the BVNPT, no later than the fifteenth day of the second month preceding the month of the Board meeting.
 - b. Provide documentation that adequate resources, i.e., faculty and facilities, are available to support each admitted class of students.
 - c. Maintain an average annual pass rate that is compliant with California Code of Regulations, Title 16, Section 2530(*I*).
- 7. Comply with all the requirements in Article 4 of the Vocational Nursing Practice Act, commencing with California Business and Professions Code Section 2880, and Article 5 of the California Code of Regulations, Title 16, commencing with Section 2525.
- 8. Board staff will continue to monitor the Program's effectiveness by tracking class admissions, the effectiveness of employed interventions, and the Program's licensure examination pass rates each quarter.
- 9. Failure to take any of these corrective actions may cause the Board to revoke the Program's approval, as specified in California Code of Regulations, Title 16, Section 2526.1(f).

10. Any material changes in circumstances affecting any information contained the documents submitted by the Program to the Board, require the Program notify the NEC immediately, in writing, as specified in California Code of Regulations, Title 16, Section 2526(g).	