

Agenda Item #9.E.



STATE AND CONSUMER SERVICES AGENCY • ARNOLD SCHWARZENEGGER, GOVERNOR

BOARD OF VOCATIONAL NURSING & PSYCHIATRIC TECHNICIANS
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DATE: September 3, 2009

TO: Board Members

FROM: Cheryl C. Anderson, M.S., R. N.
Nursing Education Consultant

SUBJECT: Career Development Institute, Inc., Los Angeles, Vocational Nursing Program – Consideration of Placement on Provisional Accreditation (Director: Sasha Alexis Rarang, Los Angeles, Los Angeles County, Private)

Career Development Institute, Los Angeles, Vocational Nursing Program is presented to the Board for consideration of placement on provisional accreditation.

In accordance with Section 2526.1(c) of the Vocational Nursing Rules and Regulations,

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

Section 2530(l) of the Vocational Nursing Rules and Regulations states:

“The program shall maintain a yearly average minimum pass rate on the licensure examination that does not fall below 10 percentage points of the state average pass rate for first time candidates of accredited 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 accreditation.”

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

NCLEX-PN® Licensure Examination Pass Rates			
Quarter	State Annual Average Pass Rate	Program Annual Average Pass Rate	Variance from State Annual Average Pass Rate
Jul – Sep 2007	76%	56%	- 20
Oct – Dec 2007	76%	56%	- 20
Jan – Mar 2008	75%	50%	- 25
Apr - Jun 2008	74%	25%	- 49
Jul - Sep 2008	74%	40%	- 34
Oct – Dec 2008	73%	40%	- 33
Jan – Mar 2009	72%	40%	-32
Apr – Jun 2009	70%	40%	-30

History of Prior Board Actions

- On February 21, 2005, the Executive Officer approved the Career Development Institute to begin a full - time vocational nursing program with an initial class of 30 students on February 12, 2005 only; and approved the program curriculum for 1532 hours, including 576 theory and 956 clinical hours.
- On October 5, 2005, the director notified the Board of a delayed start from February 12, 2005, to October 22, 2005, with a completion date of October 17, 2006.
- On September 8, 2006, the Board approved initial full accreditation for the Career Development Institute Vocational Nursing Program for the period from September 8, 2006, through September 7, 2010, and issued a certificate accordingly.

The Board also approved the program’s request to admit 30 students starting November 18, 2006 only, to replace students graduating October 22, 2006. The projected completion date for the replacement class is November 9, 2007.

- On March 1, 2007, the Board approved the Career Development Institute, Inc. Vocational Nursing Program’s request to admit 30 students into a part-time program starting March 9, 2007 only, with a projected graduation date of March 9, 2008.
- On April 9, 2008, the program was requested to review its curriculum, instructional plan, policies and procedures to evaluate changes needed to improve program pass rates.
- On June 4, 2008, the Executive Officer approved the program’s request to admit 15 students on July 7, 2008 only, as a replacement class with an anticipated graduation date of July 2, 2009.
- On October 3, 2008, the program submitted a written plan for improving its pass rates on the on the National Council Licensure Examination for Practical/Vocational Nurses (NCLEX-PN®).

- On March 16, 2009, the program was notified that its pass rates had fallen below 10 percentage points of the state average annual pass rate for the past six (6) quarters. The program was requested to submit detailed documentation verifying implementation of the submitted plan of correction, dates of implementation of the plan, the effectiveness of the employed interventions, and modifications, if any, in the submitted plan, on or before April 2, 2009.
- On March 18, 2009, the Executive Officer approved the Career Development Institute Vocational Nursing Program's request to admit 15 students commencing July 17, 2009, with an anticipated graduation of October 10, 2010 only, to **replace** the class completing program requirements on July 2, 2009. Additionally, the program was required to submit a follow-up report by April 30, 2009 that included a comprehensive analysis of the program, specific actions to improve the program pass rates, timeline for implementation, and expected outcomes. The following elements must be addressed.
 1. Admission Criteria.
 2. Screening and Selection Criteria.
 3. Terminal Objectives.
 4. Curriculum Objectives.
 5. Instructional Plan.
 6. Theory and Clinical Objectives for Each Course.
 7. Lesson Plans for Each Course.
 8. List of Textbooks.
 9. Attendance Policy.
 10. Remediation Policy.
 11. Evaluations of Theory and Clinical Faculty.
 12. Evaluations of Theory Presentations.
 13. Evaluations of Clinical Rotations and Their Correlation to Theory Presentations.
- On May 14, 2009, the program was notified that its pass rates had fallen below 10 percentage points of the state average annual pass rate for the past seven (7) quarters. The program was requested to submit the following information by June 15, 2009.
 1. Current enrollment information.
 2. Current faculty and facility information.
 3. Documentation demonstrating the clinical rotation schedules for all current classes.
 4. An analysis of your program's plan of correction indicating the elements that have been effective and those that have not. Describe alterations that you will make in the plan based on this analysis.
 5. Any other pertinent information to be considered by the Board.
- On July 17, 2009, the Board received the program's follow – up report. That report contained the program's analysis of its plan of correction and modifications of that

plan. The program failed to submit information and documentation addressing the following areas.

1. Current enrollment information.
2. Current faculty and facility information.
3. Documentation demonstrating the clinical rotation schedules for all current classes.

- **On July 22, 2009, a new program director was approved.**
- On August 17, 2009, the Board received information and documents from the owner correcting reported inaccuracies in information submitted by the prior director relative to the program's enrollment history.

Enrollment

The program offers a 53 – week full – time class and a 17 – month part – time class. Prior Board approval is required for each class admission. The pattern of admissions for current and proposed classes is seen in the enrollment table below.

The following table represents **projected** student enrollment based on current and proposed class starts and completions. The table indicates **a maximum enrollment of 7 students** from July 2009 through October 2010.

ENROLLMENT DATA				
CLASS DATES		#Students Admitted	#Students Current or Completed	Total Enrolled
Start	Complete			
10/05 (FT)		10	9	9
	10/06 (10/05 FT Class)		- 9	9 – 9 = 0
10/06 (FT)		9	6	0 + 6 = 6
	11/07 (10/06 FT Class)		- 6	6 – 6 = 0
3/07 (PT)		9	8	0 + 8 = 8
	3/08 (3/07 PT Class)		-8	8 – 8 = 0
7/08 (FT)		6	6	0 + 6 = 6
	7/09 (7/08 FT Class)		-6	6 – 6 = 0
7/09 (PT)		8	7	0 + 7 = 7

ENROLLMENT DATA				
CLASS DATES		#Students Admitted	#Students Current or	Total Enrolled
	10/10 (7/09 PT Class)		- 7	7 - 7 = 0

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 July 2007 through June 2009, specify the pass percentage rates for graduates of Career Development Institute, Inc., 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 Average Quarterly Pass Rate	Program Average Annual Pass Rate	State Average Annual Pass Rate
Jul - Sep 2007	3	0	0%	76%	56%	76%
Oct - Dec 2007	No Candidates Tested			76%	56%	76%
Jan - Mar 2008	No Candidates Tested			75%	50%	75%
Apr - June 2008	5	2	40%	70%	25%	74%
July - Sep 2008	No Candidates Tested			74%	40%	74%
Oct - Dec 2008	No Candidates Tested			73%	40%	73%
Jan - Mar 2009	No Candidates Tested			70%	40%	72%
Apr - Jun 2009	No Candidates Tested			71%	40%	70%

*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.

Based on the most recent data available (April – June 2009), the program's average annual pass rate is 40%. The California average annual pass rate for graduates from accredited vocational nursing programs who took the NCLEX-PN® for the first time during the same period is 70%. The pass rate for the Career Development Institute, Inc., Vocational Nursing Program is 30 percentage points **below** the state average annual pass rate.

Faculty and Facilities

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

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

The total number of Board-approved faculty is seven (7), including the program director. Four (4) instructors are available to teach in the clinical area. For a maximum enrollment of 7 students, one (1) instructor is needed. 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's clinical facilities 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

As noted above, the program's average annual pass rate on the NCLEX-PN[®] is 30 percentage points below the state average annual pass rate. On October 3, 2008, the program submitted its plan for improving program pass rates.

On March 16, 2009, the consultant notified the program that its pass rates on the NCLEX/PN[®] had fallen below 10 percentage points of the state average annual pass rate for six (6) quarters. The director was requested to submit a report relative to the effectiveness of its previously submitted plan by April 2, 2009.

On May 14, 2009, the consultant notified the program that its pass rates on the NCLEX/PN[®] had fallen below 10 percentage points of the state average annual pass rate for seven (7) quarters. The director was requested to complete a comprehensive analysis of the curriculum, instructional plans, lesson plans, textbooks, attendance policy, remediation policy, theory and clinical instructors, clinical rotations and all clinical facilities to identify those areas requiring improvement. Subsequently, the director was requested to submit a follow-up report setting forth an analysis and revisions to the previously submitted plan of correction. That plan was received on July 17, 2009 (see Attachment A).

As presented therein, the program's report addressed the following areas.

A. Revised Admission Criteria, Screening and Selection Criteria.

Applicants for program admission must attain a minimal score of 67% overall and 75% in overall Reading Comprehension on the Test of Essential Academic Skills (TEAS). Effective July 2009, applicants are also required to participate in the Assessment Technologies Institute (ATI) Comprehensive Assessment and Review Program. Successful applicants are required to pass the ATI Critical Thinking Entrance Examination.

B. Improved Identification of Students with Performance Deficits.

The program requires all students to complete the following ATI Level Examinations.

1. Fundamentals of Nursing Practice.
2. Mental Health Nursing Practice.
3. Pharmacology of Nursing Practice.
4. Nutrition for Nursing.
5. Adult Medical – Surgical Nursing.
6. Maternal – Newborn Nursing.
7. Nursing Care of Children.
8. Leadership and Management for Nursing Practice.

Students must score minimally at Proficiency Level II prior to progressing to the next term of the program.

Upon completion of all curricular requirements, the program requires all students to pass the ATI Comprehensive Predictor Examination to be eligible for graduation.

C. Improved Monitoring of Student Academic Progress.

The director reports the development of an Academic Improvement Program. Instructors conduct weekly one-on-one meetings with each student to discuss their academic progress or lack thereof. The student is placed on academic probation for either of the following criteria.

1. The student receives a grade below 75% on an examination or paper.
2. The student performs below a satisfactory level in clinical.

An intensive remediation plan with counseling, tutorials, and reevaluation is then implemented.

D. Revised Attendance Policy.

The program's revised Attendance Policy specifies that all students are required to maintain an overall attendance performance of 85% or better. The program does not differentiate between excused and non – excused absences. Students who

have an attendance performance of 15% are counseled and may be placed on probation.

Based on the performance of program graduates on the NCLEX-PN® for the period July 2007 through June 2009, the following violation of the California Rules and Regulations is identified.

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 accredited 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 accreditation.”

Violation #1:

The program’s average annual pass rate has been more than ten (10) percentage points below the state average annual pass rate for eight (8) consecutive quarters.

Plan of Correction:

This violation is **not corrected**. The violation will be corrected when the program’s pass rates improve consistent with regulatory requirements.

Recommendations:

1. Place Career Development Institute, Inc, Los Angeles, Vocational Nursing Program on provisional accreditation for the two-year period from September 17, 2009, through September 30, 2011, and issue a notice to the program to identify specific areas of noncompliance and requirements for correction as referenced in Section 2526.1 (e) of the California Code of Regulations (see Attachment B Draft).
2. Require the program to show documented progress by submitting a follow-up reports in 10 and 22 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.
3. Require the program to comply with all accreditation 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 2525.

Rationale: The Board has serious concerns relative to the program's non-compliance with regulations relative to pass rate on the NCLEX-PN[®] for the last eight (8) quarters. During that time, eight (8) program graduates have completed the NCLEX-PN[®]. Of the total tested, two (2) program graduates have passed the licensure examination.

Attachment A – Program correspondence received July 17, 2009.

Attachment B – Notice of Change in Accreditation Status Draft.