Agenda Item #5.E.3.A.

STATE OF CALIFORNIA
dca
DEPARTMENT OF CONSUMER AFFAIRS

BUSINESS, CONSUMER SERVICES, AND HOUSING AGENCY • GOVERNOR EDMUND G. BROWN JR.

BOARD OF VOCATIONAL NURSING & PSYCHIATRIC TECHNICIANS
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DATE: October 15, 2013

TO: Board Members

Suellen Clayworth

FROM: Suellen Clayworth, M.N., R.N.
Nursing Education Consultant – Retired Annuitant

SUBJECT: Franklin Career College Vocational Nursing Program - Consideration of Provisional Approval (Director: **VACANT**, Ontario, San Bernardino County, Private)

The Education Division Report on the Franklin Career College Vocational Nursing Program summarizes the program's violations of the California Code of Regulations and includes program licensing examination statistics and other relevant information. The report with relevant items are attached to this memorandum.

On September 13, 2013, a report relative to the Franklin Career College Vocational Nursing Program was considered by less than a quorum of the full Board (see **draft** September 13, 2013, Board Meeting Minutes, attached to Agenda Item #5). The recommendations from that meeting were to accept the report and adopt the recommendations with the following changes.

- Suspend approval of the Franklin Career College Vocational Nursing Program during the period of time the program lacks the ability to instruct students pursuant to California Education Code Section 94886.

Attachment A: Agenda Item #11.C.1. Franklin Career College Vocational Nursing Program – Consideration of Provisional Approval, Dated August 28, 2013.

Agenda Item #11.C.1.

STATE OF CALIFORNIA
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DEPARTMENT OF CONSUMER AFFAIRS

BUSINESS, CONSUMER SERVICES, AND HOUSING AGENCY • GOVERNOR EDMUND G. BROWN JR.

BOARD OF VOCATIONAL NURSING & PSYCHIATRIC TECHNICIANS
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DATE: August 28, 2013

TO: Board Members

FROM: Suellen Clayworth, M.N., R.N.
Nursing Education Consultant, Retired Annuitant

SUBJECT: Franklin Career College Vocational Nursing Program – Consideration of Provisional Approval (Director: **VACANT**, Ontario, San Bernardino County, Private)

Franklin Career College Vocational Nursing Program is presented to the Board for consideration of placement on provisional approval.

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…"

History of Prior Board Actions

(See Attachment A, History of Prior Board Action)

Enrollment

Each class admission to the 52-week full-time program must have prior Board approval. The pattern of admissions for current classes is seen in the enrollment table below.

The following table represents **current and projected** student enrollment based on the current and proposed class start dates. The table indicates a **maximum enrollment of 40 students** for the period **August 2011 through April 2014.**

ENROLLMENT DATA				
CLASS DATES		#Students Admitted	#Students Current or Completed	Total Enrolled
Start	Completed			
8/11		20	14	**14**
4/12		36	23	14 + 23 = **37**
	9/12 (8/11 Class)		-14	37 – 14 = **23**
9/12		21	17	23 + 17 = **40**
	5/13 (4/12 Class)		-23	40 – 23 = **17**
5/13		9	6	17 + 6 = **23**
	9/13 (9/12 Class)		-17	23 – 17 = **6**
	4/14 (5/13 Class)		-6	6 – 6 = **0**

Licensing Examination Statistics

The following statistics, furnished by Pearson VUE and published by the National Council of State Boards of Nursing as "Jurisdictional Summary of All First-Time Candidates Educated in Member Board Jurisdiction" for the period October 2010 to June 2013, specify the pass percentage rates for graduates of the Franklin Career College Vocational Nursing Program on the National Council Licensure Examination for Practical/Vocational Nurses (NCLEX-PN®).

NCLEX-PN® Licensure Examination Data							
Quarterly Statistics					Annual Statistics*		
Quarter	# Candidates	# Passed	% Passed	State Quarterly Pass Rate	Program Average Annual Pass Rate	State Average Annual Pass Rate	Variance from State Annual Average Pass Rate
Oct – Dec 2010	**No Candidates Tested**			77%	**50%**	76%	**-16**
Jan – Mar 2011	**No Candidates Tested**			80%	**0%**	77%	**-77**
Apr – Jun 2011	7	7	100%	71%	88%	76%	+12
Jul – Sep 2011	**No Candidates Tested**			74%	100%	75%	+25
Oct - Dec 2011	10	10	100%	74%	100%	75%	+25
Jan - Mar 2012	15	10	67%	77%	84%	74%	+10
Apr - June 2012	6	4	67%	72%	77%	74%	+3
Jul – Sep 2012	6	4	67%	74%	76%	74%	+2
Oct – Dec 2012	9	3	**33%**	70%	**58%**	74%	**-16**
Jan – Mar 2013	14	11	79%	75%	**63%**	73%	**-10**
Apr – Jun 2013	2	0	**0%**	78%	**58%**	73%	**-15**

*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 2013), the program's average annual pass rate is **58%**. The California average annual pass rate for graduates from accredited vocational nursing programs who took the NCLEX-PN® Licensure Examination for the first time during the same period is **73%**. The average annual pass rate for the Franklin Career College Vocational Nursing Program is **15 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."

Board documentation indicates that the current number of Board-approved faculty totals ten (10) including the director. The director has 100% administrative duties. Of the total faculty, nine (9) instructors are approved to teach clinical. Recent information provided by the program, however, indicates that, in reality, adequate faculty has not been available to support enrolled students. Please see the *Other Considerations* section of this report for details.

Based on a maximum enrollment of 40 students, three (3) instructors are required. It is clear that for an undesignated period of time (at least several months) the number of faculty was **not** adequate for the current enrollment.

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

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

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

Other Considerations

On May 1, 2013, the assigned consultant received a telephone call from the director of the Franklin Career College Vocational Nursing Program reporting that she had no support from administration and had not been able to hire instructors. As a result of having too few clinical instructors, the director reported that students were not getting their required clinical hours. The director was asked to submit a list of all students and the number of hours each student missed, along with a cover letter explaining the situation and a plan for how she would have each student make up the missed clinical hours.

On May 7, 2013, the director submitted the requested documentation (See Attachment B). At the time of that report, students had reportedly missed between 22 and 80 hours of clinical experience due to the lack of the appropriate number of instructors. The director proposed a plan for students to complete missed clinical experience in the school skills lab under the supervision of two (2) instructors. To accommodate the clinical make-up time, the graduation date of the Term 4 students would be delayed. Schedules for the other terms would also be revised.

The director was asked whether the planned skills lab experience would allow the students to meet all of the stated clinical objectives for the time that was missed in clinical facilities. She responded with an email on May 15, 2013, stating that the students would be able to meet all of the missed clinical objectives in the skills lab. (See Attachment C)

On June 24, 2013, the Board received an email from the director indicating that she had resigned her position effective June 25, 2013.

On July 3, 2013, the Board received an email from Petra Arredondo-Rios, the Executive Director for Franklin Career College notifying the Board that the program director had resigned. Further, she reported that the VN Program currently had three (3) part-time theory instructors and one (1) of those had resigned effective July 15, 2013. No clinical instructors were mentioned. At the time of this email, the VN program reportedly had 44 students enrolled, divided into three (3) groups. The Executive Director stated that the program would be sending an application for a new director.

On July 8, 2013, the Board received complaints from a number of students alleging critical program deficiencies. Students reported the following:

- The program is without a director.
- The program lacks enough instructors;
- The instructors change “on a daily basis”, and
- Sometimes no instructor is available.

(See Attachment D)

The complaints go on to state that the students have tried to talk to administration, but have been redirected to a current instructor who has been made Director of Education for the school. The students reported feeling betrayed and feeling like their future has been threatened because they are not receiving adequate education.

On July 11, 2013, the Board received an application for Cherry Clement to be the new program director. That application was approved on July 11, 2013. The program was requested to provide Ms. Clement’s email address. That information was received on July 17, 2013 and New Director Orientation materials were sent to her.

On July 11, 2013, an email was sent to Ms. Arredondo-Rios asking that she and the new program director come to the Board’s office in Sacramento to discuss the status of the VN Program. That meeting was held on July 18, 2013 at the Board’s office in Sacramento. The meeting was attended by Petra Arredondo-Rios, Executive Director, Patricia Armstrong, L.V.N., Director of Education, and Michael Vu, Regional Director for ResCare Workforce Services, the company that owns Franklin Career College. Program representatives reported that the new program director would not attend the meeting because she had not yet completed all steps of ResCare’s hiring process. Board representatives at this meeting were Cheryl Anderson, Supervising Nursing Education Consultant and Suellen Clayworth, the program’s assigned Nursing Education Consultant.

Board representatives advised program representatives of statutory and regulatory requirements for all approved VN programs. Discussion during the meeting focused on identifying program issues that were causing the current problems at the school and hindering student achievement. Board representatives suggested that the program be placed in hiatus until assessment testing was competed and remediation could be done to bring all students to their expected level for their respective term in the program.

Information obtained during the meeting substantiated the allegations relative to inadequacy of program faculty. Additionally, other critical program issues were identified.

Based upon information obtained during the meeting, subsequent discussion, and documentation submitted by the previous director, the following violations of the California Code of Regulations were identified:

Section 2526(a)(7) of the California Code of Regulations states:

> **"The institution shall apply to the Board for approval. Written documentation shall be prepared by the director and shall include:**
> **(7) Instructional Plan."**

Violation #1: Submitted information confirmed that the program was providing instruction that was inconsistent with the Board-approved Instructional Plan. Program representatives reported that a copy of the Board – approved curriculum was not available.

Plan of Correction #1: This violation is **corrected.** The Board-approved instructional plan was found and has been implemented according to the new program director,

"This administration has implemented use of the instructional plan. The students are given a syllabus and Daily calendar. We have scheduled monthly staff meetings so everyone can be on the same page."

Section 2529(b) of the California Code of Regulations states:

> **"(b) 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 #2: The program did not have a Board-approved director in place to actively administer the program for more than 10 days during the time students were enrolled and attending classes.

Additionally, submitted information confirmed that the organization's hiring process significantly impeded the director's ability to secure adequate qualified faculty for the enrolled population.

Plan of Correction #2: This violation is **corrected.** A director was approved on July 11, 2013. The organization has voiced its commitment to expediting the hiring process for new faculty. Since May 2013, three (3) new instructors have been approved for the program.

Section 2530(a) of the California Code of Regulations states:

"(a) The program shall have sufficient resources, faculty, clinical facilities, library, staff and support services, physical space, skills laboratory and equipment to achieve the program's objectives."

Violation #3: Submitted information confirmed that the program failed to provide adequate resources for the students over a prolonged period of time. Specifically the program failed to provide an adequate number of qualified Board – approved instructors for the enrolled student population. As a result, students missed an undocumented number of hours of theory instruction and up to 80 hours of clinical instruction per student.

Further, the program failed to provide textbooks for the students that were consistent with the approved plan of instruction. Program representatives reported that textbooks were available; however, they were not disseminated to students. In many cases, students were given copies of materials; frequently, students received no educational reference materials.

Plan of Correction #3: This violation is **not corrected.** The program sent a list of the textbooks used, but did not address the supply of textbooks to the students.

Section 2530 (e) of the California Code of Regulations states"

"(e) Each instructor shall have a daily lesson plan which correlates the theory and practice offered to the student. A copy of this plan shall be available to the director."

Violation #4: Submitted information substantiated that the program did not have daily lesson plans that were consistent with the Board – approved curriculum and correlated theory and practice offered to students.

Plan of Correction #4: This violation is **not corrected**. The director indicated that the approved instructional plan had been found and that instructors are using it; however, no mention of lesson plans was included.

Section 2530(l) of the California Code of Regulations states:

"(l) 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 approved vocational nursing schools for the same period."

Violation #5: During the past three (3) quarters, the program's licensure examination pass rate has been successively **16, 10 and 15** points **below** state average annual pass rates. Of the 25 graduates who tested during those quarters, only 14 graduates or 56% have passed the licensure examination; 44% failed.

Plan of Correction #5: This violation is **not corrected.**

Section 2532(b) of the California Code of Regulations states:

"(b) The minimum hours required shall be as follows: Theory Hours-576, which shall include a minimum of 54 hours in pharmacology; Clinical Hours-954."

Violation #6: As approved by the Board, the program curriculum contains 1,560 hours, 580 theory and 980 clinical hours.

Information provided by program representatives confirmed that the approved plan of instruction was not being used. Since the approved instructional plan was not being utilized and instructors' lesson plans were not developed, followed, nor monitored, it is unclear what content was taught. Further, information reported and substantiated confirmed that the program had failed to provide all theory and clinical content and hours consistent with the approved plan and schedule of instruction.

Plan of Correction #6: This violation is **not corrected.** The violation was admitted. The new director subsequently indicated that the approved instructional plan was found and is currently being implemented to offer the approved number of program hours.

Section 2533(a) of the California Code of Regulations states:

"(a) Vocational nursing programs shall include theory and correlated clinical experience."

Violation #7: The program's curriculum as approved by the Board included 1,560 hours (Theory - 580 hours; Clinical - 980 Hours). Information submitted and confirmed substantiates that the program failed to provide instruction consistent with the Board – approved instructional plan. Further, the program failed to provide students instruction in the sequence nor amount consistent with the Board – approved curriculum. Students missed both theory and clinical content and hours of instruction.

Plan of Correction #7: This violation is **not corrected.** This violation was admitted. The new director subsequently indicated that the approved

instructional plan was found and is currently being implemented to offer the correlated theory and clinical content.

Section 2533(b) of the California Code of Regulations states:

"(b) The curriculum shall develop the knowledge, skills, and abilities necessary to care for patients of all ages in current health care settings."

Violation #8: Based on information provided by school representatives, including the fact that there seemed to be no stable instructional plan in place, it is difficult to tell what content and amount of education students received and whether they were being prepared to provide safe and competent care to patients.

Plan of Correction #8: This violation is **not corrected.** This violation was admitted. The new director states that the program is currently assessing the students' level of knowledge, skills and abilities using ATI tests to determine consistency with the curriculum and is planning to take a 2 week hiatus to remediate students as needed before continuing the program.

Section 2533(c) of the California Code of Regulations states:

"(c) Curriculum content shall be taught in a sequence that results in students' progressive mastery of knowledge, skills and abilities."

Violation #9: Submitted information substantiates that the program lacked consistent implementation of a stable instructional plan. As presented, instruction was based on the presence or lack thereof, of faculty availability, rather than scheduled curricular content. As a result, it is unclear what content the students received and whether the students demonstrated progressive mastery of knowledge, skills and abilities.

The program's pass rates on the licensure examination indicate program graduates were unable to demonstrate progressive mastery of knowledge, skills, and abilities required for the delivery of safe and competent patient care.

Plan of Correction #9: This violation is **not corrected.** This violation was admitted. The new director states that the program is currently assessing the students for knowledge, skills and abilities using ATI tests and is planning to take a 2 week hiatus to remediate students as needed before continuing the program.

Section 2533(d) of the California Code of Regulations states:

"(d) The curriculum content shall include:
(1) Anatomy and physiology
(2) Nutrition
(3) Psychology
(4) Normal growth and development
(5) Nursing fundamentals
(6) Nursing process
(7) Communication, both verbal and written, including communication with patients who have psychological disorders
(8) Patient education
(9) Pharmacology which shall include:
(A) Knowledge of commonly used drugs and their action
(B) Computation of dosages
(C) Preparation of medications
(D) Principles of administration
(10) Medical-surgical nursing 40
(11) Communicable diseases, which shall include but not be limited to Human Immunodeficiency Virus (HIV)
(12) Gerontological nursing
(13) Rehabilitation nursing
(14) Maternity nursing
(15) Pediatric nursing
(16) Leadership
(17) Supervision
(18) Ethics and unethical conduct
(19) Critical thinking
(20) Culturally congruent care
(21) End-of-life care"

Violation #10: Board records confirm that the program had an approved curriculum that contained instruction in all content areas as required in existing regulations.

However, submitted information substantiates that the program lacked consistent implementation of a Board - approved plan of instruction. Significant numbers of theory and clinical hours were missed in each term of the curriculum. Further, submitted information confirmed that the program had inadequate faculty resources for the enrolled population. Given the foregoing, it is unclear what content, sequence of presentation, or amount of education students received.

Plan of Correction #10: This violation is **not corrected.** This violation was admitted. The new director subsequently indicated that the approved instructional plan was found and is currently being implemented to offer all required content.

Section 2533(f) of the California Code of Regulations states:

> **"(f) All curricular changes that significantly alter the program philosophy, conceptual framework, content, objectives, or other written documentation as required in Section 2526, shall be approved by the Board prior to implementation. Proposed curricular changes must be submitted to the Board in final form by the fifteenth day of the second month preceding the month of the Board meeting at which the changes will be considered."**

Violation #11: Information provided by program representatives substantiates that the program lacked stability in the implementation and monitoring of its instructional plan. Further, submitted information confirmed that program faculty frequently, based instruction on the presence or lack thereof, of available faculty, rather than scheduled curricular content sequence or amount in the approved curriculum.

Plan of Correction #11: This violation is **not corrected.** This violation was admitted. The new director subsequently indicated that the approved instructional plan was found and is currently being implemented to offer required content. Additionally, the director stated that there will be monthly staff meetings to assure that all faculty are following the approved instructional plan.

At the conclusion of the meeting, Board representatives requested program representatives to submit the following documents via email no later than Thursday, July 25, 2013.

1. A corrected list of faculty with the dates that faculty members left the program.

2. A corrected list of clinical facilities with the dates of approval, clinical experience provided, and dates that approved clinical facilities stopped being used by the program.

3. Names of all enrolled students, the number of theory and clinical hours that each student did not receive due to lack of instructors, and the method and dates on which those hours were/will be made up. The supervising instructor's name was to be included.

4. List of current textbooks.

5. Program's revised organizational chart.

6. A copy of the current student handbook.

On July 25, 2013, the Board received documents from the new program director; however, the list of enrolled students did not include information regarding the number of

theory or clinical hours missed and how those hours were made up. The new director stated:

> "In regards to providing the clinical hours that students missed due to a lack of instructors, I have been unable to find any supporting documentation. All the make- sheets have personal reasons for missed clinical days/hours. The calendar also does not show any missed clinical days because of a call off or instructor absence. There are no payroll days missing clinical days/hours to support that instructors missed clinical days/hours.
>
> In reviewing the Instructional plan and the hours the students accumulated, there appears to be a misrepresentation or miscalculation of hours showing the students were short. The students have an excess of hours because of the make-up skills days added to accommodate the perceived shortage of hours." (See Attachment E)

On July 31, 2013, the Board received a formal response from the new director of the program related to the issues identified. (See Attachment F) In the response, the director indicated that there are discrepancies in the documentation done by the previous director making it impossible to determine the actual numbers of hours of theory and clinical that were missed by the students. She stated that students report missing clinical and theory hours.

The director identified that the program had no substitute instructors. If an instructor could not fulfill his/her teaching assignment, there was no substitute instructor to call. At the time the previous director resigned, three (3) of the instructors also resigned.

The new director stated that the program has an approved instructional plan and that instructional plan folders were located in the classrooms; however, the instructors were not using the instructional plan. She went on to state,

> "As a result, it is true that some students did not receive correlated theory and clinical or adequate theory instruction."
>
> "This administration has implemented use of the instructional plan. The students are given a syllabus and Daily calendar. We have scheduled monthly staff meetings so everyone can be on the same page. This administration is committed to the success of our students. Appropriate scheduled testing will also allow staff to determine areas of weakness for remediation on an on-going basis."

Additionally, the director stated:

> "The current students are being tested using a standardized test (ATI) to determine their level of knowledge. This administration is considering a hiatus to remediate instead of continuing current classes until the students can achieve basic med/surgical level. We are asking for the Board approval to adjust the graduation date to accommodate the hiatus. Estimated time of 2

weeks of intense progressive remediation based on areas of deficiency as shown by the testing topic areas."

The director addressed the program's non-compliant licensure examination pass rate and stated that the program is encouraging current and past graduates to attend review classes offered by the program. She went on to state:

> "This administration is interested in the success of each student here at Franklin Career College. There is a lot to rectify. The students have definitely been short changed. This administration has met with the students and we are working collaboratively to achieve their success.
>
> We are asking to board reconsider putting the college on a provisional accreditation and allow the changes we are implementing to take root and affect change not only in the pass rate but also in the morale of the students."

On August 2, 2013, in response to a question from the director, the assigned nursing education consultant sent electronic correspondence to the director indicating that the program does not require prior Board approval related to the planned two-week hiatus that will be used for student remediation.

On August 4, 2013, the director submitted the results of the assessment testing that had been done since she became the director. (See Attachment G) She listed the following results:

Term 4 students (class about to graduate):

Number of Students	Results indicating Probability of Passing NCLEX-PN®
1	88-90%
1	80-82%
1	57-72%
11	15-54%

Term 3 students:

Number of Students	Results indicating Probability of Passing NCLEX-PN®
1	88-90%
Remaining Students	1-54%

The director indicated that with the knowledge she has gained about the students' lack of preparation for the licensure examination she, "in all good conscience", cannot allow the Term 4 students to graduate until they have completed remediation. She is in the

process of developing a schedule of remediation although no discussion of a program hiatus was part of the plans.

The director also indicated that she had not known the extent of the problems within the program when she was hired and is now feeling overwhelmed, especially since she was just told that the two computers belonging to the previous director had, "fried and died."

On August 21, 2013, the Accrediting Council for Continuing Education and Training (ACCET) notified Franklin Career College - Ontario and Norwalk campuses, via email and Federal Express that the Commission voted to withdraw the school's accreditation, effective August 21, 2013, at its August 2013 meeting (see Attachment I). The school has 15 calendar days from receipt of the letter to appeal ACCET's action – by September 5, 2013. In the absence of an appeal, revocation of the school's accreditation by ACCET and revocation of approval by the California Bureau for Private Postsecondary Education (Bureau) will be final (see Attachment J). It's important to note that California Education Code Section 94886 prohibits the school from providing a course of instruction without express authority from the Bureau.

On August 29, 2013, Jo Anne Wenzel, Chief, Bureau for Private Postsecondary Education, informed the Board that a Bureau representative attended an onsite assembly with Franklin Career College administration and enrolled students on August 27, 2013. At this meeting, students were informed of their rights under the Student Tuition Recovery Fund.

Recommendations:

1. Suspend approval of the Franklin Career College Vocational Nursing Program during the period of time the program lacks the ability to instruct students pursuant to California Education Code Section 94886.

2. Should the Franklin Career College Vocational Nursing Program appeal the action of ACCET and the Bureau, place the program on provisional approval for the five-month period from **September 13, 2013,** through **February 28, 2014,** and issue a notice to the program to identify specific areas of noncompliance and requirements for correction, as referenced in Section 2526.1 (e) of the California Code of Regulations. (See Attachment H)

3. Require the program to submit documented proof of approval by the California Bureau for Private Postsecondary Education.

4. Require the program to obtain expressed approval by the full Board prior to the admission of each class.

5. Using the form provided by the Board as a guide, submit the following documentation for <u>each</u> enrolled student by **October 14, 2013**:

    - Theory hours completed with instructor's name for each class
    - Clinical hours completed with instructor's name for each clinical session

- Clinical facility at which each clinical session was completed and contact person who can verify student attendance and performance.

6. Require the program to show documented progress satisfactory to the Board, substantiating the ability to instruct students pursuant to California Education Code Section 94886 and to improve the effectiveness of instruction and program pass rates on the NCLEX/PN®. If no progress has been shown, the Board may revoke the program's approval completely.

7. Require the program to submit a report relative to program resources by **October 14, 2013.** The report shall include a comprehensive assessment of current program resources, including faculty, clinical facilities, library references, physical space, skills laboratory space and equipment, staff and support services, as specified in section 2530(a) of the California Code of Regulations, to determine sufficiency of resources necessary for students' achievement of the program's objectives, specific actions for improvement, and timeline for accomplishment.

8. Require the program to submit a follow-up report in three (3) months, but no later than **December 15, 2013.** The report must include a comprehensive analysis of the program, specific actions to improve program resources and improve the program pass rates, timeline for implementation, and expected outcomes. The following elements must be addressed in the analysis.

   a. Admission Criteria.
   b. Screening and Selection Criteria.
   c. Terminal Objectives.
   d. Curriculum Objectives.
   e. Instructional Plan.
   f. Theory and Clinical Objectives for Each Course.
   g. Lesson Plans for Each Course.
   h. Textbooks.
   i. Attendance Policy.
   j. Remediation Policy.
   k. Evaluations of Theory and Clinical Faculty.
   l. Evaluations of Theory Presentations.
   m. Evaluations of Clinical Rotations and Their Correlation to Theory Presentations.
   n. Evaluation of Student Achievement.
   o. Current Enrollment.

9. Require the program to comply with all approval standards in Article 4 of the Vocational Nursing Practice Act, commencing at Business and Professions Code Section 2880, and Article 5 of the Vocational Nursing Regulations, commencing at California Code of Regulations, Title 16, Section 2526.

10. Require the program to demonstrate incremental progress in correcting the violations. If the program fails to satisfactorily demonstrate incremental progress, the full Board may revoke the program's approval. Failure to take any of these corrective actions may cause the full Board to revoke the program's approval.

11. Place the program on the **February 2014** Board agenda for reconsideration of provisional approval.

Rationale: The Board has serious concerns relative to the program's lack of compliance with regulatory requirements as specified in California Code of Regulations. Of additional concern is the program's noncompliance with requirements specified in the California Education Code.

As noted previously, the program has failed to provide critical program resources required for student achievement of the curricular objectives. Such resources include, but are not limited to, a lack of consistent program administration, inadequate faculty resources, and a lack of textbooks and other resource documents. Additionally, the program has failed to provide instruction in accordance with the Board – approved curriculum. Such demonstrated consistent and pervasive noncompliance with regulatory requirements supports the recommendation to place the program on provisional approval.

On August 21, 2013, the school was notified by the Accrediting Council for Continuing Education and Training (ACCET) that the Commission voted to withdraw the school's accreditation, effective August 21, 2013, at its August 2013 meeting. The school has 15 calendar days from receipt of the letter to appeal ACCET's action – by September 5, 2013. In the absence of an appeal, revocation of the school's accreditation by ACCET and revocation of approval by the California Bureau for Private Postsecondary Education (Bureau) will be final.

On August 27, 2013, a Bureau representative attended an onsite assembly with enrolled Franklin Career College students and school administration. At that meeting, students were informed of their rights under the Student Tuition Recovery Fund.

Board staff will continue to monitor the program's ability to offer a course of instruction and its effectiveness by tracking class admissions, the effectiveness of employed interventions, and the program's licensure examination pass rates each quarter.

Attachment A: History of Prior Board Actions
Attachment B: Email dated May 7, 2013 from director to assigned NEC
Attachment C: Email dated May 15, 2013 from director to assigned NEC
Attachment D: Complaint from students dated July 8, 2013
Attachment E: Email dated July 25, 2013 from new director to assigned NEC
Attachment F: Correspondence from new program director attached to email dated July 31, 2013
Attachment G: Email from program director to NEC dated August 4, 2013
Attachment H: Draft Notice of Change in Approval Status
Attachment I: Correspondence from Accrediting Council for Continuing Education and Training, dated August 21, 2013
Attachment J: Correspondence from Bureau for Private Postsecondary Education, dated August 28, 2013

Franklin Career College
Vocational Nursing Program

History of Prior Board Actions

- On January 9, 2007, the Executive Officer approved Franklin Career College's request to begin a vocational nursing program with an initial class of 45 students starting on February 26, 2007, with a projected graduation of March 7, 2008. The Board approved the program curriculum for 1560 hours, including 580 theory, and 980 clinical hours.

- On March 10, 2007, the director notified the Board that the class start date had been delayed to May 7, 2007, to allow additional time for assessment and recruitment of students.

- On February 13 – 14, 2008, the program was inspected to determine compliance with Article 5 of the Vocational Nursing Rules and Regulations. One (1) violation was identified and corrected.

- On April 16, 2008, the Executive Officer approved initial full accreditation for Franklin Career College Vocational Nursing Program for the period from April 10, 2008, through April 9, 2012, and issued a certificate accordingly. Additionally, the Board approved the program's request to admit a full-time class of 45 students on May 12, 2008 only, to **replace** students graduating on May 10, 2008.

- On May 27, 2008, the director notified the Board that the replacement class start date had been delayed until June 9, 2008, to complete recruitment and entrance testing. The projected graduation date is June 30, 2009.

- **On March 25, 2009, a new program director was approved**.

- On August 13, 2008, the Executive Officer approved the program's request to admit 45 students into the full-time class beginning September 8, 2008, with a projected completion date of September 9, 2009; thereby increasing frequency of admissions.

- On October 20, 2009, the Executive Officer approved Franklin Career College Vocational Nursing Program's request to admit a full-time class of twenty (20) students and two (2) alternates commencing December 14, 2009 only and graduating January 29, 2011, to **replace** students scheduled to graduate October 30, 2009.; and, approved the program's request to admit a class of twenty (20) students and two (2) alternates commencing March 29, 2010 and graduating May 6, 2011.

- On September 22, 2010, the director notified the Board that commencement of the December 14, 2009 class had been delayed to March 7, 2010, and is scheduled to

graduate March 18, 2011. Commencement of the March 29, 2010, class was delayed to June 21, 2010. That class is scheduled to graduate July 15, 2011.

- On September 22, 2010, the Executive Officer approved Franklin Career College Vocational Nursing Program's request to admit a full-time class of 25 students commencing September 27, 2010 only, and graduating October 21, 2011; **and**, approved the program's request to admit a class of 25 students commencing January 2, 2011 only, and graduating February 27, 2012.

- On May 13, 2011, the Executive Officer denied Franklin Career College Vocational Nursing Program's request to admit a class of twenty-four (24) students commencing May 16, 2011 and graduating May 28, 2012 to **replace** students that graduated March 14, 2011; **and,** approved Franklin Career College Vocational Nursing Program's to admit a full -time class of twenty (20) students commencing May 16, 2011 and graduating May 28, 2012 to **replace** students that graduated March 14, 2011; **and**, denied Franklin Career College Vocational Nursing Program's request to admit a class of twenty-four (24) students August 22, 2011 and graduating September 12, 2012 to replace the class that will graduate July 21, 2011, at this time.

  The program was required to perform an analysis and submit a written report of the following elements of the program by **June 30, 2011**:

  a. Admission Criteria.
  b. Screening and Selection Criteria.
  c. Terminal Objectives.
  d. Curriculum Objectives.
  e. Correlation of Theory to Clinical.
  f. Instructional Plan.

  The program was required to be brought before the Full Board if no improvement in program performance pass rates based on Quarter 2, 2011 NCLEX/PN® statistics. Additionally, the program is required to obtain Board approval prior to the admission of future classes.

- On June 24, 2011, the Board received program documents as required on May 13, 2011.

- On August 26, 2011, the Executive Officer approved Franklin Career College Vocational Nursing Program's request to admit a class of twenty-four (24) students August 29, 2011 and graduating September 19, 2012 to **replace** the class that will graduate July 21, 2011, only; and, required the program to obtain Board approval prior to the admission of each class.

- On November 21, 2011, the Board received notification of the resignation of the current program director.

- On November 22, 2011 the Executive Officer **denied** Franklin Career College Vocational Nursing Program's request to admit a class of twenty-five (25) students commencing on November 28, 2011, only, and graduating December 21, 2012 to

replace the class that graduated October 14, 2011, at this time until a new director is Board approved and oriented to the director position; **and,** required the program to obtain Board approval prior to the admission of each class.

- **On February 7, 2012 a new Director was approved.**

- On April 16, 2012, the Executive Officer approved the Franklin Career College Vocational Nursing Program's request to admit a class of forty (40) students commencing on April 23, 2012 and graduating May 16, 2013, only, to **replace** the class that graduated October 14, 2011; and required the program to obtain Board approval prior to the admission of each class.

- On August 14, 2012, the Executive Officer approved continued approval of the Franklin Career College Vocational Nursing Program for a four-year period from April 9, 2012, through April 8, 2016, and the Board issued a certificate accordingly; approved the program's request to admit a class of forty (40) students commencing on August 27, 2012, and graduating September 19, 2013, only, to **replace** the class that graduated February 28, 2012; and continued to require the program to obtain Board approval prior to the admission of each class.

- On December 6, 2012, the Executive Officer approved the program's request to admit a class of forty (40) students commencing on January 7, 2013, and graduating January 24, 2014, only, to **replace** the class that graduated May 28, 2012; and continued to require the program to obtain Board approval prior to the admission of each class.

- On February 13, 2013, the Executive Officer approved the following recommendations:

    1. **Deny** the Franklin Career College Vocational Nursing Program's request to admit a class of forty students commencing on April 15, 2013, and graduating April 25, 2014, only, to **replace** the class that graduated September 19, 2012.
    2. Approve the Franklin Career College Vocational Nursing Program to admit a class of twenty students commencing on April 15, 2013, and graduating April 25, 2014, only, to replace the class that graduated September 19, 2012.
    3. Require the program to perform an analysis of the program and submit a written report by **March 30, 2013**. That analysis and report should include a determination of the root causes of the graduates not being successful on the licensure examination and a plan of action to address those causes.
    4. Continue to require the program to obtain Board approval prior to the admission of each class.

- On June 25, 2013, the director notified the Board that she resigned her position effective June 25, 2013.

- **On July 11, 2013, Cherry Clement was approved as director.**

- On July 18, 2013, a meeting was held at the Board office that included the Franklin Career College Project School Director, Patricia Armstrong, the Franklin Career College Director of Education, Michael Vu, the Regional Director of ResCare Workforce Services,

part of the company that owns Franklin Career College, Cheryl Anderson, Supervising Nursing Education Consultant and Suellen Clayworth, Nursing Education Consultant, Retired Annuitant.

Agenda Item #11.C.1., Attachment B
Franklin Career College
Vocational Nursing Program

Email dated May 7, 2013 from Director to Board NEC:

Good day Ms. Suellen Clayworth,

This is to wrap up what I have reported and consulted with you last Wednesday, May 01, 2013.

As I have reported that I have been trying to have Administrator to provide me with instructors and there were times when we do not have instructors to follow up with the students because of unavailability of these instructors. I was so desperate to keep the program running by asking for more instructors and help in the office. I have had gone to complain to higher people in Rescare, reached HR and the last one was to complain to Compliance. From that time on, I used to receive assurance that we will be hiring and hoping that they would get me instructors and help here, knowing that I do not have a secretary here or a clinical coordinator with more than 60 students in the program. I have been pushing to hire more instructors with anticipation of needing more because of the January 2013 class start and the supposedly April 2013 class start (I have moved it to May 6, 2013 because of not having a new Term 1 instructor on board yet). We happened to interview some instructors on last week of February 2013 and I thought they (Rescare Administration) are now close to see the gravity of my situation here. I was still able to beg more hours from my instructors to cover some of the days where I don't have clinical instructors. The situation went worse when one of the main instructor for Term 1 gave me his resignation letter, followed by another instructor who went part time to full time, and another who has been giving us full time hours, went to part time again because she was not given the PTO benefits she was promised by Administration. I was at the verge of quitting my job as DON but I feel that it's not even fair for the students to leave them and they will be left with no DON again and their program will be a mess. I have been in academe for years as instructor and I feel for the students. It's not fair for the students who has been paying the school and they receive less quality hours because there was not enough instructors for them. I have been trying to hold on to keep the school in compliance. I thought I should not give up asking for help so to keep the program running to help these students.

When we started interviewing people last week of February 2013, I felt that I have made Administration understand the situation of not having enough instructors. I thought they heard my concerns. Days passed and I had to let HR know about me needing help with having applicants come on board sooner. After that, everytime I would be asking about the progress on hiring the interviewed applicants, I was always left hanging.." still on process". I had several meetings with my bosses here and I had been literally a "cry baby" while asking for help, knowing that we will have another class coming for April 2013. Because I don't see any progress that we can have somebody on board for the April 2013 class, I have to ask the Board to move the class start date to May 6, 2013. My boss was not happy with this but I felt this is the right thing to do. I thought that this move made them to realize that they cannot leave me running the program with not enough instructors and help.

I was able to interview another applicant who was I thought was the right fit for the upcoming May 06, 2013 class and I was assured that they will really help me out to have her on board sooner for the upcoming class since she already had board's approval before to teach. She was scheduled for her drug test but the next day, I was told that her specimen was lost. I thought that something is wrong here... hiring process too slow (February interviewee is just starting her hiring papers on mid April), and an incidence of lost drug test specimen of another applicant?

It made me to think that if this would go on like this, this would mean prolonging the days again for all term students not having enough instructors and it will not be fair to keep students here with no hands on for some

clinical hours because of unavailability of instructors. That is why I started with you by asking if you allow simulations or testing for skills and what can be done to correct some days where the students were only made to come here for some clinical hours for computer simulations or ATI practice and made to have assignments to do (like case studies).

After our conversation, I really don't mind having to do a lot of paperwork like giving you the list of every student and their missed clinical hours because, I believe, they should be given their due clinical hours. I felt that they were paying the school and they should be provided with enough instructors for their education. I don't mind even if I would have to go back to student schedules months ago to determine the days when I have to let students come to school (instead of clinicals hands-on) to do ATI testing or case studies because I do not have enough instructors for them, especially those days/time when an instructor quit and some went to part time, while I have been asking for more instructors. As you requested, I have to give you the list of every student and their missed clinical hours and that would mean moving their graduation date per term. I then called a meeting with the staff the next day and informed them that I will have to i·nform the students that their graduation dates will be moved at a later date to give the students their missed clinical hours even if they will not be happy about it. I informed my bosses too that this is the corrective action plan for the violation that we were not able to give the actual hands on clinical hours because of unavailability of instructors.

As you have mentioned, I was brave enough to report and consult with you regarding issues I am facing in my program. I just got so frustrated after calling Compliance and I have nowhere to go to get help and I thought of letting you know and consulting what we can do to correct this. I felt I was mislead to believe that Administration was going to support me with the needs of the program when they started to let me interview for the applicants. I kept on talking with the students that we are already hiring more instructors so they get what they deserve. I felt we were giving the students the false hope because they still don't get what they are supposed to have. I do not want to lie to students, assuring them that we will have instructors for them and yet, it was taking forever to get somebody on board. just because hiring is no longer under my control.

Just to give you an update....last Friday, May 03, 2013, Administration was able to get somebody on board right away for the May 06, 2013 class after emailing them about my consultation with you. I have emailed you also the application for approval for Ms. Doris Gullatt and also regarding Ms.Patricia Armstrong who already was approved to teach Franklin Career College last 8/11 and Glendale College last 2012. She is coming back to teach here in FCC. Another clinical instructor, Ms. Sherry Ma was also hired by the school and her paperwork will be sentjemailed to you for approval as soon as she gets her teaching course certificate. We have another one probably to hire as clinical instructor as part- time/per diem. Looks like that they are now really hiring instructors for the students!

Attached are the list of every student and their missed clinical hours and how they will have those hours. It would mean moving their graduation at a later date. Also, included is the list of instructors that I have right now including the pending ones for Board's approval.

Thank you for hearing my concerns. I really appreciate you taking the time despite your busy schedule.
Respectfully,

Maluisa Lahorra
VN Program
Director Franklin
Career College
(909)937-9007
Luisa.Lahorra@franklincareercollege.com

FRANKLIN CAREER COLLEGE
VN Program

Here is the list of students currently in the VN program per term and the number of hours missed due to the unavailability of instructors:

A. TERM 4 CLASS 10 Per CLINICAL GROUPING

GROUP 1-A	*(34 hours)*	**- 4.5 days more**	**GROUP 2-A**	*(26 hrs)*	**3.5 days more**
GROUP 1-B	*(22 hrs)*	**-3 days mor**	**GROUP 2-B**	*(34 hrs)*	**- 4.5 days more**
GROUP 1-C	*(24 hrs)*	**-3 days more**	**GROUP 2-C**	*(22 hrs)*	**-3 days more**

PLAN OF ACTION: Instead of having the May 16, 2013 as their date of graduation, I have moved the date to May 22, 2013 because we are setting up the days for skills lab (hands-on with mannequins) with 2 clinical instructors for this class. The students were made aware.

B. Term 3 Class 11

Student 1 - **80** *hours missed* (5 days/wk x 2 weeks)

Student 2 - **64** *hours missed*

Student 3 - **56** *hours missed*

Student 4 - **56** *hours missed*

Student 5 - **56** *hours missed*

Student 6 - **80** *hours missed*

Student 7 - **80** *hours missed*

Student 8- **56** *hours missed*

Student 9 - **80** *hours missed*

Student 10 - **64** *hours missed*

Student 11 - **56** *hours missed*

Student 12 - **64** *hours missed*

Student 13 - **64** *hours missed*

Student 14 - **80** *hours missed*

PLAN OF ACTION: This class is originally to start Term 4 this coming June 24, 2013. This will be moved to July 01. 2013. June 24-28 will be skills lab with 2 instructors to cover their one week missed clinical hours. The other week of missed clinical hours will be covered on their last week of Term 4:

>Term 3 will be until June 21, 2013

>June 24-28, 2013 will be one week skills lab

>Term 4 will be July 01, 2013 until October 4, 2013 instead of September 27, 2013.

C. TERM 2 Class 12

Group 1 - ***54*** *hours missed*
Group 2 - ***54*** *hours missed*
Group 3 - ***40*** *hours missed*

PLAN OF ACTION: The Term 2 Class 12 students will have to make up for the missed hours. It would mean moving their Term 2 for 7 weekdays more before they start Term 3. Instead of starting Term 3 on July 15, 2013, it will start July 22, 2013. I will be using their 3 day break at the end of Term 2 to be their regular skills/clinical days as well as the week of July 15-19, 2013.

LIST OF INSTRUCTORS:

Term 4

Ms. Mona Flores- Assigned in San Bernardino Public Health for Term 3- Term 4
Does Theory with Term 4 but temporarily with Term 1 while the new Term 1 instructor is on orientation

Ms. Patricia Armstrong – Will supervise Term 4 students with skills lab for their missed hours

Ms. Nikki Villao – Assigned in Ontario Public Health for Term 3- Term 4
- Supervises Term 4 students with skills lab for their missed hours with Ms. Patricia Armstrong

Term 3 (Ready to start with Public Health Rotation)

Ms. Stacey Perdomo – Term 3 Theory instructor

Ms. Mona Flores – Assigned in San Bernardino Public Health

Mr. Kerry Johnson - Assigned in Hesperia Public Health

Ms. Jaquolin Eskandr – Formerly assigned at Rowland site but went to part-time theory

Term 2

Ms. Jaquolin Eskandr – Term 2 Theory instructor

Ms. Imelda Bachar – Term 2 Clinicals at Kindred Rancho

Ms. Doris Gullatt – Awaiting Board Approval to start with skills lab and clinicals under Supervision of approved instructor

Ms. Sherry Ma – Still awaiting Certification for Board Approval Application- will be at Rowland

Term 1

Ms. Audrey Uy – Full time theory and clinical instructor

Ms. Eva Ablog- Awaiting hiring and for Board Approval Application. May be assigned to Chino Valley Medical Center.

***** Ms. Olivia Salas is on Medical Leave and Ms. Grace Bartlett is not at this time, giving us hours but has not resigned.

***** Kindred Rancho only allows 6 students maximum per instructor

***** Chino Valley Medical Center will only allow 7 students maximum per instructor

***** Public Health only allows 5 students per instructor

***** Rowland allows 15 students maximum per instructor

Agenda Item #11.C.1., Attachment C

Franklin Career College
Vocational Nursing Program

Email dated May 15, 2013 from Director to Assigned NEC

Good day Ms. Suellen Clayworth,

Yes, the students will be able to have that opportunity in the skills lab activities that we are going to provide. After that report I had with you, we were able to come up with making our skills lab more beneficial for our students. I am proud to inform you that our skills lab is very much equipped for every module that the students will have. Examples are having our Noelle Maternal-Child simulator mannequins where the students are shown the birthing process with the use of Noelle. Students have sometimes limited access to birthing process and having to show them the ideal scenario in the skills lab makes them to learn more and appreciate that. Our students can make use of our cervical, breast, genital models to determine abnormal from normal. Our skills lab has maternal-peds area where they can practice/reinforce their learning to handle pediatric cases like newborn care to immunizations. These skills are learned actually in clinical sites before. They just need to reinforce these learning and make them practice what concepts they need to focus more. This is with regards to our Term 4. Our Term 3 students has endocrine, neuro, immune, genito urinary, onco and leadership concepts for that term. Although they have these ongoing opportunity at clinical sites at this time, their make up hours will be focused more on the reinforcement on the ideal way to do procedures like catheterization, genito-urinary assessments which the students have limited opportunity at times because some patients in clinical sites wont allow students to because of privacy issues. We do have models like the the genital, cervical models both normal and abnormal. Students make use of our phlebotomy arm model, injection models, and our mannequins. They can make use of the mannequins that are equipped with heart, respiratory sounds. They are made to practice injections and procedures among themselves and for those who do not want to have themselves injected, can use the models. We also have the med carts where they can practice doing the med passing where medication safety is the priority. Term 2 covers integumentary, musculoskeletal, respiratory, cardiovascular, gastro concepts. Again, these are covered in their clinicals right now, but the missed hours will be at skills lab reinforcing procedures like the trache care, suctioning, using their respiratory/chest models, suction machines. We also have the feeding and IV tubings with simulated bld and IVF products as well as use of mannequins with feeding tubes. We also have them to practice using the hoyer lifts, ambulatory devices for their musculoskeletal concepts.

I am making sure that these students cover the concepts in every term and the instructors were made aware of the objectives for these students making up the hours.

Please advise if there are other things that I need to address.

Thank you so much for the time you accomodated me when I needed to consult with you. I really appreciate your assistance and patience.

Respectfully,

MaLuisa Lahorra
VN Program Director
Franklin Career College
(909)937-9007
Luisa.Lahorra@franklincareercollege.com

Agenda Item #11.C.1., Attachment D

Franklin Career College
Vocational Nursing Program

Complaint from Students Dated July 8, 2013

July 08,2013
Board of Vocational Nursing &
Psychiatric technicians
2535 Capitol Oaks Drive
Suite 205
Sacramento, Ca 95833

To Whom It May Concern,
I am a student at Franklin Career College,1274 Slater Cir, Ontario, Ca. I am currently enrolled in the LVN/LPN program and currently, will be on term 3 on july 22,2013. I am writing this letter on behalf of a lot of the students in my class. We currently do not have a Director of Nurses, we dont have full time instructors. Our DON just resigned 2 weeks ago and they havent informed us. Our teachers change in a daily basis when available on other days we dont have instructors. We are treated unjustly by the administrative staff. We have tried repeatedly to speak to our new campus director Ms. Rios but we keep getting redirected to a current instructor by the name of Patricia Armstrong which ms Rios has appointed to be a director of Education of the school which we dont have to have one. Its so unfortunate circumstance that not one paying student can speak to our administrator for details regarding our situation at the school. Our moral is low and we have exhausted our all other means of communication. Good staff has quit including our DON and current best teachers like Ms. Jaquolin Eskandr and Ms. Mona will be leaving Franklin shortly as well due to the issues that continue to go unresolved at this campus. We ask to please investigate what is happening to our school because all we want is a successful future in our health care fields. Many of us feel that our very own future is being threatened.
Thank you for your time and we hope to hear from you soon as possible.

Franklin Career College
Vocational Nursing Program

Email Dated July 25, 2013 from New Program Director to Assigned NEC:

From: fynwyn@aol.com [fynwyn@aol.com]
Sent: Thursday, July 25, 2013 9:28 AM
To: Clayworth, Suellen@DCA
Subject: Re: Additional documents needed
Hello Suellen,

Attached Please find the following requested documents:
New Organizational Chart
Current student Handbook
List of Faculty Members
Faculty/Student Clinical Assignments
Maternity and Pediatric Tracking Form
VN Program Books
List of Current VN Students

In regards to providing the clinical hours that students missed due to a lack of instructors, I have been unable to find any supporting documentation. All the make- sheets have personal reasons for missed clinical days/hours. The calender also does not show any missed clinical days because of a call off or instructor absence. There are no payroll days missing clinical days/hours to support that instructors missed clinical days/hours.

In reviewing the Instructional plan and the hours the students accumulated, there appears to be a misrepresentation or miscalculation of hours showing the students were short.The students have an excess of hours because of the of make up skills days added to accommodate the perceived shortage of hours.

Thank you for the list of violations. We have begun working on the remediation.

Cherry Clement, RN MSN Ed
Director of Nursing,
Franklin Career College
Ontario Campus
1274 Slater Circle
Ontario 91761
Tel (909) 937 9007

Agenda Item #11.C.1., Attachment F

Franklin Career College
Vocational Nursing Program

Correspondence from new program director attached to email dated July 31, 2013:

Franklin Career College,
1274 Slater Circle,
Ontario, CA 91761
July 31, 2013

Board of Vocational Nursing and Psychiatric Technicians
2535 Capitol Oaks Drive
Suite 205
Sacramento, Ca 95833-2945

This letter is a formal report on my investigation since starting as Director of Nursing (DON) on July 22, 2013.

According to the daily calendar Ms Lahorra used to keep track of the clinical schedule, there were no days that instructors did not show up for their assigned clinical days. However according to the students there were days that there were no instructors and days that they were sent home early from clinical. There is no documentation to support that faculty were absent or short hours. The students also said that when the instructor was absent, they were told to return to campus and had skills and case studies on those days. Attendance sheets support that the students returned to campus. I found that Ms Lahorra reported those days, as days the students had simulation lab and was told that the college is not approved for a simulation lab. Exactly how Ms Lahorra determined the number of missing clinical hours for the students is unclear. There are students with perfect attendance shown on that plan of action missing more than 50 clinical hours. I have found clinical make up sheets prior to the date of the letter sent by Ms Lahorra. However all the missing hours are students' personal absences. The students did follow the plan of action and make up all the hours reported by Ms Lahorra. All of these discrepancies took place before this DON was hired. Mrs. Rios the Campus Director, stated she had asked Ms Lahorra on several occasions how she came to those missed hours, but the information was not forthcoming

In reviewing the staffing I found there are no substitute instructors. If an instructor called off the students returned to the college for skills or in some instances the student chose to go home. There appeared to be an adequate number of instructors but creativity in moving instructors for adequate coverage was not implemented.

After Ms Lahorra resigned as DON, 3 other instructors resigned. We are actively attempting to recruit new faculty. We have hired (1) one new instructor for term 3 and this author came on as DON.

It is true the college was operating without a DON while attempting to hire. However the new DON was hired within the 10 day period as required by the Board.

The program has an approved instructional plan received by the Board May 2012, The instructional plan folders are located in the classroom, however, the instructors were not using the instructional plan. As a result, it is true that some students did not receive correlated theory and clinical or adequate theory instruction.

This administration has implemented use of the instructional plan. The students are given a syllabus and Daily calendar. We have scheduled monthly staff meetings so everyone can be on the same page. This administration is committed to the success of our students. Appropriate scheduled testing will also allow staff to determine areas of weakness for remediation on an on-going basis.

The annual pass rate is not in compliance with the regulations. Franklin Career College staff has actively been in contact with past students and offered the students review classes to assist the students is taking the NCLEX PN. The success rate of getting the students to return for review has been poor. As a result, because we are working with small numbers the pass rate percentage stays low because the students are not taking the board examination.
This administration is working with the last graduating class to promote the pass rate and will continue to review with the graduating students so they have a good outcome. The faculty is being held accountable to follow the instructional plan and the syllabus as written.

The current students are being tested using a standardized test (ATI) to determine their level of knowledge. This administration is considering a hiatus to remediate instead of continuing current classes until the students can achieve basic med/surgical level. We are asking for the Board approval to adjust the graduation date to accommodate the hiatus. Estimated time of 2 weeks of intense progressive remediation based on areas of deficiency as shown by the testing topic areas.

This administration is interested in the success of each student here at Franklin Career College. There is a lot to rectify. The students have definitely been short changed. This administration has met with the students and we are working collaboratively to achieve their success.

We are asking to board reconsider putting the college on a provisional accreditation and allow the changes we are implementing to take root and affect change not only in the pass rate but also in the morale of the students.

Cherry Clement, DON
Director of Vocational Nursing Program
Franklin Career College

Agenda Item #11.C.1., Attachment G

Email from program director to NEC dated August 4, 2013

The students' score from the standardized testing showed them lacking in fundamentals labs, diagnostic tests, pharmacology, the list is long. Only 1 student had a predicted probability of 88-90%, 1 student had a predictability of 80-82%, 1 student had 57-72% and 11 students were 15-54% in the term 4 class. In the term 3 class only 1 student scored 88-90% and the remaining students scored 1-54%.

I met with the students on Friday and offered them options such as morning , evening and Saturday remediation to keep the graduation date as is. The students were very angry. I think you have another letter from the students on the way. They are very frustrated and seeing the assessment results probably scared them. They don't seem to realize that I'm trying to get them to the educational level where they need to be to pass the Boards. They just want to graduate.

I can't in good conscious graduate them knowing how much they are lacking and only 3 have a potential for passing the Boards.

I was hired in July and I should have done due diligence before accepting this position. Ms. Armstrong asked me to take the position because the time had almost run out and the college would be in violation. I did not know the extent of the problems and was not given the opportunity to attend the last meeting. I found out when you sent the list of violations.

I feel I owe it to the students to try but I am also starting to feel overwhelmed. Friday morning I was told by Ms. Armstrong that both of the computers with all the DON information fried and died.

Cherry Clement, DON
Franklin Career College,
1274 Slater Circle,
Ontario Ca 91761

STATE OF CALIFORNIA
DEPARTMENT OF CONSUMER AFFAIRS
BUSINESS, CONSUMER SERVICES, AND HOUSING 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

September 13, 2013

Cherry Clement, Director
Vocational Nursing Program
Franklin Career College
1274 Slater Circle
Ontario, CA 91761

Subject: Notice of Change in Approval Status

Dear Ms. Clement:

Pursuant to the action of the Board of Vocational Nursing and Psychiatric Technicians (Board) on September 13, 2013, the Board placed the Franklin Career College Vocational Nursing Program on Provisional Approval[1] for the one – year period from September 13, 2013 through September 30, 2014.

The purpose of this letter is to explain the areas of non-compliance found and the corrections required of your program to avoid losing approval completely.

Once you have reviewed this letter, please sign and return the enclosed "Acknowledgement of Change in Approval Status" form by **Friday, September 27, 2013.**

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…"

[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.

Section 2526(a)(7) of the California Code of Regulations states:

> "The institution shall apply to the Board for approval. Written documentation shall be prepared by the director and shall include:
> (7) Instructional Plan."

Section 2529(b) of the California Code of Regulations states:

> "(b) 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(a) of the California Code of Regulations states:

> "(a) The program shall have sufficient resources, faculty, clinical facilities, library, staff and support services, physical space, skills laboratory and equipment to achieve the program's objectives."

Section 2530 (e) of the California Code of Regulations states"

> "(e) Each instructor shall have a daily lesson plan which correlates the theory and practice offered to the student. A copy of this plan shall be available to the director."

Section 2530(l) of the California Code of Regulations states:

> "(l) 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 approved vocational nursing schools for the same period."

Program pass rates of the Franklin Career College Vocational Nursing Program for the past eleven (11) 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 2010	76%	**50%**	**-26**
Jan – Mar 2011	77%	**0%**	**-77**
Apr – Jun 2011	76%	88%	+12
Jul – Sep 2011	75%	100%	+25
Oct – Dec 2011	75%	100%	+25
Jan – Mar 2012	74%	84%	+10
Apr – Jun 2012	74%	77%	+3
Jul – Sep 2012	74%	76%	+2
Oct – Dec 2012	74%	**58%**	**-16**
Jan – Mar 2013	73%	**63%**	**-10**
Apr – Jun 2013	73%	**58%**	**-15**

Section 2532(b) of the California Code of Regulations states:

"(b) The minimum hours required shall be as follows: Theory Hours-576, which shall include a minimum of 54 hours in pharmacology; Clinical Hours-954."

Section 2533(a) of the California Code of Regulations states:

"(a) Vocational nursing programs shall include theory and correlated clinical experience."

Section 2533(b) of the California Code of Regulations states:

"(b) The curriculum shall develop the knowledge, skills, and abilities necessary to care for patients of all ages in current health care settings."

Section 2533(c) of the California Code of Regulations states:

"(c) Curriculum content shall be taught in a sequence that results in students' progressive mastery of knowledge, skills and abilities."

Section 2533(d) of the California Code of Regulations states:

"(d) The curriculum content shall include:
(1) Anatomy and physiology
(2) Nutrition
(3) Psychology
(4) Normal growth and development
(5) Nursing fundamentals
(6) Nursing process
(7) Communication, both verbal and written, including communication with patients who have psychological disorders
(8) Patient education
(9) Pharmacology which shall include:

(A) Knowledge of commonly used drugs and their action
(B) Computation of dosages
(C) Preparation of medications
(D) Principles of administration

(10) Medical-surgical nursing 40
(11) Communicable diseases, which shall include but not be limited to Human Immunodeficiency Virus (HIV)
(12) Gerontological nursing
(13) Rehabilitation nursing
(14) Maternity nursing
(15) Pediatric nursing
(16) Leadership
(17) Supervision
(18) Ethics and unethical conduct
(19) Critical thinking
(20) Culturally congruent care
(21) End-of-life care"

Section 2533(f) of the California Code of Regulations states:

> "(f) All curricular changes that significantly alter the program philosophy, conceptual framework, content, objectives, or other written documentation as required in Section 2526, shall be approved by the Board prior to implementation. Proposed curricular changes must be submitted to the Board in final form by the fifteenth day of the second month preceding the month of the Board meeting at which the changes will be considered."

Based on the violations listed above, the Franklin Career College Vocational Nursing Program failed to comply with regulatory requirements for program approval.

REQUIRED CORRECTION(S)

1. The Franklin Career College Vocational Nursing Program shall show documented progress satisfactory to the Board, to improve the effectiveness of instruction and program pass rates on the NCLEX/PN®. If no progress has been shown, the Board may revoke the program's approval completely.

2. The program shall submit documented proof of approval by the California Bureau for Private Postsecondary Education.

3. The program shall bring its average annual pass rate to no more than ten (10) percentage points below the state average annual pass rate.

4. The program shall obtain expressed approval by the full Board prior to the admission of additional students.

5. The program shall submit the following documentation for each enrolled student by **October 14, 2013**.

   a. Theory hours completed with instructor's name for each class.
   b. Clinical hours completed with instructor's name for each clinical session.
   c. Clinical facility at which each clinical session was completed and contact person who can verify student attendance and performance.

6. The program shall submit a report relative to program resources by **October 14, 2013.** The report shall include a comprehensive assessment of current program resources, including faculty, clinical facilities, library references, physical space, skills laboratory space and equipment, staff and support services, as specified in section 2530(a) of the California Code of Regulations, to determine sufficiency of resources necessary for students' achievement of the program's objectives, specific actions for improvement, and timeline for accomplishment.

7. The program shall submit follow-up reports in three (3) months, but no later than **December 15, 2013,** and nine (9) months, but no later than **June 15, 2014.** The report must include a comprehensive analysis of the program, specific actions to improve program resources and improve the program pass rates, timeline for implementation, and expected outcomes. The following elements must be addressed in the analysis.

   a. Admission Criteria.
   b. Screening and Selection Criteria.
   c. Terminal Objectives.
   d. Curriculum Objectives.
   e. Instructional Plan.
   f. Theory and Clinical Objectives for Each Course.
   g. Lesson Plans for Each Course.
   h. Textbooks.
   i. Attendance Policy.
   j. Remediation Policy.
   k. Evaluations of Theory and Clinical Faculty.
   l. Evaluations of Theory Presentations.
   m. Evaluations of Clinical Rotations and Their Correlation to Theory Presentations.
   n. Evaluation of Student Achievement.
   o. Current Enrollment.

8. The program shall comply with all approval standards in Article 4 of the Vocational Nursing Practice Act, commencing at Business and Professions Code Section 2880, and Article 5 of the Vocational Nursing Regulations, commencing at California Code of Regulations, Title 16, Section 2526.

9. 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 approval.

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10. Failure to take any of these corrective actions may cause the full Board to revoke the program's approval.

11. In the event additional violations of the approval standards are identified, such violations may result in further corrective action or revocation of provisional approval.

FUTURE BOARD ACTION

Your program will be placed on the **September 2014** Board Meeting agenda, at which point the Board may revoke or extend the program's approval. If you have additional information that you wish considered beyond the required corrections listed on pages 4, 5, and 6, 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: **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 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

cc: Board Members

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ACCREDITING COUNCIL FOR CONTINUING EDUCATION & TRAINING
1722 N. Street, N.W., Washington, D.C. 20036
Telephone: 202-955-1113 Fax: 202-955-1118
http://www.accet.org

August 21, 2013

VIA EMAIL & FEDERAL EXPRESS
(petra.rios@franklincareercollege.com)

Ms. Petra Arredondo – Rios, Director
Franklin Career College
1274 Slater Circle
Ontario, CA 91761

Re: Accreditation Withdrawn
(Appealable, Not a Final Action)
ACCET ID #1148

Dear Ms. Arredondo – Rios;

This letter is to inform you that, at its August 2013 meeting, the Accrediting Commission of the Accrediting Council for Continuing Education & Training (ACCET) voted to withdraw accreditation from Franklin Career College, located in Ontario, California, with a branch campus in Norwalk, California. The decision was based upon a careful review and evaluation of the record during an extended period under Institutional Show Cause status, initiated at the December 2011 Commission meeting, during which the institution failed to demonstrate why its accreditation should not be withdrawn. Included in this determination, the Commission reviewed the Change of Ownership report (visit conducted May 10, 2011), the response to that report, dated June 15, 2011, the Quality Assurance Unannounced Visit (QAV) report (visit conducted February 10, 2012); the institution's response to that report, dated February 28, 2012; along with a series of interim reports directed in Commission action letters, beginning with the August 2011 Commission meeting, through the institution's latest interim report, received on July 1, 2013, submitted in response to the April 2013 Commission action letter, dated April 26, 2013. Throughout this period of time the Commission provided a clearly focused direction and opportunity for the institution to come into compliance, for which it provided minimal progress and consistently unsatisfactory responses to the Commission's serious concerns related to the institution's failure to systematically and effectively implement policies and procedures in practice over time to demonstrate the essential achievement required of a vocational institution to competently select, train, and assist students whose preparations lead to successful job placement consistent with ACCET benchmarks.

Upon its review, the Commission determined that one of the findings cited in the April 26, 2013 Commission action letter was adequately addressed in the response; however, the institution has not demonstrated compliance with respect to ACCET standards, policies, and procedures, relative to Standard VIII-E: Completion and Placement as follows:

> The institution did not provide an effective means to regularly assess and document the quality of the education and training services provided relative to completion and placement rates in a systematic and effective manner in practice over time. The institution cannot

validate the quality of the education and training services provided due to significantly below – benchmark placement rates as established by the Accrediting Commission.

The Commission action letter, dated April 26, 2013, required the institution to provide a comprehensive narrative update related to revised policy and procedures, and supporting documentation, demonstrating the systematic and effective implementation of tracking and monitoring of completion and placement statistics, including the accurate use of ACCET reporting documentation, in practice over time. The narrative update was to include a plan of action that immediately and substantively remedied the monitoring and tracking errors that continue to be an inherent characteristic of the institution's operations, as evidenced in the April 2013 review of the institution's completion and placement statistics.

In its response to the interim report, the institution hired a new School Director who has developed a corrective action plan agenda related to the institution's operations; however, the institution failed to demonstrate systematic and effective implementation of any of the initiatives described in the response. The institution's response does not include evidence of implementation, expected timelines, or method for evaluation. Further, the response does not address with any detail or substance the central issue facing the institution, which is the lack of systematic and effective implementation of policy and procedures related to the tracking and monitoring of completion and placement outcomes in practice over time. By way of example, a review of the institution's completion and placement statistics and supporting documentation, including the On – Site Sampling Verification: Completion, Placement, and Academic Data form (OSV), submitted in its response to the Commission action letter, dated April 26, 2013, noted the following errors for all programs and both campus sites for calendar year 2012: four placements claimed by the institution were discounted by the Commission for failure to meet the ACCET definition of full time employment, with the term of employment being less than the required 30 day period and/or the verification of employment occurring prior to the 30 day period of employment, which are out of compliance with the requirements of ACCET Document 28. In four cases, the institution's data, as presented on the respective OSV, did not correlate with the data presented on the corresponding ACCET Document 28.1 – Completion and Placement Statistics. In three cases, the placement was discounted due to incomplete verification documentation, with placements claimed by the institution missing crucial verification documentation such as a self – employed attestation, part – time attestation or a continuing employment attestation. These results directly undermine the statement of confidence made by the new School Director in reference to the institution's reporting abilities and competencies and reinforces the Commission's lack of confidence in the institution's ability to effectively and accurately track and monitor placement outcomes. It is noted for the record that this is but the latest error-ridden completion and placement data set submitted by the institution, beginning with the Commission's review in August 2011, which included five placements that were discounted due to non-training related placement; the December 2011 meeting, which had seven placements that were discounted due to non – training related employment and/or failure to fulfill 30 days of continuous full – time employment; the December 2012 meeting had 49 placements which were claimed by the institution discounted by the Commission, and the April 2013 meeting where seven cohorts

of OSV data went unreported by the institution, and an additional six discrepancies were noted between the OSV data and the correlating Document 28.1.

Additionally, the April 2013 Commission action letter required the institution to provide updated Document 28.1s – Completion and Placement Statistics, for calendar year 2012, for all programs at both campuses, together with full supporting documentation for all placements and waivers referenced to completed copies of the attached OSV for each Scheduled to Graduate (column 3) cohort on the respective 28.1s to be submitted with the response.

In its response to the Interim Report, the institution provided updated Document 28.1s – Completion and Placement Statistics, for calendar year 2012, for all programs at both campuses, together with full supporting documentation for most placements and waivers referenced to the attached OSV for each Scheduled to Graduate (column 3) cohort; however, as previously noted, the data and supporting documentation provided by the institution were, in some cases, incomplete and, in other cases, incorrect. Further, the statistics and documentation provided resulted in the following significantly below benchmark rates for placement for calendar year 2012:

Medical Billing and Coding:
Ontario Campus: Placement = 42.86% (7 eligible/3 placed)
Norwalk Campus: Placement = 14.29% (14 eligible/2 placed)

Clinical Back Office Medical Assistant:
Ontario Campus: Placement = 42.86% (7 eligible/3 placed)
Norwalk Campus: Placement = 27.78% (18 eligible/5 placed)

Licensed Vocational Nurse:
Ontario Campus: Placement = 34.21% (38 eligible/13 placed)

Therefore, the Commission has determined that the institution has continuously failed to demonstrate effective implementation and observable results related to this mission critical standard.

Since denial of reaccreditation is an adverse action by the Accrediting Commission, the institution may appeal the decision. The full procedures and guidelines for appealing the decision are outlined in Document 11, Policies and Practices of the Accrediting Commission, which is available on our website at www.accet.org.

If the institution wishes to appeal the decision, the Commission must receive written notification no later than fifteen (15) calendar days from receipt of this letter, in addition to a certified or cashier's check in the amount of $7,500.00, payable to ACCET, for an appeals hearing. This notification must be accompanied by an affidavit signed by an authorized representative of the institution indicating that a Notice of Status of Accreditation notifying interested parties of the

Commission's adverse action has been disseminated to new enrollees and posted in conspicuous places at the institution to include, at minimum, the admissions office and student lounge or comparable location. In addition, the institution must submit a written teach-out plan that is in accordance with ACCET Document 32 – Closing/Teach-Out Policy.

In the case of an appeal, a written statement, plus six (6) additional copies regarding the grounds for the appeal, saved as **PDF documents and copied to individual flash drives**, must be submitted to the ACCET office within sixty (60) calendar days from receipt of this letter. The appeal process allows for the institution to provide clarification of and/or new information regarding the conditions at the institution at the time the Accrediting Commission made its decision to deny or withdraw accreditation. The appeal process does not allow for consideration of changes that have been made by or at the institution or new information created or obtained after the Commission's action to deny or withdraw accreditation.

It remains our hope that the accreditation evaluation process has served to strengthen your institution's commitment to and development of administrative and academic policies, procedures, and practices that inspire a high quality of education and training for your students.

Sincerely,

Roger J. Williams
Executive Director

RJW/eyl

C: Ms. Kay Gilcher, Director, Accreditation Division, USDE (aslrecordsmanager@ed.gov)
Mr. Ron Bennett, Director, School Eligibility Service Group, USDE (ron.bennett@ed.gov)
Ms. Martina Fernandez-Rosario, Area Case Director, School Participation Team (martina.fernandez-rosario@ed.gov)
USDE Accredited Schools Directory (AccreditedSchoolsList@westat.com)
Ms. Joanne Wenzel, Bureau Chief, CA Bureau for Private Postsecondary Education (joanne_wenzel@dca.ca.gov)
Ms. Suellen Clayworth, Nursing Education Consultant, California Board Of Vocational Nursing And Psychiatric Technicians, (suellen.clayworth@dca.ca.gov)

Agenda Item #11.C.1., Attachment J

Business, Consumer Services and Housing Agency - Governor Edmund G. Brown Jr.

Bureau for Private Postsecondary Education
2535 Capitol Oaks Drive, Suite 400, Sacramento, CA 95833
P.O. Box 980818, West Sacramento, CA 95798-0818
P (916) 431-6959 F (916) 263-1897 www.bppe.ca.gov

August 28, 2013

Dennis Roberts
Franklin Career College
9001 Linn Station Road
Louisville, KY 40223-3808

Ms. Petra Arredondo-Rios
Franklin Career College
1274 Slater Circle
Ontario, CA 91761

RE: Withdrawal of Accreditation

Dear Mr. Roberts and Ms. Arredondo-Rios:

On August 21, 2013 the Bureau for Private Postsecondary Education (Bureau) received notification from the Accrediting Council for Continuing Education & Training (ACCET) that the accreditation for Franklin Career College has been withdrawn. Franklin Career College is approved by means of accreditation with the Bureau and the withdrawal of accreditation the approval with the Bureau is terminated. The Bureau understands that Franklin Career College has until September 5, 2013 to request an appeal the decision.

If Franklin Career College chooses not to request an appeal and wishes to continue to operate, you must submit an application for approval to operate an institution not accredited along with the $5,000.00 application fee by September 5, 2013.

If Franklin Career College chooses to close in lieu of an appeal or filing an application for approval to operate an institution not accredited please contact Susan Hertle at 916-431-6914 or by email at Susan.hertle@dca.ca.gov.

Because of the current status of Franklin Career College the Bureau requests that you submit a list of students currently in attendance or on a leave of absence with the school. We request that the list includes the student name, address, telephone number, email address and the educational program that they are completing. Please submit that list by e-mail to Susan Hertle at susan.hertle@dca.ca.gov.

If you have any questions you may contact Yvette Johnson by e-mail at Yvette.johnson@dca.ca.gov or by telephone at 916-431-6914.

Sincerely,

Joanne Wenzel
Bureau Chief