

# Agenda Item #14.A.10.



BUSINESS, CONSUMER SERVICES, AND HOUSING AGENCY • GOVERNOR EDMUND G. BROWN JR.  
**BOARD OF VOCATIONAL NURSING & PSYCHIATRIC TECHNICIANS**  
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DATE: August 28, 2014

TO: Board Members

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

SUBJECT: Valley School of Allied Health, Vocational Nursing Program –  
Reconsideration of Provisional Approval Based on Report of Unannounced  
Survey Visit; Consideration of Request to Admit Students (Director: Norma  
Jones, Reseda, Los Angeles County, Private)

On September 16, 2010, the Board placed the Valley School of Allied Health Vocational Nursing Program on provisional accreditation<sup>1</sup> for the two-year period from September 16, 2010, through September 30, 2012 due to noncompliance with California Code of Regulations Section 2530 (I). Further, the Board rescinded approval for the program's ongoing admissions and required the program to admit no additional students unless approved by the Board. On September 6, 2012, the Board **extended** the program's provisional approval for the two-year period from September 6, 2012 through September 30, 2014.

On June 25 - 26, 2014, Board representatives conducted an onsite survey of the program relative to compliance with Board requirements. Findings from that visit are presented for Board consideration.

Additionally, the program requests approval to admit a full-time class of 20 students on October 13, 2014, graduating November 15, 2015, to **replace** students who graduated June 13, 2014.

## History of Prior Board Actions

(See attachment A, History of Prior Board Actions)

## Enrollment

The program offers a full-time course of instruction that is 54 weeks in length and a part-time course of instruction that is 90 weeks in length. Prior Board approval is required for

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<sup>1</sup> 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.

the admission of all students. The pattern of admissions for current classes is seen in the enrollment table below.

The following table represents **current and proposed** student enrollment based on class starts and completions. The table indicates a **maximum enrollment of 59 students** for the period from **February 2011 through October 2014**.

ENROLLMENT DATA				
CLASS DATES		#Students Admitted	#Students Current or Completed	Total Enrolled
Start	Completed			
2/11		10	10	<b>10</b>
5/11		9	10	10 + 10 = <b>20</b>
8/11	9/12	18	14	20 + 14 = <b>34</b>
11/11		14	14	34 + 14 = <b>48</b>
4/12		10	11	48 + 11 = <b>59</b>
	6/12 (2/11 Class)		-10	59 - 10 = <b>49</b>
	6/12 (5/11 Class)		-10	49 - 10 = <b>39</b>
6/12		11	11	39 + 11 = <b>50</b>
	9/12 (8/11 Class)		-14	50 - 14 = <b>36</b>
9/12		17	17	36 + 17 = <b>53</b>
	12/12 (11/11 Class)		-14	53 - 14 = <b>39</b>
5/13		20		39 + 20 = <b>59</b>
	5/13 (4/12 Class)		-11	59 - 11 = <b>48</b>
	7/13 (6/12 Class)		-11	48 - 11 = <b>37</b>
	10/13 (9/12 Class)		-17	37 - 17 = <b>20</b>
3/14		14		20 + 14 = <b>34</b>
	6/14 (5/13 Class)		-20	34 - 20 = <b>14</b>
	4/15 (3/14 Class)		-14	14 - 14 = <b>0</b>
10/14 <b>Proposed</b>	11/15	20		0 + 20 = <b>34</b>

## Licensing Examination Statistics

The following statistics, furnished by the Pearson Vue and published by the National Council of State Boards of Nursing as “Jurisdictional Summary of All First-Time Candidates Educated in Member Board Jurisdiction” for the period July 2008 through June 2014, specify the pass percentage rates for graduates of Valley School of Allied Health Vocational Nursing Program on the National Council Licensure Examination for Practical (Vocational) Nurses (NCLEX-PN®).

<b>NCLEX-PN® Licensure Examination Data</b>							
<b>Quarterly Statistics</b>					<b>Annual Statistics*</b>		
<b>Quarter</b>	<b># Candidates</b>	<b># Passed</b>	<b>% Passed</b>	<b>State Quarterly Pass Rate</b>	<b>Program Average Annual Pass Rate</b>	<b>State Average Annual Pass Rate [CCR §2530(l)]</b>	<b>Variance from State Average Annual Pass Rate</b>
Jul – Sep 2008	5	2	<b>40%</b>	70%	<b>56%</b>	74%	<b>-18</b>
Oct – Dec 2008	2	0	<b>0%</b>	73%	<b>45%</b>	73%	<b>-28</b>
Jan – Mar 2009	7	4	<b>57%</b>	70%	<b>50%</b>	72%	<b>-22</b>
Apr – Jun 2009	9	4	<b>44%</b>	71%	<b>43%</b>	70%	<b>-27</b>
Jul – Sep 2009	16	9	<b>56%</b>	74%	<b>50%</b>	72%	<b>-22</b>
Oct – Dec 2009	16	5	<b>31%</b>	76%	<b>46%</b>	73%	<b>-27</b>
Jan – Mar 2010	14	7	<b>50%</b>	76%	<b>46%</b>	74%	<b>-28</b>
Apr – Jun 2010	7	5	71%	74%	<b>49%</b>	75%	<b>-26</b>
Jul - Sep 2010	13	8	<b>62%</b>	76%	<b>50%</b>	75%	<b>-25</b>
Oct – Dec 2010	17	9	<b>53%</b>	77%	<b>57%</b>	76%	<b>-19</b>
Jan - Mar 2011	12	8	<b>67%</b>	80%	<b>61%</b>	77%	<b>-16</b>
Apr – Jun 2011	2	2	100%	71%	<b>61%</b>	76%	<b>-15</b>
Jul – Sep 2011	11	8	73%	74%	<b>64%</b>	76%	<b>-12</b>
Oct – Dec 2011	14	10	71%	74%	72%	75%	-3
Jan – Mar 2012	19	10	<b>53%</b>	77%	65%	74%	-9
Apr – Jun 2012	7	3	<b>43%</b>	72%	<b>61%</b>	74%	<b>-13</b>
Jul – Sep 2012	16	9	<b>56%</b>	74%	<b>57%</b>	74%	<b>-17</b>
Oct – Dec 2012	5	3	60%	70%	<b>53%</b>	74%	<b>-21</b>
Jan – Mar 2013	16	13	81%	75%	64%	73%	-9
Apr – Jun 2013	9	2	<b>22%</b>	78%	<b>59%</b>	73%	<b>-14</b>
Jul – Sep 2013	10	6	<b>60%</b>	75%	<b>60%</b>	74%	<b>-14</b>
Oct – Dec 2013	7	6	86%	76%	<b>64%</b>	76%	<b>-12</b>

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 [CCR §2530(l)]	Variance from State Average Annual Pass Rate
Jan – Mar 2014	13	6	46%	74%	51%	76%	-25
Apr – Jun 2014	7	2	29%	66%	54%	73%	-19

\*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(l) 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.”

Examination statistics substantiate the program’s **noncompliance** with regulatory requirements twenty - one (21) out of 24 quarters.

Based on the most current data available (April through June 2014), the program’s average annual pass rate is **54%**. The California average annual pass rate for graduates from approved vocational nursing programs who took the NCLEX-PN® for the first time is 73%. The average annual pass rate for Valley School of Allied Health Vocational Nursing Program is **19 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 total number of Board-approved faculty is 14, including the program director. The director has 100% administrative duties. Two (2) faculty members are additional faculty. Of the total faculty, ten (10) are approved to teach in the clinical area.

For an enrollment of 59 students, four (4) instructors are needed for clinical instruction. Therefore, the number of current faculty is adequate for the current and proposed enrollment.

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

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

The program has submitted and received written approval for clinical facilities that are adequate as to type and variety of patients treated to enable current and proposed students to meet clinical objectives, in accordance with Section 2534 (b) of the Vocational Nursing Rules and Regulations. Despite having facilities approved by the Board, those facilities are not being utilized consistent with the approved curriculum and facility approval. (See Violation #1)

### **Other Considerations**

As noted previously, on September 16, 2010, the Board placed the program on provisional approval for a two (2) year period from September 16, 2010, through September 30, 2012. **At that time, the program’s average annual pass rate was 49%.**

On September 6, 2012, the Board extended the program’s provisional approval for the two-year period from September 6, 2012 through September 30, 2014. **At that time, the program’s average annual pass rate was 61%, an improvement of 12 percentage points since placement on provisional approval.** (See Attachment B)

Based on the most current data available (April through June 2014), the program’s average annual pass rate is **54%, 19 percentage points below** the state average annual pass rate. It is important to note that the program’s average annual pass rate **has decreased seven (7) percentage points since the Board extended provisional approval on September 6, 2012.**

On May 30, 2014, the director submitted her comprehensive analysis. The submitted document noted minor adjustments to the comprehensive analysis and plan submitted a year ago (see Attachment C).

### **Program Survey Visit**

On June 25 and 26, 2014, an unannounced onsite visit was completed by Board representatives to determine the program’s compliance with Board requirements. During the visit, the Consultants assessed program resources, including faculty, clinical facilities, library, staff and support services, physical space, skills laboratory and equipment required to achieve the program’s objectives. In addition, the Consultants reviewed records for newly graduated and currently-enrolled students, and facilitated discussions with the Program Director and other staff members.

The following violations of the California Code of Regulations (Code) were identified (see Attachment D):

**2526 (a) (7) of the Vocational Nursing Rules and 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:** The program’s instructional plan was submitted and approved by the Board. However an analysis of class schedules and other documents confirmed that the program failed to follow the Board - approved instructional plan.

Board files substantiate that the program is approved for 62 hours of clinical experience in a Board - approved clinical site for Maternity and 62 hours of clinical experience in a Board - approved clinical site for Pediatrics. At the time of the visit, Consultants confirmed that students were not being assigned and had not completed any Maternity Nursing clinical experience in a Board - approved facility. Hands - on clinical experience was replaced with laboratory simulation without prior approval by the Board. Further, students were assigned to complete only 16 of the 62 hours of clinical experience in Pediatric Nursing.

**Plan to Correct #1:** This violation is **not corrected**.

**Section 2526(a) (13) of the Vocational Nursing Rules and Regulations states:**

“The institution shall apply to the Board for approval. Written documentation shall be prepared by the director and shall include:  
... (13) Screening and selection criteria...

**Violation #2:** Board records substantiate approval of the program’s Screening and Selection Policy. Based upon analysis of program records and provided documents, the program failed to follow the approved policy. In so doing, students were admitted who did not meet the established criteria to enter the program. As such, these students were at increased risk of failure.

**Plan to Correct #2:** This violation is **not corrected**.

**Section 2530 (a) of the Vocational Nursing Rules and Regulations states:**

“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:** Consultants observed that the program did not have sufficient resources to achieve the program’s objectives. Classrooms and skills laboratories were dimly lit. One skills laboratory was utilized as storage for items that had reportedly been donated to the school. A second skills laboratory was very small and was reportedly used to demonstrate Maternity related procedures to students.

Consultants observed that the skills laboratory used for demonstration was inadequate for the enrolled population. The space marginally could allow two (2) students to observe procedures; however, the students would need to enter the room prior to the instructor, since the Maternity mannequin obstructed the doorway.

In addition, although the program had obtained written approval of clinical sites, those sites were not being utilized as noted in Violation #1 above.

**Plan to Correct #3:** This violation is **not corrected**.

**Section 2530 (g) of the Vocational Nursing Rules and Regulations states:**

“Each school shall have on file proof that each enrolled student has completed a general education course of study through the 12<sup>th</sup> grade or evidence of completion of the equivalent thereof ...”.

**Violation #4:** An analysis of program files substantiates that the program did not have on file proof of 12<sup>th</sup> grade completion or the equivalent thereof for each enrolled student. Specifically, program files confirm two (2) students were admitted without proof of high school completion or the equivalent thereof.

**Plan to Correct #4:** This violation is **not corrected**.

**Section 2530 (i) of the Vocational Nursing Rules and Regulations states:**

“The school shall evaluate student performance to determine the need for remediation or removal from the program”.

**Violation #5:** Although the program had a Remediation Policy in place, program documents substantiate the program's failure to demonstrate effective follow-through to ensure resolution of identified deficiencies. Remediation plans were not consistently developed for students with identified educational deficiencies. Further, for those students for whom a remediation plan had been developed, the program failed to complete reevaluation of the student or modify the plan based on student progression or the lack thereof. Additionally, it was noted that students who failed final exams were allowed to use other coursework to bring their grades up to passing.

**Plan to Correct #5:** This violation is **not corrected**.

**Section 2530 (k) of the Vocational Nursing Rules and Regulations states:**

"The program shall have prior Board approval to increase the number of students per class and/or increase the frequency of admission of classes. Criteria to evaluate a school's request to increase the number of students per class and/or increase the frequency of class admissions include but are not limited to:

- (1) Sufficient program resources as specified in section 2530(a).
- (2) Adequacy of clinical experience as specified in section 2534.
- (3) Licensure examination pass rates as specified in section 2530(l)."

**Violation #6:** Classroom observations confirm that the program had begun a class without prior Board approval. Consultants were informed by the school administrator that students who had previously been terminated from the program based on academic deficiencies were admitted into a new class. Approximately 15 to 20 students were observed in the skills laboratory receiving instruction in urinary catheterization on a female mannequin. The individual providing the instruction was the administrator.

It is important to note that as presented in the approved faculty application, the administrator did not meet requirements prescribed in regulations for Instructors. (See Violation # 6)

**Plan to Correct #6:** This violation is **not corrected**.

**Section 2533 (e) of the Vocational Nursing Rules and Regulations states:**

"The following related courses may be taught by additional faculty. Additional faculty are persons who have qualifications to teach in a community college or a state university in California or hold a baccalaureate degree in the field

related to the curriculum taught, or meet the requirement for a vocational credential.”

<b>Courses</b>	<b>Maximum Hours of Instruction by Other Professionals Accepted by the Board</b>
Anatomy and Physiology	54
Psychology	54
Pharmacology	54
Nutrition	54
Normal Growth and Development	54

**Violation #7:** Based upon an analysis of provided documents and files, Consultants identified that the program failed to comply with regulatory requirements for program faculty. Specifically, two (2) additional faculty were assigned as clinical instructors in clinical facilities. Consultants observed the administrator, Pedraja Nonylon and another Additional Faculty member providing instruction to students relative to Maternity procedures. Such utilization of additional faculty is noncompliant with existing regulations.

Additionally, Consultants noted, that the faculty and students referred to Pedraja Nonylon as Doctor Nonylon (Dr. Nony). The director advised the Consultants that “Doctor Nony” was a Doctor in the Philippines. It is important to note that the official records of the Medical Board of California do not confirm issuance of a physicians and surgeons license to Pedraja Nonylon.

**Plan to Correct #7:** This violation is **not corrected**.

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

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

**Violation #8:** Consultants determined that the program is not actively administered by a Board – approved director, as evidenced by the following findings.

- 1) Information provided by the director and documents obtained during the survey confirmed that faculty are assigned to teach in all levels of the program by the campus administrator.

- 2) The program's utilization and teaching assignment of some faculty is inconsistent with existing regulations and the terms of their approval. When queried by the Consultants about the program's utilization of additional faculty, the director responded that she was unaware that additional faculty could not teach Medical/Surgical Nursing, Maternity Nursing, Pediatric Nursing, etc. or that additional faculty may not teach skills laboratory or provide instruction in Board - approved clinical sites.

It is important to note, that the director is a seasoned director who has been approved as a director, albeit at a different school, in excess of ten (10) years.

- 3) The director failed to evaluate program faculty.
- 4) The director does not ensure that the approved instructional plan is followed. Class schedules are made by an instructor.
- 5) The director communicated her inability to physically evaluate the program's clinical facilities. As such, she is dependent on the unapproved instructors to evaluate and convey to her information relevant to the clinical site.

**Plan to Correct #8:** This violation is **not corrected**.

**Recommendations:**

1. Deny Valley School of Allied Health Vocational Nursing Program's request to admit a full-time class of 20 students on October 13, 2014, graduating November 15, 2015, to **replace** students who graduated June 13, 2014.
2. Revoke Valley School of Allied Health Vocational Nursing Program's provisional approval effective immediately.
3. Remove the program from the *List of Approved Schools*.

**Rationale:** The program was placed on provisional approval **September 16, 2010, 4 years ago**. Since data has been recorded for the program (beginning July 2008), 24 quarters of licensure data is available. The program's average annual pass rates have been more than ten (10) percentage points **below** state average annual pass rates for twenty-one (**21**) **of the 24** quarters. As such, the program has been **compliant 12.50%** of the quarters for which examination statistics are available and **noncompliant for 87.50%** of available quarters. Based on published examination statistics for Quarter 2 2014, the program's quarter pass rate is 29% and the **average annual**

pass rate is 54%. As such, the program's average annual pass rate is 19 percentage points **below** the state average annual pass rate.

On June 25, 2014, Board representatives made an unannounced school site visit. Eight (8) violations of the California Code of Regulations were identified by Consultants. The identified violations are not corrected. Significantly, the director's failure to actively administer the program place the program and enrolled students at risk. Non-nurse personnel were assigned to teach nursing and instruct students in skills laboratory. As evidenced by the licensure data, the program is failing to prepare students for success on the licensure examination.

The number and critical nature of the violations, the length of time the program has been on provisional approval, and noncompliance with program pass rate requirements over 87.50% of the quarters for which program statistics are reported support the recommendation to revoke the program's approval.

Based on reported enrollment data, 14 students began classes in March 2014 and are currently enrolled in classes. If the Board adopts the recommendations, the following options are available for these students.

1. Students may apply for admission to other programs, requesting transfer credit for previously completed theory and clinical instruction.
2. Students with prior paid work experience may apply for vocational nurse licensure based on equivalent education and experience.

Attachment A: History of Prior Board Action.

Attachment B: Notice of Change in Approval Status dated September 6, 2012; Mailed September 19, 2012.

Attachment C: Program Comprehensive Analysis, dated May 21, 2014.

Attachment D: Board Correspondence – Notice of Violations dated August 8, 2014.

# **Agenda Item #14.A.10., Attachment A**

## **VALLEY SCHOOL OF ALLIED HEALTH VOCATIONAL NURSING PROGRAM**

### **History of Prior Board Actions:**

- On November 2, 2006, the Executive Officer approved Valley School of Allied Health's request to begin a vocational nursing program with an initial class of 15 students commencing November 27, 2006, only. The Board approved the program curriculum for 1,566 hours, including 605 theory and 961 clinical hours.
- In November 2006, the Executive Officer approved a postponement of the starting date for the first class from November 27, 2006 until January 8, 2007. The graduation date of this initial class will be February 1, 2008.
- On October 22, 2007, the Executive Officer approved full accreditation for Valley School of Allied Health, Vocational Nursing Program for the period October 22, 2007, through October 21, 2011, and issued a certificate accordingly.

The Executive Officer approved an additional full-time class of 20 students to start on November 12, 2007, with an expected graduation date of November 26, 2008. The Board also approved a full-time class of 20 students to start on February 25, 2008, with an expected graduation date of March 13, 2009.

The Executive Officer postponed action on the approval of additional full-time class requests for May 27, 2008; August 27, 2008; and December 8, 2008, pending demonstration of sufficient clinical facilities to afford the number, type, and variety of patients that will provide clinical experience consistent with competency-based objectives and the theory being taught; adequate numbers of instructors for the proposed increase in student enrollment; and demonstration of student success on the NCLEX-PN® licensure examination.

- On May 21, 2008, the Executive Officer approved the Valley School of Allied Health Vocational Nursing Program's request to admit 20 students on May 27, 2008, only, with an anticipated graduation date of June 12, 2009.
- On August 13, 2008, the Executive Officer approved the Valley School of Allied Health Vocational Nursing Program's request to admit 20 students on September 2, 2008, with an anticipated graduation date of October 2, 2009. The Bureau also approved the program's request to admit a full-time class of 20 students on December 8, 2008, with an anticipated graduation date of January 22, 2010.

- On October 8, 2008, the Executive Officer approved the program's request to admit a part-time class of 20 students on October 14, 2008, with an anticipated graduation date of July 13, 2010. The effect of approving this request will be a pattern of admissions consisting of four (4) full-time classes per year, to **replace** graduating classes, and one (1) part-time class every 18 months, to **replace** graduating classes.

The Valley School of Allied Health was approved for **ongoing** admissions to **replace** graduating classes, only, with the following stipulations:

- a. No additional classes are added to the program's current pattern of admissions without prior 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 August 19, 2009, the program was notified that its pass rates had fallen more than ten (10) percentage points below the state average annual pass rate for the past four (4) quarters. A written plan for improving the program's NCLEX-PN® was requested to be submitted by September 19, 2009.
  - On September 21, 2009, the Board received the program's written plan for improving program pass rates.
  - On December 29, 2009, the program was notified that its pass rates had fallen more than ten (10) percentage points below the state average annual pass rate for the past five (5) quarters.
  - On January 26, 2010, the program was notified that its pass rates had fallen more than ten (10) percentage points below the state average annual pass rate for the past six (6) quarters. The program was requested to submit documentation verifying implementation of the plan of correction submitted on September 21, 2009.
  - On February 10, 2010, the program submitted a plan of correction to improve the program pass rates on the NCLEX-PN® licensure examination.
  - On May 20, 2010, the program submitted requested documentation.
  - On August 5, 2010, the Board forwarded correspondence per certified and regular mail notifying the program that the program had been placed on the September 16, 2010 Board agenda for consideration of placement on provisional accreditation. The program was requested to complete and submit a current and projected enrollment form, list of current faculty, list of clinical facilities to which students are assigned, and

effects of actions the program has taken to improve student pass rates by August 12, 2010.

- On August 12, 2010, the program submitted all requested documents related to the August 5, 2010 request.
- On September 16, 2010, the Board placed Valley School of Allied Health Vocational Nursing Program on provisional accreditation for the two-year period from September 16, 2010, through September 30, 2012, and issued a notice to the program to identify specific areas of noncompliance and requirements for correction as referenced in Section 2526.1 (e) of the California Code of Regulations; **and** required the program to submit a follow-up report in 10 and 22 months but no later than July 1, 2011. The report must include a comprehensive analysis of the program, specific actions taken to improve program pass rates, timeline for implementation, and the effect of employed interventions. The following elements must be addressed in the analysis.
  - a. 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 Information.

The Board rescinded approval for the program's ongoing admissions. The program is required to admit no additional students unless approved by the Board. The program is required to comply with all accreditation standards in Article 4 of the Vocational Nursing Practice Act, commencing at Business and Professions Code section 2880, and Article 5 of the Board's Regulations, commencing at California Code of Regulations, Title 16, Section 2526. The Board placed the program on the September 2012 Board agenda for reconsideration of the program's provisional accreditation.

- On October 14, 2010, the Executive Officer approved Valley School of Allied Health's request to admit 20 students on October 18, 2010, and graduate November 24, 2011, only, to **replace** students scheduled to graduate October 15, 2010; and continued to require the program to request Board approval prior to the admission of additional classes.

- On December 21, 2010, the Executive Officer approved the program's request to admit 20 students on February 28, 2011, graduating May 7, 2012, to **replace** students graduating February 15, 2011 only; **and** denied the program's request to admit 20 students on May 9, 2011 and complete June 12, 2012, to **replace** students graduating May 7, 2011, at this time.
- On April 21, 2011, the Executive Officer approved Valley School of Allied Health's request to admit a full-time class of 20 students on May 16, 2011, graduating June 12, 2012, only, to **replace** students who are scheduled to graduate May 13, 2011; and, require the program to obtain Board approval prior to the admission of future classes.
- On July 6, 2011, the Board received the program's comprehensive analysis.
- On August 19, 2011, the Executive Officer approved Valley School of Allied Health request to admit a full-time class of 20 students on August 22, 2011, graduating September 22, 2012, only, to **replace** students who are scheduled to graduate August 12, 2011; and, required the program to obtain Board approval prior to the admission of future classes.
- On November 21, 2011, the Executive Officer approved Valley School of Allied Health Vocational Nursing Program's request to admit a full-time class of 20 students on November 28, 2011, graduating January 10, 2013, only, to **replace** students who are scheduled to graduate November 18, 2011; **and**, required the program to submit a written plan identifying a time table to perform evaluations of each instructor's theory and clinical presentations by December 22, 2011; **and**, required the program to obtain Board approval prior to the admission of future classes.
- On December 19, 2011, the program submitted the plan to evaluate instructor performance as required.
- On April 16, 2012, the Executive Officer approved Valley School of Allied Health Vocational Nursing Program's request to admit a full-time class of 20 students on April 16, 2012, only, graduating May 15, 2013, to **replace** students who graduated March 9, 2011; and, approved the program's requirement to obtain Board approval prior to the admission of future classes.
- On May 30, 2012, the Executive Officer approved Valley School of Allied Health Vocational Nursing Program's request to admit a full-time class of 20 students on June 11, 2012 only, graduating July 20, 2013, to **replace** students who graduated June 8, 2012; and, require the program to continue to obtain approval by the Board prior to the admission of future classes.

- On September 6, 2012, the Board **extended** provisional approval of Valley School of Allied Health Vocational Nursing Program for the two-year period from September 6, 2012 through September 30, 2014, and issue a notice to the program to identify specific areas of non-compliance and requirements for correction as referenced in Section 2526.1 (e) of the California Code of Regulations; **and**, approved Valley School of Allied Health Vocational Nursing Program's request to admit a full-time class of 20 students on September 10, 2012, only, graduating October 20, 2013, to **replace** students who will graduate September 7, 2012; **and**, required the program to bring its average annual pass rate to no more than ten (10) percentage points below the State average annual pass rate for four (4) consecutive quarters; **and**, required the program to demonstrate incremental progress in correcting the violation. If the program fails to satisfactorily demonstrate incremental progress, the full Board may revoke the program's accreditation; **and**, required the program to show documented progress by submitting a follow-up report in nine (9) months, but no later than **June 1, 2013**, and 21 months, but no later than **June 1, 2014**. The report must include a comprehensive analysis of the program, specific actions taken to improve program pass rates, timeline for implementation, and the effect of employed interventions. The following elements must be addressed in the analysis:

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

required the program to comply with all accreditation standards in article 4 of the Vocational Nursing Practice Act, commencing at Business and Professions Code section 2880, and article 5 of the Board's regulations, commencing at California Code of Regulations, title 16, section 2526; and, advised the program that failure to take any of these corrective actions may cause the full Board to revoke the program's approval; **and**, continue the program's requirement to obtain approval by the Board prior to the admission of future classes.

- On December 6, 2012, the Executive Officer **denied** Valley School of Allied Health Vocational Nursing Program's request to admit a full-time class of 20 students on January 7, 2013, graduating February 10, 2014, to **replace** students who graduated December 7, 2012; and, required the program to obtain approval by the Full Board prior to the admission of future classes.
- On March 11, 2013, the assigned consultant forwarded correspondence requesting submission of two (2) copies and a CD or Flash Drive of pertinent documents, plan, and subsequent actions taken to correct identified problems that they desire Board members to consider.
- On March 28, 2013, the Board received correspondence from the program director and two (2) copies and a CD of pertinent documents and subsequent actions taken to correct identified problems that they desire the Board members to consider.
- On May 10, 2013, the Board approved Valley School of Allied Health Vocational Nursing Program's request to admit a full-time class of 20 students on May 14, 2013, only, graduating June 15, 2014, to **replace** students who graduated December 7, 2012; **and**, required the program to obtain approval by the Full Board prior to the admission of future classes.
- On June 5, 2013, the assigned consultant forwarded correspondence requesting submission of two (2) copies and a CD or Flash Drive of pertinent documents, plan, and subsequent actions taken to correct identified problems that they desire Board members to consider.
- On June 10, 2013, the Board received the program's comprehensive analysis from the program director and two (2) copies and a CD of pertinent documents and subsequent actions taken to correct identified problems that they desire the Board members to consider.
- On September 13, 2013, the Board **denied** Valley School of Allied Health Vocational Nursing Program's request to admit a full-time class of 20 students on September 16, 2013, to **replace** students who graduated July 15, 2012; **and**, required the program to obtain approval by the Full Board prior to the admission of future classes.
- On February 28, 2014, the Board approved Valley School of Allied Health Vocational Nursing Program's request to admit a full-time class of 20 students on March 3, 2014, only, graduating April 15, 2015, to **replace** students who graduated October 18, 2013; **and**, Required the program to continue to obtain approval by the full Board prior to the admission of future classes.
- On May 16, 2014, the Board **denied** Valley School of Allied Health Vocational Nursing Program's request to admit a full-time class of 20 students on June 23, 2014; graduating July 23, 2015 to **replace** students who graduated on June 13, 2015; **and**,

required the program to obtain approval by the full Board prior to the admission of future classes.

- On May 30, 2014, the director submitted the required comprehensive analysis.
- On August 8, 2014, the Board sent via Certified Mail a Notice of Violations. The plan to correct the violations is due to the Board by Friday, August 29, 2014.



September 6, 2012

Norma Jones  
Valley School of Allied Health  
Vocational Nursing Program  
18107 Sherman Way, Suite 101  
Reseda, CA 91335

***Subject: Notice of Change in Approval Status***

Dear Ms. Jones:

Pursuant to the action of the Board of Vocational Nursing and Psychiatric Technicians (Board) on September 6, 2012, the provisional approval status of the Valley College of Allied Health Vocational Nursing Program has been extended for the two – year period from September 6, 2012 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 accreditation completely.

Once you have reviewed this letter, please sign and return the enclosed "Acknowledgement of Change in Accreditation Status" form by **Friday, September 27, 2012**.

**AREAS OF NON-COMPLIANCE [VIOLATION(S)]**

In accordance with Section 2526.1(c) of title 16 of the California Code of Regulations,

"The Board may place any program on provisional accreditation when that program does not meet all requirements as set forth in this chapter and in Section 2526..."

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

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

The program pass rates of the Valley College of Allied Health Vocational Nursing Program for the past sixteen (16) quarters are set forth in the following table.

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

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

### REQUIRED CORRECTION(S)

1. Extend provisional approval of Valley School of Allied Health Vocational Nursing Program for the two-year period from **September 6, 2012 through September 30, 2014**, and issue a notice to the program to identify specific areas of non compliance and requirements for correction as referenced in Section 2526.1 (e) of the California Code of Regulations.
2. The program shall bring its average annual pass rate to no more than ten (10) percentage points below the State average annual pass rate for four (4) consecutive quarters.
3. The program shall show documented progress by submitting a follow-up report in nine (9) months, but no later than **June 1, 2013**, and 21 months, but no later than **June 1, 2014**. The report must include a comprehensive analysis of the program, specific actions taken to improve program pass rates, timeline for implementation, and the effect of employed interventions. The following elements must be addressed in the analysis:
  - a. Current Student Enrollment.
  - b. Admission Criteria.
  - c. Screening and Selection Criteria.

- d. Terminal Objectives.
  - e. Curriculum Objectives.
  - f. Instructional Plan.
  - g. Theory and Clinical Objectives for Each Course.
  - h. Lesson Plans for Each Course.
  - i. Textbooks.
  - j. Attendance Policy.
  - k. Remediation Policy.
  - l. Evaluations of Theory and Clinical Faculty.
  - m. Evaluations of Theory Presentations.
  - n. Evaluations of Clinical Rotations and Their Correlation to Theory Presentations.
  - o. Evaluation of Student Achievement.
6. The program shall comply with all accreditation standards in article 4 of the Vocational Nursing Practice Act, commencing at Business and Professions Code section 2880, and article 5 of the Board's regulations, commencing at California Code of Regulations, title 16, section 2526.
  7. Failure to take any of these corrective actions may cause the full Board to revoke the program's approval.
  8. The program shall be required to obtain approval by the Board prior to the admission of future classes.
  9. In the event additional violations of the accreditation standards are identified, such violations may result in further corrective action or revocation of provisional accreditation.

### **FUTURE BOARD ACTION**

Your program will be placed on the **September 2014** Board Meeting agenda for reconsideration of your approval status. If you have additional information that you wish considered beyond the required corrections listed on pages 2 and 3, you must submit this documentation by the fifteenth day of the second month prior to the Board meeting.

### **OTHER IMPORTANT INFORMATION**

Please be advised that, pursuant to the Board's regulations, the program will not be authorized to admit new classes beyond the established pattern of admissions previously approved by the Board. The established pattern of admissions approved by the Board is as follows: Prior Board approval is required to admit classes.

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

The program may no longer advertise that it has full approval, and should take steps to correct any ongoing advertisements or publications in that regard.

A copy of title 16, California Code of Regulations, section 2526.1, regarding provisional accreditation is attached for your reference. A complete copy of the Board's laws and regulations can be found on the Board's web site at [www.bvnpt.ca.gov](http://www.bvnpt.ca.gov).

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

Sincerely,

A handwritten signature in black ink, appearing to read "Teresa Bello-Jones", written in a cursive style.

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

Enclosure  
TBJ/ph  
cc: Board Members

# Agenda Item #14.A.10., Attachment C



## VALLEY SCHOOL of ALLIED HEALTH

**BVNPT RECD EDU  
ON 5/31/14 WITH Dg**

May 21, 2014

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

Dear Ms. Hinckley,

Subject: Comprehensive Analysis

The following is the Valley School of Allied Health progress report due June 01, 2014.

a. Current student enrollment

- There are a total of 31 students currently enrolled in the program. Eleven (11) students are in Term IV and scheduled to graduate on June 13, 2014. Nine (9) students are in Term III, who are repeaters that failed Term II. Eleven (11) students are in Term I that started March 03, 2014 and scheduled to graduate on April 15, 2015

b. Admission Criteria

- The criteria remains the same except for the following:
  1. Score of at least a 78% for Reading, Mathematics and Language must be attained etc...
  2. The applicant will be interviewed by at least three people. Including:
    - The administrator
    - Director of Nursing
    - Appointed Designee

c. Screening and Selection Criteria

- Remain the same except for the interview process as stated in b, 2.

d. Terminal objectives currently remain the same. Except for the following:

- The faculty is currently reviewing the philosophy, conceptual framework, threads and Terminal objectives.
- The faculty will be meeting within a week to review the results and make a decision as to any changes.
- The Board will be notified as to the changes and asking for approval.

e. Curriculum objectives

- Currently the same
- However, once the above has been decided upon the faculty will:
  1. Review each term and make a decision on what is to be taught in each term.
  2. Review the clinical objectives to correlate with what is being taught in theory.
  3. Instructors are to communicate every week, document their findings, and submit documents to the Director of Nursing.
  4. Instructors for each term will meet once a month with the Director of Nursing to discuss and make any decisions necessary regarding their students.
    - These meetings will be documented and kept on file.

f. Instructional Plan

- Currently remain the same.
- Will be revised if changes made in (e) above.

g. Theory and Clinical objectives for each course

- These as stated above will be reviewed.

h. Lesson Plans for each course

- These are currently being worked on.
- More specific group projects will be listed.
- More time for questioning at the higher levels of learning will be allowed for.  
Note: In clinical, instructors will also be questioning students at the higher levels of learning.

i. Textbooks

- Currently for Term 1 and 2, we are using Rosdahl, Textbook of Basic Nursing edition 10.
- Term 3 and 4 are using Christensen Adult Health Nursing, 6<sup>th</sup> edition.
- This fall, Christensen will be coming out with a new edition 7, and we will be going back to Christensen for Term 1 and 2 as well as Terms 3 and 4.

j. Attendance Policy

- Remains the same.

k. Remediation Policy

- Remains the same.
- There may be new editions depending on what is decided in (e) above.

l. Evaluation of Theory and Clinical Faculty

- The following has been added:
  1. The Administrator and Director of Nursing will both evaluate the faculty.
  2. The Administrator and Director of Nursing will discuss their findings.
  3. They will meet and discuss their findings with each faculty member and the strengths and weaknesses of the individual.
  4. The evaluations will be done every 6 months.

m. Evaluation of Theory presentation

- The evaluation of the theory presentation will be every 6 months and if necessary.

n. Evaluation of Clinical rotations and their correlation to theory presentation.

- The evaluation of clinical rotations and correlation to theory will be completed every 6 months and if necessary.
- This may be changed or updated due to findings in (e) above (curriculum objectives).

o. Evaluation of Student achievement

- The policy remains the same
- Evaluations are done at the end of each term and as necessary.

Added Information

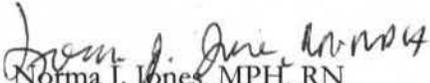
p. Evaluations

- Students evaluate classroom and clinical instructors at the end of every term.
- Students evaluate their clinical experience at the end of each term.
- Instructors evaluate the clinical site at the end of each term
- The administrator and Director of Nursing evaluate all clinical sites every 6 months.
- All evaluations are reviewed by the Director of Nursing and necessary corrections or decisions made and implemented.

I hope the above meets with the approval of the Board. We are working very hard with our students to help them with analysis, critical thinking, problem solving and communication. These areas are what we think are critical to passing the NCLEX.

Thank you for your support.

Sincerely,



Norma J. Jones, MPH, RN

*Program Director*

*Vocational Nursing Program*

Please complete the following **Enrollment Data Table** for all **Previous and Currently Enrolled** classes and for those classes that are **proposed or projected**.

School Name: **Valley School of Allied Health**

ENROLLMENT DATA			
CLASS DATES		#Students Admitted at time of class start	#Students who have graduated or are still in the class
List ALL classes to date. Include if FT or PT and include proposed classes <small>If this is a request for a replacement class, identify which class the new class will replace</small>	Date class will Complete		
05/13/2013 - FT	06/13/2014	20	11 (scheduled to graduate) 9 (Term III)
03/03/2014 - FT	04/15/2015	14	11 (still in class) 3 (dropped)
Proposed 10/13/2014 To replace class graduating 06/13/2014	11/15/15	20	

Signature: James J. Jones, M.D. 4/14 Date: 5/29/2014





# Attachment C

## Faculty/Student Clinical Assignments

School: Valley School of Allied Health

Faculty name	Assigned facility	# of Students Allowed/ Instructor	# of Students Actually in Group	Level of students being taught	Days of Clinical Experience	Time of Clinical Experience	Pre-conference Time	Post-conference Time
<i>05/13/2013 class</i>								
Gerry Topacio	Care Meridian	15:1	11:1	Term IV	M-T	7:00 - 3:00	7:00 - 7:30	2:00 - 3:00
<i>05/13/2013 class (repeaters)</i>								
Gerry Topacio	Care Meridian	15:1	9:1	Term III	W-Th	7:00 - 3:00	7:00 - 7:30	2:00 - 3:00
<i>03/13/2014 class</i>								
Gale Veroy	Lake Balboa Care Center	10:1	6:1	Term II	M-T	7:00 - 3:00	7:00 - 7:30	2:00 - 3:00
Cheryl Machart	Woodland Care Center	10:1	5:1	Term II	M-T	7:00_3:00	7:00-7:30	2:00- 3:00
<b>Proposed class</b> <i>10/13/2014 class</i>								
Jennifer Hermoso	Country Villa Woodman	10:1	10:1	Term I	W-Th	7:00 - 3:00	7:00 - 7:30	2:00 - 3:00
Cheryl Machart	Woodland Care Center	15:1	10:1	Term I	W-Th	7:00 - 3:00	7:00 - 7:30	2:00 - 3:00

**OB/Peds  
CLINICAL TRACKING  
Valley School of Allied Health**

	week 1		week 2		week 3		week 4		week 5		week 6		week 7	
student	1	2	3	4	5	6	7	8	9	10	11	12	13	14
1	simulation	simulation	simulation	simulation	OB VCE	child care	Peds clinic	OB clinic	Peds VCE	child care	Peds clinic	child care	OB clinic	Field Trip Shriners
2	simulation	simulation	simulation	simulation	child care	Peds clinic	OB clinic	Peds VCE	child care	Peds clinic	child care	OB clinic	OB VCE	Field Trip Shriners
3	simulation	simulation	simulation	simulation	Peds clinic	OB clinic	Peds VCE	child care	Peds clinic	child care	OB clinic	OB VCE	child care	Field Trip Shriners
4	simulation	simulation	simulation	simulation	OB clinic	Peds VCE	child care	Peds clinic	child care	OB clinic	OB VCE	child care	Peds clinic	Field Trip Shriners
5	simulation	simulation	simulation	simulation	Peds VCE	child care	Peds clinic	child care	OB clinic	OB VCE	child care	Peds clinic	OB clinic	Field Trip Shriners
6	simulation	simulation	simulation	simulation	child care	Peds clinic	child care	OB clinic	OB VCE	child care	Peds clinic	OB clinic	Peds VCE	Field Trip Shriners
7	simulation	simulation	simulation	simulation	Peds clinic	child care	OB clinic	OB VCE	child care	Peds clinic	OB clinic	Peds VCE	child care	Field Trip Shriners
8	simulation	simulation	simulation	simulation	child care	OB clinic	OB VCE	child care	Peds clinic	OB clinic	Peds VCE	child care	Peds clinic	Field Trip Shriners
9	simulation	simulation	simulation	simulation	OB clinic	OB VCE	child care	Peds clinic	OB clinic	Peds VCE	child care	Peds clinic	child care	Field Trip Shriners
10	simulation	simulation	simulation	simulation	OB VCE	child care	Peds clinic	OB clinic	Peds VCE	child care	Peds clinic	child care	OB clinic	Field Trip Shriners
11	simulation	simulation	simulation	simulation	child care	Peds clinic	OB clinic	Peds VCE	child care	Peds clinic	child care	OB clinic	OB VCE	Field Trip Shriners
12	simulation	simulation	simulation	simulation	Peds clinic	OB clinic	Peds VCE	child care	Peds clinic	child care	OB clinic	OB VCE	child care	Field Trip Shriners
13	simulation	simulation	simulation	simulation	OB clinic	Peds VCE	child care	Peds clinic	child care	OB clinic	OB VCE	child care	Peds clinic	Field Trip Shriners
14	simulation	simulation	simulation	simulation	Peds VCE	child care	Peds clinic	child care	OB clinic	OB VCE	child care	Peds clinic	OB clinic	Field Trip Shriners
15	simulation	simulation	simulation	simulation	child care	Peds clinic	child care	OB clinic	OB VCE	child care	Peds clinic	OB clinic	Peds VCE	Field Trip Shriners

OB VCE - OB Virtual Clinical Excursion

Peds VCE - Pediatrics Virtual Clinical Excursion



## **CERTIFIED MAIL**

August 8, 2014

Norma Jones, Director  
Vocational Nursing Program  
Valley School of Allied Health  
18107 Sherman Way, Suite 101  
Reseda, CA 91335

### ***Subject: Vocational Nursing Program Notice of Violation***

Dear Ms. Jones:

On June 25 and 26, 2014, the Board of Vocational Nursing and Psychiatric Technicians (Board) made an unannounced site visit to the Valley School of Allied Health Vocational Nursing Program. Based on the site visit and review of submitted documents, the following violations were identified:

#### **Section 2526(a)(7) of the Vocational Nursing Rules and 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:** The program's instructional plan was submitted and approved by the Board, however, based upon review of class schedules and other documents, the program failed to follow the Board approved instructional plan. Specifically, the program replaced on - hands clinical experience in Maternity and Pediatric Nursing with laboratory simulation without prior approval by the Board.

Board files substantiate that the program is approved for 62 hours of clinical experience in a Board - approved clinical site for Maternity and 62 hours of clinical experience in a Board - approved clinical site for Pediatrics. At the time of the visit, consultants confirmed that students were not being scheduled and had not completed any Maternity Nursing clinical experience in a Board approved facility. Further, students were assigned to complete only 16 of the 62 hours of Pediatric clinical experience.

**Section 2526(a) (13) of the Vocational Nursing Rules and Regulations states:**

“The institution shall apply to the Board for approval. Written documentation shall be prepared by the director and shall include:  
... (13) Screening and selection criteria...

**Violation #2:** The program submitted a Screening and Selection policy that was approved by the Board, however, based upon analysis of documents the program failed to follow the approved policy. In so doing, students were admitted that did not meet the established criteria to enter the program. As such, these students were at increased risk of failure.

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

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

**Violation #3:** During an analysis of the program, consultants identified that the director was not actively administering the program. Based on information identified during the survey, consultants identified that the campus administrator scheduled all faculty to teach in all levels of the program. The assigned faculty were not Board approved to teach in the content areas to which they were assigned.

Further, the director failed to evaluate any of the assigned faculty, even though some were identified as performing at less than optimum level. Additionally, the director communicated her inability to physically evaluate the program’s clinical facilities. As such, she is dependent on the unapproved instructors to evaluate and convey to her the information relevant to the clinical site.

**Section 2530 (g) of the Vocational Nursing Rules and Regulations states:**

“Each school shall have on file proof that each enrolled student has completed a general education course of study through the 12<sup>th</sup> grade or evidence of completion of the equivalent thereof ...”.

**Violation #4:** An analysis of program files substantiate that two (2) students were admitted without proof of High School completion or the equivalent thereof.

**Section 2530 (i) of the Vocational Nursing Rules and Regulations states:**

“The school shall evaluate student performance to determine the need for remediation or removal from the program”.

**Violation #5:** Although the program had a remediation policy in place, program documents substantiate failure of the program to demonstrate effective follow-through to ensure resolution to the remediation. Additionally, it was noted that students who failed final exams were allowed to include other coursework to bring their grades up to passing.

**Section 2530 (k) of the Vocational Nursing Rules and Regulations states:**

“The program shall have prior Board approval to increase the number of students per class and/or increase the frequency of admission of classes. Criteria to evaluate a school’s request to increase the number of students per class and/or increase the frequency of class admissions include but are not limited to:

- (1) Sufficient program resources as specified in section 2530(a).
- (2) Adequacy of clinical experience as specified in section 2534.
- (3) Licensure examination pass rates as specified in section 2530(l).”

**Violation #6:** Classroom observations revealed that the program had begun a class without prior Board approval.

**Section 2533 (e) of the Vocational Nursing Rules and Regulations states:**

“The following related courses may be taught by additional faculty. Additional faculty is persons who have qualifications to teach in a community college or a state university in California or hold a baccalaureate degree in the field related to the curriculum taught, or meet the requirement for a vocational credential.”

<b>Courses</b>	<b>Maximum Hours of Instruction by Other Professionals Accepted by the Board</b>
Anatomy and Physiology	54
Psychology	54
Pharmacology	54
Nutrition	54
Normal Growth and Development	54

**Violation #7:** Based upon an analysis of provided documents and files, consultants identified that the program failed to comply with regulatory requirements for program faculty. Specifically, two (2) additional faculty were assigned as clinical instructors in clinical facilities. Such assignment is noncompliant with regulatory requirements.

**Be advised that the continuation of such violations jeopardizes your program’s approval.** Please submit the following by the date listed below:

- 1. A plan and timeline for correction of each violation listed above (1-7).

2. Submit a signed statement attesting that the program has on file proof of High School completion or the equivalent thereof for all enrolled students.
3. Submit an instructional calendar that demonstrates curricular presentation consistent with the Board – approved instructional plan.
4. Develop tools to be utilized for written evaluation of:
  - a. Clinical facilities.
  - b. Student progress.
  - c. Remediation (to include follow-up).
  - d. Attendance.
5. Develop evaluation forms utilized by the Director for the following:
  - a. Curriculum.
  - b. Student performance.
  - c. Facilities.
  - d. Faculty.
6. Submit a faculty assignment schedule that demonstrates utilization and assignment consistent with professional abilities and regulatory requirements.
7. Submit a clinical rotation calendar and statement of completion that demonstrates that all current and future students have completed required Obstetrics and Pediatrics clinical rotations that are consistent with the Board approved instructional plan. The submitted schedule must include the following information.
  - a. Dates and times of rotation.
  - b. Names of students.
  - c. Assigned clinical facility.
  - d. Name of assigned instructor.
8. Provide a written document identifying how the director will actively administer the program in accordance with existing regulatory requirements.

The Board requests the above information no later than **Friday, August 29, 2014.**

Should further information be needed, please feel free to contact me at (916) 263-7840.

Sincerely,



**PAM HINCKLEY, R.N., M.S.N.**  
Nursing Education Consultant