

Agenda Item #13.C.2.



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



DATE: May 1, 2014

TO: Board Members

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

SUBJECT: Premiere Career College Vocational Nursing Program – Consideration of Request to Admit Students (Director: Zenaida Plata, Irwindale, Los Angeles County, Private)

On February 28, 2014, the Board placed the Premiere Career College Vocational Nursing Program on provisional approval for the two (2) year period from February 28, 2014, through February 28, 2016. The Board directed that the program must obtain approval by the full Board prior to the admission of additional students. This action was taken due to the program's noncompliance with California Code of Regulations Section 2530 (I).

The program is requesting approval to admit the following classes:

1. A day class of 30 students commencing on May 19, 2014; graduating July 24, 2015. This class would **replace** students that graduated on March 14, 2014.
2. An evening class of 30 students commencing on June 9, 2014; graduating August 24, 2015. This class would **replace** students that graduated on June 6, 2014.
3. A day class of 30 students commencing on September 1, 2014; graduating November 6, 2015. This class would **replace** students scheduled to graduate August 29, 2014.

History of Prior Board Actions

(See Attachment A. History of Prior Board Action)

Enrollment

The program is required to obtain Board approval prior to the admission of each class. The pattern of admissions for current classes is seen in the enrollment table below.

The following table represents **current** student enrollment based on the current and proposed class start dates. The table indicates a **maximum enrollment of 126** students for the period **June 2012 through September 2014**.

ENROLLMENT DATA				
CLASS DATES		#Students Admitted	#Students Current or Completed	Total Enrolled
Start	Complete			
6/12 Day		30	23	23
9/12 Eve		30	30	23 + 30 = 53
12/12 Eve		30	30	53 + 30 = 83
4/13 Eve		30	28	83 + 28 = 111
6/13 Day		15		111 + 15 = 126
	8/13 (6/12 Day Class)		-23	126 - 23 = 103
9/13		15		103 + 15 = 118
	11/13 (9/12 Eve Class)		-30	118 - 30 = 88
	11/13 (12/12 Eve Class)		-30	88 - 30 = 58
	3/14 (4/13 Eve Class)		-28	58 - 28 = 30
5/14 Day Proposed	7/15	30		30 + 30 = 60
	6/14 (6/13 Day Class)		-15	60 - 15 = 45
6/14 Eve Proposed	8/15	30		45 + 30 = 75
	8/14 (9/13 Day Class)		-15	75 - 15 = 60
9/14 Day Proposed	11/15	30		60 + 30 = 90

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 January 2008 to March 2014, specify the pass percentage rates for graduates of the Premiere 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 Average Quarterly Pass Rate	Program Average Annual Pass Rate	State Average Annual Pass Rate [CCR §2530(I)]	Variance from State Average Annual Pass Rate
Jan - Mar 2008	30	24	88%	76%	79%	76%	+3
Apr - Jun 2008	12	9	75%	75%	77%	75%	+2
July - Sep 2008	10	5	50%	70%	74%	74%	0
Oct - Dec 2008	18	5	28%	73%	63%	73%	-10
Jan - Mar 2009	12	6	50%	70%	48%	72%	-24
Apr - Jun 2009	25	17	68%	71%	51%	70%	-19
July - Sep 2009	9	6	67%	74%	53%	72%	-19
Oct - Dec 2009	13	9	69%	76%	64%	73%	-9
Jan - Mar 2010	18	15	83%	75%	73%	74%	-1
Apr - Jun 2010	16	7	44%	74%	66%	75%	-9
Jul - Sep 2010	14	11	79%	74%	72%	75%	-3
Oct - Dec 2010	15	7	47%	74%	70%	75%	-5
Jan - Mar 2011	29	26	90%	80%	74%	77%	-3
Apr - Jun 2011	22	11	50%	77%	56%	74%	-18
Jul - Sep 2011	14	11	79%	74%	72%	75%	-3
Oct - Dec 2011	15	7	47%	74%	70%	75%	-5
Jan - Mar 2012	22	11	50%	74%	46%	72%	-26
Apr - Jun 2012	13	4	31%	72%	52%	77%	-25
Jul - Sep 2012	22	11	50%	74%	46%	74%	-28
Oct - Dec 2012	21	14	67%	70%	51%	74%	-23
Jan - Mar 2013	20	8	40%	75%	49%	73%	-24
Apr - Jun 2013	20	17	85%	78%	60%	73%	-13
Jul - Sep 2013	38	19	50%	75%	59%	75%	-16
Oct - Dec 2013	17	10	59%	76%	56%	76%	-20
Jan - Mar 2014	36	26	72%	74%	65%	76%	-11

*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.

California Code of Regulations, section 2530(I) states:

“The program shall maintain a yearly average minimum pass rate on the licensure examination that does not fall below 10 percentage points of the state average pass rate for first time candidates of approved vocational nursing schools for the same period.”

Based on the **most recent data available** (January – March 2014), the program’s average annual pass rate is **65%**. The California average annual pass rate for graduates from approved vocational nursing programs who took the NCLEX-PN® Licensure Examination for the first time during the same period is 76%. The average annual pass

rate for the Premiere Career College Vocational Nursing Program is **eleven (11)** percentage points **below** the state average annual pass rate.

Faculty and Facilities

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

“For supervision of clinical experience, there shall be a maximum of 15 students for each instructor.”

The number of Board-approved faculty totals 51, including the director. The director has 70% administrative and 30% teaching responsibilities. Fourteen (14) of the faculty are “additional faculty” and eight (8) teach theory only. Of the total faculty, 29 instructors are approved to teach clinical.

Based on a maximum enrollment of 126 students, nine (9) instructors are needed. Therefore, the number of current faculty is adequate for the current and proposed enrollment.

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

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

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

Other Considerations

Over the course of the last eight (8) quarters, the program’s average annual pass rate has fluctuated between 46% and 60%. Based on the most recent data available (October – December 2013), the program’s current average annual pass rate is 56%, 20 percentage points below the state average annual pass rate.

On February 4, 2013, the director was notified that the program had **four (4)** quarters of noncompliant average annual pass rates on the NCLEX-PN® Licensure Examination. The director was required to submit a plan to improve the programs licensure pass rates by March 5, 2013.

On March 2, 2013, the director submitted her plan to improve licensure pass rates. Included in the plan were the following elements:

- **Admission Criteria.** The passing score on the pre-nursing module was increased from 75% to 80%.

- **Assessment Technology Institute (ATI) Testing.** Incorporated ATI testing with an ATI Coordinator. The required ATI score was increased from 75% to 80%.
- **Textbooks.** The following (2) new references were added as required textbooks: Pharmacology Made Insanely Easy and Cases for Nursing Simulation.
- **Remediation Policy.** The Remediation Policy was revised to require students experiencing difficulty in any test to attend mandatory tutorial classes. Attendance is strictly monitored.
- **Faculty Evaluation.** An evaluation of theory and clinical faculty identified the need for faculty to incorporate alternate test items in exams. Monthly in-services will be given to teach the faculty how to create these test items. Additionally, ATI testing policy will be reinforced.

On May 3, 2013, the Executive Officer **rescinded** approval of the program's ongoing admission of four (4) classes per year and required the program to request approval prior to admitting classes. This action was taken due to the program's low licensure pass rates.

On May 7, 2013, the director was notified the program had **five (5)** quarters of noncompliant average annual pass rates. The director was required to submit a plan to improve the programs licensure pass rates by May 31, 2013.

On June 17, 2013, the director submitted the required comprehensive analysis. Upon analysis by the assigned consultant, the director was advised that the submitted analysis was incomplete and that submission of a revised analysis is required not later than September 13, 2013.

On July 29, 2013, the director was notified that the program had **six (6)** quarters of noncompliant average annual pass rates. The director was required to submit proof that the plan identified above is being implemented by August 16, 2013.

On September 17, 2013, the Board received the program's revised comprehensive analysis as requested on June 17, 2013. The program reported:

- **Admission & Screening and Selection.** The top 30 students will be accepted from the pre-requisite course. The director identified that grade inflation may have occurred and she decreased the amount of credit that will be given in identified content areas.
- **Objectives.** No problem identified from previous plan changes listed above.
- **Instructional Plan.** No problem identified from previous plan changes listed above.
- **Lesson Plans.** The director is having all instructors use the lesson plans, power point presentations, etc. that come with the current textbooks. This eliminates the problem of each instructor teaching from varied lesson plans.

- **Textbooks.** All textbooks have been updated. The director identified that the students and faculty were not using all required textbooks. Instructors were given textbook lists and required reading assignments to enforce requirements.
- **Attendance.** Attendance policy is being implemented. The director identified there was no structured make-up for missed assignments in clinical and theory. In January 2012, a structured make-up policy was implemented.
- **Remediation.** All students that fail an examination are required to attend a remediation class prior to taking the next test. Students that do not attend the class will not be allowed to retake the examination.
- **Evaluation of Theory and Clinical Instruction.** Classroom observations will be made quarterly by the Director. Evaluations will be conducted every course to identify problems early. ATI will be evaluated by one instructor appointed as the ATI resource person.
- **Quizzes and Examinations.** Faculty attended a class on development of test items. An evaluation of current tests identified insufficient questions requiring critical thinking. Standardized testing adopted.
- **Clinical Experience.** The director identified that not all clinical instructors were attempting to correlate presented clinical experiences with the theory being taught. Instructors were counseled on how to do this. Clinical scoring was revised to reinforce this correlation.
- **Theory Presentations.** Standardized lesson plans were adopted and implemented. Merging of content areas of certain topics was implemented with Board approval to assist with the flow on topics.
- **Grading.** The grading previously included a 5% score for participation and a 5% score for attendance. This 10% was reallocated to ATI. The passing score was raised from 75% to 80% for all courses as of March 4, 2013. Students must attend and pass a simulated NCLEX examination. They are given 3 attempts to pass. Failure to pass on the third attempt will result in not graduating from the program. This student may apply to take the state board exam based on equivalency.

On October 30, 2013, the director was notified that the program had **seven (7)** quarters of noncompliant licensure pass rates. The director was requested to submit proof that the plan identified above is being implemented and its effectiveness in correcting the identified deficiency by August 16, 2013.

On November 20, 2013, the Director re-submitted the program's comprehensive analysis. The elements of that analysis were the same as those received September 17, 2013.

On December 6, 2013, the Executive Officer considered the program's request for approval to admit a class of 15 students on January 6, 2014. The request was denied and the program was required to obtain Board approval prior to the admission of

additional students. Additionally, the Executive Officer directed that the program be placed on the Board's February 2014 agenda for consideration of placement on provisional approval.

Upon notification, the director requested identification of steps the program could take in lieu of placement on the Board's agenda. On December 10, 2013, Board representatives, SNEC and assigned NEC, conducted a teleconference with program representatives. Participating program representatives included Fe Aragon, President, Owner; Enrique Aragon, Vice President; Rowena Gabriel, Director of Student Services; and Jennifer Ty DeGuzman, Program Director.

An extensive discussion was held relative to the program's persistent difficulties maintaining compliant average annual pass rates on the NCLEX-PN® Licensure Examination that resulted in the program's placement on the on the Board's February 2014 agenda. The program's plan of correction was also discussed as well as the status of currently enrolled students.

The SNEC asked the director to identify factors resulting in the lack of achievement of enrolled students and the program's noncompliant pass rates. The director was unable to identify the causes. The program owner interjected that, in her opinion, the program's pass rates resulted from the admission of a large number of unprepared students with English as their second language and the failure of the faculty to follow the instructional plan and understand the mission of the school. Upon closure of the teleconference, the NEC requested the director to submit her written revised plan of correction by December 27, 2013.

On December 11, 2013, the Board received notification from the owner, Fe Aragon, that the program director, Jennifer Ty De Guzman, was no longer employed at the school.

On December 16, 2013, the Board received correspondence from Ms. Aragon withdrawing the program's request to admit students.

On December 20, 2013, the Board approved a new director.

On February 28, 2014, the Board placed Premiere Career College on provisional approval for a two (2) year period from February 28, 2014, through February 28, 2016. This action was taken due to the program's noncompliance with California Code of Regulations Section 2530 (l). During the Board meeting, the new director presented information relative to her plan to address the program's deficiencies. The Board directed the program director to submit the proposed plan in writing.

On March 12, 2014, the new program director submitted her plan to increase program licensure pass rates. The following elements were included in her plan (see Attachment B):

- Implement a mandatory, more aggressive review program for all graduating classes to assess their readiness to take the licensure examination.

- Provide an on - campus 21 day review. This review is scheduled for May 5, 2014 through June 2, 2014 for the current graduating class.

For incoming classes:

- **Revise Admission Criteria**

1. Applicants for program admission will be required to complete the ATI Entrance Examination in critical thinking.
2. With the next class, applicants for program admission will be required to complete a Pre-Nursing assessment test:
 - Reading, Comprehension and reasoning, Numerical and Language ability. A score of 50% in each content area is required. The NEC advised the director to increase the entrance score.

- **Assessment and Evaluation of Students.**

1. Implement NCLEX type testing at the end of each module (50 questions) and a 100 item test at the end of each clinical course. An 80% minimum grade is required. Students that do not achieve 80% will be remediated.
2. Students in remediation will be closely tracked and monitored.
3. The critical thinking exit examination will be given to students prior to graduation. The director will compare and track progress. Students that do not show progress will be counseled.

On March 20, 2014, the Board forwarded to the Director the Notice of Change of Approval Status (see Attachment C).

Recommendations:

1. Deny Premiere Career College Vocational Nursing Program's request to admit a day class of 30 students commencing on May 19, 2014, graduating July 24, 2015, to **replace** students that graduated on March 14, 2014.
2. Deny the program's request to admit an evening class of 30 students commencing on June 9, 2014' graduating August 24, 2015, to **replace** students that graduated on March 14, 2014.
3. Approve the program's admission of 20 students commencing on June 9, 2014; graduating August 24, 2014, to **replace** students that graduated on March 14, 2014, provided that the program has no more than ten (10) students per instructor during clinical experience.

4. Deny the program a day class of 30 students commencing on September 1, 2014; graduating November 16, 2015, to **replace** students scheduled to graduate August 29, 2014.
5. Approve the program's admission of 20 students commencing September 1, 2014, graduating November 16, 2015, to **replace** students scheduled to graduate August 29, 2014, provided that the program has no more than ten (10) students per instructor during clinical experience.
6. Continue to require the program to obtain approval of the full Board prior to the admission of additional students.

Rationale: The program currently has nine (9) quarters of noncompliant average annual pass rates. The program's Quarter 1 2014 average annual pass rate is **65%**. As such, it is **eleven (11)** percentage points **below** the state average annual pass rate. Over the course of the last nine (9) consecutive quarters, the average annual pass rate has fluctuated between 46% and 65%. The most current quarter notwithstanding, the program's average annual pass rate was 16 to 28 percentage points below the state average annual pass rate.

It must be noted that 26 of the program's 36 graduates tested during Quarter 1 2014 passed. However, it must also be noted that the director assumed her position in December 2013. While she meets regulatory requirements, she lacks significant experience in the role of program director. On March 12, 2014, the new director submitted a plan to increase the program's licensure pass rates. That plan includes a revision of the program's admission criteria and process for the assessment and evaluation of students. Additionally, an on – campus review is scheduled to commence May 5, 2014 and conclude June 2, 2014.

Given the significant improvement in quarter pass rate, the size of the Quarter 1 2014 sample population, elements in the proposed and submitted plan of correction, and the limited experience of the current director, approval of the program's admission of 20 students in June and September 2014 **only** is recommended. Reducing the number of students approved will allow the new director time needed to focus on enrolled students and implement her plan to bring up the licensure pass rates.

Attachment A: History of Prior Board Actions.

Attachment B: Program Correspondence Dated March 12, 2014; Received March 12, 2014.

Attachment C: Notice of Change in Approval Status Dated March 20, 2014; Mailed March 21, 2014.

Agenda Item #13.C.2., Attachment A

PREMIERE CAREER COLLEGE VOCATIONAL NURSING PROGRAM

History of Prior Board Actions

- On February 20, 2004, the Board approved Premiere Career College's request to begin a vocational nursing program with an initial class of 30 students on March 8, 2004, only, and approved the program's curriculum to include 1568 hours, including 586 theory, and 982 clinical hours.

Commencement of the initial class was delayed to June 2004.

- On February 4, 2005, the Board approved initial full accreditation for the Premiere Career College Vocational Nursing Program for the period February 4, 2005, through February 3, 2009, and issued a certificate accordingly; **and** approved the program's request to **replace** students graduating May 20, 2005, with 30 students on June 6, 2005, only.
- On September 16, 2005, the Executive Officer approved the program's request to admit an additional full-time class of 30 students on November 21, 2005, only.
- On May 12, 2006, the Executive Officer approved the program's request to admit a class of 30 students on June 5, 2006, only, to **replace** students graduating on May 19, 2006.
- On October 3, 2006, the Executive Officer approved the program's request to admit a class of 30 students on November 20, 2006, only, to **replace** students graduating on November 3, 2006.

The Executive Officer also approved the program's request for ongoing admissions to **replace** graduating classes, only, with the stipulations that no additional classes are added to the program's current pattern of admissions without prior Board approval, and that the director documents that adequate resources are available to support each admitted class of students.

- On July 2, 2008, the Executive Officer approved the program's request to admit 30 students to a class commencing November 10, 2008, with an anticipated graduation date of October 23, 2009; and approved ongoing admissions to **replace** graduating classes only be approved with the following stipulations:
 - a. No additional classes are added to the program's current pattern of admissions without prior approval. The program's current pattern of admissions includes admission of three full-time classes of 30 students per year.

- b. The director documents that adequate resources, i.e. faculty and facilities, are available to support each admitted class of students.
- On September 20, 2010, the Executive Officer approved Premiere Career College Vocational Nursing Program's request to admit 30 students four (4) times per year to **replace** graduating students only, with the following stipulations:
 - a. No additional classes are added to the program's current pattern of admissions without prior approval. The program's current pattern of admissions includes admission of four (4) full - time classes of 30 students per year to **replace** graduating students only.
 - b. The director documents that adequate resources, i.e. faculty and facilities, are available to support each admitted class of students.
- On February 4, 2013, the director was notified the program had four (4) quarters of low licensure pass rates. The director was required to submit a plan to improve the programs licensure pass rates by March 5, 2013.
- On March 2, 2013, the director submitted her plan to improve licensure pass rates.
- On May 7, 2013, the director was notified the program had five (5) quarters of low licensure pass rates. The director was required to submit a plan to improve the programs licensure pass rates by May 31, 2013.
- On May 3, 2013, the Executive Officer continued full approval for the Premiere Career College Vocational Nursing Program for the period February 4, 2013, through February 3, 2017, and issued a certificate accordingly; **and, revoked** the programs ongoing admission pattern; **and**, required the program to obtain Board approval prior to the admission of additional students.
- On May 20, 2013 the Executive Officer denied Premiere Career College's request to admit a class of 30 students on June 24, 2013; graduating June 6, 2014. This class would have **replaced** students that will graduate on June 7, 2013; and, approved the program's admission of a class of 15 students on June 24, 2013, only; graduating June 6, 2014. This class will **replace** students that will graduate on June 7, 2013; **and**, required the program to submit a written report **by June 12, 2013**. The report must include a comprehensive analysis of the program, specific actions taken to improve program pass rates, timeline for implementation, and the effect of employed interventions. The following elements must be addressed in the analysis.
 - a. Admission Criteria.
 - b. Screening and Selection Criteria.
 - c. Terminal Objectives.
 - d. Curriculum Objectives.
 - e. Instructional Plan.
 - f. Theory and Clinical Objectives for Each Course.
 - g. Lesson Plans for Each Course.

- h. Textbooks.
- i. Attendance Policy.
- j. Remediation Policy.
- k. Evaluations of Theory and Clinical Faculty.
- l. Evaluations of Theory Presentations.
- m. Evaluations of Clinical Rotations and Their Correlation to Theory Presentations.
- n. Evaluation of Student Achievement.
- o. Current Enrollment; **and,**

Required the program to obtain Board approval prior to the admission of additional students.

- On June 17, 2013, the director submitted the comprehensive analysis required above. The analysis was inadequate as presented. The director was given guidance on how to complete the analysis. A new due date of September 13, 2013 was given.
- On July 29, 2013, the director was notified the program has six (6) quarters of low licensure pass rates. The director is required to submit proof that the plan identified above is being implemented by August 16, 2013.
- On August 27, 2013, the Board received the program's documentation verifying the plan to improve graduates licensure pass rates had been implemented.
- On September 17, 2013, the Board received the program's revised comprehensive analysis.
- On September 19, 2013, the Board approved Premiere Career College Vocational Nursing Program's request to admit a class of 15 students on September 23, 2013, only; graduating November 21, 2014. This class **replaces** students that graduated on August 30, 2013; and, required the program to obtain Board approval prior to the admission of additional students.
- On October 30, 2013, the director was notified the program has seven (7) quarters of low licensure pass rates. The director is required to submit an evaluation of her plan to bring up the program's licensure pass rates by November 15, 2013.
- On November 13, 2013, the director re-submitted the comprehensive analysis.
- On December 6, 2013, the Executive Officer considered the program's request for approval to admit a class of 15 students on January 6, 2014. The request was denied and the program was required to obtain Board approval prior to the admission of additional students. Additionally, the Executive Officer directed that the program be placed on the Board's February 2014 agenda for consideration of placement on provisional approval.
- On December 10, 2013, Board representatives, SNEC and assigned NEC, conducted a teleconference with program representatives relative to their request. Participating program representatives included Fe Aragon, President, Owner; Enrique Aragon, Vice

President; Rowena Gabriel, Director of Student Services; and Jennifer Ty DeGuzman, Program Director.

- On December 11, 2013, the Board received correspondence from the owner, Fe Aragon, advising that the program director, Jennifer Ty De Guzman, was no longer employed at the school.
- **On December 20, 2013, the Board approved a new director.**
- On February 28, 2014, the Board placed Premiere Career College on provisional approval for a two (2) year period from February 28, 2014, through February 28, 2016 and issue a notice to the program identifying specific areas of noncompliance and requirements for correction as referenced in Section 2526.1 (e) of the California Code of Regulations; **and**, required the program to admit no additional classes without prior approval by the full Board; **and**, required the program to bring its average annual pass rate to no more than ten (10) percentage points below the State average annual pass rate; **and**, advised the program it shall obtain approval of the full Board prior to the admission of additional students; **and**, the program shall submit a follow-up report in 9 months, but no later than **November 1, 2014** and 21 months, but no later than **November 1, 2015**. The report must include a comprehensive analysis of the program, specific actions taken to improve program pass rates, timeline for implementation, and the effect of employed interventions. The following elements must be addressed in the analysis:
 - a. Current Student Enrollment.
 - b. Admission Criteria.
 - c. Screening and Selection Criteria.
 - d. Terminal Objectives.
 - e. Curriculum Objectives.
 - f. Instructional Plan.
 - g. Theory and Clinical Objectives for Each Course.
 - h. Lesson Plans for Each Course.
 - i. Textbooks.
 - j. Attendance Policy.
 - k. Remediation Policy.
 - l. Evaluations of Theory and Clinical Faculty.
 - m. Evaluations of Theory Presentations.
 - n. Evaluations of Clinical Rotations and Their Correlation to Theory Presentations.
 - o. Evaluation of Student Achievement; **and**,

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 Board's regulations, commencing at California Code of Regulations, title 16, section 2526; **and**, 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; **and**, failure to take any of these corrective actions may cause the full Board to revoke the program's approval.



PREMIERE CAREER COLLEGE

VOCATIONAL NURSING PROGRAM IMPROVEMENT PLAN

VN REGULATION	VIOLATIONS/DEFFICIENCIES	GOAL/ACTION PLAN	RESULTS																								
<p>Section 2530 (1) of Title 16 of California codes of regulations. The program shall maintain a yearly average minimum pass rate on the licensure exam that does not fall below 10% points of the state average pass rate for the first time candidates of the accredited vocational nursing schools for the same period. Failure to maintain the required yearly average minimum pass rate for two years or eight consecutive quarters may be cause to place the program on provisional status.</p>	<p>Premiere’s NCLEX-PN passage rate compared to the California state average for the last five years as published by BVNPT are as follows :</p> <table border="1" data-bbox="569 719 1068 980"> <thead> <tr> <th></th> <th>2013</th> <th>2012</th> <th>2011</th> <th>2010</th> <th>2009</th> </tr> </thead> <tbody> <tr> <td>Premiere Career College</td> <td>56%</td> <td>51%</td> <td>70%</td> <td>70%</td> <td>64%</td> </tr> <tr> <td>CA State Average</td> <td>76%</td> <td>70%</td> <td>72%</td> <td>76%</td> <td>73%</td> </tr> <tr> <td>Differential</td> <td>-20%</td> <td>-19%</td> <td>-2%</td> <td>-6%</td> <td>-9%</td> </tr> </tbody> </table> <p>For 2012 and 2013, the pass rate plunged to a rate below the -10% threshold allowed by the CA BVNPT standard for Licensure Pass Rate.</p>		2013	2012	2011	2010	2009	Premiere Career College	56%	51%	70%	70%	64%	CA State Average	76%	70%	72%	76%	73%	Differential	-20%	-19%	-2%	-6%	-9%	<p>GOAL:</p> <p>Program graduates’ pass rate will be consistent with regulatory requirements, at 10% points of the state annual average pass rate or higher.</p> <p>ACTION PLANS :</p> <p>Review Classes:</p> <p>A. Implementation of a mandatory more aggressive and intensive review program for all graduating classes to assess their readiness to take the NCLEX :</p> <ol style="list-style-type: none"> 1. Sylvia Rayfield & Associates review course 	<p>Sylvia Rayfield & Associates review is scheduled on March 25 & 26, 2014, 0800-1600 for the graduating class</p>
	2013	2012	2011	2010	2009																						
Premiere Career College	56%	51%	70%	70%	64%																						
CA State Average	76%	70%	72%	76%	73%																						
Differential	-20%	-19%	-2%	-6%	-9%																						

VN REGULATION	VIOLATIONS/DEFFICIENCIES	GOAL/ACTION PLAN	RESULTS
		<p>2. NCSBN 21-day review to be done on campus and will be closely monitored by an assigned faculty.</p> <p>3. In-house 20-day review by (3) faculty members. Post-tests will be given at the end of every major content area which will require a pass rate of 80%. High risk students will be identified and a one-on-one tutorial will be done.</p> <p>Incoming Cohorts</p> <p>1. Critical Thinking ATI Assessment Entrance will be given to all classes on the first day of classes.</p> <p>2. Critical Thinking Exit Exam will be given at the end of each module.</p>	<p>NCSBN review is scheduled on May 5-June 2, 2014 for the graduating class</p> <p>In-house review is scheduled on March 26 to April 24, 2014 with Mr. Peter Morante, Mr. Richard Alba and myself.</p> <p>Will be fully implemented upon receiving approval from the VN board to resume admission of new cohort VN students</p>

VN REGULATION	VIOLATIONS/DEFFICIENCIES	GOAL/ACTION PLAN	RESULTS
		<p>3. Results of both entrance and exit critical thinking exams will be compared to track progress of students in their critical thinking abilities. Students who don't show any improvement will be identified and counseled.</p> <p>4. Periodic testing using a variety of NCLEX test formats to be done as follows :</p> <ul style="list-style-type: none"> a) 50-item at the end of every major concept b) A 100-item test at the end of every clinical course <p>A minimum grade of 80% will be required from these test. Students who fail will be remediated</p>	

VN REGULATION	VIOLATIONS/DEFFICIENCIES	GOAL/ACTION PLAN	RESULTS
	<p>Admission Requirements</p> <p>Pre-Nursing Assessment Test that is administered by the Admission Dept. is from C-Net. Student report includes a total score, 3 sub-scores, 8 diagnostic scores and corresponding percentiles. Only the corresponding percentile is being considered for admission, and to be accepted in the program, prospective student need to score an average of <i>50% minimum of the total content areas.</i></p>	<p>Remediation</p> <p>Provision of remediation following the VN Board Remediation Algorithm. After identification of high risk students.</p> <p>High risk students are those with:</p> <ol style="list-style-type: none"> 1. Low performance on achievement tests 2. Low English Comprehension (ESL Students) 3. Inability to effectively apply critical thinking skills 4. Below passing standard on clinical performance <p>The Pre-Nursing Assessment test consists of 4 major content areas :</p> <ul style="list-style-type: none"> - Reading - Comprehension/Reasoning - Numerical Ability - Language Ability <p>Prospective students will be required to score a minimum of <i>50% in each of the content area to be considered in the program.</i></p>	<p>Progress of students undergoing remediation will be closely monitored and tracked.</p> <p>Will be implemented upon approval of new classes by the VN board</p>

VN REGULATION	VIOLATIONS/DEFFICIENCIES	GOAL/ACTION PLAN	RESULTS
	<p>Evaluation of Theory & Clinical Instructors some faculty members have been remiss in integrating critical thinking in their lectures</p>	<p>Initiate a new faculty orientation and mentorship plan.</p> <ol style="list-style-type: none"> 1. Clinical instructors must include discussion of course syllabus on clinical orientation day. 2. Mandatory faculty meeting every 5th and 20th of the month to ensure that everyone is consistent in the material being presented 3. Quarterly faculty-in-service and or attendance at services/workshops that may include : <ol style="list-style-type: none"> a. Test item analysis b. Student advisement/counseling and remediation c. Utilizing the curriculum in teaching 4. Teaching strategies 	<p>A workshop will be provided by Sylvia Rayfield & Associates on April 30, 2014, 0800-1630 hours. Topic : Teaching Strategies for the Current Generation of Nursing Students</p> <p>Next faculty meeting is scheduled on March 20, 2014.</p> <p>Subsequent workshops will be scheduled later.</p>

Agenda Item #13.C.2., Attachment C

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



CERTIFIED MAIL

March 20, 2014
Zenaida Plata
Director, Vocational Nursing Program
Premiere Career College
12901 Ramona Boulevard
Irwindale, CA 91706

Subject: Notice of Change in Approval Status

Dear Ms. Plata:

Pursuant to the action of the Board of Vocational Nursing and Psychiatric Technicians (Board) on February 28, 2014, the Premiere Career College Vocational Nursing Program has been placed on provisional approval for the two – year period from February 28, 2014 through February 28, 2016. The purpose of this letter is to explain the areas of non-compliance found and the corrections required of your program to avoid losing accreditation completely.

Once you have reviewed this letter, please sign and return the enclosed "Acknowledgement of Change in Approval Status" form by **Friday, March 28, 2014**.

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 approval when that program does not meet all requirements as set forth in this chapter and in Section 2526..."

Section 2530(l) of title 16 of the California Code of Regulations states:

"The program shall maintain a yearly average minimum pass rate on the licensure examination that does not fall below 10 percentage points of the state average pass rate for first time candidates of approved vocational nursing schools for the same period.

- (l) Failure to maintain the required yearly average minimum pass rate for two years or eight consecutive quarters may be cause to place a program on provisional approval.”

The program pass rates of the Premiere Career College Vocational Nursing Program for the past 24 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
Jan – Mar 2008	76%	79%	+3
Apr – Jun 2008	75%	77%	+2
Jul – Sep 2008	74%	74%	0
Oct – Dec 2008	73%	63%	-10
Jan – Mar 2009	72%	48%	-24
Apr – Jun 2009	70%	51%	-19
Jul – Sep 2009	72%	53%	-19
Oct – Dec 2009	73%	64%	-9
Jan – Mar 2010	74%	73%	-1
Apr – Jun 2010	75%	66%	-9
Jul – Sep 2010	75%	72%	-3
Oct – Dec 2010	76%	70%	-6
Jan – Mar 2011	77%	74%	-3
Apr – Jun 2011	76%	56%	-20
Jul – Sep 2011	76%	72%	-4
Oct – Dec 2011	75%	70%	-5
Jan – Mar 2012	74%	46%	-28
Apr – Jun 2012	74%	52%	-22
Jul – Sep 2012	74%	46%	-28
Oct – Dec 2012	74%	51%	-23
Jan – Mar 2013	73%	49%	-24
Apr – Jun 2013	73%	60%	-13
Jul – Sep 2013	74%	59%	-15
Oct – Dec 2013	76%	56%	-20

This data substantiates the program's history of non-compliance with Section 2530(l) of the Vocational Nursing Rules and Regulations for 12 of 24 Quarters.

REQUIRED CORRECTION(S)

1. Premiere Career College, Vocational Nursing Program shall bring its average annual pass rate to no more than ten (10) percentage points below the State average annual pass rate.
2. The program shall obtain approval of the full Board prior to the admission of additional students.

3. The program shall submit a follow-up report in 9 months, but no later than **November 1, 2014** and 21 months, but no later than **November 1, 2015**. The report must include a comprehensive analysis of the program, specific actions taken to improve program pass rates, timeline for implementation, and the effect of employed interventions. The following elements must be addressed in the analysis:
 - a. Current Student Enrollment.
 - b. Admission Criteria.
 - c. Screening and Selection Criteria.
 - d. Terminal Objectives.
 - e. Curriculum Objectives.
 - f. Instructional Plan.
 - g. Theory and Clinical Objectives for Each Course.
 - h. Lesson Plans for Each Course.
 - i. Textbooks.
 - j. Attendance Policy.
 - k. Remediation Policy.
 - l. Evaluations of Theory and Clinical Faculty.
 - m. Evaluations of Theory Presentations.
 - n. Evaluations of Clinical Rotations and Their Correlation to Theory Presentations.
 - o. Evaluation of Student Achievement.
4. 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 Board's regulations, commencing at California Code of Regulations, title 16, section 2526.
5. The program shall demonstrate incremental progress in correcting the violations. If the program fails to satisfactorily demonstrate incremental progress, the full Board may revoke the program's approval.
6. Failure to take any of these corrective actions may cause the full Board to revoke the program's approval.

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 **May 2014** Board Meeting agenda, at which point the Board will consider your request to admit additional students. Additionally, your program will be placed on the **February 2016** 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 page 2 and 3, you must submit this documentation by the fifteenth day of the second month prior to that Board meeting.

OTHER IMPORTANT INFORMATION

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

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

The program may no longer advertise that it has full 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 approval is attached for your reference. A complete copy of the Board's laws and regulations can be found on the Board's web site at www.bvnpt.ca.gov.

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

Sincerely,



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

Enclosures

cc: Board Members

TBJ: ph

California Code of Regulations
Title 16
Section 2526.1

2526.1. Provisional Approval.

- (a) Provisional approval means a program has not met all requirements as set forth in this chapter and in Chapter 6.5, Division 2 of the Business and Professions Code.
- (b) Provisional approval shall be granted for a period determined by the Board.
- (c) The Board may place any program on provisional approval when that program does not meet all requirements as set forth in this chapter and in Section 2526. If the program has not met all requirements at the end of the initial provisional approval period, provisional approval may be extended if the program demonstrates to the satisfaction of the Board a good faith effort to correct all deficiencies.
- (d) Any program holding provisional approval may not admit "new" classes beyond the established pattern of admissions previously approved by the Board. The admission pattern is defined by the number of students per class and the frequency of admissions for the six class admissions that immediately precede the Board action to consider provisional approval.
- (e) A program placed on provisional approval shall receive written notification from the Board. The notification to the program shall include specific areas of noncompliance and requirements for correction. A program's failure to correct delineated areas of noncompliance is cause for revocation of provisional approval.
- (f) A material misrepresentation of fact by a vocational nursing program in any information submitted to the Board is cause for revocation of provisional approval.
- (g) A program whose provisional approval has been revoked shall be removed from the Board's list of approval programs. The status of students as potential applicants for licensure will be determined by the Board.
- (h) A program that is removed from the Board's list of approved programs subsequent to Board action based on the program's non-compliance with applicable regulations shall not reapply to establish a vocational nursing program for a minimum period of one calendar year.



Acknowledgement of Change in Approval Status

I, _____, director of _____
(Director's Name) (Name of Program)

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

Please complete and return this form to the Board by [DATE: 7 days from date of Provisional Approval letter].

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

(Signature of Director)

(Date)