

Agenda Item #14.B.2.



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: 
Denise Rodriguez, MSN, RN
Nursing Education Consultant

SUBJECT: Preferred College of Nursing, Los Angeles, Vocational Nursing Program – Consideration of Placement on Provisional Approval; Consideration of Request to Admit Students (Director: Bernard Sanchez, Los Angeles, Los Angeles County - Private)

Preferred College of Nursing, Los Angeles, Vocational Nursing Program is presented to the Board for consideration of placement on provisional¹ approval.

In accordance with Section 2526.1(c) of the Vocational Nursing Rules and Regulations

“The Board may place any program on provisional approval when a program does not meet all requirements as set forth in this chapter and in Section 2526...”

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

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

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

¹ Prior to January 1, 2012, references in article 4 of the Vocational Nursing Practice Act and article 4 of the Psychiatric Technicians Law provided that the Board accredits all vocational nursing and psychiatric technicians programs. Pursuant to Business and Professions Code Sections 2883 and 4532 (Senate Bill 539, Chapter 338, Statutes of 2011), **accredit** was changed to **approve**. There was no change to the Board's authority or jurisdiction.

Additionally, on July 14, 2014 the director requested approval to admit two classes of students as follows:

1. A full – time class of thirty (30) students commencing September 15, 2014, graduating September 30, 2015 to **replace** a class that graduated on May 15, 2014, only.
2. A part – time class of thirty (30) students commencing September 19, 2014, graduating March 4, 2016 to **replace** a class that graduated July 21, 2013.

History of Prior Board Actions

(See Attachment A, History of Prior Board Actions)

Enrollment

Currently, the program must obtain Board approval prior to the admission of all classes. The program offers part-time and full-time classes. The current full-time class is 47 weeks in length and the current part-time class is 75 weeks in length.

The following table represents **current and projected** student enrollment based on current and proposed class starts and completions. The table indicates a **maximum enrollment of 110 students** for the period from **October 2011 through September 2014**.

ENROLLMENT DATA				
CLASS DATES		#Students Admitted	#Students Current or Completed	Total Enrolled
Start	Complete			
10/11 (FT Class)		22	13	13
1/12 (PT Class)		19	16	13 + 16 = 29
1/12 (FT Class)		14	10	29 + 10 = 39
4/12 (PT Class)		28	26	39 + 26 = 65
6/12 (FT Class)		28	24	65 + 24 = 89
	10/12 (10/11 FT Class)		-13	89 – 13 = 76
	1/13 (1/12 FT Class)		-10	76 – 10 = 66
3/13 (PT Class)		26	22	66 + 22 = 88
4/13 PT (FT Class)		25	22	88 + 22 = 110

ENROLLMENT DATA				
CLASS DATES		#Students Admitted	#Students Current or Completed	Total Enrolled
Start	Complete			
	6/13 (6/12 FT Class)		-24	110 - 24 = 86
	7/13 (1/12 PT Class)		-16	86 - 16 = 70
9/13 (FT Class)		22	15	70 + 15 = 85
	11/13 (4/12 PT Class)		-26	85 - 26 = 59
	5/14 (4/13 FT Class)		-22	59 - 22 = 37
9/14 (Proposed FT Class)	9/15	30		37 + 30 = 67
	9/14 (9/13 FT Class)		-15	67 - 15 = 52
9/14 (Proposed PT Class)	3/16	30		56 + 30 = 82

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 July 2011 through June 2014, specify the pass percentage rates for graduates of the Preferred College of Nursing, Los Angeles, Vocational Nursing Program on the National Council Licensure Examination for Practical/Vocational Nurses (NCLEX-PN®) and the variance from state average annual pass rates.

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(I)]	Variance from State Average Annual Pass Rate
Jul-Sep 2011	17	9	53%	74%	67%	75%	-8
Oct-Dec 2011	9	4	44%	74%	56%	75%	-19
Jan-Mar 2012	19	15	79%	77%	60%	74%	-14
Apr-Jun 2012	12	7	58%	72%	61%	74%	-13
July-Sept 2012	28	20	71%	74%	68%	74%	-6
Oct-Dec 2012	17	10	59%	70%	68%	74%	-6
Jan-Mar 2013	22	10	45%	75%	59%	73%	-14

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
Apr-Jun 2013	18	8	44%	78%	56%	73%	-17
July-Sept 2013	19	13	68%	75%	54%	74%	-20
Oct-Dec 2013	6	4	67%	76%	54%	76%	-22
Jan-Mar 2014	29	17	59%	74%	58%	76%	-18
April-Jun 2014	11	6	55%	66%	62%	73%	-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 §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.”

Based on the most recent data available (April - June 2014), the program’s average annual pass rate is **62%**. 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 **73%**. The average annual pass rate for the Preferred College of Nursing, Los Angeles, Vocational Nursing Program is **eleven (11)** percentage points **below** the state average annual pass rate.

This data substantiates the program’s non-compliance with Section 2530 (l) of the Vocational Nursing Rules and Regulations for the past **six (6)** consecutive quarters and for a total of **nine (9)** of the last **twelve (12)** quarters.

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 totals 24 (twenty-four), including the director. The director has 80% administrative responsibility and 20% teaching duties. The total number of faculty approved to teach clinical is twelve (12) instructors including the director.

Based on a maximum enrollment of 110 students, and with a ratio of one (1) instructor for every fifteen (15) students, eight (8) instructors are needed. There are adequate faculty resources to support the students in the requested additional classes.

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

The Preferred College of Nursing, Los Angeles, Vocational Nursing Program was approved to commence its initial class on April 11, 2003. On September 10, 2004, the Board approved the program's initial full accreditation.

Published examination statistics evidence the program's difficulties maintaining compliant program pass rates on the NCLEX/PN®. As noted previously, based on reported statistics, the program's average annual pass rates have been more than ten (10) percentage points below state average annual pass rates for nine (9) of the previous twelve (12) quarters. Further, the program has been noncompliant for the previous six (6) consecutive quarters.

On August 14, 2012, the Executive Officer rescinded approval of the program's ongoing admissions citing the program's declining average annual pass rates on the licensure examination.

On February 28, 2013, the Executive Officer approved the program's request to admit a part – time and a full – time class of 30 students as replacement classes and denied a request to admit another full – time class of 30 students. Again, the program's inconsistent and declining pass rates were cited.

On June 25, 2013, the Executive Officer denied the program's request to admit a full – time class of 30 students and required the director's completion of a program analysis to determine the cause of graduates' lack of success on the licensure examination. The director was required to submit a written report by July 25, 2013, identifying issues negatively impacting program achievement and a plan of action to correct each problem.

On July 25, 2013, the Board received a copy of the program director's analysis and plan of correction. Revisions were reported in the following areas:

1. Admission Criteria.
2. Screening and Selection Criteria.

3. Curriculum Modification.

On September 19, 2013, the Executive Officer approved the program's request to admit a full-time class of 30 students on September 23, 2013, to **replace** students who graduated on June 6, 2013 and denied a request to admit a part-time evening class of 30 students on October 14, 2013, to **replace** students who graduated on July 21, 2013. It was noted that the program's quarter pass rates had improved for one quarter and declined thereafter. At that time, the program's quarter pass rate was 44%; its average annual pass rate was 56%.

On February 6, 2014, the Executive Officer denied the program's request to admit a part-time class of 30 students to start on February 14, 2014. The program was required to submit a follow-up report no later than **March 1, 2014**, to include the effect of employed interventions, identification of required revisions of the plan of correction, and a timeline for implementation. The Executive Officer continued the program's requirement to obtain Board approval prior to the admission of each class.

On February 26, 2014, the Board received a copy of the director's follow up report of the program and plan of correction that was submitted to the Board on June 10, 2013 (see attachment B)

Changes since the June 10, 2013 report are summarized below:

1. Institution of NCLEX-PN Boot Camp, including individualized coaching and mentoring after completion of program requirements
2. Updated lectures, tests and lesson plans
3. Students are required to complete a CNA program prior to entry into the VN program
4. NCLEX-PN prep is incorporated into the program
5. Homework assignments are based on textbooks now, rather than ATI materials
6. ATI material is integrated into class and post-lecture activities
7. "Those deemed not ready to graduate are being dismissed from the program at the earliest moment this fact becomes noticeable."

Board records substantiate that the director has been working on curriculum revisions throughout this year. The records also document the need for multiple revisions of the organization of the curriculum as recently as July 25, 2014. As of July 30, 2014, the process of revising the curriculum was still ongoing. The director has identified revision of the curriculum as a priority.

In summary, Preferred Nursing College, Los Angeles, Vocational Nursing Program has been non-compliant with Section 2530(l) of the Vocational Nursing Rules and Regulations for the past **six (6) consecutive quarters**. Further, the program has been non-compliant with Section 2530(l) of the Vocational Nursing Rules and Regulations for **nine (9) of the last twelve (12) quarters**. While a number of efforts to improve student achievement have been reported, the program's average annual pass rates remain consistently noncompliant with regulatory requirements.

Recommendations:

1. Place Preferred College of Nursing, Los Angeles, Vocational Nursing Program on provisional approval for the two year period from September 12, 2014 through September 30, 2016, and issue a notice to the program to identify specific areas of non-compliance and requirements for correction as referenced in Section 2526.1 (e) of the California Code of Regulations (see attachment E).
2. Defer a decision regarding the request to admit students to the November 2014 Board meeting.
3. Require the program to provide no less than one (1) instructor for every ten (10) students in clinical experiences.
4. Require the program to admit no additional classes without prior approval by the full Board.
5. Require the director to submit a complete curriculum revision no later than **September 30, 2014**.
6. Require the program to submit follow up reports in nine (9) months, but no later than **June 1, 2015**, and 21 months, but no later than **June 1, 2016**. The reports must include a comprehensive analysis of the program, specific actions taken to improve 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
7. Require the program to bring its average annual pass rate to no more than (10) ten percentage points below the State average annual pass rate.
8. Require the program to demonstrate incremental progress in correcting the violations. If the program fails to satisfactorily demonstrate incremental progress the full Board may revoke the program's approval.

9. Require the program to comply with all approval standards in Article 4 of the Vocational Nursing Practice Act, commencing at Business and Professions Code Section 2880, and Article 5 of the Board's Regulations, commencing at California Code of Regulations, Title 16, Section 2526.
10. Failure to take any of these corrective actions may cause the full Board to revoke the program's approval.
11. Place the program on the Board's **September 2016** agenda for reconsideration of provisional approval.

Rationale: The Board is seriously concerned about the program's consistent noncompliance with regulatory requirements. Published examination statistics evidence the program's persistent difficulties in achieving and maintaining compliance with regulatory requirements relative to average annual pass rates. Based on reported statistics for **the last twelve (12) quarters**, the program's average annual pass rates have been **below** state average annual pass rates. Further, the program has been noncompliant for the previous **six (6) consecutive quarters**. Based on data for Quarter 2, 2014, the program's average annual pass rate is 62%, eleven (11) percentage points **below** the state average annual pass rate.

The Board will continue to monitor the program's effectiveness and compliance with regulatory requirements by tracking class admissions, the effectiveness of employed interventions, and the program's licensure examination pass rates each quarter.

Attachment A: History of Prior Board Actions.

Attachment B: Board Correspondence Dated February 12, 2014.

Attachment C: Program Analysis and Corrective Action Plan Dated February 26, 2014.

Attachment D: Correspondence from the Board Dated May 9, 2014.

Attachment E: Draft Notice of Change in Approval Status.

Agenda Item #14.B.2., Attachment A

PREFERRED COLLEGE OF NURSING, LOS ANGELES VOCATIONAL NURSING PROGRAM

History of Prior Board Actions

- On April 11, 2003, the Board approved the Preferred College of Nursing, Los Angeles, Vocational Nursing Program's request to begin a 75-week part-time class of 30 students in Los Angeles, California with a projected graduation date of October 17, 2004. The Board also approved the program's curriculum for 1550 hours, including 590 theory and 960 clinical hours.
- On September 10, 2004, the Board approved the initial full accreditation for the Preferred College of Nursing, Los Angeles, Vocational Nursing Program for the period September 10, 2004, through September 9, 2008, and issued a certificate accordingly.

The Board also approved the program's request to admit 30 students in the part-time Tuesday, Thursday, Saturday and Sunday class schedule starting October 5, 2004, only, to **replace** students graduating October 17, 2004, with a projected completion date of April 5, 2006; approved the program's request to admit 30 students into a second 75-week part-time Monday, Wednesday, Saturday and Sunday class schedule starting October 4, 2004, only, with a projected completion date of April 4, 2006; and approved the program's request to admit 30 students into a 48-week full-time Monday to Friday class schedule starting January 10, 2005, only, with a projected completion date of January 14, 2006.

- On August 17, 2005, the Board approved the Preferred College of Nursing, Los Angeles, Vocational Nursing Program's request to admit 30 students into a part-time Friday, Saturday, and Sunday class starting on August 19, 2005, with a completion date of January 7, 2007. The Board also approved ongoing admissions to **replace** graduating classes, only, for the Preferred College of Nursing, Los Angeles, Vocational Nursing Program with the following stipulations.
 - a. No additional classes are added to the program's current pattern of admissions without prior Board approval. The program's current pattern of admissions includes one full-time class admission every 12 months and three part-time programs which admit every 18 months.
 - b. The director documents that adequate resources, i.e. faculty and facilities, are available to support each admitted class of students.
- On April 12, 2007, the Board approved the Preferred College of Nursing, Los Angeles, Vocational Nursing Program's request to admit 30 students into a second full-time Monday through Friday evening class starting on June 19, 2007, with a completion date of June 27, 2008.

- On July 2, 2008, the Executive Officer approved continued full accreditation of the Preferred College of Nursing, Los Angeles, Vocational Nursing Program be approved for a four-year period, from September 9, 2008, through September 8, 2012, and issued a certificate accordingly.
- **On October 23, 2009, a new director was approved.**
- On April 27, 2010, the Executive Officer approved the program's request to admit a part-time class of 30 students on April 11, 2010. The anticipated graduation date of the class is September 16, 2011; and approved the program's request to admit a full-time class of 30 students on April 26, 2010. The anticipated graduation date of the class is April 29, 2011; and approved the program's request to change its pattern of admissions from three (3) part-time and three (3) full-time classes of 30 students per year, to four (4) part-time and four (4) full-time classes of 30 students per year, with the following stipulations:
 - a. No additional classes are added to the program's current pattern of admissions without prior Board approval. The program's current pattern of admissions includes one full-time class admission every 12 months and three part-time programs which admit every 18 months.
 - b. The director documents that adequate resources, i.e. faculty and facilities, are available to support each admitted class of students.
- On August 14, 2012, the Executive Officer continued approval of the Preferred College of Nursing, Los Angeles, Vocational Nursing Program for a four-year period from September 8, 2012 through September 7, 2016, and the Board issued a certificate accordingly; and required the program to obtain Board approval prior to the admission of each class.
- On February 13, 2013, the Executive officer approved the following recommendations:
 - a. Approve the program's request to admit a part-time class of 30 students on March 2, 2013, to **replace** students who graduated on November 3, 2012. The requested class would graduate on September 30, 2014.
 - b. Approve the program's request to admit a full-time class of 30 students on April 29, 2013, to replace students who graduated on October 2, 2012. The requested class would graduate on May 15, 2014.
 - c. **Deny** the program's request to admit a full-time class of 30 students on July 17, 2013, to replace students who graduated on January 15, 2013. That class would graduate on July 30, 2014.
 - d. Continue to require the program to obtain Board approval prior to the admission of each class.
- On September 19, 2013, the Executive Officer approved the following recommendations:
 - a. Approve Preferred College of Nursing, Los Angeles, Vocational Nursing Program's request to admit a full-time class of 30 students on September 23,

2013, to **replace** students who graduated on June 6, 2013. The requested class would graduate on September 5, 2014.

- b. **Deny** the program's request to admit a part-time evening class of 30 students on October 14, 2013, to **replace** students who graduated on July 21, 2013.
 - c. Continue to require the program to obtain Board approval prior to the admission of each class.
- On February 6, 2014, the Executive Officer **denied** the program's request to admit a part-time class of 30 students to start on February 14, 2014 that would have **replaced** the class that graduated on July 21, 2013; **and**, required the program to submit a follow-up report no later than **March 1, 2014**, to include a review of the submitted comprehensive analysis including the effect of employed interventions, identification of required revisions of the plan of correction, and a timeline for implementation; **and**, continued to require the program to obtain Board approval prior to the admission of each class.
 - On February 12, 2014, via electronic communication, the Board notified the program of four (4) consecutive quarters of non-compliance with Section 2530(l) of the Vocational Nursing Rules and Regulations, relative to low passing scores.
 - On February 26, 2014, the Board received the required follow-up report from the director.
 - On May 9, 2014, via certified mail, the Board notified the program of five (5) consecutive quarters of non-compliance with Section 2530(l) of the Vocational Nursing Rules and Regulations, relative to low passing scores.
 - On July 14, 2014, the director correspondence requesting approve to admit students.

Agenda Item #14.B.2., Attachment B



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



Board of Vocational Nursing and Psychiatric Technicians
2535 Capitol Oaks Drive Suite 205, Sacramento, CA 95833-2945
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February 12, 2014

Bernard Sanchez, Director
Vocational Nursing Program
Preferred College of Nursing -Los Angeles
Vocational Nursing Program
3424 Wilshire Boulevard, Suite 1100
Los Angeles, CA 90010

Dear Mr. Sanchez:

The Board of Vocational Nursing and Psychiatric Technicians hereby informs you of your program's status related to Section 2530(l) of the Vocational Nursing Rules and Regulations which states:

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

- (1) Failure to achieve the required yearly average minimum pass rate within two years of initial approval may be cause to place a program on provisional accreditation.
- (2) Failure to maintain the required yearly average minimum pass rate for two years or eight consecutive quarters may be cause to place a program on provisional accreditation."

Statistics furnished by Pearson VUE, and published by the National Council of State Boards of Nursing as "Jurisdictional Summary of All First-Time Candidates Educated in Member Board Jurisdiction", indicate that the pass rates for the Preferred College of Nursing, Los Angeles, Vocational Nursing Program have fallen below 10 percentage points of the state average pass rate for the **past four quarters**. (See attached pass rate grid for statistics.)

As requested in the Executive Officer Decision of February 6, 2014, please provide the Board with your follow-up plan for improving your program's NCLEX-PN® pass rates by March 1, 2014. The Board will continue monitoring the pass rates closely.

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

Sincerely,

Suellen Clayworth

Nursing Education Consultant, Retired Annuitant

Enclosure

Board of Vocational Nursing and Psychiatric Technicians																										
VN Program Pass Rates																										
			1			2			3			4			5			6			7			8		
NEC	School	Sch Code	State Qtr Avg 76%	Schl's Cand This Qtr Pass/ Test	State Yr Avg 76%	State Qtr Avg 75%	Schl's Cand This Qtr Pass/ Test	State Yr Avg 74%	State Qtr Avg 75%	Schl's Cand This Qtr Pass/ Test	State Yr Avg 73%	State Qtr Avg 75%	Schl's Cand This Qtr Pass/ Test	State Yr Avg 73%	State Qtr Avg 70%	Schl's Cand This Qtr Pass/ Test	State Yr Avg 74%	State Qtr Avg 74%	Schl's Cand This Qtr Pass/ Test	State Yr Avg 74%	State Qtr Avg 72%	Schl's Cand This Qtr Pass/ Test	State Yr Avg 74%	State Qtr Avg 77%	Schl's Cand This Qtr Pass/ Test	State Yr Avg 74%
			Oct-Dec 2013	School 1/13- 12/13	July-Sep 2013	School 10/12-9/13	April-June 2013	School 10/12-9/13	April-June 2013	School 7/12- 6/13	Jan-Mar 2013	School 4/12- 3/13	Oct-Dec 2012	School 1/12- 12/12	July-Sep 2012	School 10/11-9/12	April - June 2012	School 7/11- 6/12	Jan-Mar 2012	School 4/11- 3/12						
SC	Preferred, LA	268	67%	4/6	54%	68%	13/19	54%	44%	8/18	56%	45%	10/22	59%	59%	10/17	68%	71%	20/28	68%	58%	7/12	61%	79%	15/19	60%
SC	Preferred, LA			4			3			2				1							3				2	



Agenda Item #14.B.2., Attachment C

Preferred College of Nursing, Los Angeles

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Phone: (323) 857 – 5000 Fax: (323) 857 – 5010

www.pcnla.com

BVNPT RECD EDU
ON 3/4/14 WITH SC

February 26, 2014

Dear Ms. Clayworth,

Per your request, please find below the follow-up report of the comprehensive analysis submitted on July 23, 2013, which included a review of several aspects of our program.

As I was performing this comprehensive review of the program, I noticed that perhaps the biggest step taken since July 2013 to improve our program and its outcome was to foster success of the then-current students. Since then, we've implemented the NCLEX-PN Boot Camp as well as individualized coaching/mentoring after the student completes the program requirements. We felt that we needed to enhance the quality of the program throughout (with updated lectures and tests), and give additional tools for the students to prepare while waiting to test.

We know that in average, it takes 3 months for students to sit for the exam (after they complete the program requirements. During this period, graduates are required to attend our own designed NCLEX-PN Boot Camp, and I personally reach out to all of them, offering coaching and mentoring opportunities to strengthen their weakest areas, providing tips, furnishing new practice questions through the ATI system, and monitoring the results of their efforts.

We are taking all the steps we can possibly take to guide and support them until they pass the test, and we are fully committed to the success of our graduates. Those deemed not ready to graduate are being dismissed from the program at the earliest moment this fact becomes noticeable. I believe that our actions are showing positive results: 4 graduates from the most recent batches have taken the test and passed – that's 100% of takers. While we understand that 4 takers is not a high number to test, but it serves as a primary indicator that our coaching approach is working.

We are closely monitoring the graduates to encourage them to take the NCLEX-PN Boot Camp the soonest they can, as it is a known fact that the longer they wait, the retention of their knowledge decrease, since a large portion of the test requires them to retrieve memorized information.

In fact, during this first quarter of 2014, 12 students informed me that they sat for the exam. Out of those, 10 communicated to us that they passed. All these students are from the same batches mentioned two paragraphs before. All remaining students, except 3 students, have scheduled to take their test in March.

In short, I am personally devoted to the success of this program and my graduates, and I will do everything within my reach to continue improving and allow our students to be successful.

As for the students still in the program and the improvement plan submitted in July 2013, please find below the follow-up assessment of the measures employed.

Area of Intervention	Students Affected	July 2013 Intervention	Assessment
A - Admission	New (incoming students) - admitted in May and September 2013.	Adoption of CASAS test in lieu of in-house developed assessment.	<p>The CASAS test appears to be well assessing the ability of students in Reading and Comprehension, crucial to VN students. The test will be maintained as our Entrance Exam.</p> <p>Follow-up steps: In addition to that, in August 2013, the school implemented a policy to require students to have completed a C.N.A. program. This would enable us to ensure that the applicant understands the tasks nurses perform, as well as the flow of a workday on the floor.</p> <p>This measure ensures that our applicants have a substantial interest in the program and in the career and will take reasonable extra steps to achieve their goals.</p>
B - Screening and Selection Criteria	Same as above	Interview with the Program Director	<p>This step will be maintained in our practice. We've identified that this step – with the proper review of the applicant's file – allows for an opportunity for the Program Director to ensure that the candidate exceeds the minimum expectation in Reading and Comprehension and will adequately follow commands in the clinical rotations.</p>
C - Terminal Objectives	Current and new students	No additional interventions presented in July 2013	<p>There were no additional steps regarding the terminal objectives.</p> <p>The school continues to review the NCLEX-PN Test Plan to ensure the terminal objectives are current, and also meeting the requirements of the local community.</p>

<p>D - Curriculum Objectives/ E - Instructional Plan/ F - Theory and Clinical Objectives/ G - Lesson Plans for each course</p>	<p>Current students: P/T VN – Started in March 2013 to graduate in September 2014 F/T-A VN – Started in April 2013 to graduate in May 2014 F/T-B – Started in September 2013 to graduate in September 2014 New (future) students</p>	<p>Re-structuring of the program: flow of courses, term length, pharmacology integration throughout the Medical Surgical courses</p> <p>Integration of NCLEX-PN preparation throughout the program</p> <p>Homework assignments based on ATI (for class 42 and upcoming classes)</p>	<p>As we expected, the revision of the structure of the courses actually allows for an easier and more effective way to monitor the student’s performance. With the new structure of the VN program, the school updated the application progression policy, having a more objective assessment of the students’ grades.</p> <p>As anticipated, particularly in terms II and III, where Pharmacology and M/S subjects are taught, students who are not meeting the minimum standards are dismissed early in the term, preventing them from carrying through the term and benefiting from averaging of subjects. Our point is that failing a subject triggers other actions (such as probation or intervention plan)</p> <p>Follow-up steps: This measure proved to be valid, so we will continue to monitor the students throughout the program, dismissing those who are not prepared to continue in the term.</p> <p>The Program Director has taken direct responsibility in updating the lesson plans, incorporating NCLEX-PN preparation in the form of a) NCLEX-PN focused <u>mini reviews</u> after each subject; b) <u>inclusion of pre-selected videos</u> so students could visualize the nursing process and applications even prior to clinical or skills days; c) <u>inclusion of NCLEX-PN</u> type questions in each lecture to enable students to critically think and get used to the system/style of NCLEX questions; d) <u>inclusion of Select all that apply questions</u> to the tests – for the same reasons as item “c”.</p> <p>Follow-up steps: We will continue to update the content of the lectures as new trends in NCLEX continue to arise. As for the homework assignments, the intention in the July 2013 plan was to have them all based on ATI materials. However, we felt that the students wouldn’t benefit from the ATI when homework was due, since it was too early in each subject.</p> <p>Follow-up steps: Therefore, we decided to maintain the homework assignments, but instead of ATI, base them on their basic textbook. The ATI material is being integrated in other activities (in class or post-lecture) to enhance the attainment of the subject after the main lecture is provided.</p> <p>This model appears to be working very well with the latest class (42), which is the first one to receive the full ATI package (upon commencement of the program). Students and instructors are developing a routine of integrating ATI within the lectures and assignments, embedding the NCLEX style since the beginning of the course.</p>
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H - Textbooks	Class 42 and future classes	Incorporation of ATI materials	<p>As mentioned above, the inclusion of ATI for the new classes has proven as a positive move for the program. While only the latest class is directly benefiting from the use of ATI since the beginning of the program, the other classes were not left out, as we've incorporated NCLEX materials to the lectures and to the NCLEX Review at the end of the course.</p> <p>We understand that class 42 has the ATI books and tests as a bonus, and this will continue to the future classes, but as we will mention below, the other classes who were half way through the program or near graduation received and will continue to receive NCLEX preparation by other means to ensure students are fully prepared to their test.</p>
I - Attendance Policy	Current and future classes	Enforcement of existing policies	<p>The school continues to enforce a very strict attendance policy. Students who exceed the very low number of absences are indeed dismissed from the program. However, in general, students do not miss classes. Attendance has never been one of our problems, so we have very few students who miss class and a very low number who exceed the number of absences permitted, and those are immediately dismissed.</p> <p>Follow-up steps: We will continue to monitor attendance and apply our existing policies.</p>
J - Remediation Policy	Current and future classes	Require proof of additional training in order to authorize student to test	<p>We are maintaining the limitation on courses that may be remediated and will continue to require students to show proof of additional training in order to take the remedial test.</p> <p>Follow-up steps: For the upcoming classes, with the new structure of the terms, students will have fewer opportunities to remediate, so the imposition of additional work should not pose as a burden to them. Moreover, as we are strengthening the quality of lectures and implement the 'intervention plan' as soon as we notice a student begins to struggle, we are not anticipating a lot of students in need to remediate.</p>
K - Evaluations of Theory and Clinical Faculty/ L - Evaluations of Theory Presentations	Current and future classes	<p>Frequent class observations</p> <p>Improvement of theory presentations with inclusion of new materials/ tools</p>	<p>We've been frequently monitoring lectures and clinical rotations, to ensure instructors are delivering the content of the program in an adequate and satisfactory manner.</p> <p>In addition, I personally revisited all syllabi and lesson plans, and added materials to make the lectures even clearer. Plus, the integration of mini reviews focused on NCLEX is proving to be a great move as the results of tests (also newly developed) appear to be much better.</p> <p>We will continue with this approach, and will keep monitoring the results on an ongoing basis, to assess the need for further changes.</p>

M - Evaluations of Clinical rotations and their correlations to theory presentations	Current and future classes	Instructors are guided to utilize the post conference time to test students on the skills applied on that day, and tie up the lecture	<p>We will maintain the approach of proper utilization of pre and post conference times.</p> <p>Follow-up steps: In looking and assessing our revised curriculum, together with the evaluations of students about the facilities they've been and their respective experiences, and in conjunction with the evaluations performed by each of the facility representatives related to our students' performance while in the clinical settings, we realize that at this time, the theory is appropriate and well correlated to the clinical facilities they are assigned.</p>
N – Evaluation of Student Achievement	Current and future classes	<p>Comprehensive examinations are computerized, and incorporating the NCLEX-PN style questions</p> <p>Frequent monitoring of students performance</p>	<p>Students needed time to adjust to the idea of taking a computerized exam. We've explained that the goal was to make them NCLEX ready, since that test is also computerized.</p> <p>Follow-up steps: With the integration of ATI and other tasks in the computer lab, we feel that at this point students are not reluctant in taking computerized tests. So, we will continue to deliver these types of tests.</p> <p>As explained throughout this letter, the evaluation of academic performance occurs frequently. We are utilizing intervention strategies to coach students who – for no apparent reason and out of a pattern – drop their performance in particular subjects, expanding tutorials, and dismissing students who are not achieving the expected level in their grades.</p>

I hope this provides a clear picture that we are doing everything to make our students succeed. We've taken measures to help students who are finishing the program, but also to address weaknesses affecting our "current" students. I am committed to continue providing the individualized counseling to our graduates and all the tools for our students to finish the program successfully.

If you have questions or other suggestions, I would be happy to hear from you.

Warm Regards,



Bernard/Matthew Sanchez, MSN, RN, PHN
 Director of Nursing Education
bsanchez@pcnla.com

cc K. Attar, MSL, JD
 J. Faron Brindley

Agenda Item #14.B.2., Attachment D



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

Board of Vocational Nursing and Psychiatric Technicians
2535 Capitol Oaks Drive Suite 205, Sacramento, CA 95833-2945
Phone 916-263-7800 Fax 916-263-7855 www.bvnpt.ca.gov



CERTIFIED MAIL

May 9, 2014

Bernard Sanchez, Director
Preferred College of Nursing, Los Angeles, VNP
3424 Wilshire Blvd, Suite 100
Los Angeles, CA 90010

Subject: NCLEX-PN® Program Performance

Dear Mr. Sanchez:

The Board of Vocational Nursing and Psychiatric Technicians (Board) is providing you an update of your program's status related to Section 2530 (I) of the Vocational Nursing Rules and Regulations. The Board has reviewed your plan for improving your program's NCLEX-PN® pass rates and will continue monitoring the pass rates closely.

Section 2530 (I) of the Vocational Nursing Rules and Regulations states,

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

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

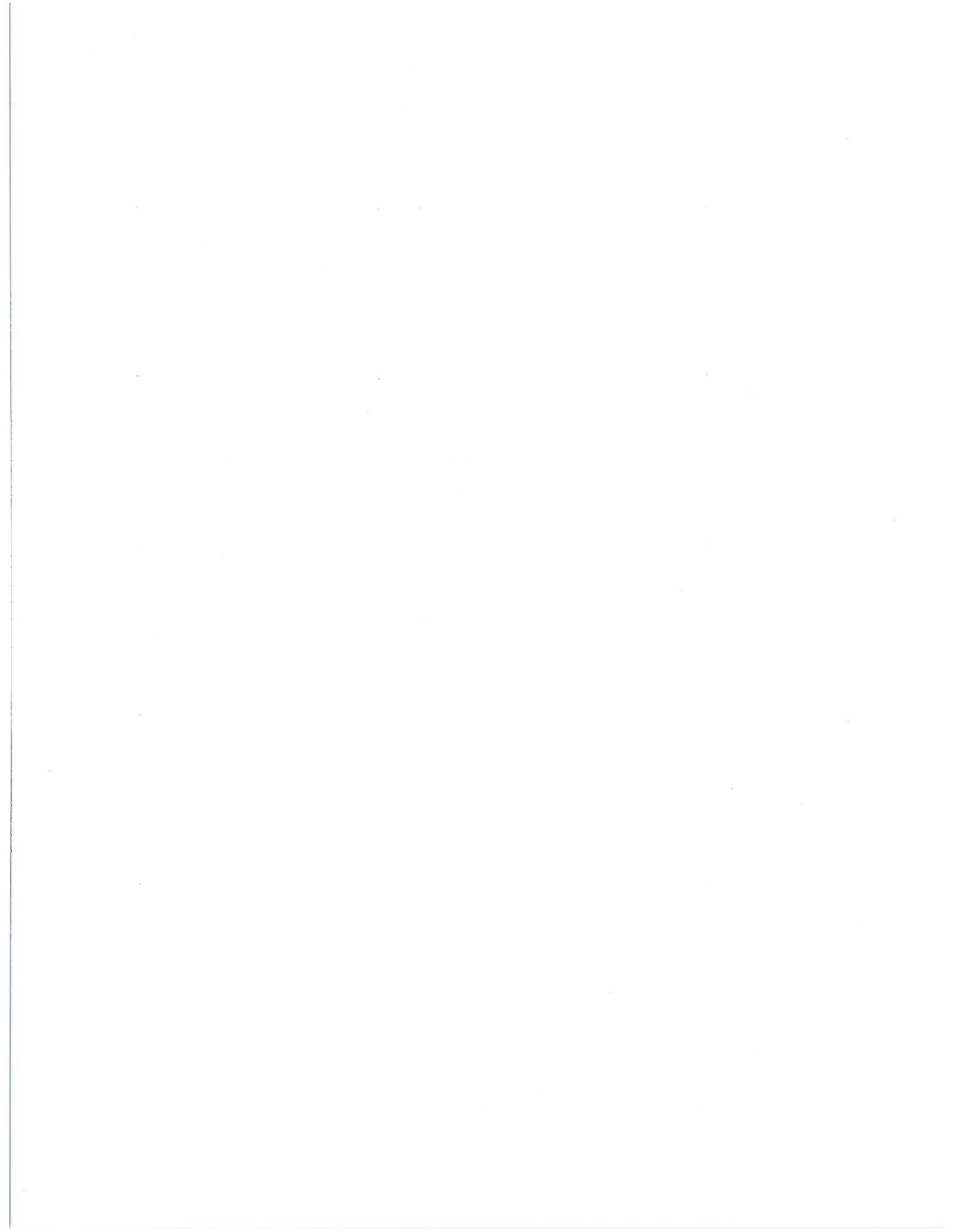
Statistics furnished by Pearson VUE, and published by the National Council of State Boards of Nursing as "Jurisdictional Summary of All First-Time Candidates Educated in Member Board Jurisdiction," indicate that the **pass rates** for the Preferred College of Nursing, Los Angeles **Vocational Nursing Program** have fallen below 10 percentage points of the state average pass rate for the past five (5) quarters.

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

Sincerely,

Denise Rodriguez

DENISE RODRIGUEZ, MSN, RN
Nursing Education Consultant



Agenda Item #14.B.2., Attachment E



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

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CERTIFIED MAIL

September X, 2014

Bernard Sanchez
Director, Vocational Nursing Program
Preferred College of Nursing, Los Angeles
3424 Wilshire Blvd # 1100
Los Angeles, CA 90010

Subject: Notice of Change in Approval Status and Request to Admit

Dear Mr. Sanchez:

Pursuant to the action of the Board of Vocational Nursing and Psychiatric Technicians (Board) on September 12, 2014, the Preferred College of Nursing, Los Angeles, Vocational Nursing Program has been placed on provisional approval for the two – year period from September 12, 2014 through September 30, 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 approval completely.

Once you have reviewed this letter, please sign and return the enclosed “Acknowledgement of Change in Approval Status” form by **Friday, September 26, 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 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 Preferred College of Nursing, Los Angeles, Vocational Nursing Program for the past twelve (12) quarters are set forth in the following table.

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
Jul-Sep 2011	17	9	53%	74%	67%	75%	-8
Oct-Dec 2011	9	4	44%	74%	56%	75%	-19
Jan-Mar 2012	19	15	79%	77%	60%	74%	-14
Apr-Jun 2012	12	7	58%	72%	61%	74%	-13
July-Sept 2012	28	20	71%	74%	68%	74%	-6
Oct-Dec 2012	17	10	59%	70%	68%	74%	-6
Jan-Mar 2013	22	10	45%	75%	59%	73%	-14
Apr-Jun 2013	18	8	44%	78%	56%	73%	-17
July-Sept 2013	19	13	68%	75%	54%	74%	-20
Oct-Dec 2013	6	4	67%	76%	54%	76%	-22
Jan-Mar 2014	29	17	59%	74%	58%	76%	-18
April-Jun 2014	11	6	55%	66%	62%	73%	-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.

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

REQUIRED CORRECTION(S)

1. Place the Preferred College of Nursing, Los Angeles, Vocational Nursing Program on provisional approval for the two year period from September 12, 2014, through **September 30, 2016**, direct staff to issue a certificate accordingly, **and** issue a notice to the program identifying specific areas of non-compliance and requirements for correction as referenced in Section 2526.1(e) of the California Code of Regulations.

2. **Deny** the program's request to admit a part-time day class of 20 students to commence on September 26, 2014, graduating May 13, 2016.
3. Require the program to admit no additional classes without prior approval by the full Board.
4. Require the program to submit documentation of approved clinical experience for obstetric and pediatric nursing.
5. Require the program to submit a follow up report no later than **June 1, 2015**. The report must include a review of the comprehensive analysis submitted previously by the program including the effect of employed interventions, identification of revisions required in the program's plan of correction, and timeline for implementation.
6. Require the program to bring its average annual pass rate to no more than ten (10) percentage points below the State average annual pass rate.
7. Require the program to comply with all approval standards in Article 4 of the Vocational Nursing Practice Act, commencing at Business and Professions Code Section 2880 and Article 5 of the Board's Regulations, commencing at California Code of Regulations, Title 16, Section 2526.
8. Failure to take any of these corrective actions may cause the full Board to revoke the program's approval.
9. Require the program to demonstrate incremental progress in correcting the violations. If the program fails to satisfactorily demonstrate incremental progress, the full Board may revoke the program's approval.
10. Place the program on the **September 2016** Board agenda for reconsideration of provisional approval.

FUTURE BOARD ACTION

Your program will be placed on the **September 2016** Board Meeting agenda, at which point the Board may revoke or extend the program's accreditation. If you have additional information that you wish considered beyond the required corrections listed on page 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 approval by the full Board is required to admit classes.**

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

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

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

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

Sincerely,

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

Enclosures

cc: Board Members

TBJ:cca