

Agenda Item #11.B.



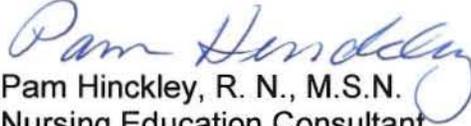
STATE AND CONSUMER SERVICES AGENCY • GOVERNOR EDMUND G. BROWN JR.

BOARD OF VOCATIONAL NURSING & PSYCHIATRIC TECHNICIANS
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DATE: October 24, 2011

TO: Board Members

FROM: 
Pam Hinckley, R. N., M.S.N.
Nursing Education Consultant

SUBJECT: Bay Area College of Nursing, Palo Alto, Vocational Nursing Program – Consideration of Placement on Provisional Accreditation; Request to Admit Students (Director: Rachelle Cagampan, Palo Alto, Los Angeles County, Private)

Bay Area College of Nursing, Palo Alto, 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 sixteen (16) 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 |
| Oct –Dec 2007 | 76% | 79% | +3 |
| Jan – Mar 2008 | 76% | 73% | -3 |
| Apr – Jun 2008 | 75% | 75% | +0 |
| Jul – Sep 2008 | 74% | 75% | +1 |
| Oct - Dec 2008 | 73% | 38% | -35 |
| Jan – Mar 2009 | 72% | 71% | -1 |
| Apr – Jun 2009 | 70% | 72% | +2 |
| Jul - Sep 2009 | 72% | 74% | +2 |
| Oct – Dec 2009 | 73% | 75% | +2 |
| Jan – Mar 2010 | 74% | 64% | -10 |
| Apr – Jun 2010 | 75% | 59% | -16 |
| Jul – Sep 2010 | 75% | 45% | -30 |
| Oct – Dec 2010 | 76% | 37% | -39 |
| Jan – Mar 2011 | 77% | 41% | -36 |
| Apr – Jun 2011 | 76% | 37% | -39 |
| Jul – Sep 2011 | 76% | 39% | -37 |

The program requested approval to admit 22 students commencing September 19, 2011. The proposed class was projected to graduate November 2012.

On August 26, 2011, the Executive Officer deferred action on the program's request for consideration by the full Board at its November 10, 2011 meeting. That action was based on the program's published pass rate statistics. The consultant notified the director of the decision.

The program requests approval to admit 22 full-time students into an evening class on November 14, 2011, graduating on January 13, 2013.

History of Prior Board Actions

- On April 12, 2006, the Executive Officer approved Bay Area College of Nursing, Palo Alto's request to begin a vocational nursing program with an initial full-time class of 20 students commencing May 22, 2006 only; and approved the program curriculum for 1598 hours, including 628 theory, and 970 clinical hours.
- February 8, 2007, the program notified the Executive Officer that the program name was changed to Bay Area College of Nursing, Inc., Palo Alto.
- On July 10, 2007, the Executive Officer approved the program's full accreditation for the period from June 26, 2007, through June 25, 2011, and issued a certificate accordingly.

Additionally, the Executive Officer approved the program's request for ongoing admissions of a full-time class of 60 students each January and July, only, commencing July 17, 2007, with the following stipulations:

- a. No additional classes are added to the program's current pattern of admissions without prior Board approval. The program's current pattern of admissions includes two (2) full-time classes of 60 students plus 6 alternates in January and July of each year.
 - b. The director documents that adequate resources, i.e. faculty and facilities, are available to support each admitted class of students.
- On November 8, 2007, the Executive Officer approved the program's request to admit a full-time evening class of 30 students commencing November 5, 2007 only, graduating December 16, 2008.
 - On April 30, 2008, the Executive Officer approved the program's revised curriculum for 1646 hours (Theory – 676 hours; Clinical – 970 hours.) The program shall submit a revised instructional plan consistent with the revised program hours by May 1, 2008.
 - On December 8, 2010, the assigned consultant forwarded correspondence to the director advising that the program's average annual pass rate had fallen more than ten (10) percentage points below the state average annual pass rate for the past four (4) quarters. The program was requested to submit a written plan for improving their NCLEX-PN® pass rates by December 17, 2010.
 - On December 10, 2010, the Board received electronic correspondence from Abigail Ethel A. Valbuena, Assistant Director of Nursing, Bay Area College of Nursing, Palo Alto Daly City Milpitas San Jose, relative to a proposed curriculum revision.
 - On December 16, 2010, program representatives delivered correspondence and a computer disk to the Board's Sacramento headquarters, specifying the program's plan to improve program pass rates.
 - On December 21, 2010, the Executive Officer approved the Bay Area College of Nursing, Palo Alto, Vocational Nursing Program's request to admit 30 students into an evening class commencing January 3, 2011. Graduation of that class is projected for February 10, 2012. The Executive Officer required the program to submit a report by **February 1, 2011**, that includes 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 Information

Additionally, the EO **rescinded** the program's current approval for the ongoing admission of 60 students into full-time day classes each January and July; **and**, required the program to obtain Board approval prior to the admission of students into day and evening classes.

- On March 22, 2011, the Board received program documents related to its comprehensive analysis.
- On August 24, 2011, the program submitted a comprehensive program analysis dated January 28, 2011.
- On August 26, 2011, the Executive Officer deferred action on Bay Area College of Nursing, Palo Alto, Vocational Nursing Program's request to admit 22 students commencing September 19, 2011, to the full Board; **and**, placed the program on the agenda for the November 10, 2011 Board meeting for consideration of placement on provisional accreditation; **and**, required the program to obtain Board approval prior to the admission of future classes.
- On October 7, 2011, the assigned consultant forwarded correspondence requesting submission of fifteen (15) copies of pertinent documents, plan, and subsequent actions taken to correct identified problems that they desire Board members to consider.

Enrollment

The program offers full-time day and evening classes that are 58 weeks in length. Board approval is required prior to the admission of each class. The program's admission pattern for current classes is seen in the enrollment table below.

The following table represents **current and projected** student enrollment based on **current and proposed** class starts and completions. The table indicates a **maximum enrollment of 112 students** for the period from **June 2006 through February 2012**.

| ENROLLMENT DATA | | | | |
|----------------------------------|----------------------|--------------------|--------------------------------|----------------------|
| CLASS DATES | | #Students Admitted | #Students Current or Completed | Total Enrolled |
| Start | Completed | | | |
| 6/06 | | 19 | -16 | 16 |
| | 7/07 (6/06 Class) | | -16 | 16 - 16 = 0 |
| 7/07 | | 42 | 32 | 0 + 32 = 32 |
| 1/08 | | 39 | 33 | 32 + 33 = 65 |
| 7/08 | | 35 | 34 | 65 + 34 = 99 |
| | 8/08 (7/07 Class) | | -32 | 99 - 32 = 67 |
| 1/09 | | 46 | 45 | 67 + 45 = 112 |
| | 3/09 (1/08 Class) | | -33 | 112 - 33 = 79 |
| 7/09 | | 19 | 22 | 79 + 22 = 101 |
| | 8/09 (7/08 Class) | | -34 | 101 - 34 = 67 |
| 1/10 | | 24 | 21 | 67 + 21 = 88 |
| | 2/10 (1/09 Class) | | -45 | 88 - 45 = 43 |
| 7/10 | | 25 | 23 | 43 + 23 = 66 |
| | 8/10 (7/09 Class) | | -22 | 66 - 22 = 44 |
| 1/11 | | 16 | 14 | 44 + 14 = 58 |
| | 2/11 (1/10 Class) | | -21 | 58 - 21 = 37 |
| | 9/11 (7/10 Class) | | -23 | 37 - 23 = 14 |
| 11/11 (eve) (Proposed) | 1/13 | 22 | | 14 + 22 = 36 |
| | 2/12 (1/11 Class) | | -14 | 36 - 14 = 22 |

Licensing Examination Statistics

The following statistics, furnished by the 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 2007 through September

2011, specify the pass percentage rates for graduates of the Bay Area College of Nursing, Palo Alto, Vocational Nursing Program on the National Council Licensure Examination for Practical (Vocational) Nurses (NCLEX-PN®).

| NCLEX-PN® Licensure Examination Data | | | | | | |
|--------------------------------------|----------------------|----------|----------|---------------------------|----------------------------------|--------------------------------|
| Quarterly Statistics | | | | | Annual Statistics* | |
| Quarter | # Candidates | # Passed | % Passed | State Quarterly Pass Rate | Program Average Annual Pass Rate | State Average Annual Pass Rate |
| Oct – Dec 2007 | 14 | 11 | 79% | 76% | 79% | 76% |
| Jan – Mar 2008 | 1 | 0 | 0% | 75% | 73% | 76% |
| Apr – Jun 2008 | 1 | 1 | 100% | 75% | 75% | 75% |
| Jul – Sep 2008 | No Candidates Tested | | | 70% | 75% | 74% |
| Oct – Dec 2008 | 6 | 2 | 33% | 73% | 38% | 73% |
| Jan – Mar 2009 | 17 | 14 | 82% | 70% | 71% | 72% |
| Apr – Jun 2009 | 9 | 7 | 78% | 71% | 72% | 70% |
| Jul – Sep 2009 | 33 | 25 | 76% | 74% | 74% | 72% |
| Oct – Dec 2009 | 10 | 6 | 60% | 76% | 75% | 73% |
| Jan – Mar 2010 | 18 | 7 | 39% | 75% | 64% | 74% |
| Apr – Jun 2010 | 13 | 6 | 46% | 74% | 59% | 75% |
| Jul – Sep 2010 | 17 | 7 | 41% | 76% | 45% | 75% |
| Oct – Dec 2010 | 11 | 2 | 18% | 77% | 37% | 76% |
| Jan – Mar 2011 | 13 | 7 | 54% | 80% | 41% | 77% |
| Apr – Jun 2011 | 2 | 0 | 0% | 71% | 37% | 76% |
| Jul – Sep 2011 | 15 | 7 | 47% | 74% | 39% | 76% |

*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 to September 2011), the program's average annual pass rate is **39%**. The California average annual pass rate for graduates from accredited vocational nursing programs who took the NCLEX-PN® for the first time is 76%. The average annual pass rate for the Bay Area College of Nursing, Palo Alto, Vocational Nursing program is **37** 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 number of Board-approved faculty totals 19, including the director. The director has 90% administrative and 10% teaching duties. Of the total faculty, 15 instructors and director are approved to teach clinical.

Based on a maximum enrollment of 112 students, eight (8) instructors are needed. Therefore, the number of current faculty is adequate for the current and proposed enrollment.

Other Considerations

The program has six (6) consecutive quarters in which its average annual pass rates have been more than ten (10) percentage points below state average annual pass rates. For the most recent reporting period (July – September 2011), the program's average annual pass rate is **39%**. As such, the program's average annual pass rate is **37** percentage points **below** the state average annual pass rate.

On December 21, 2010, the Executive Officer rescinded the program's approval for ongoing admissions of 60 students into full-time day classes each January and July and required the director to submit a report that included the following information.

1. A comprehensive program analysis.
2. Specific actions taken to improve program pass rates.
3. A timeline for implementation.
4. The effect of employed interventions.

On March 22, 2011, the Board received program documents related to its comprehensive analysis.

The director has been in the process of revising the program curriculum to correct identified deficiencies; however, to date the revisions have not met the Board identified criteria. The director indicates she will continue to work on it. On August 24, 2011, the program submitted a comprehensive program analysis dated January 28, 2011 (see Attachment A).

On August 26, 2011, the Executive Officer deferred action on Bay Area College of Nursing, Palo Alto, Vocational Nursing Program's request to admit 22 students commencing September 19, 2011, to the full Board at the November 10, 2011 meeting; **and**, placed the program on the November 2011 Board agenda for consideration of placement on Provisional Accreditation. Additionally, the Executive Officer required the program to obtain Board approval prior to the admission of future classes. That action was based on the program's published pass rate statistics.

Based on the published program statistics, submitted documents, and materials, the following violation is identified.

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.”

Violation #1: The program's average annual pass rates have been more than ten (10) percentage points below the state average annual pass rates for six (6) consecutive quarters.

Plan of Correction #1: This violation is **not corrected**. The violation will be corrected when the program's pass rates improve and are consistent with regulatory requirements. This violation will be addressed in recommendations below.

On October 7, 2011, the assigned consultant forwarded correspondence requesting submission of fifteen (15) copies of pertinent documents, plan, and subsequent actions taken to correct identified problems that they desire Board members to consider (see Attachment B).

Recommendations:

1. Place Bay Area College of Nursing, Palo Alto, Vocational Nursing Program on provisional accreditation for the two-year period from November 10, 2011, through November 30, 2013, 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 C).
2. Deny the programs request to admit a class of 22 full-time evening students on November 14, 2011, graduating on January 13, 2013, at this time.
3. Require the program to admit no additional students unless approved by the full Board.
4. Require the program to bring its average annual pass rate to no more than ten (10) percentage points below the State average annual pass rate by **September 1, 2013**.
5. Require the program to submit follow-up reports in nine months, but no later than **August 1, 2012**, and 21 months, but no later than **August 1, 2013**. The reports 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.
6. 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 2526.
 7. 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 accreditation.
 8. Failure to take any of these corrective actions may cause the full Board to revoke the program's accreditation.
 9. Place the program on the **November 2013** Board agenda for reconsideration of provisional accreditation.

Rationale: The program currently has six (6) quarters of noncompliant average annual pass rates. In Quarter 4 2009, the program had an average annual pass rate of 75%. Subsequent to Quarter 4 2009, the program's average annual pass rates fell to **62%**, then **60%**, **45%**, **37%** then up to **41%**, then **37%**, and currently **39%**. The program's current average annual pass rate is **37** percentage points **below** the state average annual pass rate. Placing the program on provisional accreditation is advisable based on this trend. Additionally, denying approval of the program's admission of the class of 20 students, at this time, will give the program time to revise their curriculum and focus on the 14 currently enrolled students.

Attachment A: Program Correspondence Dated January 28, 2011; Received August 24, 2011.

Attachment B: Board Correspondence Dated October 7, 2011.

Attachment C: Draft Notice of Change in Accreditation Status.

Agenda Item #11.B.Attachment A



BAY AREA COLLEGE
OF NURSING

**Pam Hinckley, RN M.S.N.
Nursing Education Consultant
BVNPT**

August 25, 2011

Dear Ms. Hinckley,

Bay Area College of Nursing *Palo Alto* and *Daly City* would like to request the following:

1. Admission Criteria:

a. Explanation of changes and Rationale for proposed revision:

- The use of Wonderlic/WBST entrance exams assesses two sections:
- 1. Language
- 2. Math-Based

With our school's experience, the WBST assessment test did not accurately evaluate the suitability of our prospective students/current students for the nursing program. The test failed to identify or weed out gaps in required knowledge and the suitable attitude to ensure academic preparation and commitment in the rigorous training required by the school.

b. Description of revised curriculum materials:

- Initial Assessment to determine readiness to enter the program. Will propose to change the entrance exam type from WBST to HESI A2. HESI A2 entrance test content consists of six sections:
 1. Anatomy and Physiology (25 items)
 2. Vocabulary and general knowledge (50 items)
 3. Reading Comprehension (50 items)
 4. Grammar (50 items)
 5. Basic Math skills (50 items)
 6. Learning style, decision-making skills, and personality traits

The time allotted to the test is four hours with candidates needing to score 80% to pass. HESI A2 test assesses the suitability of the candidate for the nursing program for which the test is designed. It is a tool to assess the readiness and suitability for success in the VN program and can provide an accurate appraisal of a candidate's potential as a nurse.

2. Screening and Selection Criteria

a. Explanation of changes and Rationale for proposed revision:

- High School Diploma and GED Certification - overall grade/average is not being considered.



- b. Description of revised curriculum materials:
 - Will require a 3.0 or higher overall cumulative grade point average based on completed secondary education official transcript of records or GED results.
 - c. Please refer to Appendix A for the revised document.
3. Attendance Policies
- a. Explanation of changes and Rationale for proposed revision:
 - Attendance is monitored daily and made up accordingly, if absences occur. Some of the factors affecting student attendance are family responsibilities and employment issues.
 - b. Description of revised curriculum materials:
 - Explain to the candidates/students that increased family responsibilities and employment hours negatively impact their nursing education and their success in the program. Admission criteria should include commitment to the program. Will continue monitoring attendance.
 - c. Please refer to Appendix B for the revised document.
4. Evaluations of Clinical Rotations
- a. Explanation of changes and Rationale for proposed revision:
 - The students and faculties evaluate clinical rotations at the end of each term. Clinical sites are adequate. Approved Skills lab hours for Medical Surgical Nursing = 48 hours.
 - b. Description of revised curriculum materials:
 - Will request to increase practical lab hours every term (Term 1 from 52-hours to 165-hours; Term 2 from 24-hours to 78-hours; Term 3 from 24-hours to 94-hours; Term 4 90 hours) to improve, hone, and correctly apply the nursing and medical skills/procedures learned during the theory portion of the course program and to obtain a well-balanced curriculum. Yearly evaluation of faculty and facility at the end of the year.
5. Evaluation of Student Achievement
- a. Explanation of changes and Rationale for proposed revision:
 - Evaluates student achievement after each term. The school does not offer an exit exam to predict successful passing of the NCLEX PN.
 - b. Description of revised curriculum materials:
 1. Assess students for at-risk status early in the program and implement a plan to assist at-risk students with success in the program and on the NCLEX. At-



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risk students are those who fail the nursing courses, repeat of nursing courses, and fails in the NCLEX predictor exam.

2. Increase the minimum grade average to 75% from 70% to pass the nursing courses.
3. Implement NCLEX simulation test and monitor progress.
4. Incorporate a comprehensive exam as their final examination at the end of the final term of the course program before completion of the program and prior to graduation.

Should you have questions, please feel free to contact me at (650) 858-6810.

Respectfully,



Rachelle Cagampan, RN M.S.N., M.P.A.
Program Director



Appendix A

VOCATIONAL NURSING PROGRAM School Information and Admission Requirements

School Information

Main Office:

824 San Antonio Road
Palo Alto, CA 94303
Phone: (650) 858-6810
Fax: (650) 204-6979

Main Office:

6150 Mission St. Suite 103
Daly City, CA 94014
Phone: (650) 755-6887
Fax: (650) 755-6888

Satellite Branches:

702 E. Santa Clara Street
San Jose, CA 95112
Phone: (408) 280-6888
Fax: (408) 280-6888

School Director: Rachelle Cagampan, RN, MSN, MPA

Start Date: November 14, 2011

Completion Date: January 13, 2013

Theory Class: Wednesday & Thursday

Time: 5:00pm to 10:40pm NOTE: Hours may vary according to approved schedule.

Venue: San Jose Campus
702 E. Santa Clara Street
San Jose, CA 95112

Clinical: Saturdays & Sundays

Time: 6:30am to 2:10pm (AM Shift)
2:30pm to 10:10pm (PM Shift) NOTE: Hours may vary according to approved schedule.



Admission Requirements

1. Completely filled out Bay Area College of Nursing application form.
2. High school transcript of records sealed and sent by the school or G.E.D. certificate. Will require a 3.0 or higher overall cumulative grade point average based on completed secondary education official transcript of records or GED results.
3. All foreign transcripts must be evaluated by a member of the National Association of Educational Credential Service for 12th grade equivalency.
4. Complete Anatomy and Physiology course of at least 3 semester units with a grade of C or higher. ***This course may be taken at Bay Area College of Nursing or at a community college.***
5. Complete Entrance Assessment Test with a score of 200 or higher in English and a score of 210 or higher in Mathematics. Test scores must be within 2 years prior to the date of admission.
6. Current and valid C.P.R. certificate.
7. Physical examination by a medical doctor or nurse practitioner.
8. TB clearance; hepatitis B vaccination or at least 1st injection of the series of 3; MMR or titer verifying immunity to rubella and rubeola; varicella immunization or immunity verification by titer and current flu vaccine.
9. Tetanus within past 5 years
10. Personal malpractice insurance.
11. Must be at least 17 years of age by the time the program begins.
12. Have no convictions in any court of law of a crime other than minor traffic violations
13. One (1) Letters of Recommendation.
14. Laptop once admitted into the program.
15. Clinical Paraphernalia once admitted into the program.

Selection Procedure

1. The application for B.A.C.N. should be filled out when all admission requirements have been met.
2. Applicant's name will be placed on the eligibility list in the order of date and time received. The application fee is due at this time.
3. Applicant shall be competitively screened for the open slots based on qualifications, quota and requirements for admission. The final phase of the selection process will be an interview with the prospective students.
4. Enrollment must be completed within seven (7) business day from acceptance in the program. Failure to do so will disqualify the applicant from admission.
5. When class size has been filled, the next two applicants will be identified as "alternates". Alternates will attend classes through the Fundamentals period (first 3 weeks of program). The alternate at the top of the list at the time of an opening will be allowed to replace any student who leaves the program during this time. If an alternate does not replace a student, he/she will be guaranteed admission to the next class. The alternate who becomes a student in the next class is not required to attend a class days already completed.



Appendix B

ATTENDANCE POLICY

The Bay Area College of Nursing is designed to take the student from basic information to more complex information. Each new unit of information adds to previously learned material and prepares the student for materials to follow. Thus, students need to meet the objectives in theory and clinical performance for each unit of presented material before advancing to the next unit of information.

Students are advised that frequent tardiness and absences will interfere with the ability to complete this program. It is the student's responsibility to contact the instructor to establish ways of achieving unmet objectives that occur for any reason. Instructor/student conference is held with the goal of providing the student every opportunity to succeed in the program.

- Students are expected to attend all classes regularly and be on time for both theory classes and clinical assignments.
- Students are required to record their attendance by using the school's official time clock to punch in upon arrival, clock out and back in during lunch periods and out when leaving for the day. Ten-minute breaks do not require clocking out. In addition, we require that each student sign in and out upon arrival and departure from school. Failure to comply will result in lost hours. An attendance sheet is used to monitor your attendance. Failure to sign in or swipe your badge is not a valid excuse, therefore, a student will still be considered absent requiring necessary make-up.
- Students who are unable to attend theory and/or clinic must notify the instructor at least one hour before the start class or hospital assignment.
- Upon return to class arrangements must be made promptly with the instructor for makeup work.
- A decision to dismiss or retain any student will be based on the student's overall performance and reason(s) for excessive absenteeism and/or tardiness. Dismissal is determined by the Director.
- Tuition fees will be refunded, if applicable, to students who are dismissed from the program using the standard state-mandated formula and process.
- If a course is dropped voluntarily, a refund will be calculated using the State of California guidelines and formula.

The maximum absence time is as follows:

- (a) Four (4) days per term, regardless of any reason
- (b) Students' tardiness and leaving prior to end of class hours will be counted towards the absences incurred in each term.

- Three (3) tardiness/early dismissals = one (1) absence

The student will receive a written warning from the instructor on the third (3rd) absence. Bay Area College of Nursing reserves the right to subject the student on probation status should the student incur a fourth (4th) absence. The student will be scheduled to meet or confer with the Program Director to be placed on probation. A student exceeding the allowable



number of absences may eventually lead to dismissal or termination from the program. A decision to dismiss or retain any student may be based on the student's overall performance and reason/s for excessive absenteeism and/or tardiness. Final dismissal is determined by the School Director.

An attendance sheet is used to monitor your attendance. Failure to sign in or swipe your badge is not a valid excuse, therefore, a student will still be considered absent requiring necessary make-up.

MAKE-UP POLICY

If absenteeism prevents the student from meeting the program objectives, the student may be required to repeat either theory content, clinical experience, or both. Make-up work will be permitted only upon approval of the instructor.

The maximum absence time is as follows:

- (a) Four (4) days per term, regardless of any reason
- (b) Students' tardiness and leaving prior to end of class hours will be counted towards the absences incurred in each term.
 - Three (3) tardiness/early dismissals = one (1) absence

Theory Make-up

The student will have five (5) school days to make-up a test. There will be a 10% deduction from the score obtained for a late test. If the test is not made-up within the five school days, a score of zero will be assigned. It is the student's responsibility to make arrangements with the instructor for a make-up test.

Missed Theory hours may be made up by submitting research reports, case studies, passing a written examination and attending seminars or workshops meeting the program objectives.

Clinical Make-up

It is the student's responsibility to call the office about any absence and make-up requirements as soon as he/she knows he/she will be out or immediately upon return to class. A student is required to complete the make-up form to be submitted to the director for approval BEFORE scheduling a make-up day. Any make-up hours completed, but not pre-approved by the director, will not be counted and may result to an incomplete grade. A student will not be allowed to advance to the next term until all absences (clinicals and theory) are made up.

The school mandate for one (1) day of Clinical Make-Up will be at a Clinical Site for the duration of eight (8) hours at the rate of \$60/student (must meet minimum of 10 students per Clinical Make-Up day). If the group does not meet the minimum number of students required and still requests for make-up clinical, they have to pay the full rate for 10 students or choose the option of signing up for the following clinical make-up date. Clinical make-ups need to be completed in order to receive clearance from the office to register for the next term or to attend the commencement to receive his/her certificate/diploma.

Bay Area College of Nursing

PROJECT COMPREHENSIVE ANALYSIS-Palo Alto

DUE DATE: Created and submitted on 01/28/11
Revised 09/02/11.

| ELEMENTS | COMPREHENSIVE ANALYSIS | SPECIFIC ACTIONS TO IMPROVE PASS RATE | TIMELINE | EFFECT OF INTERVENTION |
|---|--|--|--|--|
| <p>1. Admission Criteria</p> | <p>The use of Wonderlic/WBST entrance exams assesses two sections: 1. Language; 2. Math Based on our school's experience, the WBST assessment test did not accurately evaluate the suitability of our prospective students/current students for the nursing program. The test failed to identify or weed out gaps in required knowledge and the suitable attitude to ensure academic preparation and commitment in the rigorous training required by the school.</p> | <p>Initial Assessment to determine readiness to enter the program. Will propose to change the entrance exam type from WBST to HESI A2. HESI A2 entrance test content consists of six sections: 1. Anatomy and Physiology (25 items); 2. Vocabulary and general knowledge (50 items); 3. Reading Comprehension (50 items); 4. Grammar (50 items); 5. Basic Math skills (50 items); 6. Learning style, decisionmaking skills, and personality traits. The time allotted to the test is four hours with candidates needing to score 80% to pass. HESI A2 test assesses the suitability of the candidate for the nursing program for which the test is designed. It is a tool to assess the readiness and suitability for success in the VN program and can provide an accurate appraisal of a candidate's potential as a nurse.</p> | <p>Will take effect once the proposed entrance exam change is approved by the BVNPT.</p> | <p>Expected outcome of intervention will be as follows: 1. The school's quarterly pass rate will improve to 80% or higher each quarter. 2. There will be no students withdrawing or dropping out from the class, except for financial or emergency/urgent reasons. 3. The accepted students will be academically prepared and committed in the rigorous training required by the school.</p> |
| <p>2. Screening and Selection Criteria</p> | <p>High School Diploma and GED Certification - overall grade/average is not being considered.</p> | <p>Will require a 3.0 or higher overall cumulative grade point average based on completed secondary education official transcript of records or GED results.</p> | <p>Will take effect once the proposed action is approved by the BVNPT.</p> | <p>Expected outcome of intervention will be as follows: 1. The students will be prepared to take the NCLEX exams as evidenced by obtaining no less than 60% score on the the NCLEX predictor exam. 2. The school's quarterly pass rate will improve to 80% or higher each quarter.</p> |

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| <p>3. Terminal Objectives</p> | <p>The school does not integrate and provide an end-of-the program clinical case study review/NCLEX test plan within the course program in preparation for the NCLEX-PN state exams. The school does not administer Exit exams to determine adequate knowledge to successfully pass the NCLEX-PN.</p> | <ol style="list-style-type: none"> 1. Monitor student progress throughout the four (4) terms to determine capability to advance or complete the program. 2. Incorporate a 190.5-hour clinical case study/NCLEX test plan and course review at the end of the program which will further enhance critical thinking and refresh previous knowledge to better prepare them for the NCLEX state exams. 3. Initiate and require students to earn 60% score on a standardized NCLEX predictor examination. 4. Incorporate a comprehensive exam (topics covered from all terms) as their final examination at the end of the final term of the course program before its completion and prior to graduation. 5. Utilize the annual reports for ongoing evaluation of factors influencing the program's NCLEX results. | <p>Will take effect once the proposed action is approved by the BVNPT.</p> | <p>Expected outcome of intervention will be as follows:</p> <ol style="list-style-type: none"> 1. The students will be prepared to take the NCLEX exams as evidenced by obtaining no less than 60% score on the the NCLEX predictor exam. 2. The school's quarterly pass rate will improve to 80% or higher each quarter 3. 90% or more students will complete the course program in a timely manner. |
| <p>4. Instructional Plan</p> | <p>The school does not include NCLEX tutorials, NCLEX test plans, NCLEX predictor examinations, clinical case study reviews, study and test-taking workshops and the analysis of all essential elements to ensure the success of the student in the program. The school does not incorporate Exit exams to determine adequate preparation to successfully pass the NCLEX-PN.</p> | <ol style="list-style-type: none"> 1. Begin using NCLEX predictor examinations as part of the curriculum and a requirement of the program. Case study/NCLEX predictor examination will be given at the end of each term. 2. Perform a cross analysis of the curriculum with the detailed clinical case study/NCLEX test plan and course review. 3. Utilize board consultants as needed in program evaluation and curriculum development. 4. Include study and test-taking skills early in the program to facilitate the development of such skills. 5. Faculty needs to receive training on test development and instructional techniques. 6. Incorporate a comprehensive exam (topics covered from all terms) as their final examination at the end of the final term of the course program before its completion and prior to graduation. | <p>Will take effect once the proposed action is approved by the BVNPT.</p> | <p>Expected outcome of intervention will be as follows:</p> <ol style="list-style-type: none"> 1. The students will be fully prepared to take the NCLEX exams as evidenced by obtaining no less than 60% score on the the NCLEX predictor exam. 2. The school's quarterly pass rate will improve to 80% or higher each quarter. |

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| 5. Theory and Clinical Objectives for each Course | Most of the theory and clinical objectives are met. | Incorporate a comprehensive exam in each term and a comprehensive exam covering all terms as their final examination at the end of the final term of the course program before completion of the curriculum and prior to graduation. | Will take effect once the proposed action is approved by the BVNPT. | Expected outcome of intervention will be as follows: 1. The students will be fully prepared to take the NCLEX exams as evidenced by obtaining no less than 60% score on the the NCLEX predictor exam. 2. The school's quarterly pass rate will improve to 80% or higher each quarter. |
| 6. Lesson Plans for each Course | Lesson plans are submitted by the instructor after the class is taught and is kept on file. | 1. Lesson plans shall reflect implementation of test taking strategies and NCLEX practice tests at the end of each course topic. 2. Faculty needs to receive training on test development and instructional techniques. 3. Incorporate a comprehensive exam as their final examination at the end of the final term of the course program before its completion and prior to graduation. | Will take effect once the proposed action is approved by the BVNPT. | Expected outcome of intervention will be as follows: 1. The students will be fully prepared to take the NCLEX exams as evidenced by obtaining a no less than 60% score on the the NCLEX predictor exam. 2. The school's quarterly pass rate will improve to 80% or higher each quarter. |
| 7. Textbooks | The school uses textbooks required for the nursing theory and practical class and does not provide any NCLEX-related materials. | Will add computerized resources online and provide all available NCLEX review materials and study question resources for use throughout the program to increase student's familiarity with the NCLEX examination. | Will take effect once the proposed action is approved by the BVNPT. | Expected outcome of intervention will be as follows: 1. The students will be fully prepared to take the NCLEX exams as evidenced by obtaining no less than 60% score on the the NCLEX predictor exam. 2. The school's quarterly pass rate will improve to 80% or higher each quarter. |
| 8. Attendance Policies | Attendance is monitored daily and made up accordingly, if absences occur. Some of the factors affecting student attendance are family responsibilities and employment issues. | Explain to the candidates/students that increased family responsibilities and employment hours negatively impact their nursing education and their success in the program. Admission criteria should include commitment to the program. Will continue monitoring attendance. | Immediate action is required. | The student will prioritize her nursing education and make a full commitment to the program as evidenced by a maximum number of four absences within a term. |
| 9. Remediation Policies | Remediation policies are being followed accordingly. | Will maintain policy at this time. No action is needed. | NA | NA |

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| 10. Evaluations of Theory and Clinical Faculty | Faculty turnover; incompetent faculty; most of the faculty are part-time employees. Instructors are evaluated at the end of every term by the students and program director. | <ol style="list-style-type: none"> 1. Faculty needs to receive training on test development and instructional techniques. 2. Faculty needs to spend adequate time evaluating NCLEX result data and plan program changes based on the data. 3. Will hire full-time instructors. 4. Provide continuing education for faculty members on test development and analysis skills. 5. Student will evaluate faculty at the end-of-term evaluation and Director will evaluate the faculty at the end of the year. 6. Surprise evaluations/drop-ins. | Immediate action required. | <ol style="list-style-type: none"> 1. Faculty retention for a minimum of three years. 2. The students will be fully prepared to take the NCLEX exams as evidenced by obtaining no less than 60% score on the the NCLEX predictor exam. 3. The school's quarterly pass rate will improve to 80% or higher each quarter. |
| 11. Evaluations of Theory Presentations | Theory Presentations are evaluated by the students at the end of each term. | Ensure that all essential theoretical elements and content are discussed and covered adequately; Will check lesson plans submitted by the faculty. | Immediate action is required. | <ol style="list-style-type: none"> 1. The students will obtain no less than 60% score on the the NCLEX predictor exam. 2. The school's quarterly pass rate will improve to 80% or higher each quarter. 3. 90% or more students will pass the theoretical portion of the course program. |
| 12. Evaluations of Clinical Rotations | Clinical Rotations are evaluated by the students and faculty at the end of each term. Clinical sites are adequate. Approved Skills lab hours for Medical Surgical Nursing = 48 hours. | Will request to increase practical lab hours every term (Term 1 from 52-hours to 165-hours; Term 2 from 24-hours to 78-hours; Term 3 from 24-hours to 94-hours; Term 4 90 hours) to improve, hone, and correctly apply the nursing and medical skills/procedures learned during the theory portion of the course program and to obtain a well-balanced curriculum. Yearly evaluation of faculty and facility at the end of the year. | Will take effect once the proposed action is approved by the BVNPT. | <ol style="list-style-type: none"> 1. Students will become and remain confident in performing and demonstrating all nursing and medical procedures as stated in their clinical objectives before exposure to the clinical sites. 2. The students will be fully prepared to take the NCLEX exams as evidenced by obtaining no less than 60% score on the the NCLEX predictor exam. 3. The school's quarterly pass rate will improve to 80% each quarter. |

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| 13. Evaluation of Student Achievement | Evaluates student achievement after each term. The school does not offer an exit exam to predict successful passing of the NCLEX PN. | <ol style="list-style-type: none"> 1. Assess students for at-risk status early in the program and implement a plan to assist at-risk students with success in the program and on the NCLEX. At-risk students are those who fail the nursing course, repeat of nursing courses, and fails in the NCLEX predictor exam. 2. Increase the minimum grade average to 75% from 70% to pass the nursing courses (VN Program). 3. Implement NCLEX simulation test and monitor progress. 4. Incorporate a comprehensive exam as their final examination at the end of the final term of the course program before its completion and prior to graduation. | Will take effect once the proposed action is approved by the BVNPT. | Expected outcome of intervention will be as follows: <ol style="list-style-type: none"> 1. The students will be fully prepared to take the NCLEX exams as evidenced by obtaining no less than 60% score on the the NCLEX predictor exam. 2. The school's quarterly pass rate will improve to 80% or higher each quarter. 3. 90% or more students will complete the course program in a timely manner. |
| 14. Current Enrollment | Current enrollment has decreased from the past. Teacher to Student ratio is less than the required ratio mandated by the board. | Maintain approved student quota and instructor : student ratio. | In effect. | Expected outcome of intervention will be as follows: <ol style="list-style-type: none"> 1. The students will be fully prepared to take the NCLEX exams as evidenced by obtaining no less than 60% score on the the NCLEX predictor exam. 2. The school's quarterly pass rate will improve to 80% or higher each quarter. 3. 90% or more students will complete the course program in a timely manner. |

Agenda Item #11.B.Attachment B.



STATE AND CONSUMER SERVICES AGENCY • GOVERNOR EDMUND G. BROWN JR.
BOARD OF VOCATIONAL NURSING & PSYCHIATRIC TECHNICIANS
2535 Capitol Oaks Drive, Suite 205, Sacramento, CA 95833-2945
Phone (916) 263-7800 Fax (916) 263-7859 Web www.bvnpt.ca.gov



CERTIFIED MAIL

October 7, 2011

Rachelle Cagampan, Director
Bay Area College of Nursing, Palo Alto
Vocational Nursing Program
824 San Antonio Road
Palo Alto, CA 94303

Re: Consideration of Placement on Provisional Accreditation; Consideration of Request to Admit Students

Dear Mr. Cagampan:

On September 29, 2011, the Board of Vocational Nursing and Psychiatric Technicians (Board) received your correspondence requesting Board approval to admit students to the **Bay Area College of Nursing, Palo Alto, Vocational Nursing Program**. The Board is scheduled to consider that request at its meeting scheduled November 10, 2011. That meeting will be held at the San Diego Convention Center, in San Diego, California.

To ensure dissemination and review by individual Board members and relevant staff for timely consideration prior to the May 20, 2011 Board meeting, please submit the following written information by **Friday, October 30, 2011**:

- Fifteen (15) copies of pertinent documents related to subsequent actions taken by the program to correct identified problems **that you desire Board members to consider**. Please remember existing statutes require that any document considered by the Board will become a public record. Accordingly, please redact all names of students.
- In addition, please provide information on a compact disc (CD) for Board use. Again, please remember to redact any student names prior to copying information onto the CD.

Although the primary purpose of this letter is to convey the Board's need for the copies, please be assured that, if timely submitted, any correspondence and attachments will be reviewed and, if appropriate, information submitted may be included in the report of the assigned consultant.

The Board strongly recommends that you plan to attend the meeting and be prepared to respond to questions from Board members relative to your program.

Please contact the Board at (916) 263-7843 should further clarification be needed.

Sincerely,

PAM HINCKLEY, RN, MSN
Nursing Education Consultant
Board of Vocational Nursing and Psychiatric Technicians
2535 Capitol Oaks Drive, Suite 205
Sacramento, CA 95833
(916) 263-7843 Phone
(916) 263-7866 Fax
Pam_hinckley@dca.ca.gov

Agenda Item #11.B.Attachment C.



STATE AND CONSUMER SERVICES AGENCY • GOVERNOR EDWIN D. BROWN, JR.
BOARD OF VOCATIONAL NURSING & PSYCHIATRIC TECHNICIANS
2535 Capitol Oaks Drive, Suite 205, Sacramento, CA 95833-2945
Phone (916) 263-7800 Fax (916) 263-7859 Web www.bvnpt.ca.gov



CERTIFIED MAIL

November XX, 2011

Rachelle Cagampan
Director, Vocational Nursing Program
Bay Area College of Nursing, Palo Alto
824 San Antonio, Road
Palo Alto, CA 94303

Subject: Notice of Change in Accreditation Status

Dear Ms. Cagampan:

Pursuant to the action of the Board of Vocational Nursing and Psychiatric Technicians (Board) on November 10, 2011, the provisional accreditation status of the Bay Area College of Nursing, Palo Alto, Vocational Nursing Program has been changed from full accreditation to provisional accreditation for the two – year period from November 10, 2011 through November 30, 2013. The purpose of this letter is to explain the areas of non-compliance found and the corrections required of your program to avoid losing accreditation completely.

Once you have reviewed this letter, please sign and return the enclosed "Acknowledgement of Change in Accreditation Status" form by **Friday, November 30, 2011**.

AREAS OF NON-COMPLIANCE [VIOLATION(S)]

In accordance with Section 2526.1(c) of title 16 of the California Code of Regulations,

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

Section 2530(l) of title 16 of the California Code of 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.

- (l) 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 program pass rates of the Bay Area College of Nursing, Palo Alto, Vocational Nursing Program for the past sixteen (16) quarters are set forth in the following table.

| NCLEX-PN® Licensure Examination Pass Rates | | | |
|--|--------------------------------|----------------------------------|--|
| Quarter | State Annual Average Pass Rate | Program Annual Average Pass Rate | Variance from State Annual Average Pass Rate |
| Oct –Dec 2007 | 76% | 79% | +3 |
| Jan – Mar 2008 | 76% | 73% | -3 |
| Apr – Jun 2008 | 75% | 75% | +0 |
| Jul – Sep 2008 | 74% | 75% | +1 |
| Oct - Dec 2008 | 73% | 38% | -35 |
| Jan – Mar 2009 | 72% | 71% | -1 |
| Apr – Jun 2009 | 70% | 72% | +2 |
| Jul - Sep 2009 | 72% | 74% | +2 |
| Oct – Dec 2009 | 73% | 75% | +2 |
| Jan – Mar 2010 | 74% | 64% | -10 |
| Apr – Jun 2010 | 75% | 59% | -16 |
| Jul – Sep 2010 | 75% | 45% | -30 |
| Oct – Dec 2010 | 76% | 37% | -39 |
| Jan – Mar 2011 | 77% | 41% | -36 |
| Apr – Jun 2011 | 76% | 37% | -39 |
| Jul – Sep 2011 | 76% | 39% | -37 |

Based on this data, the program failed to comply with the annual average pass rate requirement.

REQUIRED CORRECTION(S)

1. The Bay Area College of Nursing, Palo Alto, Vocational Nursing Program shall bring its average annual pass rate to no more than ten (10) percentage points below the state average annual pass rate by September 1, 2013.
2. The program shall admit no additional students unless specifically approval by the full Board.
3. The program shall submit a follow-up report in 9 months, but no later than **August 1, 2012**, and 21 months, but no later than **August 1, 2013**. 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 Student Enrollment.
4. The program shall 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 2526.
 5. The program shall demonstrate incremental progress in correcting the violations. If the program fails to satisfactorily demonstrate incremental progress, the full Board may revoke the program's accreditation.
 6. Failure to take any of these corrective actions may cause the full Board to revoke the program's accreditation.
 7. In the event additional violations of the accreditation standards are identified, such violations may result in further corrective action or revocation of provisional accreditation.

FUTURE BOARD ACTION

Your program will be placed on the **November 2013** Board Meeting agenda for reconsideration of your accreditation status. If you have additional information that you wish considered beyond the required corrections listed on page 2 and 3, you must submit this documentation by the fifteenth day of the second month prior to the Board meeting.

OTHER IMPORTANT INFORMATION

Please be advised that, pursuant to the Board's regulations, the program will not be authorized to admit new classes beyond the established pattern of admissions previously approved by the Board. The established pattern of admissions approved by the Board is as follows: **Prior Board approval was required for the admission of each class; however, based on the above corrections, the full Board's permission will be required for each future class admission.**

In the event your program is required to submit any report(s) as a corrective action pursuant to this notice, such reports are required in addition to any other reports required pursuant to 2527 of the Board's regulations.

The program may no longer advertise that it has full accreditation, and should take steps to correct any ongoing advertisements or publications in that regard.

A copy of title 16, California Code of Regulations, section 2526.1, regarding provisional accreditation is attached for your reference. A complete copy of the Board's laws and regulations can be found on the Board's web site at www.bvnpt.ca.gov.

Should you have questions, please do not hesitate to contact the Board.

Sincerely,

TERESA BELLO-JONES, J.D., M.S.N., R.N.
Executive Officer

Enclosures

cc: Board Members

TBJ:cca