

Agenda Item #12.A.8

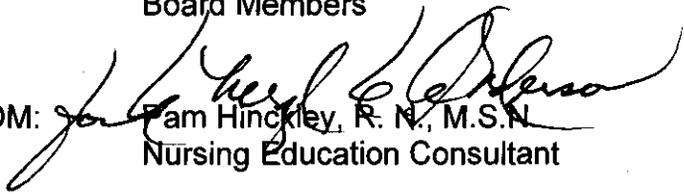


STATE AND CONSUMER SERVICES AGENCY • GOVERNOR EDMUND G. BROWN JR.
BOARD OF VOCATIONAL NURSING & PSYCHIATRIC TECHNICIANS
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DATE: August 17, 2012

TO: Board Members

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

SUBJECT: Stanton University, Garden Grove, Vocational Nursing Program – Consideration of Placement on Provisional Approval; Request to Admit Students (Director: **VACANT**, Garden Grove, Orange County, Private)

Stanton University, Garden Grove, Vocational Nursing Program, also known as College of Medical Arts, Anaheim, Vocational Nursing Program, is presented to the Board for consideration of placement on provisional approval¹.

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...”

The program is noncompliant with requirements set forth in California Code of Regulations, Sections 2527(a), 2527(b), 2529(b), and 2529(l)..

The following table shows the variance of the program’s pass rates from the state average annual pass rates of first time graduates of approved vocational nursing programs over the past fifteen (15) 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 2008	73%	30%	-43
Jan – Mar 2009	72%	36%	-36

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.

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 2009	70%	40%	-30
Jul – Sep 2009	72%	40%	-32
Oct – Dec 2009	73%	71%	-2
Jan – Mar 2010	74%	55%	-19
Apr – Jun 2010	75%	44%	-31
Jul – Sep 2010	75%	47%	-28
Oct – Dec 2010	76%	44%	-32
Jan – Mar 2011	77%	49%	-28
Apr – Jun 2011	76%	54%	-22
Jul – Sep 2011	76%	54%	-22
Oct – Dec 2011	75%	57%	-18
Jan – Mar 2012	74%	56%	-18
Apr – Jun 2012	74%	57%	-17

The program proposed the admission of 30 students commencing August 6, 2012. A projected date of graduation was not provided.

History of Prior Board Actions

- On March 1, 2007, the Executive Officer approved College of Medical Arts, Anaheim's request to begin a vocational nursing program with an initial class of 20 students on March 19, 2007 only; and approved the program curriculum for 1590 hours, including 622 theory, and 968 clinical hours.
- **On September 13, 2007, a new director was approved.**
- The Board was subsequently notified that commencement of the initial class was delayed until July 16, 2007.
- On June 5, 2008, the assigned consultant completed an onsite program inspection to determine compliance with regulatory requirements. Three (3) violations were identified and subsequently corrected.
- On June 25, 2008, Executive Officer approved initial full accreditation for the Stanton University Vocational Nursing Program for the period from June 4, 2008, through June 3, 2012, and issued a certificate accordingly.
- On November 7, 2008, the program submitted documentation of the school's name change to Stanton University Vocational Nursing Program, effective December 1, 2008.
- On May 13, 2009, the Executive Officer rendered the following decisions relative to the Stanton University, Garden Grove, Vocational Nursing Program.
 - a. Denied the admission of 30 students into a full – time class on June 15, 2009.
 - b. Denied the admission of 30 students into a part – time class on June 15, 2009.

c. Approved the admission of 30 students into a full – time class commencing July 27, 2009, to **replace** students graduating July 25, 2009.

d. Require the program to submit a follow-up report by June 15, 2009. The report must include a comprehensive analysis of the program, specific actions to improve the program pass rates, timeline for implementation, and expected outcomes. The following elements are to be addressed in the analysis:

1. Admission Criteria
2. Screening and Selection Criteria
3. Terminal Objectives
4. Curriculum Objectives
5. Instructional Plan
6. Theory and Clinical Objectives for Each Course
7. Lesson Plans for Each Course
8. List of Textbooks
9. Attendance Policy
10. Remediation Policy
11. Evaluations of Theory and Clinical Faculty
12. Evaluations of Theory Presentations
13. Evaluations of Clinical Rotations and Their Correlation to Theory Presentations

- On October 8, 2009, the Board received electronic notification of the director's resignation, effective October 5, 2009.
- **On October 12, 2009, a new program director was approved.**
- On January 6, 2010, the Board notified the program that its pass rates on the NCLEX/PN[®] had fallen below 10 percentage points of the state average annual pass rate for **four (4)** consecutive quarters. The director was requested to submit an evaluation of the plan for improving the program's pass rates by January 20, 2010.
- On January 7, 2010, the Executive Officer approved Stanton University, Garden Grove, Vocational Nursing Program's request to admit a full – time class of 30 students commencing January 11, 2010 only, and graduating January 13, 2011, to **replace** students who graduated on December 17, 2009.
- On May 16, 2011, the Board notified the program that its pass rates on the NCLEX/PN[®] had fallen below 10 percentage points of the state average annual pass rate for **five (5)** consecutive quarters. The director was requested to submit an evaluation of the plan for improving the program's pass rates by June 1, 2011.
- On June 1, 2011, the director submitted an evaluation of the program's plan to improve pass rates.
- On October 14, 2011, the Board notified the program that its pass rates on the NCLEX/PN[®] had fallen below 10 percentage points of the state average annual pass

rate for **eight (8)** consecutive quarters. The director was requested to submit an evaluation of the plan for improving the program's pass rates by November 4, 2011

- On October 27, 2011, the director submitted her plan to increase program pass rates.
- On February 22, 2012, the NEC contacted the school relevant to lack of the director's response to communication from the Board. **During the call it was identified that the director no longer was employed at Stanton University. Additionally, the program has no enrolled students. The last group of students graduated December 16, 2011 per Yumee Rah, Dean of Academic Affairs.**
- On April 4, 2012, the Board met with representatives from Bethesda University. At that meeting it was identified that students were transferred from Stanton University to Bethesda University, without Board knowledge. The Bethesda representative indicated that no students were currently enrolled at Stanton University.
- On May 7, 2012, the Board notified the program that its pass rates on the NCLEX/PN[®] had fallen below 10 percentage points of the state average annual pass rate for **nine (9)** consecutive quarters. The director was requested to submit a written plan for improving the programs pass rates by June 7, 2012.
- On June 20, 2012, Roxanne Workman, contacted the NEC via electronic communication requesting an extension of the June 7, 2012 deadline listed above. The SNEC and NEC placed a teleconference call to Ms. Workman. During that call the SNEC requested information relative to Ms. Workman's interest in Stanton University. She advised the SNEC she was hired as a consultant by Stanton University. Ms. Workman was advised that the Board must provide information specific to the program to a Board – approved program director.
- On June 25, 2012, the SNEC and assigned consultant placed a call to Yumee Rah, Dean of Academic Affairs for Stanton University relevant to her electronic communication to the NEC.
- On July 2, 2012, the Board received a plan to increase program pass rates. The plan was submitted by Yumee Rah, Dean of Academic Affairs.

Enrollment

The program offers full – time classes that are 48 weeks in length and part – time classes that are 70 weeks in length. The pattern of admissions for proposed classes is seen in the enrollment table below.

The following table represents **projected** student enrollment based on current and proposed class starts and completions. The table indicates a **maximum enrollment of 109 students** for the period from **July 2008 through January 2010.**

ENROLLMENT DATA				
CLASS DATES		#Students Admitted	#Students Current or Completed	Total Enrolled
Start	Completed			
7/08 (FT)		15	15	15
8/08 (PT)	Graduation date unavailable	9	9	15 + 9 = 24
1/09 (FT)		27	24	24 + 24 = 48
3/09 (PT)	Graduation date unavailable	15	13	48 + 13 = 61
	7/09 (7/08 FT)		-15	61 - 15 = 46
7/09 (FT)	Graduation date unavailable	30	27	46 + 27 = 73
	12/09 (1/09 FT)		-24	73 - 24 = 49
1/10	Graduation date unavailable	30		49 + 30 = 79
8/12 (Proposed)		30		79 + 30 = 109

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 October 2008 through June 2012, specify the pass percentage rates for graduates of Stanton University, Garden Grove, Vocational Nursing Program on the National Council Licensure Examination for Practical/Vocational Nurses (NCLEX-PN®).

NCLEX-PN® Licensure Examination Data						
Quarter	Quarterly Statistics				Annual Statistics*	
	# Candidates	# Passed	% Passed	State Quarterly Pass Rate	Program Average Annual Pass Rate	State Average Annual Pass Rate
Oct - Dec 2008	10	3	30%	73%	30%	73%
Jan - Mar 2009	1	0	0%	70%	36%	72%
Apr - Jun 2009	4	3	75%	71%	40%	70%
Jul - Sep 2009	No Candidates Tested			74%	40%	72%
Oct - Dec 2009	12	9	75%	76%	71%	73%
Jan - Mar 2010	17	6	35%	76%	55%	74%
Apr - Jun 2010	10	2	20%	74%	44%	75%
Jul - Sep 2010	14	8	57%	76%	47%	75%
Oct - Dec 2010	20	11	55%	77%	44%	76%

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
Jan – Mar 2011	27	14	52%	80%	49%	77%
Apr - Jun 2011	6	3	50%	71%	54%	76%
Jul – Sep 2011	1	1	100%	74%	54%	76%
Oct – Dec 2011	10	7	70%	74%	57%	75%
Jan – Mar 2012	15	7	47%	77%	56%	74%
Apr - Jun 2012	9	5	56%	72%	57%	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 (April to June 2012) the program's average annual pass rate is **57%**. The California average annual pass rate for graduates from approved vocational nursing programs who took the NCLEX-PN® for the first time during the same period is 74%. The pass rate for the Stanton University, Garden Grove, Vocational Nursing Program is 17 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."

Submitted information confirms the program does not have a Board - approved director. Based on documents submitted by the Dean of Academic Affairs, the assigned consultant is unable to determine the current number of faculty employed by the program and available for presentation of didactic and clinical instruction. Board records confirm approval of 38 program faculty. To date, dates of termination have not been submitted. Of the total Board – approved faculty, 36 are approved to teach in the clinical area.

Documents received from Dean Rah on July 2, 2012, lists three (3) faculty members. To date, applications for the reported individuals have not been received nor approved by the Board.

Based on a maximum enrollment of 109 students, eight (8) instructors are needed.

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

"Schools shall have clinical facilities adequate as to number, type, and variety of patients treated, to provide clinical experience for all students in the areas specified by Section 2533. There must be available for student assignment, an adequate daily census of patients to afford a variety of clinical experiences consistent with competency-based objectives and theory being taught."

Based on submitted documents, the assigned consultant is unable to determine the adequacy of clinical facilities as to type and variety of patients treated to enable current and proposed students to meet clinical objectives. Board records substantiate approval of clinical facilities consistent with regulatory requirements. However, it must be noted that a list of clinical facilities for current assignment was not submitted.

Other Considerations

Published examination statistics confirm the program's average annual pass rates for program graduates on the NCLEX/PN[®] have been substantially below state annual average pass rates since initial approval. There are fifteen (15) quarters of examination statistics reported for Stanton University. Of the 15 total quarters for which data is reported, one (1) quarter was within ten (10) percentage points of the state average annual pass rate. During the remaining 14 quarters, the program's average annual pass rates ranged from **18 to 43 points below** state average annual pass rates. As such, the program was **compliant** with regulatory requirements **6.66%** and **noncompliant 93.33%** of the quarters from Quarter 3 2008 through Quarter 2 2012. The most recent quarter pass rate is **56%** and the average annual pass rate is **57%**. As such, the program's average annual pass rate is currently **17 percentage points below** the state average annual pass rate.

As noted previously, information reported to the Board confirms that the program lacks a Board – approved director. Board records confirm the most recent director was approved on October 12, 2009. On June 1, 2011, the Board received correspondence from the director relative to the plan to improve program pass rates (see Attachment A). The Board last received communication from the director on October 27, 2011.

On February 22, 2012, the assigned consultant contacted the school relevant to lack of the director's response to communication from the Board. During the call, the consultant identified that the director was no longer employed at Stanton University. Additionally, the consultant was advised that the program currently has no students. The last group of students graduated December 16, 2011, per Yumee Rah, Dean of Academic Affairs.

On April 4, 2012, the Board met with representatives from Bethesda University. At that meeting program representatives reported the transfer of students from Stanton University to Bethesda University. The Bethesda representatives indicated that no students were currently enrolled at Stanton University.

On May 7, 2012, the Board notified school's administration that the program's pass rates on the NCLEX/PN[®] had fallen below 10 percentage points of the state average annual pass rate for **nine (9)** consecutive quarters. The director was requested to submit a written plan for improving the programs pass rates by June 7, 2012 (see Attachment B).

On June 20, 2012, the assigned consultant received electronic correspondence from Roxanne Workman requesting an extension of the June 7, 2012 deadline. The SNEC and NEC conducted a teleconference with Ms. Workman. During that call the SNEC requested information relative to Ms. Workman's interest in Stanton University. Ms. Workman stated

that she was not the program director but had been hired as a consultant by Stanton University. Ms. Workman was informed that the Board must provide information specific to the program to a Board – approved program director.

On June 25, 2012, the SNEC and assigned consultant telephoned Yumee Rah, Dean of Academic Affairs at Stanton University in response to Ms. Rah's electronic communication to the consultant. Included in the electronic communication from Ms. Rah, was a notice that Stanton University "has decided to notify the BVNPT of the pending transfer of our approved accredited Vocational Nursing Program to the Angeles College, Garden Grove branch campus. This program transfer is in the final stage and should be completed shortly"... I hope with these changes the Board will grant a seven day extension to submit all documents requested by the May 7th notice".

The SNEC requested information relative to the numbers and status of students. Ms. Rah indicated she did not have that information. Ms. Rah confirmed her position as Dean of Academic Affairs; however, she stated that she did not have student records. Board representatives advised that the Board is scheduled to consider the program's approval status on September 6, 2012. Ms. Rah responded that she was unable to provide the requested information.

Given the reported planned transfer to Angeles College, Board representatives inquired the basis of the transfer. Ms. Rah responded "we have a person who is in charge of transferring". Ms. Rah was advised that Board records confirm that the program lacks a Board – approved director. Further, she was advised that the absence of a program director constitutes noncompliance with requirements specified in California Code of Regulations Section 2529. Ms. Rah responded "give me your number and I will have a person call you".

Staff reminded Ms. Rah that the Board was scheduled to consider placement of the program on provisional approval at its September 6, 2012 meeting. Ms. Rah responded, "We never got anything" from the Board related to being placed on the September Board agenda."

On July 2, 2012, the Board received the program's plan to increase the low pass rates. The plan was submitted by Yumee Rah, Dean of Academic Affairs. Included in the plan are the following elements (see Attachment C):

- Kaplan Test Prep class instituted.
- Utilizing ATI products. Program will consider adding to ATI products.
- Added a separate Pharmacology book with a study guide, drug handbook, medical dictionary, and care planning book.
- Tutoring on an as needed basis by a nursing instructor.
- Continuing Education topics on nursing theory and clinical instruction are offered frequently at monthly faculty meetings.

- Added sub-acute clinical sites in addition to the two (2) acute care sites and several skilled nursing facilities.
- Weekly four (4) hour NCLEX review course year round.
- Implemented an early intervention program for at risk students.
- Increased the grading criteria from 75% to 77%.
- Considering adding tests at the end of each term that would be mandatory to pass in order to move to the next term.
- ESL students will be required to attend a 120 medical terminology program offered by Stanton University before they begin the program.

On July 24, 2012, the assigned consultant forwarded correspondence requesting submission of eighteen (18) copies of pertinent documents, plan, and subsequent actions taken to correct identified problems for Board members' consideration (see Attachment D).

Based on program data, the following violations were identified.

Section 2527(a) of the Vocational Nursing Rules and Regulations states:

“The Board shall require such reports by schools and conduct such investigations as necessary to determine whether or not accreditation will be continued.”

Violation #1: The program has failed to submit required reports since October 31, 2011. Documents submitted by Dean Rah were received on July 2, 2012. Those documents were incomplete and did not fully comply with the requested documents and materials.

Plan of Correction #1: This violation is not corrected.

Section 2527(b) of the Vocational Nursing Rules and Regulations states:

“A school shall report to the Board within ten days of the termination of a faculty member.”

Violation #2: The program has failed to notify the Board of the termination of 37 faculty members. The program failed to notify the Board of the termination of faculty members within the ten (10) days as required by existing regulations. Submitted information confirms the director's resignation sometime after October 27, 2011. On February 22, 2012, school's Dean of Academic Affairs informed the assigned consultant that the Board – approved director was no

longer employed by the school. Further, the Dean advised that the last class graduated in December 2011.

Plan of Correction #2: This violation is **not corrected**.

Section 2529(b) of the Vocational Nursing Rules and Regulations states:

“Each vocational nursing program shall have one faculty member, designated as director who meets the requirements of subsection (c)(1) herein, who shall actively administer the program. The director is responsible for compliance with all regulations in Chapter 1, Article 5 (commencing with Section 2525, et seq.).”

Violation #3: Based on information received by the Board, the program has been without a Board – approved director for a period in excess of nine (9) months.

Plan of Correction #3: This violation is **not corrected**. The violation will be corrected when a new director is approved by the Board.

Section 2530(I) 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.”

Violation #4: The program’s average annual pass rates of first time graduates have been noncompliant with regulatory requirements for fourteen (14) of the past fifteen (15) quarters. For the past ten (10) consecutive quarters, the program’s average annual pass rate has been more than ten (10) percentage points below the State average annual pass rate.

Plan of Correction #1: This violation is **not corrected**. The violation will be corrected when the program’s pass rates improve consistent with regulatory requirements.

Recommendations:

1. Place Stanton University Vocational Nursing Program on provisional approval for the five-month period from September 6, 2012, through February 28, 2013, and issue a notice to the program to identify specific areas of noncompliance and requirements for

marked noncompliance, scheduling the program for reconsideration of its provisional approval status in February 2013 is prudent.

Board staff will continue to monitor the program by tracking its licensure examination pass rate quarterly.

- Attachment A: Program Correspondence Dated June 1, 2011; Received June 1, 2011.
- Attachment B: Board Correspondence Dated May 7, 2012.
- Attachment C: Program Correspondence Dated June 29, 2012; Received July 5, 2012
- Attachment D: Board Correspondence Dated July 24, 2012.
- Attachment E: Draft Notice of Change in Accreditation Status.



June 1, 2011

BVNPT Received *edu*
on *6/1/11* with *me*

Pam Hinckley
Nursing Education Consultant
Board of Vocational Nursing and Psychiatric Technicians
2535 Capitol Oaks Drive, Suite 205
Sacramento, CA. 95833-2945

SUBJECT: NCLEX PASS RATE IMPROVEMENT PLAN (UPDATE)

Dear Ms. Hinckley,

On February 28, I submitted an NCLEX-PN pass rate improvement plan outlining several strategies that had been implemented by that time to raise pass rates. Since that time, additional improvements have also been incorporated as we continually strive to give our students every advantage in passing the boards.

Discussion of the original strategies is as follows:

- I. Prep course by Kaplan – students must attend the course in its entirety as well as content prep done also by school faculty. The students are all attending and the students are offered additional group study sessions or email discussions with the Kaplan consultant as desired. Students who have passed their boards gave feedback that they felt the Kaplan instruction was very relevant in that regard.
- II. ATI prep product – we are continually improvising ways to maximize use of this product. Currently, it is in use in all classes, as practice and proctored sessions and given at times most relevant in the curriculum. The predictor test is given at the end of the program, students are given some prep time to prepare and they are required to achieve the established pass rate of 90% (this was raised from 85%). First time pass rate for the predictor test was at approximately 80% in the last class. This we felt was good given that the students had not had the product for the full length of their program.
- III. New resources – I believe our textbooks changes are very helpful as the prior textbooks did not offer in-depth coverage in certain important areas. The instructors feel they are much easier to teach from and the layout is better for the students to read. We also have made additional changes discussed in Additional Improvement section. We have enhanced the Evolve website to function as a blackboard to make assignments, exchange ideas, and offer many videos, case scenarios, etc. to enhance learning. The site offers adjunct resources for instructors as well. Documents such as care plans, assessment forms, assignment sheets, etc. have been improved and posted on the site for instructors to easily download or assign students. Also, our computer lab is very busy and used by students and grads studying for boards.

- IV. Tutor 2 days a week – when students are at risk for failing or need extra help in content, computer skills, English or math, they attend one of the tutor sessions. This is mandatory if a student is failing and put on a Success Plan (see Additional Improvements).
- V. Continuing education has been very helpful for the instructors and many topics have addressed strategies that have been incorporated into the curriculum such as critical thinking, concept mapping, evaluating med pass, etc.
- VI. Better clinical sites – has improved the breadth and depth of student knowledge of skills and patient care management. The students are able to give more meds, suction, do trach care, care for a team of patients.
- VII. Skills Lab Coordinator and open skills lab – skills lab much better managed with adequate supplies and equipment, more organized competency checks and an opportunity for students to get additional practice in skills they are not confident in.
- VIII. Kaplan training for faculty in NCLEX preparation – this was very valuable in teaching faculty to have right balance of content vs. critical thinking, components of critical thinking and how to impact and improve critical thinking skills in theory and clinical. Faculty felt grateful to have a more organized way of looking at critical thinking and have incorporated his recommendations into their teaching.

Additional Improvements that have been made since the first improvement plan are:

- I. We have hired an Assistant Director of Nursing who brings a lot of experience as faculty in a very successful VN program in the recent past. He is particularly talented and seasoned in preparing students for board pass as well as serving as a strong mentor to the other faculty.
- II. The new ADON will be offering a weekly 4-hour NCLEX-PN review that will be year-round. Interested students and graduates will be welcome to attend which we believe will be a valuable adjunct to our existing resources.
- III. We have improved communication with our students and graduates with a quarterly newsletter developed by our Career Services Coordinator as well as frequent contact via email and Evolve. Through these channels, we are able to inform them of resources and offerings available to them to assist with board passage. Our grads are allowed to continue to use all school resources until they have successfully taken NCLEX.
- IV. We utilize a Success Plan for students who are at risk in either clinical or the classroom. Faculty are encouraged to implement a plan early when a student first demonstrates a problem in school such as failing quizzes, being tardy, inattention, poor study habits, working too much, etc. The idea is to prevent poor habits from developing into major problems later on. A big piece of the plan is input from students and investment into changes they must make.
- V. We also have attempted to improve communication between theory and clinical instructors by designating theory instructors as lead instructors. The lead instructors' responsibility is to assure that students are meeting the objectives in clinical that correlate with theory

instruction. There is now more collaboration in meeting the objectives and Success Plans, etc, used to improve progress.

- VI. We have a Curriculum Committee whose goal is to make improvements to the curriculum, making it more relevant and in line with current state and national standards. One element of this is to increase the required passing score in our courses from 75% to at least 77% for most classes. We hope to submit to the board for approval by September, 2011.
- VII. Finally, we have made more textbook changes. We have added an A and P book as well as Saunders NCLEX-PN prep book. This goes into effect for the June, 2011 part-time class.

This concludes my evaluation of our ongoing and ever-evolving improvement plan. As far as progress with improving pass rates, our last quarter of scores showed some improvement in recent classes, however, we are still not within the required 10% of the state pass average. We strongly believe that as more classes take boards who have had the advantage of the improvements currently in place in our program, we will be able to meet board pass requirements.

Please let me know if you have any questions regarding our improvement plan. Again, we welcome any input and suggestions you may have.

Sincerely,

Cassie Zalewski, M.S.N., R. N.
Director of Vocational Nursing

Agenda Item #12.A.8.Attachment B



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

BOARD OF VOCATIONAL NURSING & PSYCHIATRIC TECHNICIANS
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CERTIFIED

May 7, 2012

Administrator
Stanton University
Vocational Nursing Program
12666 Brookhurst Street
Garden Grove, CA 92840

Dear Administrator:

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 achieve the required yearly average minimum pass rate **within two years of initial approval** may be cause to place a program on provisional accreditation.
- (2) 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."

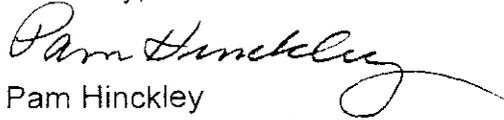
Statistics furnished by Pearson VUE, and published by the National Council of State Boards of Nursing as "Jurisdictional Summary of All First-Time Candidates Educated in Member Board Jurisdiction", indicate that the pass rates for **Stanton University** have fallen below 10 percentage points of the state average pass rate for the past nine quarters. **This means that at the September 7, 2012 (tentative date) Board meeting, your program will be considered for provisional accreditation. Be prepared to answer questions from Board members at that time.**

Please submit the following information to me by **June 7, 2012.**

1. Current enrollment information.
2. Current faculty and facility information.
3. Documentation demonstrating the clinical rotation schedules for all current classes.
4. An analysis of your program's correctional plan indicating the elements that have been effective and those that have not. Describe alterations that you will make in the plan based on this analysis.
5. Any other pertinent information to be considered by the Board. (Note: Information submitted after the deadline may not receive due consideration by the Board.)

Should you have questions, please do not hesitate to contact me at (916) 263-7840.

Sincerely,

A handwritten signature in black ink that reads "Pam Hinckley". The signature is fluid and cursive, with a long, sweeping underline that extends to the right.

Pam Hinckley
Nursing Education Consultant

Attachments: Enrollment Form
Faculty and Facility Forms
OB/Peds Rotation Form
Faculty Clinical Assignment Form

Agenda Item #12.A.8.Attachment C



STANTON UNIVERSITY

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BVNPT

2012 JUL -2 PM 3: 37

June 29, 2012

Teresa Bello-Jones, J.D.,M.S.N., Executive Officer
Pam Hinckley , M.S., R.N.,Supervising Nursing Education Consultant
Board of Vocational Nursing and Psychiatric Technicians
2535 Capital Oaks Drive, Suite 205
Sacramento, CA. 95833

ede
BVNPT Received

on 7-5-12 with RR

Subject: NCLEX Pass Rate Correctional Plan Analysis

Dear Ms. Bello-Jones and Ms Hinckley,

This letter is to provide the board with a correctional plan of action aimed at improving the current low pass rates on the NCLEX-PN for Stanton University.

1. NCLEX-PN Test Plan:

Students must attend the course in its entirety as well as content prep done also by school faculty. The students are all attending and students are offered additional group study sessions or email discussions with the Kaplan consultant⁶ as desired. Students who have passed their boards gave feedback that they felt the Kaplan instruction was very relevant⁶ in that regard. Also, pass rates had been slowly climbing. At this time we will continue the board prep as is in the requirements.

2. ATI, an NCLEX-PN prep product was added to the book list and curriculum.

Computer lab time for use by the students and implemented for the VN program. In addition, other prep products will be evaluated this year in order that we are assured that we have the best products on the market. Also, we will evaluate adding to our current ATI products if, after discussion with the product representative, it appears that it would be advantageous in improving our pass rates.

3. Textbooks were changed and additional ones were added, such as a separate pharmacology book with study guide, a drug book, medical dictionary and a care planning book. These textbooks are more appropriate as the prior textbooks did not offer in-depth coverage in certain important areas. The instructors feel they are much easier to teach from and the layout is better for the students to read. Additionally the publishers offer online resources to the students.

4. We provide a tutor who is one of the nursing instructors and students are able to schedule this on an as "needed basis". The tutoring was modified to make it more relevant and more convenient for students. The tutor uses adult learning strategies to improve study habits, time-management skills, prioritization, as well as teach content.

5. Continuing Education is provided frequently at monthly staff meetings on topics relevant to nursing theory and clinical instruction. The staff members continue to benefit from the offerings

at faculty meetings, I believe it will strengthen the quality of instruction overall with special focus on passing boards.

6. We have improved the quality and appropriateness of our clinical sites especially in adding more sub-acute care experiences. We having hands-on experience with, for example, tracheostomy care and suctioning has been a valuable addition for our students and we hope that it will be helpful to our students having a broader knowledge base for state boards. We have good clinical sites in a competitive market-Stanton University has 2 sub-acute and 2 acute sites as well as many SNF sites. We maintain them by expecting high professional standards of our faculty and students.
7. We are offering weekly 4 hour NCLEX-PN review that will be year round. Interested students and graduates are welcome to attend which we believe will be a valuable adjunct to our existing resources.
8. We have improved the communication with our students and graduates with a quarterly newsletter developed by Career Services Coordinator as well as frequent contact via email. Through these channels, we are able to inform them of resources and offerings available to assist them with board passage. Also, the grads are given a gratuity when they come back and speak to current students. This gives them more information in preparing for the boards. Our graduates are allowed to continue to use all school resources until they have successfully taken the NCLEX. This improvement in communication has allowed us to evaluate their success at the boards and to make needed adjustments in our program in weak areas.
9. We utilize a Success Plan for students who are at risk in either clinical or the classroom. Faculty are encouraged to implement a plan early when a student first demonstrates a problem in school such as failing quizzes, being tardy, inattention, poor study habits, working too much, etc. The idea is to prevent poor habits from developing into major problems later on. A large part of the plan is input from the students and investment into changes they must make. We find that this is a key element for them to learn how to be successful in a nursing program.
10. We have also attempted to improve the communication between theory and clinical instructors by designating theory instructors as lead instructors. The lead instructors' responsibility is to assure that students are meeting the objectives in clinical that correlate with theory instruction. This has created an environment of more collaboration in meeting the objectives and Success Plans used to improve progress. When these objectives are met the student should have the knowledge to pass the state board exam.
11. We have a Curriculum Committee whose goal is to make improvements to the curriculum, making it more relevant and in line with current state and national standards. One element of this was to raise the required passing score in our courses from 75% to at least a77% for most classes and to change our admissions test. We saw a trend that the border line students9 those

hovering around a 75% were not passing boards. Also utilizing an admission test score that is comparable to area community colleges has raised the bar for incoming students who should be able to be successful in the program and at the boards. Some additional improvements that I believe are needed at this point are: We will begin giving mandatory tests at the end of each term that students will be required to pass before moving on to the next term (in addition to the ATI predictor test. If they do not pass on the first try, they will be given a formal remediation and allowed to have a second attempt at passing. If they do not pass a second attempt, they must repeat the term or be dropped from the program. This change in policy will be submitted to the BVNPT and students will be informed of this policy via their Student Handbook before they begin the program. Additionally, practice tests are assigned as homework, along with handwritten focused reviews, involving written rationales for missed questions. We have provided Saunder's NCLEX-PN Review book. This will expose the students to NCLEX style of questions

12. All I-20 students will now be required to complete a 120 hour ESL Medical Terminology program offered by Stanton University, before they begin the VN program. The program will run continuously year-round and be comprised of 4-hour segments on different topics and will be numbered 1-30. When a student has completed all 30 topics, in random order, he/she may enter the VN program. Hopefully this will deal effectively with students where English is an issue, in the classroom, in clinical and on state boards. Other issues that impact our students are the long wait time between graduation and board approval. I understand that this is unavoidable due to the shortages at the Board, however, research clearly shows the negative relationship between long wait times and pass rates. Students say that they begin to forget what they have learned in the program. We encourage them through emails to keep studying and offer any resources such as computer review programs, auditing classes, use of skills lab, and tutoring.

This concludes our correctional plan and additional elements to the plan. We hope that this will be considered as we proceed with the re-accreditation process for Stanton University.

Please let me know if you have any questions regarding this plan, additional elements, and pertinent information about Stanton's VN Program I have submitted today. I welcome any input and suggestions you may have.

Sincerely,



Yumee Rah, Ph.D.

Dean of Academic Affairs

CC: David Kim, Ph.D., Chairman, Board of Trustees of Stanton University

Agenda Item #12.A.8.Attachment D



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) 263-7855 Web www.bvnpt.ca.gov



CERTIFIED MAIL

July 24, 2012

Yumee Rah
Stanton University
Vocational Nursing Program
1266 Brookhurst Street
Garden Grove, CA 92840

Re: Consideration of Placement on Provisional Approval

Dear Mr. Rah:

The Board is scheduled to consider **Stanton University, Vocational Nursing Program's** relative to consideration of placement on provisional approval and request to admit students at its meeting scheduled September 6, 2012. That meeting will be held at the Radisson Hotel LAX in Los Angeles, California.

To ensure dissemination and review by individual Board members and relevant staff for timely consideration prior to the February Board meeting, please submit the following written information by **Friday, August 3, 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,

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 # 12.A.8.Attachment E



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



September XX, 2012

Yumee Rah
Stanton University
Vocational Nursing Program
12666 Brookhurst Street
Garden Grove, CA 92840

Subject: Notice of Change in Approval Status

Dear Ms. Rah:

Pursuant to the action of the Board of Vocational Nursing and Psychiatric Technicians (Board) on September 6, 2012, the status of the Stanton University Vocational Nursing Program has been changed from full approval to provisional approval for the five month period from September 6, 2012 through February 28, 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, September XX, 2012**.

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 2527(a) of the Vocational Nursing Rules and Regulations states:

"The Board shall require such reports by schools and conduct such investigations as necessary to determine whether or not accreditation will be continued."

Section 2527(b) of the Vocational Nursing Rules and Regulations states:

"A school shall report to the Board within ten days of the termination of a faculty member."

Section 2529(b) of the Vocational Nursing Rules and Regulations states:

“Each vocational nursing program shall have one faculty member, designated as director who meets the requirements of subsection (c)(1) herein, who shall actively administer the program. The director is responsible for compliance with all regulations in Chapter 1, Article 5 (commencing with Section 2525, et seq.)”

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...”

The program pass rates of the Stanton University Vocational Nursing Program for the past fifteen (15) 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 2008	73%	30%	-43
Jan – Mar 2009	72%	36%	-36
Apr – Jun 2009	70%	40%	-30
Jul – Sep 2009	72%	40%	-32
Oct – Dec 2009	73%	71%	-2
Jan – Mar 2010	74%	55%	-19
Apr – Jun 2010	75%	44%	-31
Jul – Sep 2010	75%	47%	-28
Oct – Dec 2010	76%	44%	-32
Jan – Mar 2011	77%	49%	-28
Apr – Jun 2011	76%	54%	-22
Jul – Sep 2011	76%	54%	-22
Oct – Dec 2011	75%	57%	-18
Jan – Mar 2012	74%	56%	-18
Apr – Jun 2012	74%	57%	-17

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

REQUIRED CORRECTION(S)

1. Place Stanton University Vocational Nursing Program on provisional approval for the two-month period from September 6, 2012, through February 28, 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.

2. The program shall obtain a director who meets requirements set forth in California Code of Regulations Section 2529 (c)(1) by November 1, 2012.
3. The program shall admit no additional students without the approval of the full Board.
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 approval.
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 **February 2012** Board Meeting agenda for reconsideration of your approval status. If you have additional information that you wish considered beyond the required corrections listed on pages 3 and 4, 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 is required to admit classes.

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 approval, 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

Enclosure
TBJ/ph
cc: Board Members