



DATE	September 22, 2026
TO	Executive Officer Review
REVIEWED BY	Judith D. McLeod DNP, CPNP Supervising Nursing Education Consultant (SNEC)
PREPARED BY	Roberta Thomson Ed.D. RN Nursing Education Consultant (NEC)
SUBJECT	Request to Admit; Consideration of Provisional Approval
PROGRAM	Sri Sai Krish Institute Vocational Nursing Program (Program) Program Director: (Vijayakumar Bhaskar, Orange, Orange 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.

PROGRAM REQUEST:

Approve a part-time class of 20 students to commence on September 30, 2026, with a graduation date of June 12, 2028, replacing the class that graduated on April 30, 2026.

BACKGROUND:

On July 14, 2026, the Program Director submitted a request to admit a part-time class of 20 students with supporting documents. The Program Director did not include the number of students to be admitted on the request. The Program has not had any vocational nursing students since April 30, 2026, since the last cohort graduated. The Program admitted a class to the prerequisite courses for the vocational nursing program without prior approval of a new class. Rather than drop those students, the school offered students admission to the Sri Sai Krish Institute RN program, which is not regulated by BVNPT.

There were discussions between the NEC and the Program Director on numerous occasions between February and June 2026 regarding the status of the Vocational Nursing Program due to the small class sizes, high attrition and financial instability. The Program Director has expressed that the Sri Sai Krish Institute RN program is doing fine and small classes of LVNs can be utilized to keep the Program open, even at a financial loss so that there are LVN graduates available for the RN program as transitional students if they need them. Program Director expressed that the school was willing to absorb the financial loss to provide the Program for interested students. The school has not initiated a request for a curriculum revision to allow better transition to the RN program.

The Program has not had any first-time testers for six quarters. They have been out of compliance for eight quarters. The last two quarters with first time testers were 13 and 14 percentage points below the state average annual pass rate.

The last class's graduation date was April 30, 2026. All five students were considered graduates; none were non-graduates. The school previously sent all students after completion to take the NCLEX-PN as a non-graduate and take the NCLEX-PN by Method 3. The Records of Nursing Program (RONPs) for these five students were dated June 30, 2026, two months following their program completion. As of August 31, 2026, none of these students have taken the NCLEX-PN.

On August 2, 2026, a former student of Sri Sai Krish Institute filed a complaint with the BVNPT for the Program's failure to submit her RONP to the BVNPT licensing division. The student completed the program on November 27, 2023. She had completed all hours and course requirements. The school's graduation policy in 2023 was that in order to complete the program as a graduate, the student was required to earn a score of 1050 in each course as well as the exit exam (the HESI exam). (900-949 is the publisher's benchmark for the test on the HESI exam.) The student was offered the opportunity to retake the exam. She was given the opportunity to repeat the final term including clinical. She was not given the option to complete the program as a non-graduate and take the NCLEX-PN by Method three, until August 13, 2026, after she filed her complaint. The student chose to finish the Program as a non-graduate and not retake the exam. She completed the NCLEX-PN using Method 3.

The Program Director was notified of the complaint by the NEC on August 3, 2026, and asked to respond by August 10, 2026. Included in the response was a request to approve a policy change. The Policy change included:

1. Use of the HESI exam:

- Each HESI examination is administered within the existing course whose content it assesses, as a graded component worth 15 percent of that course grade.
- The score is converted to points, there is no minimum qualifying score, and no examination score prevents a student from passing a course, completing the program or graduating.
- A score of 1050 is retained as the program's performance standard, being the score that earns full credit for the component.
- No course is added, removed or renamed, and no approved theory or clinical hour changes. The Program determines from its own approved curriculum in which course each examination sits.

2. Revised Graduation Requirements

- Complete all terms and systems with a grade of 75% or better: Unchanged
- Complete the minimum theory and clinical hours approved by the BVNPT: This policy is unchanged
- Earn a satisfactory grade in each clinical segment: This policy is unchanged
- Not on probation for absenteeism or behavioral deficiencies: Unchanged

- Complete the Program within one and one half times the planned program length: This policy is unchanged
- Former requirement: a minimum score of 1050 on the HESI exit examination: Removed as a condition of graduation. The HESI exam continues to be administered and 1050 remains the program's performance standard for that examination. What has changed is that a student's score no longer determines graduation.
- Former requirement: the student must be in good financial standing with the school: Removed from graduation requirements. Financial obligations are administered by the business office and have no effect on graduation, transcript release, or RONP submission.

The policy changes have not currently been approved by the BVNPT. The Program currently does not have any enrolled students.

As part of the complaint response the Program submitted transcripts and documents for another student from 2023, who has not filed a complaint, but also has had her RONP held.

The alleged complaint against Sri Sai Krish Institute Vocational Nursing has not been resolved.

STAFF ANALYSIS:

The Program has had no NCLEX-PN® testers since fourth quarter of 2024. The Program's average annual NCLEX-PN® pass rates for first time candidates were 71% for last two quarters in which they had testers. The pass rates were 13 and 14 percentage points below the state average.

Submitted documentation by the Program Director substantiates adequate resources including faculty and facilities, currently the program has no students enrolled. Unable to determine if the Program has adequate resources for students to achieve programmatic learning objectives.

STAFF RECOMMENDATIONS:

1. Deny the Program's request to admit a part-time class to commence on September 30, 2026, with a graduation date of June 12, 2028.
2. Refer the Program to the full Board on October 2, 2026, for consideration of Provisional Approval due to eight quarters of non-compliance with NCLEX-PN® pass rates.
3. Require the Program to comply all requirements listed below.

PROGRAM REQUIREMENTS

1. Notify the NEC in the event a current class is displaced from clinical sites.

2. Require the Program to admit no additional classes without prior approval by the Board.
3. 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).
4. Comply with all of 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 California Code of Regulations, Title 16, commencing with Section 2525.
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.

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(l).

The Program is approved to offer both a full-time 46-week curriculum and 72-week part-time curriculum. Currently only the part-time evening class is being offered.

The part-time class requires BVNPT approval 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 20 students for the period August 2024 through September 2026.

ENROLLMENT DATA TABLE

Class Start Dates	Class Completion Dates	Number of Students Admitted	Number of Students Current	Number of Graduated	Total Enrolled
08/30/2024 PT *(4/11/2026)		6	5		5
	04/30/2026 (08/30/2024)			-5	5-5 = 0
09/30/2026 *(06/12/2028) Proposed		20			20

*Indicates projected graduation date

Licensing Examination Statistics

California Code of Regulations, Title 16, 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.

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 of July 2024 through June 2026, specify the pass percentage rate for 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		
Quarter	# Candidates in Quarter	# Passed in Quarter	% Passed in Quarter	State Quarterly Pass Rate	Program Average Annual Pass Rate	State Average Annual Pass Rate CCR §2530(l)	Variance from State Average Annual Pass Rate
Jul-Sep 2024	4	3	75%	83%	71%	85%	-14
Oct-Dec 2024	2	2	100%	81%	71%	84%	-13
Jan-Mar 2025	No tests this quarter				No Data	83%	-83
Apr-Jun 2025	No tests this quarter				No Data	81%	-81
Jul-Sep 2025	No tests this quarter				No Data	81%	-81
Oct-Dec 2025	No tests this quarter				No Data	81%	-81
Jan-Mar 2026	No tests this quarter				No Data	80%	-80
Apr-Jun 2026	No tests this quarter				No Data	81%	-81

*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 (April– June 2026), the Program has had no first-time testers or data since December 2024. 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 81 percent. The average annual pass rate for the last quarter when the Program had data was 13 percentage points below the state average annual pass rate. They have been out of compliance for eight quarters and have had no first-time testers for six quarters.

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 six, including the Program Director. The Program Director has 50% percent administrative duties and 50% percent teaching responsibilities. Of the total faculty, six are designated to teach clinical. Based upon a maximum proposed enrollment of 20 students, two instructors are 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.

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 approved competency-based objectives and theory being taught for current and proposed student enrollment.

Violations

Violation #1: California Code of Regulations, Title 16, 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.

(1) Failure to maintain the required yearly average minimum pass rate for two years or eight consecutive quarters may be cause to place a program on provisional approval.

Violation: On July 8, 2026, NCLEX- PN® pass rates were published for second quarter of 2026. The program has been out of compliance for the last eight quarters. The Program has not had first time testers for the last six quarters. The Program graduated five students in April 2026. As of August 31, 2026, no graduates had tested.

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

ATTACHMENTS:

Attachment A: Program History

Attachment A

SRI SAI KRISH INSTITUTE COLLEGE VOCATIONAL NURSING PROGRAM

Program History

- On November 4, 2014, the Executive Officer approved the following:
 1. Approved the Sri Sai Krish Institute request to begin a vocational nursing program with an initial full-time class of 55 students and five alternates on January 29, 2015 only, and graduating February 21, 2016
 2. Approved the program curriculum for 1670 hours, including 665 theory and 1005 clinical hours
 3. Required the program to obtain prior Board 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.
- On November 4, 2014, the program was approved to admit its initial class of 55 students. Class commencement was scheduled for January 29, 2015; graduation was projected for February 21, 2016. This start was delayed. Thirty-four students started in March 2015.
- On October 7 and 8, 2015, a Board representative conducted a program inspection.
- On March 24, 2016, the Executive Officer approved the following:
 1. Approved the Sri Sai Krish Institute Vocational Nursing Program for the four-year period from March 24, 2016, through March 23, 2020, and issued a certificate accordingly.
 2. Approved the program's request to admit one class of 40 students, beginning April 18, 2016, and graduating April 28, 2017.
 3. Continued to require the program to obtain Board approval prior to the admission of each class.
- On October 19, 2016, the Executive Officer approved the following:
 1. Approved Sri Sai Krish Institute Vocational Nursing Program requests approval to admit 40 students into a part-time class on November 28, 2016, with a projected graduation date of July 16, 2018.
 2. Continued to require the program to obtain Board approval prior to the admission of additional classes

- On June 15, 2016, the Executive Officer approved the following:
 1. Approved Sri Sai Krish Institute Vocational Nursing Program's request to admit 40 students into a full - time class on June 19, 2017, with a projected graduation date of July 30, 2018, to replace the full-time class which graduated on April 28, 2017.
 2. Approved the program's request to admit 40 students into a part-time class on June 19, 2017, with a projected graduation date of February 11, 2019.
 3. Continued the program's requirement to obtain Board approval prior to the admission of additional classes.
- On April 16, 2018, the Board approved the following:
 1. Approved the request to admit one full-time class of 30 students on April 16, 2018.
 2. Approved the request to admit one part-time class of 30 students on April 23, 2018.
 3. Approved the request for a pattern of admission for three part-time classes and two full-time classes a year, to replace graduating students only, with the following stipulations.
 - a. No additional classes are added to the program's pattern of admissions without prior Board approval.
 - 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 California Code of regulations, Title 16, Section 2530(I).
- On December 17, 2019, the Sri Sai Krish Institute Vocational Nursing Program requested consideration for continued approval for a period of four-year period to commence on March 23, 2020.
- On March 6, 2020, the Board of Vocational Nursing and Psychiatric Technicians (Board) considered the consultant's report relative to the Sri Sai Krish Institute, Vocational Nursing Program's request for continued approval.

The following decisions were rendered:

1. Granted continued approval of the Sri Sai Krish Institute Vocational Nursing Program, Vocational Nursing Program for a four-year period commencing on March 23, 2020, and direct staff to issue a certificate accordingly.
2. Rescinded approval of the pattern of admission for the two full-times classes of 30 students.
3. Required the program to admit no additional full-time classes without prior approval by the Board.
4. Required the program, when requesting approval to admit students, to:

- a. Submit all documentation in final form, using the forms provided by the Board, 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. Ensure that the program maintains an average annual pass rate that is compliant with California Code of regulations, Title 16, Section 2530(l).
- 5. Required the program director to submit notification to the NEC of the start date of each part-time class prior to the beginning of the class, along with the number of students admitted to the class.
- On January 7, 2025, the Executive Officer at their meeting considered the consultant's report regarding the Sri Sai Krish Institute Vocational Nursing Program

The following decisions were rendered:

- 1. Granted continued full approval for the Sri Sai Krish Institute Vocational Nursing Program for a four-year period beginning March 23, 2024, and issued a certificate accordingly.
- 2. Referred to the full Board at its May 15, 2025, meeting for consideration of rescinding approval for the pattern of admission for three part-time classes of 30 students in a calendar year.
- 3. 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. Continue the Program's approved pattern of admission to replace graduating classes only, with the following stipulations:
 - a. No additional classes are added to the Program's pattern of admission without prior approval.
 - b. The Program is approved for a pattern of admission of three part-time classes of 30 students three times per year, replacing graduating classes only.
- 3. Provide documentation that adequate resources, i.e., faculty and facilities, are available to support each admitted class of students.
- 4. Submit documentation of correction of the three violations no later than February 10, 2025.
- 5. Comply with all of 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.
- In June of 2025 a new NEC was assigned to SSKI Vocational nursing program. The Program Director informed the NEC that she would be taking an extended out of the

country trip for family emergency. The NEC requested the name of the faculty who would be administering the program in her absences. The Program Director was unable to identify the faculty who would be in charge. She informed the NEC that the trip would be postponed until students were on break. During the course of this communication the Program Director stated that they had admitted a class without the acquired BVNPT approval. Rather than dropping the students or delaying their program until the cohort received approval, the Program Director notified the NEC that the students would be offered a seat in the RN program at a reduced tuition.

- In April 2026, the Program Director was contacted and was asked to document the number of enrolled students and plans for future cohorts.
- On April 20, 2026, the Program Director responded with the following:
 1. Current VN program status:
 - a. Currently enrolled 5 students
 - b. Number enrolled at the start of the Cohort: 6
 - c. Expected next graduation: April 30th, 2026
 - d. dDate of Last Graduation: November 27th, 2023

2. Plans for the VN program:

SSKI intends to recruit one additional cohort with a planned start date of August 2026. We recognize that the recent pass rate history and the gap in testers require a credible path forward, not simply continued enrollment. Our approach for the August 2026 cohort includes:

1. Tracking the outcomes for the April 2026 graduates as they sit for the NCLEX-PN and will provide test preparation support
2. Recruitment in the Orange County service area, where the healthcare employment landscape continues to show consistent LVN demand in skilled nursing facilities, home health, outpatient care, and long-term care settings
3. Use the August 2026 VN student recruitment and enrollment results as a go/no-go decision, at which time SSKI will determine whether to continue the program or initiate voluntary closure procedures.
4. Market justification:

While we acknowledge that the California Department of Health Care Access and Information's 2025 report shows some areas of the state with a surplus of vocational nurses, however in the same reporting identifies that there are significant counties in California that still face LVN shortages. The U.S. Bureau of Labor Statistics projections also show approximately 54,400 annual LPN/LVN openings nationally through 2034. Orange County continues to show steady demand within the area for long-term projections between 2022–2032 that indicate approximately 3,440 total job openings for LVNs, also within the broader Los Angeles–Long Beach–Anaheim. Orange County's aging population, concentration of skilled nursing and long-term care facilities, and home health demand continue to support a regional need that

SSKI is well positioned to serve. A small-cohort program like ours is well within the capacity of this regional labor market, especially

With Orange County's aging population and concentration of skilled nursing and long-term care facilities.

Our commitment and transparency are that SSKI takes the concerns raised in your email seriously. If the August 2026 cohort does not reach a sustainable size, or if NCLEX-PN outcomes for the April graduates do not show meaningful improvement, we will pursue voluntary discontinuance of our VN program rather than continue it. Our goal is to serve students and the profession responsibly.