

Agenda Item #12.B.2

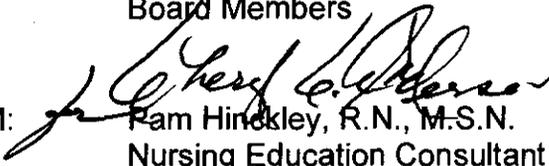


STATE AND CONSUMER SERVICES AGENCY • GOVERNOR EDMUND G. BROWN JR.
BOARD OF VOCATIONAL NURSING & PSYCHIATRIC TECHNICIANS
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DATE: August 17, 2012

TO: Board Members

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

SUBJECT: CET-Nursing (formerly Center of Education and Technology) Vocational Nursing Program – Request to Admit Students (Director: Ronoldo Varian, Whittier, Los Angeles County, Private)

The CET-Nursing Vocational Nursing Program, also known as Center of Education and Technology) Vocational Nursing Program, requests approval to admit a class of 15 students on September 11, 2012 graduating November 23, 2013 to **replace** students who graduated August 19, 2011.

The program's status was changed to provisional accreditation¹ on September 16, 2010, for the one-year period from September 16, 2010, through September 31, 2011. That action was taken due to the program's noncompliance with Section 2530 (l) of the Vocational Nursing Rules and Regulations which 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.”

On May 20, 2011, the Board **extended** the program's provisional accreditation to November 10, 2011 and approved the admission of 15 students to commence on May 23, 2011 only, graduating August 12, 2012. On August 8, 2011, the program notified the Board that the class had been postponed to October 17, 2011. Graduation was projected for January 18, 2013.

On November 10, 2011, the Board **extended** the program's provisional approval for an additional one (1) year period from November 10, 2011 through November 30, 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.

Additionally, the Board continued the program's requirement to obtain approval by the full Board prior to the admission of each class.

History of Prior Board Actions

- On April 12, 2006, the Board approved the Center of Education and Technology's request to begin a vocational nursing program with an initial full-time class of 15 students commencing May 15, 2006, only; **and** approved the program curriculum for 1560 hours, including 600 theory, and 960 clinical hours.
- On June 20 – 21, 2007, the assigned consultant completed an onsite survey visit of the program. Thirteen (13) violations of the California Code of Regulations were identified.
- On September 7, 2007, in the absence of a quorum, a committee of the Board heard the consultant's report recommending approval by the full Board of the following actions:
 1. Place the Center of Education and Technology Vocational Nursing Program on provisional accreditation for the period September 7, 2007, through September 6, 2009.
 2. Require the program to submit documentation to correct identified violations no later than November 1, 2007.
 - a. The program shall develop and submit for Board approval objective criteria, procedures for implementation, and applicable forms for the screening and selection of program applicants.
 - b. The program shall submit a report verifying that up-to-date skills laboratory equipment has been secured and outdated texts have been removed from the reference library.
 - c. The program shall submit a report verifying that their proposed classrooms contain sufficient space and furniture to accommodate a class size of 15 students.
 - d. The program shall develop a schedule of meetings for vocational nursing faculty and confirm attendance of faculty. A copy of the minutes of each meeting shall be submitted to the Board no later than ten (10) days after the meeting.
 - e. The program shall develop daily lesson plans that correlate the theory and clinical practice offered to students for weeks 16 – 60. A progress report shall be submitted to the Board.
 - f. The program shall revise and submit for Board approval a procedure for the evaluation of student progress and remediation to include:

- 1) Notification of the program director of students' knowledge or clinical deficits.
 - 2) Director review and signature for student counseling relative to program performance deficit.
 - 3) Director approval of plans for student remediation and subsequent student evaluations.
- g. The program shall develop and submit documentation of the theory and correlated clinical experience provided for each enrolled student.
 - h. The program shall consistently post clinical objectives that students are expected to master in assigned client care units and submit documentation verifying compliance.
 - i. The program shall develop and submit for Board approval a procedure and relevant forms to ensure the evaluation of program faculty at least annually.
3. The program shall submit a report to the Board delineating the effectiveness of strategies and interventions taken to correct identified violations by November 1, 2007.
 4. The program shall admit no further classes until all items in Recommendation 2 above have been corrected and information substantiating corrections as approved by the Board is submitted.
- On September 12, 2007, the Board received correspondence from the program director relative to her resignation effective September 13, 2007.
 - On October 19, 2007, the program was notified of the Board's inability to approve the proposed program director due to noncompliance with requirements set forth in California Code of Regulations Section 2529 (c)(1).
 - **On December 10, 2007, a new program director was approved.**
 - On January 10, 2008, the Board received correspondence and supporting information from the program director relative to the correction of thirteen (13) violations identified during the June 20–21, 2007 survey visit.
 - On February 1, 2008, the Board granted full accreditation to the Center of Education and Technology Vocational Nursing Program for the period February 1, 2008, through January 31, 2012, and issued a certificate accordingly. The program was required to submit a report to the Board delineating the effectiveness of strategies and interventions taken to correct identified violations by June 1, 2008. A follow-up report was to be presented at the September 2008 Board meeting.
 - A follow-up report was not presented at the September 12, 2008 Advisory Committee meeting, as the program had admitted only the initial class approved on April 12, 2006. No additional classes were admitted after February 1, 2008.

- On October 22, 2008, the Executive Officer approved the program's request to admit the following classes.
 1. A **full-time day** class of 15 students commencing October 22, 2008 only, with a projected graduation date of December 17, 2009;
 2. A **full-time evening** class of 15 students commencing October 22, 2008 only, with a projected graduation date of December 17, 2009.
- On May 14, 2009, the consultant notified the program that its average annual pass rates had fallen more than 10 percentage points below the state average annual pass rate for the past four (4) quarters. The director was requested to submit a plan for improving the program's pass rates by Friday, June 5, 2009.
- On August 4, 2009, the Board received the program's plan for improving its NCLEX-PN® pass rates.
- On August 12, 2009, the director clarified that the program admitted an evening class on October 22, 2009 only. A day class was not admitted due to insufficient enrollment.
- On August 18, 2009, the Executive Officer approved the program's request to admit 15 students on August 24, 2009 only.
- On November 19, 2009, the consultant notified the program that its average annual pass rates had fallen more than ten (10) percentage points below the state average annual pass rates for the past six (6) quarters.
- On January 7, 2010, the Executive Officer approved Center of Education & Technology Vocational Nursing Program's request to admit 15 students on February 8, 2010 only, graduating April 18, 2011; **approved** the program's request to admit 15 students on July 26, 2010 only, graduating October 11, 2012; **and required** the director to complete a comprehensive analysis of the program, identify program deficiencies, and submit a report that identifies program strengths and deficiencies, specifies steps to correct identified deficiencies, and presents a timeline for implementation. The report shall be due by January 30, 2010. The following elements must be addressed:
 - 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

- On February 11, 2010, the program was notified that its average annual pass rates had fallen more than below ten (10) percentage points below the state average annual pass rate for the past seven (7) quarters.
- On April 27, 2010, the Executive Officer approved program's request to admit 15 students on March 8, 2010 only, graduating May 8, 2011, to **replace** students who graduated December 17, 2009, and **denied** the program's request to admit a full-time class of 15 students on July 26, 2011, graduating October 11, 2012.
- On August 5, 2010, the director was notified that the Board would consider placement of the program on provisional accreditation at its September 16, 2010 meeting. The program was requested to submit documentation relative to:
 - 1. Current and Projected Enrollment.
 - 2. List of Current Faculty.
 - 3. List of Current Clinical Facilities to Which Students Are Assigned.
 - 4. Effect of Actions Taken to Improve Student Achievement and the Pass Rate Performance of Program Graduates.

The documents were to be received by the Board by August 12, 2010.

- On August 12, 2010, the program submitted documents relative to current and projected enrollment, list of current faculty, list of current facilities. The requested "Effect of Actions to Improve Student Achievement and the Pass Rate Performance of Graduates" was not submitted.
- On August 13, 2010, the assigned consultant forwarded electronic correspondence again requesting interventions the program implemented to improve program pass rates. In response, the director submitted documents dated October 14, 2009.
- On September 16, 2010, the Board placed Center of Education and Technology, Whittier, Vocational Nursing Program on provisional accreditation for the one-year period from September 16, 2010, through September 30, 2011, 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,

The program was required to submit a follow-up report in 10 months but no later than July 1, 2011. 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. Current 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.
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- 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 program will be placed on the September 2011 Board agenda for reconsideration of provisional accreditation; and 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.

Additionally, the program may not admit additional students unless approved by the full Board.

- On October 1, 2010, the Board forwarded the Notice of Change in Accreditation Status per certified and regular mail.
- On April 14, 2011, the assigned consultant forwarded correspondence requesting the program to submit fifteen (15) copies of documents relative to subsequent actions taken to correct identified problems for Board presentation.
- **On May 3, 2011, a new program director was approved**
- On May 20, 2011, the Board approved the program's request to admit a full-time class of 15 students on May 23, 2011, only, graduating August 12, 2012, to **replace** the class that graduated November 2010; **and**, extended the program's Provisional Accreditation to November 10, 2011; **and**, placed the program on the November 2011 Board agenda for reconsideration of Provisional Accreditation; **and**, required the program to obtain approval by the full Board prior to admission of each class.
- On June 29, 2011, the Board forwarded the Notice of Change in Accreditation Status per certified and regular mail.
- On August 8, 2011, the program notified the Board that the May 23, 2011 class had been postponed to October 17, 2011 and will graduate January 18, 2013.

- On October 4, 2011, the program director notified the Board that the May 23, 2011 class had again been postponed to January 16, 2012 with graduation projected for March 8, 2013.
- On October 7, 2011, the assigned consultant forwarded correspondence requesting the program to submit fifteen (15) copies of documents relative to subsequent actions taken to correct identified problems for Board presentation.
- On November 11, 2011, the Board extended provisional accreditation of the Center of Education and Technology Vocational Nursing Program for the one (1) year period from November 10, 2011 through November 30, 2012, 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; **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 for four (4) consecutive quarters; **and**, required the program to 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; **and**, required the program to submit a follow-up report in nine (9) months, but no later than **August 1, 2012**. 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. 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; **and**,

Required the program to comply with all accreditation standards in Article 4 of the Vocational Nursing Practice Act, commencing at Business and Professions Code Section 2880, and Article 5 of the Board's regulations, commencing at California Code of Regulations, Title 16, Section 2526; **and**, continue to require the program to obtain approval by the full Board prior to admission of each class; **and**, place the program on the November 2012 Board Meeting agenda for reconsideration of provisional accreditation.

- On November 29, 2011, the Board forwarded the Notice of Change in Accreditation Status per certified and regular mail.
- On June 21, 2012, the Board received notice of the school's name change from Center of Education and Technology to CET-Nursing.
- On November 23, 2011, the Board received notice of change of address for Center of Education and Technology.
- On July 24, 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 Board members to consider by August 7, 2012.
- On July 31, 2012, the Board received the program's comprehensive analysis. Fifteen (15) copies were submitted.
- On August 17, 2012, the Board forwarded an amended Notice of Change in Accreditation Status per certified and regular mail.

Enrollment

Currently, the program must have prior Board approval to admit classes to its 60-week full-time program. The pattern of admissions for proposed classes is seen in the enrollment table below.

The following table represents **current** student enrollment based on class starts and completions. The table indicates a **maximum projected enrollment of 29 students** for the period from **May 2006 through September 2013**.

ENROLLMENT DATA				
CLASS DATES		#Students Admitted	#Students Current or Completed	Total Enrolled
Start	Completed			
5/06 (PM)		9	8	8
	8/08 (5/06 PM Class)		-8	8 - 8 = 0
10/08 (PM)		9		0 + 9 = 9
8/09 (PM)		9	5	9 + 5 = 14
	1/10 (10/08 PM Class)		-9	14 - 9 = 5
4/10 (PM)		9	8	5 + 8 = 13
	11/10 (8/09 PM Class)		-5	13 - 5 = 8
	6/11 (4/10 Class)		-8	8 - 8 = 0

ENROLLMENT DATA				
CLASS DATES		#Students Admitted	#Students Current or Completed	Total Enrolled
Start	Start			
2/12 (PM)	5/13	14		0 + 14 = 14
9/12 (PM) Proposed	11/13	15		14 + 15 = 29

Licensing Examination Statistics

The following statistics, furnished by the Pearson Vue and published by the National Council of State Boards of Nursing as "Jurisdictional Summary of All First-Time Candidates Educated in Member Board Jurisdiction" for the period April 2008 through June 2012, specify the pass percentage rates for graduates of CET-Nursing, Whittier, 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
Apr – Jun 2008	3	1	33%	75%	33%	75%
Jul – Sep 2008	3	1	33%	70%	33%	74%
Oct – Dec 2008	2	0	0%	73%	25%	73%
Jan – Mar 2009	No Candidates Tested			70%	25%	72%
Apr – Jun 2009	No Candidates Tested			71%	20%	70%
Jul – Sep 2009	No Candidates Tested			74%	0%	72%
Oct – Dec 2009	No Candidates Tested			76%	0%	73%
Jan – Mar 2010	No Candidates Tested			76%	0%	74%
Apr – Jun 2010	No Candidates Tested			74%	0%	75%
Jul – Sep 2010	4	1	25%	76%	25%	75%
Oct – Dec 2010	2	2	100%	77%	50%	76%
Jan – Mar 2011	No Candidates Tested			80%	50%	77%
Apr – Jun 2011	4	3	75%	71%	60%	76%
Jul – Sep 2011	No Candidates Tested			74%	83%	76%
Oct – Dec 2011	2	1	50%	74%	67%	75%
Jan – Mar 2012	1	1	100%	77%	71%	74%
Apr – Jun 2012	3	1	33%	72%	50%	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 current data available (April – June 2012), the program's average annual pass rate is **50%**. The California average annual pass rate for graduates from accredited vocational nursing programs who took the NCLEX-PN® for the first time is 74%. The average annual pass rate for CET-Nursing, Whittier, Vocational Nursing Program is **24** percentage points **below** the state average annual pass rate.

It is important to note, that the program had no candidates test for six (6) consecutive quarters from January 2009 through June 2010. Additionally, no candidates tested during Quarter 1 and Quarter 3 of 2011.

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 program's Board-approved faculty totals five (5), including the program director. The director has 60% administrative duties and 40% teaching duties. Of the total faculty, Three (3) are approved to teach in the clinical area.

Based on a maximum enrollment of 29 students, two (2) 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:

"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 clinical facilities that are adequate as to type and variety of patients treated to enable current and proposed students to meet clinical objectives, in accordance with Section 2534 (b) of the Vocational Nursing Rules and Regulations. This information has been verified by the consultant.

Other Considerations

On September 16, 2010, the Center of Education and Technology Vocational Nursing Program was placed on provisional accreditation for a one (1) year period from September 16, 2010, through September 30, 2011. At that time, the program's average annual pass rate was **0%**.

On October 1, 2010, the Board forwarded the Notice of Change in Accreditation Status per certified and regular mail.

On May 3, 2011, a new program director was approved by the Board.

On May 20, 2011, the Board **extended** the program's Provisional Accreditation to November 10, 2011. At that time, the program's average annual pass rate had improved from 0% to 50%. However, it was noted that during that time, six (6) total program graduates were tested. Of the total tested, three (3) graduates passed.

On June 29, 2011, the Board forwarded the Notice of Change in Accreditation Status per certified and regular mail.

On November 11, 2011, the Board **extended** provisional accreditation for the one (1) year period from November 10, 2011 through November 30, 2012.

On November 29, 2011, the Board forwarded the Notice of Change in Accreditation Status per certified and regular mail 2012 (see Attachment A).

On July 24, 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 Board members to consider by August 7, 2012 (see Attachment B).

On July 31, 2012, the Board received the program's comprehensive analysis (see Attachment C). Fifteen (15) copies were attached for Board members review. Included in the analysis are the following elements:

- Admission criteria strengthened to interview potential students to determine their qualifications and commitment.
- Implemented a five (5) phase screening and selection process. The five (5) phases assess readiness for academic rigors, cognitive assessment, behavior and attitude and finally enrollment of those who meet the expectations and criteria in each category.
- Teachers have taken the Master Teacher online training by Pearson. Additionally, they attend ongoing faculty workshops.
- Teachers have incorporated, role play, team discussions, critical thinking scenarios, internet based software, and weekly practice tests that are in the NCLEX format.
- Chairpersons designated for theory, skills lab, and clinical. The three (3) designated chairpersons meet once a month to ensure all theoretical concepts are aligned with lab and clinical.
- Adoption of lesson plans that are correlated with the current textbooks, provided by the publishing company.

- Utilizing Elsevier-Evolve online resource materials.
- Remediation is instituted when a student scores less than an 80% on a weekly exam. Five (5) remediations are allowed per module, only.
- Presentations are videotaped and monitored by the director for problems. Additionally, the director monitors student's quizzes and tests.

Currently the program's average annual pass rate is **50%**. This is **22** percentage points **below** the state average annual pass rate. Five (5) classes have been enrolled since the program began in April 2006. Class sizes have been small. A total of 50 students have been enrolled in classes, since inception. Of the 50 enrolled students, 30 have graduated. Twenty-four (24) of the 30 graduates have taken the licensure examination; eleven (11) program graduates have passed the licensure examination.

Recommendations:

1. Approve CET-Nursing to admit a class of 15 students on September 11, 2012 graduating November 23, 2013, to **replace** students who graduated August 19, 2011.
2. Continue to require the program to obtain approval by the full Board prior to admission of each class.
3. Extend Provisional Approval of CET-Nursing Program for the one-year period from September 6, 2012 through September 30, 2013, and issue a notice to the program to identify specific areas of non-compliance and requirements for correction as referenced in Section 2526.1 (e) of the California Code of Regulations (see Attachment D).
4. Require the program to bring its average annual pass rate to no more than ten (10) percentage points below the State average annual pass rate for four (4) consecutive quarters.
5. Require the program to show documented progress by submitting a follow-up report in nine (9) months, but no later than **June 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. 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.
6. Require the program to comply with all accreditation standards in article 4 of the Vocational Nursing Practice Act, commencing at Business and Professions Code section 2880, and article 5 of the California Code of Regulations, title 16, section 2526.
 7. Failure to take any of these corrective actions may cause the full Board to revoke the program's approval.
 8. Place the program on the **September 2013** Board agenda for reconsideration of provisional approval.

Rationale: The program has enrolled 50 students, to date, and graduated 30. Of the 30 graduates, 24 have taken the licensure examination; six (6) graduates have not tested. Of the 24 graduates that tested, eleven (11) passed; thirteen (13) failed.

At the time of placement on provisional accreditation, the program's average annual pass rate was **0%**, 75 percentage points below the state average annual pass rate. Since that time, the program has increased its licensure pass rate to a high of 83% during quarter three (3) of 2011. Subsequent to the program high during quarter three (3) of 2011, the licensure pass rate was 67%, 71% and is currently **50%**. This is 24 percentage points **below** the state average annual pass rate.

Although the current average annual pass rate is 24 percentage points below the state average annual pass rate, the three (3) previous quarters were compliant with regulatory standards. Therefore, the class of 15 students is hesitantly recommended. Extending the Provisional Approval at this time, instead of in November 2012, will decrease staff workload and will allow the program to continue to implement and evaluate the changes reported. Additionally, no significant licensure data is expected before the November 2012 Board meeting.

Currently 14 students are enrolled in classes. The addition of 15 students would give the program a total of 29 students. The current class of 14 students will graduate on May 16, 2013.

- Attachment A: Notice of Change in Accreditation Status Dated November 29, 2011.
- Attachment B: Board Correspondence Dated July 24, 2012.
- Attachment C: Program Correspondence Dated July 26, 2012, Received July 31, 2012.
- Attachment D: Amended Notice of Change in Approval Status, Dated August 17, 2012.
- Attachment E: Draft Notice of Change in Approval Status.

Agenda Item #12.B.2.Attachment A



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

BOARD OF VOCATIONAL NURSING & PSYCHIATRIC TECHNICIANS

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November 22, 2011

Ronald Varian, Director
Center for Education and Technology
13601 E. Whittier Blvd. #209
Whittier, CA 90605

Subject: Notice Change in Accreditation Status

Dear Mr. Varian:

Pursuant to the action of the Board of Vocational Nursing and Psychiatric Technicians (Board) on November 10, 2011, the Center for Education and Technology Vocational Nursing Program's Provisional Accreditation was extended from November 10, 2011, through November 30, 2012. 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 following table sets forth the Center for Education and Technology Vocational Nursing Program's pass rates for the past fourteen (14) quarters.

Quarter	State Annual Average Pass Rate	Program Annual Average Pass Rate
Apr – Jun 2008	75%	33%
Jul - Sep 2008	74%	33%
Oct - Dec 2008	73%	25%
Jan – Mar 2009	72%	25%
Apr – Jun 2009	70%	20%
Jul - Sep 2009	72%	0%
Oct – Dec 2009	73%	0%
Jan – Mar 2010	74%	0%
Apr – Jun 2010	74%	0%
Jul – Sep 2010	75%	25%
Oct – Dec 2010	76%	50%
Jan – Mar 2011	77%	50%
Apr – Jun 2011	76%	60%
Jul – Sep 2011	76%	83%

This data substantiates the program's history of non-compliance with Section 2530(l) of the Vocational Nursing Rules and Regulations for 13 of 14 Quarters. Based on statistics reported for Quarter 3, 2011, the program is compliant with regulatory requirements.

REQUIRED CORRECTION(S)

1. The Center for Education and Technology Vocational Nursing Program must bring its licensure examination annual average pass rate to no more than ten (10) percentage points below the State annual average pass rate for four (4) consecutive quarters.
2. The program must demonstrate continued incremental progress in correcting the violations. If the program fails to satisfactorily demonstrate incremental progress, the full Board may revoke the program's accreditation.
3. The program is required to show documented progress by submitting a follow – up report by **August 1, 2012**. The report must include a comprehensive analysis of the program, specific actions that will be taken to improve program pass rates, timeline for implementation, and effectiveness of employed interventions. The following elements must be addressed in the analysis:
 - a. Current 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.
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 - n. Evaluations of Clinical Rotations and Their Correlation to Theory Presentations.
 - o. Evaluation of Student Achievement.
3. The program must comply with all accreditation standards in article 4 of the Vocational Nursing Practice Act, commencing at Business and Professions Code section 2880, and article 5 of the Board's regulations, commencing at California Code of Regulations, title 16, section 2525.
4. The program shall admit no additional students unless approved by the full Board.

Failure to take these corrective actions may cause the Board to revoke the program's accreditation. 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 2012** 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.**

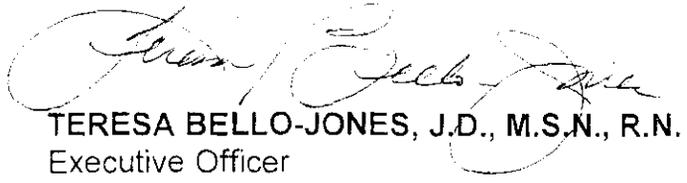
In the event your program is required to submit any report(s) as a corrective action pursuant to this notice, such reports are required in addition to any other reports required pursuant to 2527 of the Board's regulations.

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,



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

Enclosures

cc: Board Members

Agenda Item #12.B.2.Attachment B



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



CERTIFIED MAIL

July 24, 2012

Ronaldo Varian
CET Nursing
Vocational Nursing Program
639 South New Hampshire Avenue, Suite 301
Los Angeles, CA 90005

Re: Consideration of Request to Admit Students

Dear Mr. Varian:

The Board is scheduled to consider **CET Nursing, Vocational Nursing Program's** relative to consideration of 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



ABC Vocational College
dba Center of Education and Technology

Agenda Item #12.B.2.Attachment C

639 S. New Hampshire Ave. #301, Los Angeles, CA 90005
Tel: 1-800-363-5757 • 213-381-2500 • Fax: 213-387-8383
www.cetnursing.com • email: cetnursing@gmail.com

B V N P T

2012 JUL 30 PM 1:54

July 26, 2012

Board of Vocational Nursing and Psychiatric Technician
2535 Capitol Oaks Drive, Suite 205
Sacramento, CA 95833-2945
Attn: Ms. Pam Hinckley, MSN, RN, NEC

Re: Comprehensive Follow-Up Report and Plan to Obtain Additional Clinical Sites

Dear Ms. Hinckley:

Good day to you!

In compliance with the directive and letter dated October 2011 from the Board's executive officer, I am forwarding a follow-up report on the comprehensive analysis of the program prior to the deadline of August 1, 2012. I am also furnishing the Board, fifteen (15) electronic copies of this report.

In addition, I am forwarding your request for a plan to obtain clinical sites in addition to the currently-approved clinical sites by the Board.

Please let me know if you have questions or concerns. We again, in advance would like to express our gratitude for your consideration and continued support in our endeavors.

Respectfully yours,

Ronald G. Verian
Ronaldo G. Verian, RN, MOH
Program Director

CET-NURSING

VOCATIONAL NURSING PROGRAM

639 S. New Hampshire Avenue #301

Los Angeles, CA 90005

PLAN TO OBTAIN STUDENT CLINICAL ROTATIONS FOR A NEW SITE:

Sourcing of New Clinical Sites:

We are Board-approved for the following clinical sites as of July 1, 2012:

1. Temple Hospital;
2. Alexandria Care Center;
3. Dr. Hasung Lee Clinic – for pediatrics;
4. Dr. Bo Suh Clinic – for maternity

Continuous Sourcing of Clinical Sites:

Despite the approvals, we are still continuously sourcing new sites through:

1. Referrals from our ongoing clinical sites;
2. Referrals from our present faculty members and clinical instructors;
3. Getting appointments from nearby hospitals and clinical facilities;
4. We are open for suggestions.

CLINICAL CALENDAR FOR SCHEDULING ROTATIONS:

Length of Rotation per Student (days/weeks/hours) 15 weeks

Assumptions:

1. Wednesdays – Levels II-IV – Temple Hospital (Acute Care)
2. Thursdays – Level I-IV – Alexandria Care Center (SNF)
3. Wednesdays – Level IV – 6 days x 6 hours = Maternity Nursing
4. Thursdays – Level IV – 6 days x 6 hours = Pediatric Nursing

Current Class: Class No. 5

Class No. 5 start date: February 21, 2012

Class No. 5 end Date: May 31, 2013

Future Class: Class No. 6

Class No. 6 start date: TBA

Class No. 6 end Date: TBA

A. Level of Student	I	II	III	IV
B. Starting Calendar Date	03/21/2012	07/11/2012	10/24/2012	02/20/13
Unit/Services	Med-Surg(MS)	Med-Surg(MS)	Med-Surg(MS)	OB/Peds/MS
Number of Students	15	15	15	15
Days of Week	W & Th	W & Th	W & Th	W & Th
Start and End Time of Day	7 am - 3 pm			
Total Hours per Week	16	16	16	16
Pre-Conference Days & Times	7:00- 7:15 am	7:00 - 7:15 am	7:00-7:15am	7:00-7:15 am
Post-Conference Days & Times	2:45-3:00 pm	2:45 - 3:00 pm	2:45-3:00 pm	2:45 - 3:00 pm
Instructor on Site Days & Time	W & Th 7 am - 3 pm	W & Th 7 am - 3 pm	W & Th 7 am - 3 pm	W & Th 7 am - 3 pm

Summary:

Clinical Hours Computation: 8 hrs per day x 2 per week = 16 hours weekly

16 hrs per week x 15 weeks = 240 hours per module

240 hours x 4 modules = **960 hours TOTAL**

Prepared By:

Ronald G. Verian

RONALDO G. VERIAN, RN, MOH

Program Director

CET-Nursing

July 2012

Follow-Up Report

**A Comprehensive Analysis of the Program,
Specific Actions Taken to Improve Program Pass Rates,
Timeline for Implementation
The Effect of Employed Interventions Addressed**

Submitted by

Ronaldo G. Verian, RN, MOH

Program Director

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IN THIS REPORT, THE FOLLOWING ELEMENTS ARE ADDRESSED:

a. Current Student Enrollment

STRENGTHS

CET-Nursing has the goal of attracting the most-fit students into the Vocational Nursing program and filtering them through a new admission procedure. Under our current provisional approval, the maximum number of students allowed by the BVNPT is 15. We have one class at this time with 14 students enrolled.

DEFICIENCIES

CET-Nursing has no Title IV funding and has relied on standard marketing activities. As our school history indicates, our previous student enrollment was only nine even though a maximum of 15 students are allowed to enroll. Of those nine students, three of them dropped from the program.

ACTIONS TAKEN

Since December 2011, the following actions have been put into place:

First, in compliance with the Board's requirement, we have sought prior approval before starting any classes, and notified the Board whenever there was a delay in the class start date.

Second, we have identified some of the deficiencies in our past student population by comparing it to more evidence-based demographic studies of who would likely succeed in this program. As a result, we have revised our admission process and upgraded our selection and screening criteria.

Third, we have created a more systematic process of engagement between faculty and students in order to promptly identify any area of concern in a student's progress, and address any problems immediately.

Fourth, in order to increase the productivity of our school we have secured an Internet-based survey program which allows us to evaluate the effectiveness of our school, including our faculty, curriculum, instructional plan, facilities, clinical sites and student satisfaction.

b. Admission Criteria

DEFICIENCIES

In the past, CET Nursing had admitted students who were not always inclined toward college-level studies. Some applicants had come from non-medical occupations, and some were unemployed.

STRENGTHS

A certain portion of applicants had previously worked as CNAs or Medical Assistants. After interviewing and testing these applicants, many of them succeeded in their Vocational Nursing training.

ACTIONS TAKEN

The admission criteria have been revised, improved and implemented with the following additional steps:

1. Applicants meet with the admission representative to determine their initial qualifications and their commitment to complete the application process;
2. Applicants are required to pass the National League for Nursing Pre-Entrance Exam;
3. Applicants must submit and pass the required health status/drug screening tests, as validated by a physician before acceptance into the program;
4. Applicants must submit to and pass a background check.

These additional requirements have raised our standards of admission and allowed us to secure a more academically-inclined student body.

c. Screening and Selection Criteria

DEFICIENCIES

When CET Nursing had previously enrolled students who recently graduated from High School, many of these students were not adequately prepared for the rigors of a four-semester Vocational Nursing program. Although the current VN class of 14 students looks promising, CET Nursing will not be able to evaluate the effectiveness of our new admissions procedure until the results of the licensure examination after their graduation in May 2013.

STRENGTHS

CET-Nursing has tried to select students with self-discipline, compassion, respect toward others and motivation to learn the material and master the skills necessary to graduate and work successfully.

ACTIONS TAKEN

To improve the selection process, the school owner and the Program Director spent considerable time reviewing the best practices in the nursing education literature. The result is a five-phase process of screening and selection.

Phase I - Introduction of the Candidate to the School and Determination of Commitment to Pursue the Application Process

Preliminary interview with the Admission Representative
Set up appointment to take the entrance exam

Phase II – Cognitive Assessment

Take the National League for Nursing Pre-Entrance Exam
Call back in 24 hours with the exam result and schedule for Phase III

Phase III – Behavioral, Attitude, Maturity and Life Experience Assessment

Interview with Program Director and Academic Advisor. This face-to-face interview covers a broad range of topics and situations in order to elicit an understanding of the applicant's compassion and care for sick clients, as well as their personal commitment to learning and study. Candidates who do not manifest a dedication toward rigorous learning and compassion for others are not allowed to continue to admissions process.

Phase IV – Financial Assessment and Final Determination of Enrollment Fitness

Acceptance letter with a list of documents to prepare in order to complete the admission process.

Set up appointment time with the administrator for Phase V.

Phase V – Formal Enrollment into the VN Program

Meet with the Director to sign the enrollment agreement.

d. Terminal Objectives

Using our usual performance indicators, we still believe that our approved terminal objectives as written in our curriculum and syllabi, meet or exceed our outcome criteria. We plan to continue using these terminal objectives.

DEFICIENCIES

For a few students these objectives were difficult to attain, having passed our previous selection process. Some of them did not possess the maturity to follow-through on such an intensive vocational program.

STRENGTHS

For the majority of our selected students, they met these objectives as evidenced by the increase in pass rates since effectively evaluating our actions toward improving our pass rates.

ACTION TAKEN

We are currently following the approved terminal objectives while we continue to identify gaps or deficiencies. Although there are occasional obstacles, like a sudden drop in NCLEX-PN performance along the way, we have not lost sight of these terminal objectives and will continue to innovate and improve the measurement of our performance indicators.

e. Curriculum Objectives

DEFICIENCIES

CET-Nursing did instruct the students within the approved curriculum objectives, but the manner in which they were implemented was deficient.

STRENGTHS

The approved curriculum objectives were being used as prescribed.

ACTIONS TAKEN

CET-Nursing has recognized that placing continuous and further training into the hands of the faculty is the ideal way to curb the deficiency. Currently, immediately after hiring, a nursing faculty candidate must complete the Master Teacher Online Program under Pearson. This Program addresses specific skills on instruction, preparing lesson plans from the written curriculum, classroom management and how to handle difficult students. In addition, the hired faculty is to attend ongoing faculty workshops and must have at least 30 hours of continuing education every year as written in the employment policy.

f. Instructional Plan

DEFICIENCIES

After scrutinizing our former instructional plan, it became clear that our Vocational Nursing program theory suffered from a static lecture model utilizing PowerPoint.

STRENGTHS

The instructional plan did possess the needed depth of content, and it included all the crucial concepts that must be mastered by the vocational nursing student.

ACTION TAKEN

Beginning in January 2012 CET Nursing has re-arranged the program topics in each module to follow a more authentic progression of nursing skills and knowledge. Along with faculty presentations, the instructional plan now includes activities such as role play, team discussions of complex scenarios for critical thinking, the use of Internet-based software to highlight important points of anatomy and physiology, and weekly practice tests in the style of the NCLEX-PN. These tests include 30 questions on the given program material, and they provide a means for CET Nursing to regularly monitor student outcomes.

g. Theory and Clinical Objectives for Each Course

DEFICIENCIES

The theory and clinical objectives have not been reviewed and re-visited for almost two years.

STRENGTHS

Based on the previously submitted analysis to the Board, it was reported that meetings with an informal advisory board had enabled the staff and Program Director to revise the theory and clinical objectives for each course, and identify content that needed additional time in the lecture discussion.

ACTION TAKEN

Currently, instead of relying on an informal advisory board to review the theory and clinical objectives and to monitor its implementation, the Program Director has shifted this responsibility to himself and the faculty members.

To better organize the review and implementation of theory and clinical objectives, an interim Chair for the Clinical and a Chair for the Skills Lab have been appointed. Together with the Program Director who is the acting Chair for Theory, these three meet once a month to ensure that all the theoretical concepts are aligned with the skills lab and clinical rotations. During this meeting, students with a deficiency in one of the three areas are identified and plans made to fortify their learning process.

h. Lesson Plans for Each Course

DEFICIENCIES

Although our school had previously begun to utilize more innovative teaching techniques, the lesson plans used were not closely tied to a clear instructional plan. As a result, some of the lesson plans did not address the theoretical and clinical objectives.

STRENGTHS

The faculty members were encouraged to use other teaching strategies besides lecture.

ACTION TAKEN

For the theory, the Program Director and faculty of CET Nursing have chosen to adopt the lesson plans provided by the textbooks' publishing companies in their basic curricular outline. The Program Director has made some minor modifications of these lesson plans based on the particular needs of our student body.

Secondly, a faculty and student calendar is distributed every module to encourage both faculty and students to plan their learning activities simultaneously, and better prepare themselves for the weekly evaluation exams.

i. Textbooks

DEFICIENCIES

Our Nursing program formerly had an extensive list of textbooks for required reading, but some of these texts were not utilized in class or even used as a reference.

STRENGTHS

CET Nursing has always utilized nationally-recognized texts and electronic media to fortify the Vocational Nursing program. All students had access to quality materials to help them in their training and preparation for the NCLEX-PN Test.

ACTION TAKEN

Currently CET Nursing uses one reference textbook each for Foundations and Adult Health Nursing, Basic Anatomy and Physiology, Pharmacology, Skills Lab, and the NCLEX-PN. This is to streamline the utilization of resources and to draw more focus in a complex world of resources. The students use appropriate technology in class and at home as they have been enrolled with

Elsevier-Evolve online resource materials. In the interest of innovation, CET-Nursing is currently studying trends from the National League for Nursing in using effective technology to aid the learning process.

j. **Attendance Policy**

DEFICIENCIES

Performance indicators and outcomes show this is not a concern of our current students. Attendance standards have been met continuously and consistently.

STRENGTHS

Students have been effectively monitored to maintain the attendance standards.

ACTION TAKEN

CET Nursing installed an electronic scanning system so that every student scans in and out when they enter and exit the school. Standards for mandatory attendance were explained to all the students during orientation, and as of March, 2012 their average attendance has remained at 96% or higher.

k. **Remediation Policy**

DEFICIENCIES

The remediation policy has been generally effective, but there were some lapses in implementation.

STRENGTHS

We have worked with students who fall behind by offering a time of remediation under the supervision of the Program Director, who monitored each student's progress.

ACTION TAKEN

Our current remediation policy requires students who achieve less than a minimum score of 80% on a weekly exam, to do remediation work on an extra weekday. The corrective plan or remediation is designed by the Program Director and discussed with the student. Once the

corrective plan has been successfully accomplished, the Program Director meets with the student, signs the completed remediation document and places it in the student's file.

For Class 5 the average weekly number of students using this remediation has been 2.3 out of 14 students, or 17%. A student is allowed to have up to five remediation days during a 15-week module. If a student requires more than five remediation days per module, the student may be asked to postpone their program to the next VN class, or could be terminated from the Vocational Nursing program.

I. Evaluations of Theory and Clinical Faculty

DEFICIENCIES

There has been no effective evaluative measure of both the theory and clinical faculty.

STRENGTHS

The Program Director is aware that failure in evaluation is failure in implementation as well as failure in assisting the nursing faculty in achieving their goals and professional satisfaction.

ACTION TAKEN

CET Nursing has implemented an Internet-based evaluative tool that allows all theory and clinical faculty members to be evaluated by the Program Director, Academic Advisor and students. The evaluative process is explained at the faculty orientation, which consists of two elements: first, during the first month of instruction a classroom observation is done by the Program Director and/or Academic Advisor. Second, at the end of each module all the students fill out an anonymous evaluation of their instructors. The Program Director and School Director meet with the nursing faculty twice a year to discuss the results of the evaluation and to plan strategies and actions for improvement. Furthermore, in December of every year, all faculty members are given a performance appraisal by their supervisor.

m. Evaluations of Theory Presentations

DEFICIENCIES

We acknowledge some gaps in theory presentations that have been identified via videotape.

STRENGTHS

For purposes of evaluating the presenter, and in order for a student to review content for their remediation, all theory and skills lab presentations have been videotaped. The Program Director has periodically reviewed a presentation with the concerned faculty member in private, and discussed ways to improve the theory presentations in the future.

ACTION TAKEN

CET Nursing is now evaluating the effectiveness of every presentation, not only by having the Program Director review various video presentations, but also by looking more closely at the results of each weekly exam. Whenever a particular clinical or theoretical topic deficiency is identified, this is immediately addressed during the following week's classroom presentations. When the deficiency is apparent with only one or two students, they are given a remediation assignment.

n. Evaluations of Clinical Rotations and Their Correlation to Theory Presentations

DEFICIENCIES

In the past, some of the clinical sites did not always offer an adequate clinical experience for the students which would relate well to their current module.

STRENGTHS

The clinical sites did provide some measure of practical experience for our former students.

ACTION TAKEN

CET Nursing has secured two new clinical sites which together will encompass the breadth of clinical experience the students need before employment. Temple Hospital is an acute care facility, and Alexandria Care Center is a long-term care facility. They not only provide students with a variety of cases and experiences to learn from, but also provide a significant population diversity.

At the end of the second, third and fourth modules, all students are given an electronic evaluation form of the clinical site they visited, to help measure the relevance of the clinical experience with their learning objectives. These evaluations are tabulated and the results discussed among the Program Director and members of the faculty.

o. Evaluation of Student Achievement

DEFICIENCIES

Currently, the one major deficiency is the poor performance of a group of our former graduates when taking the NCLEX-PN. Throughout the VN program, the students' focus and attention span were not stretched with rigorous exams that simulate the NCLEX-PN. The highest number of questions on a weekly exam was 30.

STRENGTHS

Students were regularly tested to learn where there were deficiencies in knowledge or skills. The students were given a monthly progress report, and the Program Director discussed ways for them to improve their performance. After the end of the fourth module, students were given a complete 'mock' NCLEX exam to simulate the experience before they actually took one.

ACTION TAKEN

CET Nursing continues to give weekly exams to the students, but now we are incorporating a midterm with 100 questions and a final with 150 questions once during each module. Orientation to the NCLEX-PN begins at the start of the first module with 90-minute practice sessions on the NCLEX-PN each week. Once a month the Program Director writes a monthly progress report for each student and discusses it face to face before it is signed and placed in the student file.

Conclusion

Since November 2011 several changes took place for our school, including a new location, a new name (from Center of Education and Technology to CET Nursing), and most important, a new focus on Nursing and the hiring of top-quality faculty members. Furthermore, our new facility contains dedicated rooms for theory and skills lab.

The school has approached these changes with caution, even though the finances of our school have been jeopardized by going for almost a year without having a new class start. We had obtained approval for Class 5 on May 23, 2011 for a new start date but were delayed until February 21, 2012 in order to accommodate the changes. Furthermore, when the request for Class no. 6 as replacement for Class no. 4 was submitted to the Board, the school complied and accepted the request of the NEC to place the request on the September 2012 Board Meeting as the agenda was full for the May 2012 Board Meeting. The collective and united decision from the school owner and the program director to delay was to put solid corrective actions and not

to wait for the Board to remind the school of its obligations to California consumers and to the public.

CET Nursing has come to terms with their poor track record in the past, and we are taking seriously the requests made by the BVNPT board. We have adopted the vision of becoming a professional nursing school, and are preparing to apply for accreditation with ABHES in November 2012. When we take a cursory look at our current 14 students in Class 5, they are progressing very well in theory, lab skills and their clinical assignments. We are confident that beginning with Class 5, the BVNPT board will witness the marked improvement in our students' performance.

The school also made sure to comply with all the directives coming from state agencies including the BVNPT, by obtaining prior approvals for start dates of classes and the submission of timely reports.

Agenda Item #12.B.2.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) 263-7859 Web www.bvnpt.ca.gov



August 17, 2012

Ronald Varian, Director
Center for Education and Technology
13601 E. Whittier Blvd. #209
Whittier, CA 90605

Subject: Notice Change in Accreditation¹ Status

Dear Mr. Varian:

Pursuant to the action of the Board of Vocational Nursing and Psychiatric Technicians (Board) on November 10, 2011, the Center for Education and Technology Vocational Nursing Program's Provisional Accreditation was extended from November 10, 2011, through November 30, 2012. The term of Provisional Approval has been revised to November 10, 2011, through September 30, 2012.

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, August 24, 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 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.

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.

- ...
- (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 following table sets forth the Center for Education and Technology Vocational Nursing Program's pass rates for the past fourteen (14) quarters.

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 2008	75%	33%	-42
Jul - Sep 2008	74%	33%	-41
Oct - Dec 2008	73%	25%	-48
Jan – Mar 2009	72%	25%	-47
Apr – Jun 2009	70%	20%	-50
Jul - Sep 2009	72%	0%	-72
Oct – Dec 2009	73%	0%	-73
Jan – Mar 2010	74%	0%	-74
Apr – Jun 2010	75%	0%	-74
Jul – Sep 2010	75%	25%	-50
Oct – Dec 2010	76%	50%	-26
Jan – Mar 2011	77%	50%	-27
Apr – Jun 2011	76%	60%	-16
Jul – Sep 2011	76%	83%	+7
Oct – Dec 2011	75%	67%	-8
Jan – Mar 2012	74%	71%	-3
Apr – Jun 2012	74%	50%	-24

This data substantiates the program's history of non-compliance with Section 2530(l) of the Vocational Nursing Rules and Regulations for 14 of 17 Quarters.

REQUIRED CORRECTION(S)

1. The Center for Education and Technology Vocational Nursing Program must bring its licensure examination annual average pass rate to no more than ten (10) percentage points below the State annual average pass rate for four (4) consecutive quarters.
2. The program must demonstrate continued incremental progress in correcting the violations. If the program fails to satisfactorily demonstrate incremental progress, the full Board may revoke the program's accreditation.
3. The program is required to show documented progress by submitting a follow – up report by **August 1, 2012**. The report must include a comprehensive analysis of the program, specific actions that will be taken to improve program pass rates, timeline for

implementation, and effectiveness of employed interventions. The following elements must be addressed in the analysis:

- a. Current Enrollment.
 - b. Admission Criteria.
 - c. Screening and Selection Criteria.
 - d. Terminal Objectives.
 - e. Curriculum Objectives.
 - f. Instructional Plan.
 - g. Theory and Clinical Objectives for Each Course.
 - h. Lesson Plans for Each Course.
 - i. Textbooks.
 - j. Attendance Policy.
 - k. Remediation Policy.
 - l. Evaluations of Theory and Clinical Faculty.
 - m. Evaluations of Theory Presentations.
 - n. Evaluations of Clinical Rotations and Their Correlation to Theory Presentations.
 - o. Evaluation of Student Achievement.
3. The program must comply with all accreditation standards in article 4 of the Vocational Nursing Practice Act, commencing at Business and Professions Code section 2880, and article 5 of the Board's regulations, commencing at California Code of Regulations, title 16, section 2525.
 4. The program shall admit no additional students unless approved by the full Board.

Failure to take these corrective actions may cause the Board to revoke the program's accreditation. 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 **September 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,

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

Enclosures

cc: Board Members

Agenda Item # 12.B.2.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

Ronoldo Varian
CET-Nursing
Vocational Nursing Program
639 South New Hampshire Avenue, Suite 301
Los Angeles, CA 90005

Subject: Notice of Change in Approval Status

Dear Mr. Varian:

Pursuant to the action of the Board of Vocational Nursing and Psychiatric Technicians (Board) on September 6, 2012, the provisional approval status of the CET-Nursing Vocational Nursing Program has been extended for the one – year period from September 6, 2012 through September 30, 2013. Please sign and return the enclosed “Acknowledgement of Change in Approval 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 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 Valley College of Allied Health Vocational Nursing Program for the past sixteen (16) quarters are set forth in the following table.

NCLEX-PN® Licensure Examination Pass Rates			
Quarter	State Annual Average Pass Rate	Program Annual Average Pass Rate	Variance from State Annual Average Pass Rate
Jul - Sep 2008	74%	56%	-18
Oct - Dec 2008	73%	45%	-28
Jan - Mar 2009	72%	50%	-22
Apr - Jun 2009	70%	43%	-27
Jul - Sep 2009	72%	50%	-22
Oct - Dec 2009	73%	46%	-27
Jan - Mar 2010	74%	46%	-28
Apr - Jun 2010	75%	49%	-25
Jul - Sep 2010	75%	50%	-25
Oct - Dec 2010	76%	57%	-19
Jan - Mar 2011	77%	61%	-16
Apr - Jun 2011	76%	61%	-15
Jul - Sep 2011	74%	64%	-10
Oct - Dec 2011	75%	72%	-3
Jan - Mar 2012	74%	65%	-9
Apr - Jun 2012	74%	61%	-13

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

REQUIRED CORRECTION(S)

1. The Center of Education and Technology shall bring its average annual pass rate to no more than ten (10) percentage points below the State average annual pass rate for four (4) consecutive quarters by **September 30, 2013**.
2. The program shall show documented progress by submitting a follow-up report in nine (9) months, but no later than **June 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. 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.
6. 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.
 7. Failure to take any of these corrective actions may cause the full Board to revoke the program's approval.
 8. The program shall be required to obtain approval by the full Board prior to the admission of future classes.
 9. 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 **September 2013** Board Meeting agenda for reconsideration of your approval status. The nursing education consultant assigned to your program will ask you to submit documentation of the correction of your violation(s) 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: 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