

Agenda Item #12.B.4.

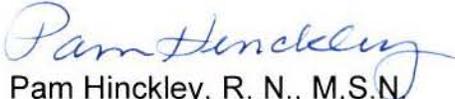


STATE AND LOCAL BUSINESS SERVICE AGENCY • GOVERNMENT ADMINISTRATION
BOARD OF VOCATIONAL NURSING & PSYCHIATRIC TECHNICIANS
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DATE: April 25, 2012

TO: Board Members

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

SUBJECT: High Desert Medical College, Vocational Nursing Program – Request to Admit Students (Director: Carol Williams, Lancaster, Los Angeles County, Private)

On November 10, 2011, the Board placed the High Desert Medical College Vocational Nursing Program on Provisional Accreditation¹ for a two (2) year period from November 10, 2011 through November 30, 2013 due to low licensure pass rates. Additionally, the Board denied the program's request to admit a class of 20 full-time day students on November 14, 2011, graduating on December 13, 2012, to **replace** a class that graduated October 6, 2011. The program was required to admit no additional students unless approved by the full Board.

On February 24, 2012, the Board required the High Desert Medical College Vocational Nursing Program to submit a new instructional plan for full – time classes no later than March 30, 2012; **and**, required the program to submit a new instructional plan for part – time classes no later than March 30, 2012; **and**, delegated to the Executive Officer discretionary authority to approve the program's part – time and full – time instructional plans.

Additionally, the Board denied the program's request to admit 20 part-time students on March 23, 2012, only, graduating August 7, 2013, to **replace** students that graduated on October 1, 2010; **and**, contingent on the program's submission of the full – time instructional plan, and approval of the major curriculum revision by the Executive Officer, approve High Desert Medical College Vocational Nursing Program's request to admit a class of 20 full-time students on April 2, 2012, only, graduating April 4, 2013, to **replace** students who graduated on March 26, 2012.

The program is requesting Board approval to admit 20 part-time students on May 18, 2012, graduating on November 20, 2013, to **replace** students that graduated March 18, 2012.

Additionally, the program is requesting to admit 20 full-time students on June 4, 2012, graduating July 12, 2013, to **replace** a class that graduated March 26, 2012.

¹ Prior to January 1, 2012, references in article 4 of the Vocational Nursing Practice Act and article 4 of the Psychiatric Technicians Law provided that the Board accredits all vocational nursing and psychiatric technicians programs. Pursuant to Business and Professions Code Sections 2883 and 4532 (Senate Bill 539, Chapter 338, Statutes of 2011), **accredit** was changed to **approve**. There was no change to the Board's authority or jurisdiction.

History of Prior Board Actions

- On August 11, 2004, the Executive Officer approved High Desert Medical College's request to begin a vocational nursing program with an initial class of 30 students on September 10, 2004, only; **and** approved the program curriculum for 1532 hours, including 576 theory, and 956 clinical hours.
- On February 3, 2006 the Executive Officer approved initial full accreditation for High Desert Medical College Vocational Nursing Program for the period February 3, 2006, through February 2, 2010, and directed issuance of a certificate accordingly; **and** approved admission of a part-time class of 30 students starting March 20, 2006, only, to replace students graduating March 11, 2006; **and** approved admission of a full-time class of 30 students on February 6, 2006, only.
- **On May 23, 2006, a new director was approved.**
- On October 3, 2006, the Executive Officer approved the High Desert Medical College Vocational Nursing Program's request to admit a full-time class of 20 students on October 9, 2006, completing November 21, 2007; **and** approved the program's request to admit a part-time class of 20 students on November 3, 2006, graduating May 18, 2008.

Additionally, the Executive Officer approved the program's request for **ongoing** admissions to replace graduating classes, only, 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 full-time classes of 20 students and two part-time classes of 20 students per calendar year.
 - b. The director documents that adequate resources, i.e. faculty and facilities, are available to support each admitted class of students.
- On August 15, 2007, the Board notified the director that the program's pass rates had fallen more than ten (10) percentage points below the state average annual pass rate for the past four (4) quarters. The director was requested to submit a written plan for improving the program's NCLEX-PN[®] pass rates by September 15, 2007.
 - On September 14, 2007, the Board received the program's plan for improving its pass rate.
 - On November 27, 2007, the Board notified the director that the program's pass rates had fallen more than ten (10) percentage points below the state average annual pass rate for the past five (5) quarters.
 - On January 22, 2008, the Board notified the director that the program's pass rates had fallen more than ten (10) percentage points below the state average annual pass rate

for the past six (6) quarters. The director was asked to provide documentation verifying that the eight elements of the program's plan of correction submitted September 14, 2007, are being carried out.

- On April 4, 2008, the program director provided an update on the program's plan of correction.
- **On December 15, 2008, a new program director was approved.**
- On August 19, 2009, the Board notified the director that the program's pass rates had fallen more than ten (10) percentage points below the state average annual pass rate for the past four (4) quarters. The consultant requested submission of a written plan for improving the pass rates by September 19, 2009.
- On September 16, 2009, the Board received the following plan for improvement of the program's pass rates:
 - a. The program revised its written examinations, and implemented stricter standards for grading.
 - b. The program revised the credit granting policy.
 - c. The program revised the remediation policy, to reduce the overall number of remediation attempts that would be acceptable prior to a termination decision.
 - d. The program revised its practice of re-admitting students who had been terminated previously for poor academic performance.
- On December 2, 2009, the Executive Officer approved continued full accreditation for the High Desert Medical College Vocational Nursing Program for the period February 3, 2010 through February 2, 2014.
- On December 29, 2009, the Board notified the director that the program's average annual pass rates had fallen below 10 percentage points of the state average annual pass rate for the past five (5) quarters.
- On November 30, 2010, the Executive Officer **denied** High Desert Medical College, Vocational Nursing Program's request to admit **30** students three (3) times per year to the full-time class; **and, approved** the program's admission of **20** students to the full-time day class commencing March 7, 2011 and graduating March 15, 2012, only; **and, denied** High Desert Medical College, Vocational Nursing Program's request to admit **30** students three (3) times per year to the part-time class; **and, approved** the program's admission of **20** students to the part-time evening class commencing on April 8, 2010, and graduating October 21, 2012, only.

Additionally, the program was required to submit a report that includes 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 by **January 28, 2011**:

- 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.

The Executive Officer **rescinded** the program's approval for ongoing admissions and required the program to obtain Board approval prior to the admission of future classes.

- On January 27, 2011, the Board received program documents as requested November 30, 2010.
- **On June 6, 2011, a new director was approved by the Board.**
- On August 25, 2011, the Executive Officer **denied** High Desert Medical College's request to admit 20 students to a full-time program commencing on September 12, 2011, graduating October 18, 2012; **and, denied** the program's request to admit 20 students into a part-time program commencing on October 14, 2011, graduating March 31, 2013; **and**, placed the program on the November 10, 2011 agenda for the Board's consideration of provisional accreditation; **and**, required the program to continue to obtain Board approval prior to the admission of future classes.
- **On September 28, 2011, a new director was approved by the Board.**
- 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.
- On November 10, 2011, the Board placed High Desert Medical College Vocational Nursing Program on provisional accreditation for the two-year period from November 10, 2011, through November 30, 2013, and issued 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.; **and**, denied High Desert Medical College Vocational Nursing Program's request to admit a class of 20 full-time, day, students on November 14, 2011, graduating on December 13, 2012, to **replace** a class that graduated October 6, 2011; **and**, required the program to admit no additional students unless approved by the full Board; **and**, required the program to bring its average annual pass rate to no more than ten (10) percentage points below the State average annual pass rate by **September 1, 2013**.

Additionally, the Board required 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; **and**,

The program was required 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.

Further, the program was required 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; **and**, notified the program that failure to take any of these corrective actions may cause the full Board to revoke the program's accreditation; **and**, place the program on the **November 2013** Board agenda for reconsideration of provisional accreditation.

- On November 22, 2011, the Board forwarded to the director the Notice of Change in Accreditation Status.
- On January 19, 2012, the assigned consultant forwarded correspondence requesting submission of fifteen (15) copies of pertinent documents and subsequent actions taken to correct identified problems that they desire the Board members to consider.
- On January 25, 2012, the program director submitted fifteen (15) copies of pertinent documents and subsequent actions taken to correct identified problems that they desire the Board members to consider.
- On February 24, 2012, the Board required the High Desert Medical College Vocational Nursing Program to submit a new instructional plan for full – time classes no later than

March 30, 2012; **and**, required the program to submit a new instructional plan for part – time classes no later than March 30, 2012; **and**, delegated to the Executive Officer discretionary authority to approve the program’s part – time and full – time instructional plans; **and**, denied the program’s request to admit 20 part-time students on March 23, 2012, only, graduating August 7, 2013, to **replace** students that graduated on October 1, 2010; **and**, contingent on the program’s submission of the full – time instructional plan, and approval of the major curriculum revision by the Executive Officer, approve High Desert Medical College Vocational Nursing Program’s request to admit a class of 20 full-time students on April 2, 2012, only, graduating April 4, 2013, to **replace** students who will graduate on March 26, 2012.

- On March 21, 2012, the program director and administrator met with the SNEC and NEC requesting to be placed on the May 2012 Board agenda for reconsideration of request to admit students.
- On April 4, 2012, the assigned consultant forwarded correspondence requesting submission of eighteen (18) copies of pertinent documents and subsequent actions taken to correct identified problems that they desire the Board members to consider.
- On April 11, 2012, the program director submitted eighteen (18) copies of pertinent documents and subsequent actions taken to correct identified problems that they desire the Board members to consider.

Enrollment

Board approval is required prior to the admission of each class to the High Desert Medical College Vocational Nursing Program. The program offers a full-time course of instruction that is 56 weeks in length and a part-time class that is 71 weeks in length. The pattern of admissions for current classes is seen in the enrollment table below.

The following table represents student enrollment based on the **current and proposed** class start dates. The table indicates a **maximum enrollment of 89** students for the period **May 2009 through September 2012**.

ENROLLMENT DATA				
CLASS DATES		#Students Admitted	#Students Current or Completed	Total Enrolled
Start	Complete			
5/09 PT		16	11	11
11/09 FT		20	20	11 + 20 = 31
1/10 PT		20	18	31 + 18 = 49
5/10 FT		20	18	49 + 18 = 67

ENROLLMENT DATA				
CLASS DATES		#Students Admitted	#Students Current or Completed	Total Enrolled
Start	Complete			
9/10 FT		20	11	$67 + 11 = 78$
	10/10 (5/09 PT Class)		-11	$78 - 11 = 67$
10/10 PT		20	12	$67 + 12 = 79$
	12/10 (11/09 FT Class)		-20	$79 - 20 = 59$
3/11 FT		17	16	$59 + 16 = 75$
4/11 PT		10	14	$75 + 14 = 89$
	5/11 (5/10 FT Class)		-18	$89 - 18 = 71$
	7/11 (1/10 PT Class)		-18	$71 - 18 = 53$
	10/11 (9/10 FT Class)		-11	$53 - 11 = 42$
	3/12 (10/10 PT Class)		-12	$42 - 12 = 30$
	3/12 (3/11 FT Class)		-16	$30 - 16 = 14$
4/12 FT (Pending curriculum revision completion)	4/13	20		$14 + 20 = 34$
5/12 PT (Proposed)	11/13	20		$34 + 20 = 54$
6/12 FT (Proposed)	7/13	20		$54 + 20 = 74$
	4/13		-20	$74 - 20 = 54$
	9/12 (4/11 PT Class)		-14	$54 - 14 = 40$

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 April 2006 to March 2012, specify the pass percentage rates for graduates of the High Desert Medical College 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
Apr – Jun 2006	2	2	100%	76%	100%	79%
Jul – Sep 2006	17	7	41%	79%	47%	79%
Oct – Dec 2006	2	1	50%	77%	48%	78%
Jan – Mar 2007	No Candidates Tested			77%	48%	77%
Apr – Jun 2007	8	4	50%	74%	44%	77%
Jul – Sep 2007	2	2	100%	76%	58%	76%
Oct – Dec 2007	4	2	50%	76%	57%	76%
Jan - Mar 2008	15	10	67%	76%	62%	76%
Apr - Jun 2008	7	5	71%	75%	68%	75%
July - Sep 2008	14	8	57%	70%	63%	74%
Oct - Dec 2008	7	2	29%	73%	58%	73%
Jan - Mar 2009	12	6	50%	70%	53%	72%
Apr - Jun 2009	4	2	50%	71%	49%	70%
July - Sep 2009	3	1	33%	74%	42%	72%
Oct - Dec 2009	8	8	100%	76%	63%	73%
Jan – Mar 2010	3	1	33%	75%	67%	74%
Apr – Jun 2010	11	5	46%	74%	60%	75%
Jul – Sep 2010	14	8	57%	76%	60%	75%
Oct – Dec 2010	3	1	33%	77%	44%	76%
Jan – Mar 2011	11	6	55%	80%	49%	77%
Apr – Jun 2011	4	2	50%	71%	50%	76%
Jul – Sep 2011	9	8	89%	74%	63%	76%
Oct – Dec 2011	4	1	25%	74%	61%	75%
Jan – Mar 2012	8	5	63%	77%	64%	74%

*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 recent data available** (January to March 2012), the program's average annual pass rate is **64%**. The California average annual pass rate for graduates from accredited vocational nursing programs who took the NCLEX-PN® Licensure Examination for the first time during the same period is 74%. The average annual pass rate for the High Desert Medical College Vocational Nursing Program is **10** 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 40, including the director. The director has ninety (90) percent administrative and ten (10) percent teaching responsibilities. Of the total faculty, twenty-nine (29) instructors are approved to teach clinical.

Based on a maximum enrollment of 89 students, six (6) instructors are needed. Therefore, the number of current faculty is adequate for the current and proposed enrollment.

Section 2534(b) of the Vocational Nursing Rules and Regulations 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.”

The program has sufficient clinical facilities to afford the number, type, and variety of patients that will provide clinical experience consistent with competency-based objectives and theory.

Other Considerations:

As noted previously, on November 10, 2011, the Board placed the High Desert Medical College Vocational Nursing Program on provisional accreditation for the two – year period from November 10, 2011 through November 30, 2013 due to noncompliance with regulatory requirements relative to average annual pass rates. Specifically, the program's average annual pass rates were consistently more than ten (10) percentage points below State average annual pass rate; **and**, denied the program's request to admit a class of 20 full-time day students on November 14, 2011, graduating on December 13, 2012. The program was required to admit no additional students unless approved by the full Board. At that time, the program's **quarterly** pass rate was **89%**; the average **annual** licensure pass rate was **63%**.

On November 4, 2011, per the director's request, the NEC forwarded to the director forms necessary to revise the program's curriculum.

On November 22, 2011, the Board forwarded to the director the Notice of Change in Accreditation Status (see Attachment A).

On November 29, 2011, the NEC advised the director that **discrepancies** exist on the Summary of Hours and Content Worksheets.

On December 6, 2011, the NEC forwarded the forms necessary to make revisions to the Summary of Hours and Content Worksheets.

On December 8, 2011, the director sent an electronic communication indicating she was sending Term I of the Instructional Plan. The NEC advised the director that no document was attached.

On December 7, 2011, the Board received the program's signed Acknowledgement of Change in Accreditation Status. The document was signed by the program director on December 2, 2011.

On December 9, 2011, the director re-submitted the Summary of Hours and Content Worksheets.

On December 12, 2011, the NEC advised the director that the discrepancies continue to exist on the Summary of Hours and Content Worksheets.

On December 13, 2011, the NEC advised the director that the Summary of Hours and Content Worksheets match each other; however, the Summary of Hours and Content Worksheets must match the Instructional Plan. The director was asked about the status of the Instructional Plan. The director advised the NEC that she was still working on it.

On December 27, 2011, the director submitted Term I, Full-time, Instructional Plan. The NEC advised the director of changes that needed to be made.

On January 4, 2012, the director re-submitted Term 1, Full-time, Instructional Plan and Content Worksheet.

On January 5, 2012, the NEC advised the director that Term I, Full-time, edits were ok and requested her to submit Term II. Term II, Full-time, Instructional Plan, was submitted by the director.

On January 9, 2012, the director submitted Terms I and II of the Part-time Instructional Plan.

On January 10, 2012, the NEC advised the director of changes that needed to be made to Term II. She was advised to revise and resubmit Term II and requested to submit Term III.

On January 11, 2012, the director submitted Term IV of the Full-time programs Instructional Plan.

On January 12, 2012, the director submitted Terms I through IV Instructional Plans for the Full-time and Part-time programs.

On February 24, 2012, the Board approved the program's request to admit a class of 20 full-time students on April 2, 2012, **contingent** on the Executive Officers approval of the **program's revised curriculum**; and, denied the program a class of 20 part-time students commencing on March 23, 2012.

On March 8, 2012, the director telephoned the assigned consultant requesting placement on the Board's May 2012 agenda for consideration of a request to admit students. The director was advised that the Board was unable to accommodate the program's request at the May 2012 meeting; however, the program's request would be placed on the Board's September 2012 agenda.

The director forwarded electronic correspondence to the Supervising Nursing Education Consultant (SNEC) requesting a meeting to discuss the program's possible placement on the Board's May 11, 2012 agenda. Additionally, the Administrative Division received a telephone call from the school's owner stating the Board had instructed the program to be on its May 2012 agenda.

The assigned consultant and SNEC telephoned the director to clarify her request. Board representatives reviewed with the director decisions rendered by the Board on February 24, 2012. The director clarified that while the Board had delegated to the EO the authority to approve a full – time class, the program requests approval to admit a part – time and an additional full – time class. A meeting was scheduled for March 22, 2012 at Board headquarters.

On March 9, 2012, the NEC advised the director that the submitted Conceptual Framework and Philosophy do not match the proposed curriculum. The director acknowledged that the Conceptual Framework **did not match** and indicated she would re-submit.

On March 15, 2012, the Board received correspondence from the director with a revised Conceptual Framework and Philosophy.

On March 22, 2012, the director and the principal of High Desert Medical College met with the NEC and SNEC at the Board's offices. Board representatives reviewed with program representatives specific decisions rendered by the Board on February 24, 2012. The director stated the school is requesting to be placed on the May 2012 Board agenda for approval to admit a part – time and an additional full – time class. At this meeting the director was questioned on the status of the curriculum revisions. The director assured the NEC's she would submit all requested documents. The director was reminded that submission of **complete and accurate** documents is required to complete the major curriculum revision and that approval by the Executive Officer of the program's request to admit a full – time class was contingent upon such completion.

On March 28, 2012, the NEC received correspondence from the director and the revised Summary of Hours and Content Worksheets. After analysis, the NEC advised the director the Summary of Hours and Content Worksheets **do not** coincide with the proposed curriculum. The director submitted revised Summary of Hours and Content Worksheets.

On March 29, 2012, the NEC advised the program director that **discrepancies still exist** in the Summary of Hours and Content Worksheets as they relate to the submitted Instructional Plan. The NEC advised the director to go over the Summary of Hours, Content Worksheets, and Instructional Plan carefully before resubmitting (see Attachment B). The director re-submitted the revised Summary of Hours and Content Worksheets.

On April 2, 2012, the NEC requested the director to call the NEC concerning the submitted documents.

On April 3, 2012, the director contacted the NEC via telephone. The NEC advised the director that **discrepancies continue** between the Content Worksheets and the Instructional Plan. The NEC reviewed, with the director, the discrepancies related to the

first three (3) weeks and suggested that these same issues probably were throughout the document. The Director was advised to go through the document carefully and make sure the hours and content all match prior to resubmission. The director assured the NEC that the documents would match exactly and that revised documents would be submitted within 24 hours. The NEC advised the director to not do this so quickly that the discrepancies still exist.

On April 4, 2012, the assigned consultant forwarded correspondence requesting submission of eighteen (18) copies of pertinent documents and subsequent actions taken to correct identified problems that they desire the Board members to consider (see Attachment C).

On April 11, 2012, the program director submitted eighteen (18) copies of pertinent documents and subsequent actions taken to correct identified problems that they desire the Board members to consider (see Attachment D). Included in the document submitted were the following elements:

- Area demographics indicating a need for the program.
- Job opportunities available for graduates.
- Program enhancements including:
 - a. Hired a new experienced director
 - b. New faculty
 - c. Working on new curriculum.
 - d. Established Elsevier-Evolve web-based learning.
 - e. Updated textbooks.
 - f. Updated Faculty development plan requirements.
 - g. Established standard lesson plans, lectures, objectives and exams.
 - h. Mandatory term testing, NCLEX review, and exit exams.

In summary, a total of 24 quarters of licensure examination statistics are available for the program since April of 2006. Of the 24 quarters, the program's average annual pass rates are more than ten (10) percentage points **below** the state average annual pass rate in **19 quarters**. Only four (4) of the 24 quarters, have been within ten (10) percentage points of the state average annual pass rate and one (1) quarter exceeded the state average annual pass rate.

The one (1) quarter that exceeded the state average annual pass rate was the first quarter in April 2006. It is important to note that the data was based on two (2) graduates testing. For the most current reporting period, the program's **quarterly** pass rate is **63%**; the average **annual** licensure pass rate is **64%**. This is three (3) percentage point increase since placed on Provisional Approval on November 10, 2011.

At the time of this writing, the program's revised curriculum for the full and part-time classes remain incomplete and therefore, unapproved. Discrepancies continue to exist between the Instructional Plan, Summary of Hours and Content Worksheets.

Recommendations:

1. Defer action on the program's request to admit 20 part-time and 20 full-time students to **replace** students that graduated on March 18, 2012 and March 26, 2012, to the Executive Officer contingent on approval of the Instructional Plan and the program's continued improvement in its average annual pass rate. Class start and end dates will be determined at that time.
2. Continue to obtain approval by the full Board prior to the admission of additional classes.

Rationale: The program was placed on Provisional Accreditation at the November 2011 Board meeting due to poor performance of graduates on the licensure examination for 18 of 23 quarters. Currently, the program has been out of compliance with California Code of Regulations for 19 of 24 quarters. **As such, the program has been compliant 21% of the previous 24 quarters; for 79% of the previous 24 quarters, the program was noncompliant with regulatory requirements.**

Based on the most recent program performance statistics available (January through March 2012), the program's quarterly pass rate is 63% and the average annual pass rate is 64%. This is 10 percentage points **below** the state average annual pass rate. Since being placed on Provisional Approval on November 10, 2011, the program's average annual pass rate has increased three (3) percentage points.

On February 24, 2012, the Board required the High Desert Medical College Vocational Nursing Program to submit a new instructional plan for full – time classes no later than March 30, 2012; **and**, required the program to submit a new instructional plan for part – time classes no later than March 30, 2012. The Board delegated to the Executive Officer discretionary authority to approve the program's part – time and full – time instructional plans. Contingent on the program's submission of the full – time instructional plan, and approval of the major curriculum revision, the Executive Officer was authorized to approve High Desert Medical College Vocational Nursing Program's request to admit a class of 20 full-time students on April 2, 2012, only, graduating April 4, 2013, to **replace** students who will graduate on March 26, 2012.

The program has been trying to revise their curriculum since November 2011. While the program has made many attempts to revise their curriculum, to date, the submitted documents contain multiple errors as they pertain to correlation of hours on the Summary of Hours, Content Worksheets, Conceptual Framework, and Instructional Plan. Until these problems are resolved, the curriculum revision remains incomplete and cannot be approved by the Executive Officer.

Attachment C: Board correspondence dated April 4, 2012.

Attachment D: Program correspondence dated April 10, 2012; received on April 11, 2012.

Agenda Item #12.B.4. Attachment A



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

November 22, 2011

Carol Williams
Director, Vocational Nursing Program
High Desert Medical College
44815 fig Avenue, Suite 109
Lancaster, CA 93534

Subject: Notice of Change in Accreditation Status

Dear Ms. Williams:

Pursuant to the action of the Board of Vocational Nursing and Psychiatric Technicians (Board) on November 10, 2011, the provisional accreditation status of the High Desert Medical College 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, December 2, 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 High Desert Medical College Vocational Nursing Program for the past twenty-two (22) 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
Apr – Jun 2006	76%	100%	+24
Jul – Sep 2006	79%	47%	-32
Oct – Dec 2006	77%	48%	-29
Jan – Mar 2007	77%	48%	-29
Apr – Jun 2007	74%	44%	-30
Jul – Sep 2007	76%	58%	-18
Oct – Dec 2007	76%	57%	-19
Jan – Mar 2008	75%	62%	-13
Apr – Jun 2008	74%	68%	-6
Jul – Sep 2008	74%	63%	-11
Oct – Dec 2008	73%	58%	-15
Jan – Mar 2009	72%	53%	-19
Apr – Jun 2009	70%	49%	-21
Jul – Sep 2009	72%	42%	-30
Oct – Dec 2009	73%	63%	-10
Jan – Mar 2010	74%	67%	-7
Apr – Jun 2010	75%	60%	-15
Jul – Sep 2010	75%	60%	-15
Oct – Dec 2010	76%	44%	-32
Jan – Mar 2011	77%	49%	-28
Apr – Jun 2011	76%	50%	-26
Jul – Sep 2011	76%	63%	-13

Based on this data, the program failed to comply with regulatory requirements relative to the admission of students. Further, the program failed to maintain the annual average pass rate requirement.

REQUIRED CORRECTION(S)

1. The High Desert Medical College, Vocational Nursing Program shall obtain full Board approval prior to the admission of additional students.
2. 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**.
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 continue 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.
 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, at which point the Board may revoke or extend the program's accreditation. If you have additional information that you wish considered beyond the required corrections listed on page 3 and 4, you must submit this documentation by the fifteenth day of the second month prior to that 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: **Based on the above corrections, the full Board's permission will be required for each future class admission.**

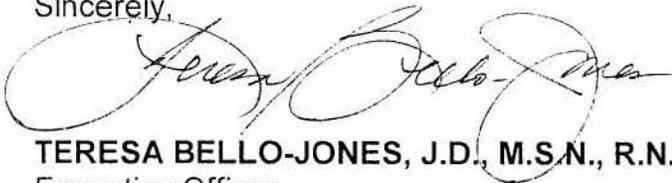
In the event your program is required to submit any report(s) as a corrective action pursuant to this notice, such reports are required in addition to any other reports required pursuant to 2527 of the Board's regulations.

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,

A handwritten signature in black ink, appearing to read "Teresa Bello-Jones", written over a circular embossed seal or stamp.

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

Enclosures

cc: Board Members

TBJ:cca



TITLE 16 CALIFORNIA CODE OF REGULATIONS

Section 2526.1

2526.1. Provisional Accreditation.

- (a) Provisional accreditation means a program has not met all requirements as set forth in this chapter and in Chapter 6.5, Division 2 of the Business and Professions Code.
- (b) Provisional accreditation shall be granted for a period determined by the Board.
- (c) 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. If the program has not met all requirements at the end of the initial provisional accreditation period, provisional accreditation may be extended if the program demonstrates to the satisfaction of the Board a good faith effort to correct all deficiencies.
- (d) Any program holding provisional accreditation may not admit "new" classes beyond the established pattern of admissions previously approved by the Board. The admission pattern is defined by the number of students per class and the frequency of admissions for the six class admissions that immediately precede the Board action to consider provisional accreditation.
- (e) A program placed on provisional accreditation shall receive written notification from the Board. The notification to the program shall include specific areas of noncompliance and requirements for correction. A program's failure to correct delineated areas of noncompliance is cause for revocation of provisional accreditation.
- (f) A material misrepresentation of fact by a vocational nursing program in any information submitted to the Board is cause for revocation of provisional accreditation.
- (g) A program whose provisional accreditation has been revoked shall be removed from the Board's list of accredited programs. The status of students as potential applicants for licensure will be determined by the Board.
- (h) A program that is removed from the Board's list of accredited programs subsequent to Board action based on the program's non-compliance with applicable regulations shall not reapply to establish a vocational nursing program for a minimum period of one calendar year.



Acknowledgement of Change in Accreditation Status

I, Carol Williams, director of High Desert Medical College Vocational Nursing
Director's Name) Name of Program)

Program, hereby acknowledge that this program's status has been changed from full accreditation to provisional accreditation. I understand that in accordance with Section 2526.1 (f) of the Vocational Nursing Rules and Regulations and Section 2581.1 (f) of the Psychiatric Technician Rules and Regulations, the Board will consider any advertisement of full accreditation while on provisional accreditation as "material misrepresentation of fact". "Material misrepresentation of fact" may lead to revocation of the program's accreditation. Further, I understand the program's provisional accreditation status will be reflected on the Board's internet website.

Please complete and return this form to the Board by December 2, 2011.

I certify under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

(Signature of Director)

(Date)

File



STATE AND CONSUMER SERVICES AGENCY • GOVERNOR LARRYINGO 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



edit
BVNPT Received
on 12/21/11 with RA

Acknowledgement of Change in Accreditation Status

I, Carol Williams, director of High Desert Medical College Vocational Nursing
(Director's Name) (Name of Program)

Program, hereby acknowledge that this program's status has been changed from full accreditation to provisional accreditation. I understand that in accordance with Section 2526.1 (f) of the Vocational Nursing Rules and Regulations and Section 2581.1 (f) of the Psychiatric Technician Rules and Regulations, the Board will consider any advertisement of full accreditation while on provisional accreditation as "material misrepresentation of fact". "Material misrepresentation of fact" may lead to revocation of the program's accreditation. Further, I understand the program's provisional accreditation status will be reflected on the Board's internet website.

Please complete and return this form to the Board by December 2, 2011.

I certify under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Carol A. Williams RN
(Signature of Director)

dec. 2, 2011
(Date)

Agenda Item #12.B.4. Attachment B

Hinckley, Pam@DCA

From: Hinckley, Pam@DCA
Sent: Thursday, March 29, 2012 7:46 AM
To: 'Carol Williams'
Subject: RE: Ft VN Program, IP, HDMC

Carol,

The hours on the Summary Form do not match the content worksheets. Specifically, the incorporated hours. I did not even get past the first pages of the FT and PT hours and found the errors. Please re-review and make sure the hours on the Summary Form and Content Worksheets match exactly AND make sure they match the IP. I do not want to be unreasonable, but I do not have time to continue to review this with continued errors.

Pam

From: Carol Williams [<mailto:Carol.Williams@hdmedcollege.com>]
Sent: Wednesday, March 28, 2012 3:08 PM
To: Hinckley, Pam@DCA
Subject: FW: Ft VN Program, IP, HDMC
Importance: High

3-28-12

Dear Pam,

Here is the info you requested on the instructional plans.

Sincerely,

Carol A. Williams RN
High Desert Medical College
VN Program Director

44815 Fig Avenue, Suite 131
Lancaster, CA 93534
P: (661) 940-9300 F: (661) 940-7319
Direct: (661) 579-2905
e-mail: Carol.Williams@HDMedcollege.com

Agenda Item # 12.B.4. Attachment C



STATE AND CONSUMER SERVICES AGENCY • GOVERNOR ED MUNDINO • BROWN JET

BOARD OF VOCATIONAL NURSING & PSYCHIATRIC TECHNICIANS
2535 Capitol Oaks Drive, Suite 205, Sacramento, CA 95833-2945
Phone (916) 263-7800 Fax (916) 263-7855 Web www.bvnpt.ca.gov



CERTIFIED MAIL

April 4, 2012

Carol Williams
High Desert Medical College
Vocational Nursing Program
44815 Fig Avenue
Lancaster, CA 93534

Re: Consideration of Provisional Approval

Dear Ms. Williams:

The Board is scheduled to consider **High Desert Medical College, Vocational Nursing Program's** relative to consideration of placement on provisional approval at its meeting scheduled May 11, 2012. That meeting will be held at the Embassy Suites Milpitas – Silicon Valley, in Milpitas, California.

To ensure dissemination and review by individual Board members and relevant staff for timely consideration prior to the May Board meeting, please submit the following written information by **Wednesday, April 11, 2012:**

- Eighteen (18) 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,

A handwritten signature in blue ink that reads "Pam Hinckley". The signature is written in a cursive style with a large, looping "P" and "H".

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

High Desert

A Legacy Education Institution

Agenda Item #12.B.4. Attachment D

BVNPT Filed *edu*
on 4/11/12 with MJC

April 10, 2012

Ms. Pam Hinckley R.N., M.S.N.
2535 Capitol Oaks Drive, Suite 205
Sacramento, CA 95833

Dear Pam,

Please find attached the pertinent documents High Desert Medical College, Vocational Nursing Program wishes you and the Board members to review with regard to our request to possibly admit students.

I have forwarded via FedEx (tracking # 7934 3771 9881) priority overnight mail the Eighteen (18) copies and the compact disc (CD) for Board use.

I want to thank you and Cheryl for your time, suggestions and professional support to help us rebuild this program to meet the needs of our students and community. We appreciate having you as our nursing consultant.

Sincerely,

Carol A. Williams RN

High Desert Main Campus
44510 North Big Avenue, Suite 101, Lancaster, CA 93304

Phone: 949.9300 Fax: 949.7619

High Desert Branch Campus
21750th Red Road, Suite 200, Bakersfield, CA 93309

Phone: 805.2931 Fax: 805.2931

Program Updates

High Desert Medical College
44815 Fig Avenue, Suite 131
Lancaster, California

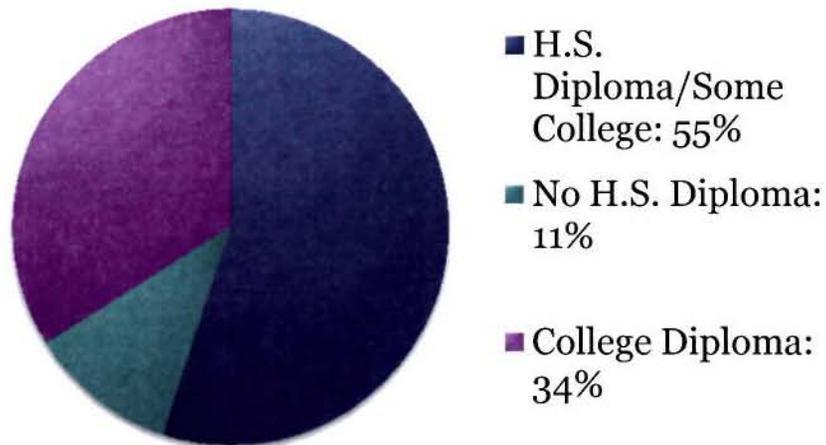
High Desert
Medical College
A Legacy Education Institution

Goals of Today's Presentation

- To request approval to admit a class of 20 P/T students on May 18 to replace students who graduated March 18, 2012
- To request approval to admit a F/T class of 20 students on June 4 to replace students that graduated March 26, 2012
- Share community demographics
- Continued program improvements

Demographics

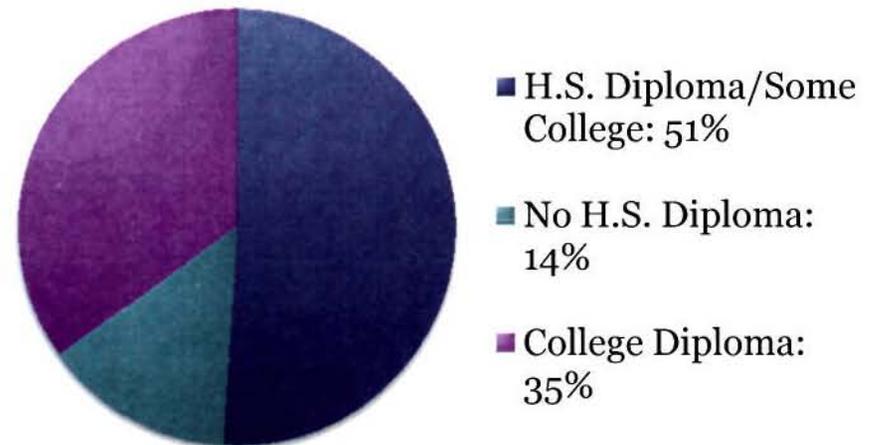
Lancaster Pop: 260,000



Current Unemployment Rate: 9%
Average Household Income: \$54,000
Healthcare is the largest employable field at 14%.

We can help 66% with our programs!

Bakersfield Pop: 500,000



Current Unemployment Rate: 6%
Average Household Income: \$61,000
Healthcare is the largest employable field at 12%.

We can help 65% with our programs!

Justification for New Starts

- Since 2011, 95% Program Completion Rate
- 2011 – 100% Placement Rate after passing NCLEX – 9 students
- Only School in the Antelope Valley that offers a Part Time Program
 - Have students waiting to start since October 2011
- Job Opportunities for LVN's
 - 5 Prisons within 100 miles hiring at \$29 per hour

Program Enhancements

- Hired experienced VN Director of Nursing
- Worked with Nursing Consultant for curriculum improvements and approval
- Enhanced academic resources for students
- Hired experience new faculty
- Continuous faculty improvement
- Evidence based teaching methods/strategies applied
- Established Dorthea Orem's Theory into Nursing Philosophy and conceptual framework
- Implemented Academic and Personal Success Plans



Learning Facilities & Resources

- Extended Classroom Support (academic support services)
- Updated Text books with workbooks
- Updated skill resources and lab
- Elsevier-EVOLVE web-based learning
- Renovated facilities

Faculty Enhancement

- Update Faculty Development Plan Requirements
- Enhanced Teaching Methodologies
- Create Professional Development Calendar
- Create Individual Development Plan for each faculty member
- Establish standard lesson plans, lectures, objectives & exams

NCLEX® PREP/REVIEW

- Catalog and Enrollment Agreement Requirements:
 - Testing Standards
 - Mandatory Term Testing
 - Mandatory NCLEX Review
 - Mandatory Exit Requirement for Graduation
 - Introduce Content Experts for NCLEX® Review
 - NCLEX® Coordinator for tracking results for all students former and current



Questions?



THANK YOU!!

- For more information contact:

Carol Williams, RN, BSN
Program Director
High Desert Medical College
661-579-2905
carol.williams@hdmedcollege.com