

Agenda Item #14.C.1.



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

Board of Vocational Nursing and Psychiatric Technicians
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DATE: August 28, 2014

TO: Board Members

FROM: 
Denise Rodriguez, M.S.N., R.N.
Nursing Education Consultant

SUBJECT: Bay Area College of Nursing, Palo Alto, Vocational Nursing Program;
Consideration of Request to Admit Students (Director: Rachele Cagampan, Palo Alto, Santa Clara County, Private)

On November 10, 2011, the Board placed the Bay Area College of Nursing, Palo Alto Vocational Nursing Program on provisional approval¹ for a two (2) year period from November 10, 2011 through November 30, 2013, due to noncompliant licensure pass rates. The Board directed that the program admit no additional students unless approved by the full Board.

On November 22, 2013, the Board extended the program's provisional approval for the one (1) year period from December 1, 2013 through November 30, 2014.

On June 23, 2014, the director submitted a request to admit one (1) part-time day class and one (1) part-time evening class to **replace** students as follows:

1. Admit one part-time evening class of twenty (20) students and two (2) alternates to commence September 29, 2014, graduating December 20, 2015. This proposed class will **replace** the class that graduated August 2013.
2. Admit one (1) part-time day class of twenty (20) students and two (2) alternates to commence November 10, 2014, graduating February 14, 2016. This proposed class will **replace** the class that graduated August 2014.

History of Prior Board Actions

(See Attachment A for Prior Board Actions)

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.

Enrollment

The program currently offers part-time evening classes that are 58 weeks in length. Approval by the full Board is required prior to the admission of each class. The program's admission pattern for current classes is seen in the enrollment table below.

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 55 students** for the period from **December 2011 through February 2016**.

ENROLLMENT DATA				
CLASS DATES		#Students Admitted	#Students Current or Completed	Total Enrolled
Start	Completed			
12/11		10	13	13
6/12		19	18	13 + 18 = 31
	3/13 (12/11 Class)		-13	31 - 13 = 18
5/13		11	10	18 + 10 = 28
	8/13 (6/12 Class)		-18	28 - 18 = 10
2/14	5/15	14	15	10 + 15 = 25
	8/14 (5/13 Class)		-10	25 - 10 = 15
9/14 (PM) (Proposed Class)	12/15	20		15 + 20 = 35
11/14 (AM) (Proposed Class)	2/16	20		35 + 20 = 55
	5/15 (2/14 Class)		-15	55 - 15 = 40

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 January 2010 through June 2014, specify the pass percentage rates for graduates of the Bay Area College of Nursing, Palo Alto, 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
Jan – Mar 2010	18	7	39%	75%	64%	74%	-10
Apr – Jun 2010	13	6	46%	74%	59%	75%	-16
Jul – Sep 2010	17	7	41%	76%	45%	75%	-30
Oct – Dec 2010	11	2	18%	77%	37%	76%	-39
Jan – Mar 2011	13	7	54%	80%	41%	77%	-36
Apr – Jun 2011	2	0	0%	71%	37%	76%	-39
Jul – Sep 2011	15	7	47%	74%	39%	76%	-37
Oct – Dec 2011	4	3	75%	74%	50%	75%	-25
Jan – Mar 2012	11	5	45%	77%	47%	74%	-27
Apr – Jun 2012	13	7	54%	72%	51%	74%	-23
Jul – Sep 2012	8	5	63%	74%	56%	74%	-18
Oct – Dec 2012	3	1	33%	70%	51%	74%	-23
Jan – Mar 2013	5	1	20%	75%	48%	73%	-25
Apr – Jun 2013	3	0	0%	78%	37%	73%	-36
Jul – Sep 2013	8	6	75%	75%	42%	74%	-32
Oct – Dec 2013	5	4	80%	76%	52%	76%	-24
Jan – Mar 2014	5	4	80%	74%	67%	76%	-9
Apr – Jun 2014	6	4	67%	66%	75%	73%	+2

*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.

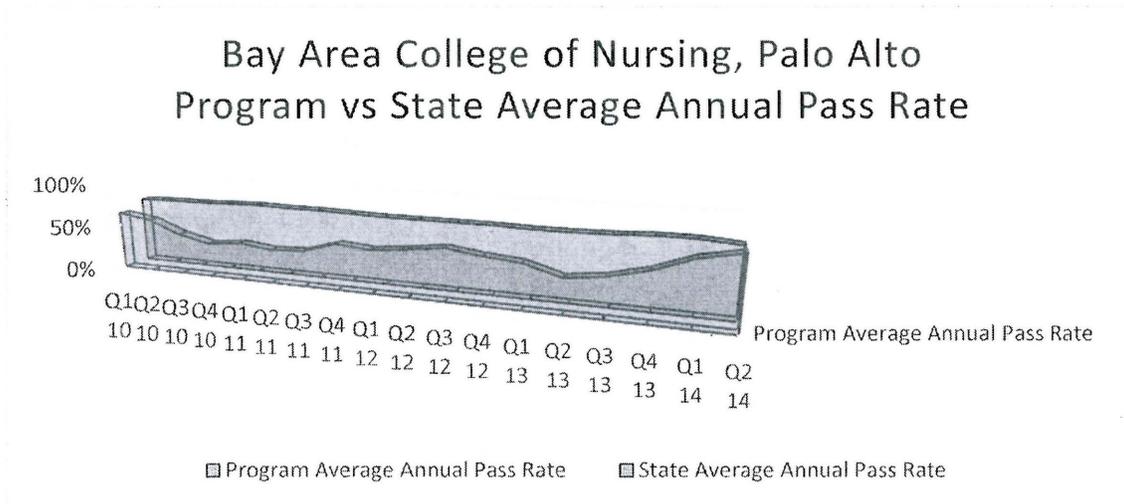
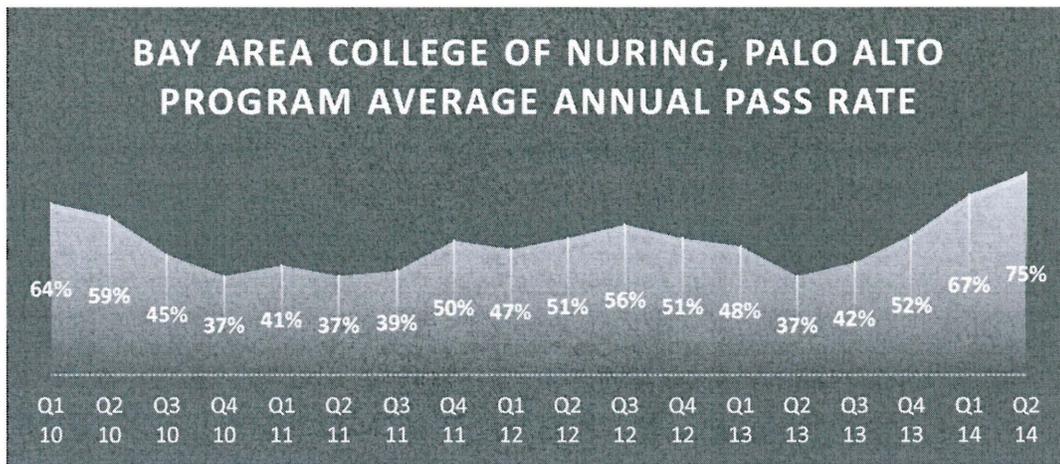
California Code of Regulations §2530(I) states:

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

This data substantiates the program’s non - compliance with Section 2530 (I) of the California Code of Regulations for sixteen (16) consecutive quarters. However, it is also noted that for the most recent two (2) quarters, the program’s average annual pass rate is compliant with regulatory requirements.

Based on the most current data available (April – June 2014), the program’s average annual pass rate is **75%**. 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 the Bay Area College of Nursing, Palo Alto, Vocational Nursing Program is **two (2) percentage points above** the state average annual pass rate. The data is summarized in the graphs, below.



Faculty and Facilities

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

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

The number of Board-approved faculty totals eleven (11), including the director. The director has 90% administrative and 10% teaching duties. Of the total faculty, ten (10) instructors and the director are approved to teach clinical.

Based on a maximum enrollment of fifty-five (55) students, four (4) instructors are needed. Therefore, the number of current faculty is adequate for the current and proposed enrollment.

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

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

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

Other Considerations

As noted previously, the Board placed the Bay Area College of Nursing, Palo Alto Vocational Nursing Program on provisional approval for a two (2) year period from November 10, 2011 through November 30, 2013, due to noncompliant program pass rates. On November 22, 2013, the Board extended the program's provisional approval for the one (1) year period from December 1, 2013 through November 30, 2014 and scheduled reconsideration for November 2014.

In an effort to improve NCLEX/PN® pass rates, the program proposed revisions to its admission, screening, and selection criteria, and completed a major curriculum revision that was submitted earlier for approval.

In August and September 2013, the program director submitted an analysis of the most recent three (3) classes, problems identified per class, and the actions taken by the program to address those problems for subsequent classes (see Attachments B and C).

The following actions were reported.

- Increased the passing score on the admission examination from 8th grade level to 12th grade level or higher and adding the Scholastic Level Exam (SLE) with a passing score of 14 or higher as part of the admission testing.
- Increased the number of tests and quizzes that are given during the program to desensitize students with test anxiety
- Added the Assessment Technologies Institute (ATI) VN Package with proctored computerized testing throughout the program.
- Incorporated students' ATI grades as part of their overall grade and raising the passing score to 75%, including the ATI predictor examination.
- Utilized third-party vendors, providing in-service training to faculty with the goal of improving teaching techniques and test development skills.
- Worked with faculty to evaluate and assure competence.
- Ensured that students strictly adhere to attendance policy.

Summary

At the time of placement on provisional approval, the program's quarter pass rate was 47%; its average annual pass rate was 39%, 37 percentage points below the state average annual pass rate. Since placement on provisional approval, the program's quarter pass rate has increased to 67%, its average annual pass rate has increased 75%. Currently, the program's average annual pass rate is two (2) percentage points **above** the state average annual pass rate.

Recommendations:

1. Approve the program's request to admit twenty (20) students plus two (2) alternates into an evening class commencing September 29, 2014, only, graduating December 20, 2015, to **replace** the class that graduated August 2013.
2. Approve the program's request to admit twenty (20) students plus two (2) alternates into a day class commencing November 10, 2014, only, graduating February 14, 2016 to **replace** the class that graduated August 2014.
3. Continue to require the program to admit no additional students unless approved by the full Board.

Rationale: As noted previously, the Board placed the Bay Area College of Nursing, Palo Alto Vocational Nursing Program on provisional approval for a two (2) year period from November 10, 2011 through November 30, 2013, due to noncompliant program pass rates. At that time, the program's quarter pass rate was 47%; its average annual pass rate was 39%, 37 percentage points below the state average annual pass rate.

Since that time, the program has made changes aimed at achieving regulatory compliance and improving students' possession of the knowledge, skills, and abilities necessary for the provision of safe and competent client care upon entry into professional practice.

Published examination statistics demonstrate the program's improved pass rates. Since placement on provisional approval, the program's quarter pass rate has increased to 67%. The program's average annual pass rate has increased steadily over the past seven (7) consecutive quarters. Currently, the program's average annual pass rate is 75%, two (2) percentage points **above** the state average annual pass rate. Such improvement supports the recommendation to approve the requested classes.

The program has demonstrated sufficient resources to support the current and proposed student enrollment. Board staff will continue to monitor the program's effectiveness by tracking class admissions, the effectiveness of employed interventions, and the program's licensure examination pass rates each quarter.

Attachment A: History of Prior Board Actions.

Attachment B: Program Follow-up Report Dated August 1, 2013.

Attachment C: Program Correspondence Addendum to Comprehensive Analysis Dated September 13, 2013

Agenda Item #14.C.1., Attachment A

BAY AREA COLLEGE OF NURSING, PALO ALTO VOCATIONAL NURSING PROGRAM

History of Prior Board Actions

- On April 12, 2006, the Executive Officer approved Bay Area College of Nursing, Palo Alto's request to begin a vocational nursing program with an initial full-time class of 20 students commencing May 22, 2006 only; and approved the program curriculum for 1598 hours, including 628 theory, and 970 clinical hours.
- February 8, 2007, the Board received correspondence stating the program name was changed to Bay Area College of Nursing, Inc., Palo Alto.
- On June 25, 26, 2007, the program was inspected to determine compliance with regulatory requirements specified in California Code of Regulations Article 5.
- On July 10, 2007, the Executive Officer approved the program's full accreditation for the period from June 26, 2007, through June 25, 2011, and issued a certificate accordingly.

Additionally, the Executive Officer approved the program's request for ongoing admissions of a full-time class of 60 students each January and July only, commencing July 17, 2007, 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 two (2) full-time classes of 60 students plus 6 alternates in January and July of each year.
 - b. The director documents that adequate resources, i.e. faculty and facilities, are available to support each admitted class of students.
- On November 8, 2007, the Executive Officer approved the program's request to admit a full-time evening class of 30 students commencing November 5, 2007 only, graduating December 16, 2008.
 - On April 30, 2008, the Executive Officer approved the program's revised curriculum for 1646 hours (Theory – 676 hours; Clinical – 970 hours.) The program was directed to submit a revised instructional plan consistent with the revised program hours by May 1, 2008.
 - On May 5, 2008, the program submitted documentation and pictures relative to its new Skills Laboratory. The Executive Officer approved the program's revised instructional plan for 1646 hours (Theory – 676 hours; Clinical – 970 hours).

- On May 15, 2008, the program submitted its revised instructional plan and documentation confirming completion of lesson plans for Terms I, II, and III.
- On December 8, 2010, the assigned consultant forwarded correspondence to the director advising that the program's average annual pass rate had fallen more than ten (10) percentage points below the state average annual pass rate for the past four (4) quarters. The program was requested to submit a written plan for improving their NCLEX-PN® pass rates by December 17, 2010.
- On December 10, 2010, the Board received electronic correspondence from Abigail Ethel A. Valbuena, Assistant Director of Nursing, Bay Area College of Nursing, Palo Alto Daly City Milpitas San Jose, relative to a proposed curriculum revision.
- On December 16, 2010, program representatives delivered correspondence and a computer disk to the Board's Sacramento headquarters, specifying the program's plan to improve program pass rates.
- On December 21, 2010, the Executive Officer approved the Bay Area College of Nursing, Palo Alto, Vocational Nursing Program's request to admit 30 students into an evening class commencing January 3, 2011 and graduating February 10, 2012. The Executive Officer required the program to submit a report by **February 1, 2011**, that includes 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

Additionally, the EO **rescinded** the program's approval for the ongoing admission of 60 students into full-time day classes each January and July; **and**, required the program to obtain Board approval prior to the admission of students into day and evening classes.

- On March 22, 2011, the Board received program documents related to its comprehensive analysis.

- On August 24, 2011, the director submitted a comprehensive program analysis dated January 28, 2011.
- On August 26, 2011, the Executive Officer deferred action on Bay Area College of Nursing, Palo Alto, Vocational Nursing Program's request to admit 22 students commencing September 19, 2011, to the full Board; **and**, placed the program on the agenda for the November 10, 2011 Board meeting for consideration of placement on provisional accreditation; **and**, required the program to obtain Board approval prior to the admission of future classes.
- On October 7, 2011, the assigned consultant forwarded correspondence requesting submission of fifteen (15) copies of pertinent documents, plan, and subsequent actions taken to correct identified problems that they desire Board members to consider.
- On October 31, 2011, the Board received fifteen (15) copies of pertinent documents for Board consideration related to subsequent actions taken by the program to correct identified problems.
- On November 10, 2011 the Board placed Bay Area College of Nursing, Palo Alto, Vocational Nursing Program on provisional accreditation for the two-year period from November 10, 2011, through November 30, 2013, 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 bring its average annual pass rate to no more than ten (10) percentage points below the State average annual pass rate; **and**

Approved the program's request to admit a class of 14 full-time evening students on December 14, 2011, graduating on February 24, 2013, at this time; **and**,

Required the program to admit no additional students unless approved by the full Board; **and**,

Required the program to submit follow-up reports in nine months, but no later than **August 1, 2012**, and 21 months, but no later than **August 1, 2013**. The reports must include a comprehensive analysis of the program, specific actions taken to improve program pass rates, timeline for implementation, and the effect of employed interventions. The following elements must be addressed in the analysis.

- a. Admission Criteria.
- b. Screening and Selection Criteria.
- c. Terminal Objectives.
- d. Curriculum Objectives.
- e. Instructional Plan.
- f. Theory and Clinical Objectives for Each Course.
- g. Lesson Plans for Each Course.
- h. Textbooks.

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

Required the program to 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**,

Required 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 accreditation; **and**,

Failure to take any of these corrective actions may cause the full Board to revoke the program's accreditation; **and**,

Placed the program on the **November 2013** Board agenda for reconsideration of provisional accreditation.

- On November 22, 2011 the Board forwarded to the director the Notice of Change in Accreditation Status.
- On March 26, 2012, the Board received correspondence from program director requesting approval to admit 20 students plus two (2) alternates into an evening class commencing May 15, 2012 and graduating July 21, 2013 to **replace** students who graduated on February 24, 2012.
- On April 4, 2012, the Executive Officer approved Bay Area College of Nursing, Palo Alto, Vocational Nursing Program's request for a major revision of the curriculum to include a change in total curriculum hours to 1588, a change in theory hours to 576, and a change in clinical hours to 1012.5; **and**, approved the program's new instructional plan, instructional methods and materials, admission criteria, screening and selection criteria, attendance policies and evaluation of student achievement.
- On April 9, 2012, the Board received school correspondence that they wished the full Board to consider.
- On April 11, 2012, the Board received the program's plan of action to improve the performance of program graduates on the licensure examination.
- On May 11, 2012, the Board approved the program's request to admit 20 students plus two (2) alternates into an evening class commencing May 15, 2012 and graduating July 21, 2013 to **replace** students who graduated on February 24, 2012; and continued to require the program to admit no additional students unless approved by the full Board.

- On August 6, 2012, the Board received the program's follow-up report that was due on August 1, 2012.
- On September 14, 2012, the Board received correspondence from program director requesting approval to admit 20 students plus two (2) alternates into an evening class commencing November 26, 2012 and graduating February 16, 2014.
- On October 3, 2012, the assigned consultant forward correspondence to the director requesting documents for dissemination to Board Members.
- On November 9, 2012 the Board approved the Bay Area College of Nursing, Palo Alto, Vocational Nursing Program's request to admit 20 students plus two (2) alternates into an evening class commencing November 26, 2012 and graduating February 16, 2014 **and** continued to require the program to admit no additional students unless approved by the full Board.
- On September 12, 2013, the Board received correspondence from the program director requesting approval to admit 20 students plus two (2) alternates into an evening class commencing February 10, 2014, and graduating May 24, 2015. The requested class would replace the class that graduated on March 3, 2013.
- On November 22, 2013, the Board extended the provisional approval of the Bay Area College of Nursing, Palo Alto, Vocational Nursing Program for the one (1) year period from December 1, 2013 through to November 30, 2014; **and** approved the Bay Area College of Nursing, Palo Alto, Vocational Nursing Program's request to admit twenty (20) students plus two (2) alternates into an evening class commencing February 10, 2014 and graduating May 24, 2015; **and** continued to require the program bring its average annual pass rate to no more than ten percentage points below the state average annual pass rates; **and** continued to require the program to admit no additional students unless approved by the full Board; **and** required the program to submit follow-up reports in nine (9) months, but no later than **August 1, 2014**. The report must include a comprehensive analysis of the program, specific actions to improve program pass rates, timeline for implementation, and expected outcomes. The following elements must be addressed in the analysis.
 - a. Admission Criteria.
 - b. Screening and Selection Criteria.
 - c. Terminal Objectives.
 - d. Curriculum Objectives.
 - e. Instructional Plan.
 - f. Theory and Clinical Objectives for Each Course.
 - g. Lesson Plans for Each Course.
 - h. Textbooks.
 - i. Attendance Policy.
 - j. Remediation Policy.
 - k. Evaluations of Theory and Clinical Faculty.
 - l. Evaluations of Theory Presentations.

- m. Evaluations of Clinical Rotations and Their Correlation to Theory Presentations.
- n. Evaluation of Student Achievement.
- o. Current Enrollment

In addition, the Board required 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; **and** required the program to demonstrate incremental progress in correcting the violations; **and** if the program fails to satisfactorily demonstrate incremental progress, the full Board may revoke the program's approval.

- On June 23, 2014 the director submitted a request to admit one (1) part-time day class and one (1) part-time evening class of twenty (20) students and two (2) alternates to commence September 29, 2014, graduating December 20, 2015 to **replace** the class that graduated August 2013 **and** one (1) part-time day class of twenty (20) students and two (2) alternates to commence November 10, 2014, graduating February 14, 2016 to **replace** the class that graduated August 2014.

Agenda Item #14.C.1., Attachment B

BAY AREA COLLEGE OF NURSING, PALO ALTO VOCATIONAL NURSING PROGRAM Follow-up Report

Submitted: August 1, 2013

1. Admission Criteria

a. COMPREHENSIVE ANALYSIS:

We are currently utilizing the revised Wonderlic/WBST entrance exams score of 12th grade level or higher. This assesses By increasing the grade level for a passing with the addition of the Scholastic level exam, this will asses the readiness and suitability of the students who are going to be enrolled in the program. In addition, this can also provide an accurate appraisal for a candidate's potential as a nurse.

b. SPECIFIC ACTIONS TO IMPROVE PASS RATE:

The addition of SLE with a passing score of 14 or higher as well as the revised WBST passing score from 8th Grade level (200 Verbal and 210 Quantitative) to a score at the 12th grade level or higher for the Verbal and Quantitative categories, are tools to assess the readiness and sustainability for success in the VN program and can provide an accurate appraisal of a candidate's potential as a nurse. Of the cohort that the revised entrance exam has been implemented all students has successfully completed the course in a timely manner.

c. TIMELINE:

In effect.

d. EFFECT OF INTERVENTION: Expected outcome of intervention will be as follows:

- i. There will be a reduction in student cancellations/withdrawals/terminations due to failure to commit to the rigorous training/education that the school offers.
- ii. Minimize failure to pass the academic requirements of the program.
- iii. The school's annual pass rate will improve to 80% or higher by the end of the course program.

Waiting for the results of the newly implemented curriculum.

2. Screening and Selection Criteria

a. COMPREHENSIVE ANALYSIS:

We have initially proposed a 3.0 cumulative grade point average or higher but learned that this was not feasible for majority of applicants have a 2.0 GPA. The students will have to go through and pass the interview process along with meeting the minimum passing grade in the entrance examination required by the school.

b. SPECIFIC ACTIONS TO IMPROVE PASS RATE:

We will require a 2.0 (C average) or higher overall cumulative grade point average based on completed secondary education or GED equivalency. We anticipate that candidates will cope with the demands of being a student when they achieve the

increased in score on WBST from a passing score at the 8th Grade level (200 Verbal and 210 Quantitative) to a score at the 12th Grade level or higher for the Verbal and Quantitative categories. In addition, testing the students' cognitive ability using SLE with a passing score of 14 will also assess their readiness and suitability for success in the field of nursing. The candidates will also have to undergo a rigorous interview process using the Rubric criteria which evaluates attitude, skills and experience. We are waiting for the results of students' success rate in the program.

- c. **TIMELINE:**
In effect.
- d. **EFFECT OF INTERVENTION:** Expected outcome of intervention will be as follows:
 - i. There will be a reduction in student cancellations/withdrawals/terminations due to failure to commit to the rigorous training/education that the school offers
 - ii. Minimize failure to pass the academic requirements of the program.
 - **There are no currently enrolled students dropping out of the program.**
 - iii. The school's annual pass rate will improve to 80% or higher by the end of the course program.

3. Terminal Objectives

- a. **COMPREHENSIVE ANALYSIS:**
Integrate and provide an end-of-the program clinical case study review/NCLEX test plan in preparation for the NCLEX-PN state exams.
- b. **SPECIFIC ACTIONS TO IMPROVE PASS RATE:**
 - i. Currently monitoring student progress throughout the three (3) terms to determine capability to advance or complete the program by instituting the following:
 - 1. (a) Proctored ATI exams throughout each term.
 - 2. (b) Students are deemed eligible to advance to the next term when they reach an overall passing grade and be cleared by their instructors as well as show improvement in their ATI exams (Level II). Failure to reach an overall passing grade will not be cleared to proceed to the next level of the program, therefore, will have to repeat the entire term.
 - 3. (c) At the end of the program, the student will have to take the comprehensive final examination that will determine their probability of passing the NCLEX if they sat and take it that day. After taking the comprehensive exam, the students will be given a list of topics they need to study, making remediation more streamlined. There have been many studies to show the ATI Proctored Comprehensive Predictor is predictive of how students will perform on the NCLEX. Any student that doesn't meet the benchmark established by Bay Area College of Nursing (Level II) will have to remediate based on the plan established by the Director.
 - ii. Utilize the annual reports for ongoing evaluation of factors influencing the program's NCLEX results.
 - In progress and waiting for the results of the newly implemented curriculum.**
- c. **TIMELINE:** This is being implemented and in progress.
- d. **EFFECT OF INTERVENTION:**
Expected outcome of intervention will be as follows:

- i. The students will be fully prepared to take and successfully pass the ATI-administered comprehensive final exams. Of the cohort that took the comprehensive final exam, it showed that they were prepared for the exam by obtaining high marks on their final exam at the end of the program as well as obtaining an overall passing grade.
- ii. The school's annual pass rate will improve to 80% or higher by the end of the course program.

We are waiting for the result of the newly implemented curriculum.

4. Instructional Plan

a. COMPREHENSIVE ANALYSIS:

Current curriculum approved and in use is the 1588.5 hours. The school has incorporated ATI in the curriculum that will help students hone their knowledge in specific areas where they struggled from during the course of the program.

b. SPECIFIC ACTIONS TO IMPROVE PASS RATE:

- i. The school has instituted the 1588.5 curriculum hours. The hours have been revised to reduce the length of time specific subjects are discussed and to eliminate redundancy of topics. Although the revised hours have been reduced, the number of weeks increased by 2. During certain weeks, the amount of theory hours is reduced in order to maximize outside class time to absorb and study the material. Students are spending more time outside class hours improving their understanding of the materials by doing ATI practice exams, tutorials, and templates. Although students have access to ATI practice exams, tutorials, modules, and videos, time spent on these modes of learning are not counted in the actual curriculum hours.

Currently being implemented.

- ii. Begin using ATI-administered practice exams, proctored exams, and comprehensive final exit exams as part of the curriculum and a requirement of the program. The ATI Proctored Comprehensive Predictor is created from the NCLEX PN 2011 Blueprint. The assessment will tell the student their probability of passing the NCLEX if they sat for it that day. Once the student has completed their practice or proctored assessment, they will have a list of topics they need to study, making remediation more streamlined. There have been many studies to show the ATI Proctored Comprehensive Predictor is predictive of how students will perform on the NCLEX. Any students that do not meet the benchmark established by Bay Area College of Nursing (Level II) will have to remediate to the plan established by the Director.

Currently being implemented and there were no remediation exam at the end of the program given to the cohort that this curriculum was implemented to.

- iii. Perform a cross analysis of the curriculum with the detailed clinical case study/NCLEX test plan and course review.

Currently being implemented.

- iv. Utilize board consultants as needed in program evaluation and curriculum development

Currently being implemented.

- v. Include development of study and test-taking skills early in the program.

Currently being implemented.

- vi. Faculty needs to receive training on test development and instructional techniques. The school promotes better teaching through attendance of faculty workshops, in-

service trainings, continuing education, seminars, and other activities that would foster professional growth. Faculty members are also encouraged to observe other instructors, at their own convenience

- The school has agreements with third-party vendors (ATI Academy, D&D Educational Resources, etc.) to provide the necessary in-service training for the improvement of instruction of our faculty and staff.

c. **TIMELINE:**

In effect.

d. **EFFECT OF INTERVENTION:** Expected outcome of intervention will be as follows:

- i. The students will be academically and clinically prepared to perform nursing tasks and functions and will successfully pass all the requirements per term including the ATI-administered practice exams, proctored exams, and comprehensive exit exams. The students successfully completed the ATI-administered examinations and were able to meet the benchmark set in order to pass the program.
- ii. The school's annual pass rate will improve to 80% or higher by the end of the course program.

We will wait for the results of the newly implemented curriculum.

5. Theory and Clinical Objectives for Each Course

a. **COMPREHENSIVE ANALYSIS:**

Theory and clinical objectives are met and the school started implementation of ATI proctored examinations in order to help the students improve their understanding of the materials and test taking skills.

b. **SPECIFIC ACTIONS TO IMPROVE PASS RATE:**

The students are currently using ATI-administered practice exams, proctored exams, and comprehensive predictor exams as part of the curriculum and a requirement of the program.

c. **TIMELINE:**

These are currently being implemented and are constantly monitored.

d. **EFFECT OF INTERVENTION:**

Expected outcome of intervention will be as follows:

- i. The students will be academically and clinically prepared to perform nursing tasks and functions and will successfully pass all the requirements per term including the ATI-administered practice exams, proctored exams, and comprehensive exit exams. The students successfully completed the ATI-administered examinations and were able to meet the benchmark set in order to pass the program.
- ii. The school's annual pass rate will improve to 80% or higher by the end of the course program.

We will wait for the results of the newly implemented curriculum.

6. Lesson Plans for each Course

a. **COMPREHENSIVE ANALYSIS:**

Lesson plans are submitted by the instructor after the class is taught and is kept on file.

This is being implemented and monitored.

b. **SPECIFIC ACTIONS TO IMPROVE PASS RATE:**

- i. Faculty will attend school related activities, Faculty Development Plans, etc. to help improve their test development and instructional techniques. In addition, the school director monitors the lesson plans and course syllabi created by the faculty to ensure that the objectives of the instructional plan are met.
 - ii. Lesson plans shall reflect implementation of test taking strategies and NCLEX practice tests at the end of each course topic.
- c. **TIMELINE:**
These are currently being implemented and are constantly monitored.
- d. **EFFECT OF INTERVENTION:**
Expected outcome of intervention will be as follows:
- i. Required evidence of ongoing professional development certifications related to teaching strategies & methods, test development will be kept on file.
Quarterly CEUs for professional and educational/teaching development are required to be submitted by each faculty. The school has agreements with third-party vendors (ATI Academy, D&D Educational Resources, etc.) to provide the necessary in-service training for the improvement of instruction of our faculty and staff.
 - ii. The students will be academically and clinically prepared to perform nursing tasks and will successfully pass the standards set forth by the school and the ATI-administered practice exams, proctored exams, and comprehensive exit exams. The students successfully completed the ATI-administered examinations and were able to meet the benchmark set by the school to pass the program.
 - iii. The school's annual pass rate will improve to 80% or higher by the end of the course program.
We will wait for the results of the newly implemented curriculum.

7. Textbooks

- a. **COMPREHENSIVE ANALYSIS:**
The school uses textbooks required for the nursing theory and practical class. The school also incorporated in the curriculum the utilization of NCLEX-related materials and provided the students with ATI books.
Currently being utilized by the students.
- b. **SPECIFIC ACTIONS TO IMPROVE PASS RATE:**
The school has added more materials for instructors and students' utilization in the library. Online access to journals, books, and others were also added for students' utilization at their discretion. The online library is accessible 24 hours/day, 7 days a week.
- c. **TIMELINE:**
These are currently being implemented.
- d. **EFFECT OF INTERVENTION:** Expected outcome of intervention will be as follows:
- i. The students will be fully equipped with resources for further learning.
 - ii. Students will be prepared to take and successfully pass the exams by utilizing all resources provide. ATI-administered practice exams, proctored exams, and comprehensive exit exams. The students successfully completed the ATI-administered examinations and were able to meet the benchmark set by the school to pass the program.

- iii. The school's annual pass rate will improve to 80% or higher by the end of the course program.

We will be waiting for the result of the newly implemented curriculum.

8. Attendance Policies

- a. **COMPREHENSIVE ANALYSIS:**

Attendance is monitored daily and absences made up accordingly. Some of the factors affecting student attendance are family responsibilities and employment issues. Three (3) students are currently under Probation due to excessive absences.

- b. **SPECIFIC ACTIONS TO IMPROVE PASS RATE:**

We explained to the candidates/students that increased family responsibilities and employment hours negatively impact their nursing education and their success in the program. Full commitment to the program included in the admission criteria. We will continue monitoring the students' attendance and enforced accordingly.

- c. **TIMELINE:**

These are currently being implemented.

- d. **EFFECT OF INTERVENTION:**

There will be a reduction in the number of students on probation or warning due to absences.

9. Remediation Policies

- a. **COMPREHENSIVE ANALYSIS:**

Remediation policies are being followed accordingly. ATI examinations are being given and students have to complete the remediation hours and templates depending on the level that they get on these proctored/practice examinations.

- b. **SPECIFIC ACTIONS TO IMPROVE PASS RATE:**

A follow-up consultation with the student to determine progress will be conducted by the Director in collaboration with the faculty, and clinical coordinator. With proper completion of remediation, students are able to retake failed exams in the following:

- i. End of the term comprehensive final proctored exam.
- ii. End of the program ATI comprehensive predictor exam.

- c. **TIMELINE:**

In effect.

- d. **EFFECT OF INTERVENTION:**

By monitoring the progress of each student on remediation, all enrolled students will successfully pass the course program and be more prepared in taking the NCLEX-PN exam.

There were no remediation given at the end of the program.

10. Evaluations of Theory and Clinical Faculty

- a. **COMPREHENSIVE ANALYSIS:**

Proposed faculty training is being implemented through ATI Academy which is an online course offering topics such as: The Crossroads: Cancer in Ages 15-39, Best Practices for Using Admission Assessments, etc. The school is also providing in-service training for all the faculty through DND Educators.

- b. **SPECIFIC ACTIONS TO IMPROVE PASS RATE:**

i. Faculty need to receive training on test development and instructional techniques. The school director observes and evaluates new faculty members 90 days after initial employment and annually at the end of the year. The school director may informally observe other faculty from time to time or as necessary. The end-of-the-year evaluation includes performance and progress made in implementing the professional development plan and the formulation of the plan for the coming year.

ii. Faculty need to spend adequate time evaluating NCLEX result data and plan program changes based on data.

This is currently in progress.

iii. Will hire full-time instructors.

There are new instructors that have been hired. Assigned instructors are now consistent with the batch that they are teaching from the beginning until the end of the program.

iv. Provide continuing education for faculty members on test development and analysis skills. The school will also provide in-service training for the faculty members, through DND Educators, and will ask for CE certificates to be added into their individual files.

Quarterly CEUs for professional and educational/teaching development are required to be submitted by each faculty. Faculties can log in to ATI academy and access material for their CEUs, i.e. The Crossroads: Cancer in Ages 15-39, Best Practices for Using Admission Assessments, etc. The school has agreements with third-party vendors (ATI Academy, D&D Educational Resources, etc.) to provide the necessary in-service training for the improvement of instruction of our faculty and staff.

v. Continue end-of-term evaluation and unannounced evaluations/drop-ins.

This is an on-going process done by the DON.

vi. The Clinical Coordinator assists in managing faculty needs, clinical assignment management, obtaining new clinical sites and establishing a good relationship with current clinical sites.

This is done continuously throughout the year.

vii. Continue routine evaluation of theory and clinical instructors and effectiveness as a teacher. The school director annually reviews and evaluates each faculty member in the classroom or at the clinical site using the faculty evaluation form. The director discusses the written observation report subsequent to the classroom visit. During the annual evaluation, the director and faculty member will address the recommendations made in the classroom observation report and plan any action to improve or enhance their teaching skills and strategies

This is continuously being implemented.

c. TIMELINE:

This is implemented currently.

d. EFFECT OF INTERVENTION:

Required evidence of professional development certifications related to teaching, curriculum and test development will be kept on file.

This is currently being implemented and monitored.

11. Evaluations of Theory Presentations

a. COMPREHENSIVE ANALYSIS:

All essential theoretical elements and contents are being discussed and covered adequately. Lesson plans are submitted by the faculty. Theory presentations are evaluated by the students at the end of each term and the DON every six months/annually.

b. SPECIFIC ACTIONS TO IMPROVE PASS RATE:

- i. Ensure that all essential theoretical elements and content are adequately covered and discussed. Instructional plan development are reviewed and evaluated annually and updated as necessary.

This is constantly being reviewed.

- ii. Will check and evaluate effectiveness of theory lesson plans submitted by the faculty. In addition, the school director monitors the lesson plans and course syllabi created by the faculty to ensure that the objectives of the instructional plan are met.

This is regularly being monitored.

- iii. Incorporate an ATI comprehensive final examination (predictor exam) at the end of the last term of the course program before its completion and prior to graduation. Continue routine evaluation of theory instructors and effectiveness of teaching strategies and materials. The school director also periodically visits classrooms informally during the course of the year to monitor new faculty, to monitor the use of new materials, and/or to visit faculty who request an informal observation. The school also administers in-class student surveys that evaluate instruction. The Student Evaluation of Faculty evaluates individual faculty in specific courses

This is regularly being monitored

c. TIMELINE:

In effect.

d. EFFECT OF INTERVENTION:

- i. The students will pass the theoretical portion of the course program.

This is constantly being evaluated by checking the students' progress throughout the program.

- ii. The students will be fully prepared to take and pass the ATI-administered practice exams, proctored exams, and comprehensive exit exams.

This is constantly being implemented

- iii. The school's annual pass rate will improve to 80% or higher by the end of the course program.

We are waiting for the results of the newly implemented curriculum.

12. Evaluations of Clinical Rotations

a. COMPREHENSIVE ANALYSIS:

Clinical rotations are evaluated by the students and faculty at the end of each term. Clinical sites are adequate and have added more sites as well as discontinued some clinical facilities.

b. SPECIFIC ACTIONS TO IMPROVE PASS RATE:

- i. Increased practical lab hours are in effect to improve, hone, and correctly apply the nursing and medical skills/procedures learned during the theory portion of the course program.

The students were able to show great improvement in their skills by passing the practical exam that was given to them.

- ii. Follow theory to clinical hour 1:3 ratio to comply with general educational requirements.
- c. **TIMELINE:**
In effect.
- d. **EFFECT OF INTERVENTION:**
 - i. Students will become and remain confident in performing all nursing and medical procedures based on their clinical objectives before exposure to the clinical sites.
This is currently in effect.
 - ii. By obtaining a high percentage grade and not only a passing mark on the NCLEX predictor exam, the students will be fully prepared to take the NCLEX examination.
The students are constantly being monitored and evaluated.
 - iii. The school's annual pass rate will improve to 80% or higher by the end of the course program.
We are waiting for the results of the newly implemented curriculum.

13. Evaluation of Student Achievement

- a. **COMPREHENSIVE ANALYSIS:**
Evaluate student achievement after each term by administering written exams and ATI proctored exams.
- b. **SPECIFIC ACTIONS TO IMPROVE PASS RATE:**
 - i. Identify students for at-risk status early in the program and implement a plan to assist them throughout the remainder of the program. At-risk students are those who are required to repeat failed nursing courses and score below school standards of NCLEX predictor exams. In addition, students are assessed by:
 - (a) Proctored ATI exam throughout each term.
 - (b) Proctored comprehensive ATI exam and written exam at the end of each term.
 - (c) At the end of the program, the student will be required to pass the predictor exam and obtain an overall passing grade in the class in order to graduate and be awarded a certificate of completion from the program.
 - ii. The students must obtain a passing grade on the ATI predictor exam and must have an overall passing grade (75%) at the end of the program. Students who fail the predictor exam and get an overall failing grade will have another chance to pass after going through an extensive remediation and completing certain number of Remediation Templates and Hours.
 - iii. Increase the minimum passing grade from 70% to 75% to pass the nursing courses.
This is being implemented.
- c. **TIMELINE:**
In effect.
- d. **EFFECT OF INTERVENTION:**
Expected outcome of intervention will be as follows:
 - i. By reaching a passing grade on the NCLEX predictor exam, the students will be fully prepared to take the NCLEX exams.
 - ii. The school's annual pass rate will improve to 80% or higher by the end of the course program, because the students will be well prepared to take the NCLEX-PN examination by passing the predictor exam. On the other hand, students who fail the

predictor exam and get an overall failing grade in the program are not fully prepared to take the NCLEX and will not be able to graduate from the program.

iii. All students are expected to complete the course program in a timely manner.

14. Current Enrollment

a. **COMPREHENSIVE ANALYSIS:**

Implementing current student quota approved by the board. Student to Teacher ratio complies with the required ratio mandated by the board.

b. **SPECIFIC ACTIONS TO IMPROVE PASS RATE:**

Maintain approved student quota and instructor to student ratio. Identify students for at-risk status early in the program and implement a plan to assist them with success in the program.

c. **TIMELINE:**

In effect.

d. **EFFECT OF INTERVENTION:** Expected outcome of intervention will be as follows:

i. The school's completion rate will improve by the end of the course program.

ii. All students will complete the course program in a timely manner.

Of the cohort that has completed the program, all enrolled students within the cohort has successfully completed the program in a timely manner.

Agenda Item #14.C.1., Attachment C

Bay Area College of Nursing, Palo Alto Vocational Nursing Program

Addendum to Comprehensive Analysis Submitted September 13, 2013

Class	Start Date	End Date	# of Students Start	# of Students End	NCLEX - % Pass Rate	Class Analysis
0814	05/13	08/14	12	N/A	N/A	- 1 student dropped due to family reasons - 1 student dropped due to a conflict of schedule - 1 student added from a previous batch (repeat)
0813	06/12	08/13	18	18	N/A	- 2 students failed to finish due to failing grades - 2 students were added from a previous class
0313	12/11	03/13	10	13	Passed: 3 (by students update) 100%	- 3 students joined the batch from a different batch during the program.
0212	01/11	02/12	16	14	Time Frame: (04/01/2012 to 03/31/2013)	- 3 transfer students were added originally from different batch

54.55%

- 3 students did not finish the program due to failing grades
- 1 student did not continue due to family reasons
- 1 student did not continue due to financial reasons

Class 0212 Analysis

The class started January 2011 and ended on February 2012. 16 students started the program, 14 graduated. Based on the class analysis, three (3) students did not finish the program due to a failing grade. One (1) student did not continue due to family reasons and another student did not finish due to financial difficulties. There were three (3) transfer students from another class who completed the program. The three (3) students who failed the class were advised to repeat the term that they did not pass and to continue with the next class. Two students heeded the advice of their instructors, but one did not return.

To date, the result of the NCLEX-PN from this class follows: NCLEX-PN: (04/01/2012 to 03/31/2013)

- 6 passed and 5 failed

Outcome:

- Our students' success rate was 54.55%

Outcome Analysis:

- Students were anxious when they took their exams. When we asked them for the reason, they cited uneasiness taking the computer-based exams.
- Students got affected by the relocation (from the old school building to the new school location).
This transition was reported by the students as an issue.
- No ATI computer-based exam was implemented during the course of the program.

Action Plan for the Next Class:

- The passing score for admission for the next class (start date: 12/2011) will be increased to \geq 12th grade level. In addition, SLE will be added as part of the entrance examination.
- In order to help the students with their anxiety level during exams/quizzes, more exams/quizzes will be administered throughout the program.
- We will add the ATI computer-based exams with the VN package to familiarize students with computer-based testing throughout the program.
- We will incorporate the ATI as part of their overall grade and raise the passing score to 75%.
- We will purchase laptops for students to check out and use during their program.
- All changes are reflected on the student manual.

Class 0313 Analysis

The class started December 2011 and ended on March 2013. There were ten (10) students who started the program and thirteen (13) graduated. Based on the class analysis, all students who started the program finished at the same time and three (3) transfer students joined the batch during the program.

To date, the results of the NCLEX-PN from this batch follows: NCLEX-PN: awaiting the results

- 3 passed and 0 failed; we are waiting for the complete official test results.

All action plans above were implemented with this batch.

Outcome:

- Our students' success rate was 100%

Outcome Analysis:

- Students are more prepared and less anxious in taking the computer-based exams due to constant practice throughout the program.
- The ATI computer-based examinations and package were incorporated during the program. Based on the preliminary results of the students who have taken the NCLEX-PN, there is a

strong correlation with doing well on the ATI computer-based exams and being successful in the state board exams.

- Increasing the pass rates also helped the students become stronger in their field of studies. In addition, increasing the passing grade of the entrance examinations with the added SLE proved to bring stronger students in the class.

Action Plan for the Next Class:

- ATI computer-based exams and VN package will be implemented.
 - o We will use all the online materials provided by ATI with the books and online videos all throughout the program.
 - o Keep ATI integrated within the program.
 - o Enrolled students will have to obtain an overall passing grade of 75% with their ATI predictor exams and other proctored exams.
 - o ATI computer-based practice exams were given throughout the program and a more focused review and comprehensive exams were administered on the last term of the program.
- The increase in the required passing score in the entrance exams ensures that students will meet the rigors of the VN program.
 - o Students will need a minimum score of $\geq 12^{\text{th}}$ grade level in English and Math. Also, they will need to pass the SLE (score of ≥ 14)

Class 0813 Analysis

The class started June 2012 with an end date of August 2013. There were eighteen (18) students who started the program and eighteen (18) graduated. Based on the class analysis, all but two (2) students who started the program finished at the same time. The two students who failed to finish with the batch withdrew due to failing grades. Two (2) transfer students completed the program.

To date, the result of the NCLEX-PN from this batch follows:

NCLEX-PN: awaiting the results

- No student has taken the NCLEX-PN to date. Application to test for the board is still being processed.

All action plans above were implemented.

Outcome:

- Students just finished the program. Retention rate was good with this class, but out of all the students who are graduating, 4 students needed to remediate and/or retake the exams in different disciplines/subjects to pass the class.
- No NCLEX-PN exam results are out at this time.

Expected Student Outcome:

- With the integration of the ATI examinations throughout the program, with its full emphasis on the third term, we expect the students to pass the state board exams, 90% of them at the minimum. We have given the students time to attend the NCLEX-PN review at the end of their program and have integrated the ATI Comprehensive Predictor exam in their final grade. Students who failed to obtain an overall passing grade of 75% after the final exams were asked to retake and pass a remediation exam.

Action Plan for the Next Class:

- We will continue to implement the existing curriculum with emphasis on computer-based practice and subject-based exams as well as administer the comprehensive exams, especially in the third term.
- Any proposed change(s) in the curriculum will be discussed by the faculty and proposed to the board prior to implementation.

Class 0814 Analysis

The class started May 2013 with an end date of August 2014. There were twelve (12) students who started the program and eleven (11) still remained in the program. Based on the class analysis, one student took a leave of absence due to family reasons and one student dropped the class due to difficulty keeping up with school, work and family. Both students withdrew from the program prior to completing the first term. One student transferred from another class.

To date, the result of the NCLEX-PN from this batch follows: NCLEX-PN: The class is on-going.

All action plans above were implemented.

Outcome Analysis:

- The current action plan will be implemented.

Action Plan for the Next Class:

Proposal to increase the students' success rate in passing the NCLEX-PN:

- Require a 90% grade on the ATI Predictor Exams:
 - o We will create a policy requiring students to obtain a 90% grade on the ATI Predictor Exams in order for their paperwork to be processed and sent to the board for evaluation.
 - o Failure to obtain a 90% grade will result in the delay of the processing of their paperwork to test making them not eligible to take the state exams.
 - o Students have two (2) chances of obtaining the required passing grade prior to graduation to make it part of their overall grade. If a student fails to obtain 90% on the ATI Predictor exams, but has an overall grade of 75%, which is the minimum passing grade, the student will be allowed to graduate, but will not be eligible to take the board exams. They are allowed to retake the ATI Predictor Exam, at their own expense after graduation, until they receive a 90% result in order for their paperwork to be sent to the board.
- End-of-the-program review
 - o We will have a policy stating that students are required to attend the end-of-the-program review in order to complete the program.
 - o We will incorporate the grade that they receive in the end-of-the-program review. An overall grade of 75% or higher must be obtained after the review class in order for the student to graduate.