

Agenda Item #8.A.2.



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

Board of Vocational Nursing and Psychiatric Technicians
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DATE: January 30, 2015

TO: Board Members

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SUBJECT: Bay Area College of Nursing, Daly City, Vocational Nursing Program – Reconsideration of Provisional Approval; Consideration of Report of Unannounced Program Survey Visit; Consideration of Request to Admit Students (Director: Rachele Cagampan Daly City, San Mateo County, Private)

On September 6, 2012, the Board placed the Bay Area College of Nursing, Daly City, Vocational Nursing Program on provisional approval for the two-year period from September 6, 2012, through September 30, 2014. The program was required to admit no additional students without prior approval by the full Board. That action was taken due to the program's noncompliance with Section 2530 (I) 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 approved vocational nursing schools for the same period.”

On September 12, 2014, the Board extended the program's provisional approval for the five (5) month period from October 1, 2014 through February 28, 2015 and required the program to provide no less than one (1) instructor for every ten (10) students in all clinical experiences.

On that date, the Board also denied a request to admit students.

On October 23, 2014, the Notice of Change in Approval Status was forwarded advising the Director of identified violations and required corrections. Acknowledgement by the director of that notice was received on November 3, 2014.

On December 15, 2014, the Board received correspondence from the director requesting Board approval to admit one (1) evening class of twenty (20) students beginning March 9, 2015 and graduating June 5, 2016.

On December 15 and 16, 2014, Board representatives conducted an unannounced on - site program survey visit. On December 19, 2014, the Board sent, via certified mail, written notice to the program regarding the violations identified and the required corrective actions.

The program is presented for reconsideration of provisional approval, consideration of findings from the survey visit, and for consideration of the program's request to admit students.

History of Prior Board Actions

(See Attachment A for History of Prior Board Actions)

Enrollment

The program currently offers classes that are 30 hours per week and 58 weeks in length. The program is required to obtain approval by the full Board prior to the admission of each class.

The following table represents **projected** student enrollment based on current and proposed class starts and completions. The table indicates a **maximum enrollment of 34 students** for the period from **October 2010 through May 2016**.

ENROLLMENT DATA				
CLASS DATES		#Students Admitted	#Students Current or Completed	Total Enrolled
Start	Completed			
10/10 Eve		19	12	12
7/11 Day		17	12	12 + 12 = 24
	12/11 (10/10 Eve Class)		-12	24 - 12 = 12
9/11 Eve		18	14	12 + 14 = 26
	9/12 (7/11 Day Class)		-12	26 - 12 = 14
1/13 Eve		14	20	14 + 20 = 34
	12/12 (9/11 Eve Class)		-14	34 - 14 = 20
11/13 Eve		11	8	20 + 8 = 28
	3/14 (1/13 Eve Class)		-20	28 - 20 = 8
3/15 (Proposed - Eve)		20		8 + 20 = 28
	4/15 (11/13 Class)		-8	28 - 8 = 20
	5/16 (Proposed 3/15 Class)		-20	20 - 20 = 0

Licensing Examination Statistics

The following statistics, furnished by Pearson Vue and published by the National Council of State Boards of Nursing as "Jurisdictional Summary of All First-Time Candidates Educated in Member Board Jurisdiction" for the period January 2010 through December 2014, specify the pass percentage rates for graduates of the Bay Area College of Nursing, Daly City, Vocational Nursing Program on the National Council Licensure Examination for Practical/Vocational Nurses (NCLEX-PN®).

NCLEX-PN® Licensure Examination Data							
Quarterly Statistics					Annual Statistics*		
Quarter	# Candidates	# Passed	% Passed	State Average Quarterly Pass Rate	Program Average Annual Pass Rate	State Average Annual Pass Rate [CCR §2530(I)]	Variance from State Annual Average Pass Rate
Jan - Mar 2010	12	8	67%	76%	62%	74%	-12
Apr - Jun 2010	9	7	78%	74%	71%	74%	-3
Jul - Sep 2010	5	1	20%	76%	62%	75%	-13
Oct - Dec 2010	5	3	60%	77%	61%	76%	-15
Jan - Mar 2011	9	6	67%	80%	61%	77%	-16
Apr - Jun 2011	4	3	75%	71%	57%	76%	-19
Jul - Sep 2011	5	3	60%	74%	65%	76%	-11
Oct - Dec 2011	8	2	25%	74%	54%	75%	-21
Jan - Mar 2012	14	8	57%	77%	52%	74%	-22
Apr - Jun 2012	13	5	38%	72%	45%	74%	-29
Jul - Sep 2012	7	4	57%	74%	45%	74%	-29
Oct - Dec 2012	5	3	60%	70%	51%	74%	-23
Jan - Mar 2013	1	1	100%	75%	50%	73%	-23
Apr - Jun 2013	6	6	100%	78%	74%	73%	+1
July - Sept 2013	6	4	67%	75%	78%	74%	+4
Oct - Dec 2013	5	2	40%	76%	72%	76%	-4
Jan - Mar 2014	4	1	25%	74%	62%	76%	-14
Apr - Jun 2014	5	1	20%	66%	40%	73%	-33
Jul - Sep 2014	7	6	86%	72%	48%	73%	-25
Oct - Dec 2014	3	2	67%	72%	53%	72%	-19

*The Annual Pass Rate changes every quarter. It is calculated by dividing the number of candidates who passed during the current and previous three-quarters by the number of candidates who tested during the same period. If no data is available for the relevant period, the statistic is carried over from the last quarter for which data is available.

California Code of Regulations Section 2530(l) states:

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

Since placement on provisional approval in September 2012, ten (10) quarters of licensing examination data are available for the program. The data substantiates the program's:

1. Noncompliance with regulatory requirements during the initial three (3) quarters (Quarters 3 and 4 - 2012, Quarter 1 - 2013) with average annual pass rates **23 to 29** percentage points **below** state average annual pass rates;
2. Compliance during the following three (3) quarters (Quarters 2, 3, and 4 - 2013); and
3. Noncompliance with regulatory requirements during the last **four (4)** quarters (Quarters 1 - 4, 2014) with average annual pass rates **14 to 33** percentage points **below** state average annual pass rates;

Based on the most recent data available (October through December 2014), the program's average annual pass rate is **53%**. The California average annual pass rate for graduates from approved vocational nursing programs who took the NCLEX-PN® for the first time during the same period is 72%. The average annual pass rate for the Bay Area College of Nursing Daly City, Vocational Nursing Program is **19** percentage points **below** the state average annual pass rate.

Faculty and Facilities

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

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

The program's Board - approved faculty totals 12, including the program director. Of the total faculty, 11 are approved to teach in the clinical area, including the director, who spends 100% of her time administering the program.

Based on the Board's prior decision requiring the program to provide no less than one (1) instructor for every ten (10) students in all clinical experiences and the program's maximum enrollment of 34 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 lacks sufficient clinical facilities to provide clinical experiences of like character and quality for the current and proposed student enrollment that are consistent with the approved curriculum.

Specifically, no provision for sick child care was proposed for half of the requested students. The pediatrician's office the program proposes to utilize reported the doctor had been too busy for the past year and had no plans to take students. The obstetrician's office the program proposes to utilize reported they can accommodate one (1) student at a time for four (4) days per week. The program proposed to send students to this office five (5) days per week. The remaining students were to be scheduled in a pregnancy options clinic that, per the clinic's website, provides prenatal care up to the third trimester. The program proposed 10 hours of simulation for pediatric nursing and 18 hours of simulation for maternity nursing. No pediatric or maternity equipment was found in the skills lab during the recent program survey visit.

Other Considerations

As noted previously, the Board placed the program on provisional approval on September 6, 2012, due to noncompliance with regulatory requirements for program pass rates. At that time, the program's average annual pass rates had been noncompliant for eight (8) consecutive quarters and was 45%. The current program annual average pass rate on the licensing examination is 53%, 19 percentage points **below** the state average annual pass rate.

On June 1, 2014, the director submitted a comprehensive analysis of the program in accordance with Corrective Action # 4 of the Board's Notice. (See Attachment B). That analysis discussed elements in which changes had been completed and those in which no changes were made.

- Changes were identified in the following elements.
 1. Evaluation of Student Achievement. At the completion of each term, student achievement is measured utilizing written examinations and proctored Assessment Technologies Institute (ATI) examinations.
 2. Remediation Policy. At enrollment, the students will be asked to sign a form indicating they must achieve a 90% on their ATI Comprehensive Exam before the program submits their NCLEX-PN application and required documents to the Board for processing. The students will have to retake the ATI Comprehensive Exam until a 90% or higher is achieved.
- No changes were identified in the following elements: Admission Criteria; Screening and Selection Criteria; Terminal Objectives; Instructional Plan; Lesson Plans; Theory and Clinical Objectives for Each Course; Attendance Policies; Evaluations of Theory Presentations; Evaluations of Clinical Rotations; Textbooks; Evaluations of Theory and Clinical Faculty; and Current Enrollment. Steps already implemented were discussed in the report.

On September 12, 2014, the Board extended provisional approval until February 2015 and denied a request to admit students due to low passing rates on the licensing examination. On October 23, 2014, the Notice of Change in Approval Status was forwarded advising the Director of identified violations and required corrections. Acknowledgement by the director of that notice was received on November 3, 2014. (See Attachment C).

Program Survey

On December 15 and 16, 2014, Board representatives conducted an unannounced program inspection.

During the two (2) day visit, Board representatives assessed the physical resources for the program, inspected records, including files of recently graduated and currently enrolled students. Currently enrolled students were also interviewed. The program director, citing a Department of Education survey visit at the Palo Alto campus, was not in attendance throughout the survey visit.

The program receptionist informed Board representatives that no records are maintained at the school. Further, the receptionist reported instructors use the program's computer for grades and attendance and she did not have a password. Board representatives provided to the receptionist a written list of materials that would be needed for inspection; the receptionist reported that all program records were housed at the Palo Alto campus. At 5 PM on the first day of the survey visit, boxes containing the requested records were provided for inspection.

Currently, the program's enrollment includes one (1) class of eight (8) students who began the program in November 2013 and are scheduled to graduate in February 2015. Examination of program records indicated that all students had evidence of completion of high school or the equivalent. Board representatives interviewed students in their evening lecture.

An assessment of program elements critical to the education of students follows.

➤ ***Classroom Space:***

The vocational nursing classroom is located on the third floor and accommodates approximately 15 desks. The classroom includes a large white board, large monitor, projector for use with a laptop, and a desk for the instructor at the front of the classroom. A smaller classroom on the third floor holds an additional five (5) desks. No visual learning aids were noted in either classroom.

➤ ***Computer Lab and Library:***

A small room on the second floor contains six (6) computers with keyboards, all in close proximity to each other. There were a total of eight (8) shelves in the library and books were thinly spread on the shelves. The program reports that students have access to an online database but the students interviewed, in the latter portion of their educational program, stated that they were not aware of this. No DVDs, videos, or other instructional aides were present on site.

Based on observation and analysis of program documents and materials provided during and continuing after the program survey visit, 11 violations were identified. On December 19, 2014, A Notice of Violations was sent to the Program. (See Attachment D). On January 1 and 2, 2015, the program's response was received by the Board. (See Attachment E).

Following is a summary of violations reflecting any corrective actions taken by the program.

Section 2526(a)(8) of the Vocational Nursing Rules and Regulations states:

“The institution shall apply to the Board for approval. Written documentation shall be prepared by the director and shall include:

... (8) Evaluation methodology for curriculum.

Violation #1:

Board files confirm that the program has an approved methodology and procedure for evaluation of the curriculum. However, program representatives failed to produce documentation confirming that the curriculum had been evaluated to determine its currency, effectiveness, consistency with the NCLEX/PN® test plan, or need for revision.

Status #1:

This violation is **not corrected**. However, if implemented as proposed, the submitted plan will prevent future occurrences of this violation.

Subsequent to the inspection, the director submitted a Faculty Curriculum Evaluation from two (2) faculty members. The evaluations were both dated December 30, 2014. Perfect scoring was noted on both evaluations.

The program’s proposed plan states that future curriculum evaluations will consist of an evaluation done by students at the end of the program; an evaluation done by faculty once per year; use of NCLEX results; and faculty and administration review of student and faculty satisfaction at the end of the year meeting. The program also notes that syllabi will be reviewed in the fourth quarter of every year and accessible copies will be maintained for the Daly City program.

Section 2526(a)(11) of the Vocational Nursing Rules and Regulations states:

“The institution shall apply to the Board for approval. Written documentation shall be prepared by the director and shall include:

... (11) Evaluation methodology for clinical facilities.”

Violation #2:

Board files confirm that the program has an approved methodology and procedure for evaluation of clinical facilities. However, program representatives failed to produce documentation confirming that clinical facilities had been evaluated by faculty since 2008. The most recent faculty evaluation of a clinical site was from 2008 and included only one site.

Status #2:

This violation is **not corrected**. However, if implemented as described, the submitted plan will prevent future occurrences of this violation.

Subsequent to the inspection, the program submitted a plan for evaluation of clinical facilities. Evaluation would be done by students

and faculty in the sites with program director involvement annually at an end of year meeting.

In addition, the program submitted three (3) Clinical Facility Evaluation by Faculty forms. They were all for the same facility and all from the same faculty member who instructs students at the facility. The forms were for Terms 1-3 for the current cohort and there was no date of evaluation. The "Date of Review By Director" was December 30, 2014 on all three (3) forms. The program also submitted a narrative, written by the clinical instructor, regarding Term 1 clinical objectives being met at the facility.

Section 2526(a)(12) of the Vocational Nursing Rules and Regulations states:

"The institution shall apply to the Board for approval. Written documentation shall be prepared by the director and shall include:
... (12) Admission criteria.

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

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

Violation #3:

The Comprehensive Analysis submitted by the program in July 2012 stated, "In addition, the candidates will also have to undergo a rigorous interview process (Rubric criteria involve attitude, skills and experience."

Based on an analysis of current and recently graduated student files, the program failed to follow its Board approved admission, screening, and selection criteria, as noted by the lack of any record of interviews with the exception of one student. Further, one (1) student was noted to have taken the same entrance examination a total of six (6) times in a one (1) month period before attaining a passing score.

Status #3:

This violation is **not corrected**.

The program was requested to provide a plan of correction that describes how the program will follow the policy for admission, screening and selection of applicants and verification of training of all individuals associated with the school, regarding admission, screening and selection policies.

In the response to the violations, the program noted, "There is currently no limit to the number of times an applicant can take the admissions test." The program notes there are two versions and they are to be used interchangeably.

Subsequent to the inspection, the program submitted examples of three (3) interviews. In one of the interviews, not all questions were asked of the applicant and scoring was changed by the interviewer, reflecting a higher score in the second scoring.

The program submitted a plan including training staff, limiting entrance tests to two (2) tests within a month, use of two (2) versions of the test, and maintenance of accessible records for the Daly City campus. The submitted plan lacks evidence confirming the director's involvement in decisions regarding the admission, screening, and selection of students.

Section 2526(a)(16) of the Vocational Nursing Rules and Regulations states:

"The institution shall apply to the Board for approval. Written documentation shall be prepared by the director and shall include:

- ... (16) List of resources for provision of counseling and tutoring services for students.

Violation #4:

Board files confirm that the program had a list of resources for provision of counseling and tutoring services for students when the program was approved. No list of resources was found on campus or in the Student Catalog. A classroom bulletin board lists that tutoring is available at the school by appointment but does not list other resources. A list of resources for counseling, such as for mental health problems or other life crises, was not provided.

Status #4:

This violation is **corrected**.

The violation is corrected in that the program submitted lists of tutoring and counseling resources. The program provided a 15 page list of Volunteer Organizations published by PR News and a 14 page list of private tutors published by a private K-8 school specializing in learning disabilities. There were some counseling organizations listed in the many pages of Volunteer Organizations, and there were some private tutors who work with adults with learning disabilities in the many pages of private tutors. It would be difficult, however, for a student facing challenges to sort through either list.

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

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

Violation #5:

Based on survey observations and an analysis of staff and support services, supplies, equipment, and physical space, Board representatives identified that the program lacks sufficient resources to achieve its educational objectives for the currently enrolled eight (8) students and the proposed class of 20 students.

The Skills Laboratory for the vocational nursing students contains four (4) beds, three (3) mannequins (some of which include a tracheostomy and provisions for catheter insertion), one (1) folding screen, and one (1) wheelchair. Based on the size of the Skills Laboratory and the space between beds and walls, approximately 12 students could crowd around the beds, leaving very little room for movement.

Skills Laboratory supplies were outdated and insufficient for the proposed enrollment. No feeding supplies were noted. There were few dressing supplies. Needles and syringes were lying loose, unorganized and in an unlocked cabinet. An empty, dirty, and stained medication cart was noted. A box with used and unorganized supplies was sitting on one of the beds. The only sink available was a small sink in a small room outside of the Skills Lab.

Program correspondence dated October 30, 2011 describing the move to what is now the current site described three (3) skills labs accommodating ten (10) students and a third floor classroom accommodating 30 students. (See Attachment F). Three (3) skills labs and space for 30 students in the third floor classroom were not observed during the recent program survey visit.

Status #5:

This violation is **not corrected**. However, if implemented as described, and if verification of resources and supplies is provided, the submitted plan will prevent further occurrences of this violation.

The program was requested to provide the following:

1. Detailed plan and timeline for improving resources sufficient to achieve the program's objectives; and
2. Verification of resources including personnel, clinical facilities, equipment and supplies.

The program responded that students and faculty have access to an online database. The program submitted three (3) lists of office supplies and a Skills Lab Equipment Inventory as of September 4, 2014. Both Board representatives conducting the program inspection examined the Skills Lab Equipment Inventory lists and noted discrepancies from the survey visit findings. The program did not address the number of computers available for students, including computers for use with proctored testing.

The program noted the following plans:

1. Needles are now kept in a locked cabinet;
2. One bed to be removed from the third floor skills lab;
3. Remind instructors to return all supplies and equipment to proper location;

4. Inventory check to be January 9, 2015 with new list of resources and supplies to be purchased. As submitted, the proposed Skills Lab Equipment Inventory contains no maternity or pediatric supplies, with the exception of an "infant cath kit."
5. Plan to expand online resources, books, and journals.

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

"Regular faculty meetings shall be held. Minutes shall be available to the Board's representative."

Violation #6: Program representatives produced a binder with agenda items and minutes from general Bay Area College of Nursing meetings. However, there was no evidence of faculty discussion specific to the Daly City Vocational Nursing program.

Status #6: This violation is **not corrected**. However, if implemented as described, and if verification of resources and supplies is provided, the submitted plan will prevent further occurrences of this violation.

The program submitted a plan to include specifics of the Daly City Vocational Nursing Program in the quarterly all – school meetings. The plan includes maintaining accessible records for the Daly City program.

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

"Each school shall have an attendance policy approved by the Board. The policy shall include but not be limited to, criteria for attendance and the specific course objectives for which make-up time is required. Acceptable methods for make-up include:

- (1) Theory: case studies, independent study, written examination, attendance at seminars or workshops, auto-tutorial laboratory, and research reports.
- (2) Clinical: performance evaluation in skills laboratory or additional time in the clinical area with clients/patients."

Violation #7: Board files confirm that the program has an approved attendance policy. However, based on an analysis of student and program documents, the program failed to implement the approved policy. Student files contained no evidence of follow-up for absences.

Status #7: This violation is **not corrected**.

The program was required to provide documentation of make-up of missed hours and specific course objectives for which make-up time is required.

The program responded that make – up records were on file at Palo Alto. A written list, including “Attendance Records” was requested on the first day of the survey visit. Such records were not delivered with the boxed materials from Palo Alto. On January 2, 2015, the director stated that the file for attendance records was too large to email.

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

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

Violation #8:

During the survey visit, Board representatives inspected files of all current students and the most recent graduates. While the program’s grade records were not available for inspection, Board representatives inspected files related to remediation and probation.

In multiple cases for one (1) recently graduated cohort, there was no follow – up noted. Four (4) students in that cohort failed multiple subjects with no clear outcome noted. For all of these students, after the course was failed and the remediation was failed, the remediation file indicated, “will need to remediate given by the DON” but no outcome was recorded. In some cases, dates of subsequent course failures indicated that students continued in the program and continued without stopping to repeat failed courses.

Probation files also failed to note follow-up. One (1) student was placed on probation for absences and no follow-up was noted. That same student later failed a course and failed remediation of that course but proceeded to take a subsequent course and failed that course. Again, no follow-up or outcome was recorded. Only one (1) of the students missing follow-up in remediation files was noted to have not gone on to continue in the program.

Status #8:

This violation is **not corrected**.

According to the program’s response to the violations (see Attachment E), “Outcomes of the final remediation for those who have unsatisfactory academic standings were recorded on Engrade, online grading software. Successful completion or satisfactory passing of the terms and conditions set by the director reinstated the students to active satisfactory academic standing as evidenced by the passing overall grade on Engrade.”

The program further responded, “If remediation was not successful, a meeting with the director shall be scheduled to revise and document another remediation plan.”

The program proposed the following: continue to follow the school’s remediation plan; the director must ensure that the remediation form is completed.

Even if implemented as described, the plan is unlikely to improve program outcome. Non-specific "terms and conditions set by the director" is unlikely to produce program graduates who will possess the minimal level of competence required to pass the licensing examination

Section 2530(j)(1) of the Vocational Nursing Rules and Regulations states:

"Each school shall advise students, in writing, of the following:

(1) Right to contact the Board of program concerns."

Violation #9: While an enrollment document in student files listed the main telephone number for the Department of Consumer Affairs, Board representatives found no evidence that the program had informed students of their right to contact the Board by posting onsite or in the program's student catalog. One (1) student interviewed asked how to contact the Board.

Status #9: This violation is **corrected**.

The program reported that Board contact information is now posted on site and in the Student Catalog.

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

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

Violation #10: Published examination statistics substantiates that the program failed to maintain an annual average pass rate that is compliant with regulatory requirements. The program's average annual pass rate has been between **14 to 33 points below** the state average annual pass rate for the **past four (4) quarters**.

Status #10: This violation is **not corrected**.

The program's most recent improvement plan, dated June 1, 2014, was described, above, in Other Considerations.

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

"Schools are responsible for the continuous review of clinical facilities to determine if the student's clinical objectives for each facility are being met."

Violation #11: As noted in Violation #2, program representatives failed to provide documentation substantiating the evaluation of clinical facilities by faculty or program administration.

Status #11:

This violation is **not corrected**. However, if implemented as described, the submitted plan will prevent future occurrences of this violation.

Subsequent to the inspection, the program submitted three (3) Clinical Facility Evaluation by Faculty forms. They were all for the same facility and all from the same faculty member who instructs students at the facility. The forms were for Terms 1-3 for the current cohort and there was no date of evaluation. The "Date of Review By Director" was December 30, 2014 on all three (3) forms. The program also submitted a narrative, written by the clinical instructor, regarding Term 1 clinical objectives being met at the facility.

In summary, 11 violations were identified during and subsequent to the program inspection. To date, two (2) violations have been corrected, and five (5) violations will be corrected should submitted plans be implemented as proposed. A total of four (4) violations (related to admissions, screening and selection; attendance; remediation; and licensing exam pass rates) are **not corrected**.

In addition, analysis of data submitted in support of the current request demonstrated a lack of adequate clinical facilities for both pediatric and maternity nursing experience for the proposed class of 20 students.

Recommendations:

1. Extend Provisional Approval for the Bay Area College of Nursing, Daly City, Vocational Nursing Program for a one (1) year period from March 1, 2015 through February 29, 2016, and issue a notice identifying specific areas of non-compliance and requirements for correction as referenced in Section 2526.1 (e) of the California Code of Regulations.
2. Require the program to correct violations identified during the onsite inspection and submit a report identifying implemented interventions to include the following no later than **February 27, 2015**.
 - a. Revised Admission Criteria.
 - b. Revised Screening and Selection Criteria.
 - c. Implementation of the approved Attendance Policy including follow – up for absences.
 - d. Revised Remediation Policy.
3. Require the program to submit verifiable plans for clinical placements for maternity and pediatric nursing for currently enrolled students, no later than **February 27, 2015**.
4. Contingent upon the program securing and obtaining, no later than **February 27, 2015**, Board approval for adequate clinical facilities such that maternity and pediatric nursing clinical objectives can be accomplished, approve the Bay Area College of Nursing, Daly City, Vocational Nursing Program's request to admit one (1) evening class of 20 students commencing March 9, 2015 and graduating June 5, 2016.

5. Require the program director to submit, under penalty of perjury, the names of all enrolled students, date of admission, placement in the curriculum, and expected date of graduation by **March 2, 2015**.
6. Continue to require the program to provide no less than one (1) instructor for every ten (10) students in all clinical experiences.
7. Continue to require the program to obtain approval by the full Board prior to the admission of additional students.
8. 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.
9. Continue to require the program to comply with all approval standards in Article 4 of the Vocational Nursing Practice Act, commencing at Business and Professionals Code Section 2880, and Article 5 of the Board's Regulations, commencing at California Code of Regulations, Title 16, Section 2526.
10. Continue to 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.
11. Failure to take any of these corrective actions may cause the full Board to revoke the program's approval.
12. Place the program on the **February 2016** Board agenda for reconsideration of provisional approval.

Rationale:

The program remains non-compliant with regulatory requirements relative to licensure pass rates. The current average annual pass rate for the program is 53%, which is 19 percentage points **below** the state average annual pass rate.

The recent unannounced survey visit identified a total of 11 violations. To date, two (2) violations have been corrected, and five (5) violations will be corrected should submitted plans be implemented as proposed. A total of four (4) violations are not corrected.

Extension of provisional approval for a period of one (1) year will allow the program time to comply with corrective actions required by the Board.

The program has not provided plans for placements in clinical facilities adequate as to number, type, and variety of patients treated such that the required competency-based objectives for maternity and pediatric nursing can be accomplished. Therefore, approval of the program's request to admit 20 additional students is recommended **contingent upon** the program obtaining and securing adequate Board – approved clinical facilities.

- Attachment A: History of Prior Board Actions
- Attachment B: Comprehensive Analysis Dated June 1, 2014
- Attachment C: Notice of Extension of Provisional Approval, October 23, 2014
- Attachment D: Notice of Violation, December 19, 2014
- Attachment E: Program Response Received January 1, 2015
- Attachment F: Program Correspondence Dated October 30, 2011

Agenda Item #8.A.2., Attachment A

BAY AREA COLLEGE OF NURSING, DALY CITY VOCATIONAL NURSING PROGRAM

History of Prior Board Actions

- On January 11, 2007, the Executive Officer approved the Palo Alto Center for Healthcare Education, Daly City, Vocational Nursing Program's request to begin a vocational nursing program with an initial full-time class of 30 students commencing March 27, 2007 only, with a completion date of April 27, 2008; and approved the program curriculum for 1598 hours, including 628 theory and 970 clinical hours.
- On February 8, 2007, the program notified the Board that the program's name had been changed to Bay Area College of Nursing, Inc., Daly City, Vocational Nursing Program.
- On March 11-12, 2008, the program was surveyed for initial accreditation.
- On May 15, 2008, the program submitted documentation substantiating the completion of its revised instructional plan, lesson plans for Terms I, II, and III, and a new Skills Laboratory.
- On May 15, 2008, the Executive Officer approved the program's initial full accreditation for the period from April 27, 2008, through April 26, 2012, and approved the program's revised curriculum for 1646 hours (Theory – 676 hours; Clinical – 970 hours).

Additionally, the Executive Officer approved the program's request to admit a class of 30 full-time students on May 15, 2008 only, to **replace** students graduating May 2, 2008.

- On August 13, 2008, the Executive Officer approved the program's request to admit a class of 30 full-time students and three (3) alternates each May and September to **replace** graduating students with the following stipulations:
 - a. No additional classes are added to the program's current pattern of admissions without prior approval. The program's current pattern of admissions includes admission of two full-time classes of 30 students and three (3) alternates each May and September to **replace** graduating students, only; and
 - b. The director documents that adequate resources, i.e. faculty and facilities, are available to support each admitted class of students.
- On May 17, 2011, the assigned consultant forwarded correspondence to the director per certified mail advising that the program's average annual pass rates had been more than ten (10) percentage points below state average annual pass rates for four (4) quarters. The director was requested to submit a written plan for improving program pass rates by June 10, 2011.
- On June 15, 2011, the Board received correspondence from the director advising that the program had delayed commencement of the class scheduled for May to July 25, 2011 due to low student enrollment. The revised date of graduation is September 16, 2012.

- On October 14, 2011, the assigned consultant forwarded correspondence to the director advising that the program's average annual pass rates had been more than ten (10) percentage points below state average annual pass rates for five (5) quarters.
- On November 8, 2011, the Board received correspondence from the director setting forth the program's plan to improve program pass rates.
- On November 15, 2011, the Board received correspondence from the director requesting revisions in school policies.
- On February 28, 2012, the Board received correspondence from the director requesting a revision of its curriculum
- On June 7, 2012, the Executive Officer deferred action on the program's request to admit an evening class of 20 students plus 3 alternates commencing August 8, 2012, graduating on October 13, 2013, and a request for a major curriculum revision, to the full Board. Additionally, the Executive Officer rescinded approval of the program's ongoing class admissions. The program was placed on the September 2012 Board agenda for consideration of provisional approval.
- On June 7, 2012, the assigned consultant forwarded correspondence to the director advising of decisions rendered by the Executive Officer.
- On June 27, 2012, the assigned consultant forwarded correspondence to the director advising that the Board was scheduled to consider the programs placement on provisional approval on September 6, 2012. A copy of the program's plan of correction and other program information was requested by July 6, 2012.
- On July 6, 2012, the Board received electronic correspondence from the director providing information for presentation at the September 2012 Board meeting.
- On July 12, 2012, the Board received electronic correspondence from the director specifying the program's revised plan of correction.
- On July 18, 2012, the assigned consultant forwarded correspondence to the director requesting documents for dissemination to Board Members.
- On September 6, 2012, the Board approved the following recommendations for the program:
 - a. Place the Bay Area College of Nursing, Daly City, Vocational Nursing Program on provisional approval for the two – year period from September 6, 2012, through September 30, 2014, and issue a notice to the program to identify specific areas of noncompliance and requirements for correction, as referenced in section 2526.1 (e) of the California Code of Regulations. (See Attachment E)
 - b. Require the program to bring its average annual pass rate to no more than ten (10) percentage points below the state average annual pass rates.

- c. Approve the program's request to admit an evening class of twenty (20) students plus two (2) alternates commencing October 31, 2012, and graduating January 26, 2014.
 - d. Require the program to obtain approval by the full Board prior to the admission of additional students.
 - e. Require the program to submit follow – up reports in nine (9) months, but no later than **June 1, 2013**, and 21 months, but no later than **June 1, 2014**. The reports 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.
 - 1. Admission Criteria.
 - 2. Screening and Selection Criteria.
 - 3. Terminal Objectives.
 - 4. Curriculum Objectives.
 - 5. Instructional Plan.
 - 6. Theory and Clinical Objectives for Each Course.
 - 7. Lesson Plans for Each Course.
 - 8. Textbooks.
 - 9. Attendance Policy.
 - 10. Remediation Policy.
 - 11. Evaluations of Theory and Clinical Faculty.
 - 12. Evaluations of Theory Presentations.
 - 13. Evaluations of Clinical Rotations and Their Correlation to Theory Presentations.
 - 14. Evaluation of Student Achievement.
 - 15. Current Enrollment.
 - f. Require 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.
 - g. Require the program to demonstrate incremental progress in correcting the violation. If the program fails to satisfactorily demonstrate incremental progress, the full Board may revoke the program's approval.
 - h. Failure to take any of these corrective actions may cause the full Board to revoke the program's approval.
 - i. Place the program on the **September 2014** Board agenda for reconsideration of provisional approval.
- On October 21, 2013, the Board approved the program's request to admit an evening class of twenty (20) students plus two (2) alternates commencing November 4, 2013, **only**, and graduating February 26, 2014, to **replace** the evening class that graduated in December 2012; **and** approved the program's request to admit a day class of twenty (20) students plus two (2) alternates commencing January 7, 2014, **only**, and graduating April 12, 2015. This class was an additional class and did not replace any graduating class. Additionally, the

Board continued to require the program to obtain approval by the full Board prior to the admission of additional students.

- On June 1, 2014, the director submitted a comprehensive analysis of the program in compliance with Board directives from the September 2012 Board Meeting.
- On June 10, 2014, the director submitted a request to admit twenty (20) students plus two (2) alternates to an evening class commencing October 27, 2014, graduating January 24, 2016, to **replace** the class that graduated on March 2014.
- On September 12, 2014, the Board approved the following recommendations:
 - a. Extend provisional approval for the Bay Area College of Nursing, Daly City, Vocational Nursing Program for a **five (5) month** period from October 1, 2014 through February 28, 2015 and issue a notice identifying specific areas of non-compliance and requirements for correction as referenced in section 2526.1 (e) of the California Code of Regulations (See Attachment C).
 - b. Deny the program's request to admit an evening class of twenty (20) students plus two (2) alternates commencing October 27, 2014, and graduating January 24, 2016, only, to **replace** the class that graduated March 2014.
 - c. Continue to require the program to obtain approval by the full Board prior to the admission of additional students.
 - d. Require the program to provide no less than one (1) instructor for every ten (10) students in all clinical experiences.
 - e. 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.
 - f. Require the program to comply with all approval standards in Article 4 of the Vocational Nursing Practice Act, commencing at Business and Professionals Code Section 2880, and Article 5 of the Board's Regulations, commencing at California Code of Regulations, Title 16, section 2526.
 - g. 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.
 - h. Failure to take any of these corrective actions may cause the full Board to revoke the program's approval.
 - i. Place the program on the **February 2015** Board agenda for reconsideration of provisional approval.
- On December 15, 2014, the Board received a request to admit students.

- On December 15 and 16, 2014, Board representatives conducted an unannounced program survey visit. Eleven (11) violations of the California Code of Regulations were identified,
- On December 19, 2014, the Board sent to the program, via certified mail, a Notice of Violations.
- On January 1 and 2, 2015, the Board received the program's response to the Notice of Violations.

Agenda Item #8.A.2., Attachment B



BAY AREA COLLEGE
OF NURSING

Bay Area College of Nursing – Comprehensive Analysis

Submitted Date: June 1, 2014

1. Admission Criteria

a. COMPREHENSIVE ANALYSIS:

We have implemented the revised Wonderlic/WBST entrance exams score of 12th grade level or higher. The increased in the grade level for a passing score and the addition of the Scholastic Level Exam (SLE) with a passing score of 14 will help assess student's readiness and suitability for success in the VN program. This can also provide an accurate appraisal for a candidate's potential as a nurse.

b. SPECIFIC ACTIONS TO IMPROVE PASS RATE:

Utilize 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. We also will add the SLE with a passing score of 14. These exams are tools to assess the student's readiness and sustainability for success in the VN program. We can then provide an accurate appraisal of a candidate's potential as a nurse.

c. TIMELINE:

In effect.

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

- i. There was a reduction in student cancellations/withdrawals/terminations due to failure to commit to the rigorous training/education that the school offers. Since implementation of the revised WBST passing score and the addition of the SLE, we only had one student who dropped out of the program due to conflict of her work schedule (Batch 25).
- ii. There was a significant increase in the annual pass rate from 51.28% in 2012 to 72.22% in 2013 (an increase of 20.94%). This showed an improvement that the intervention that we implemented worked.

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 are required to pass the interview process as well as entrance examination.



b. SPECIFIC ACTIONS TO IMPROVE PASS RATE:

We will maintain the required 2.0 (C average) or higher overall cumulative grade point average based on completed secondary education or GED equivalency. We will also keep the WBST (200 Verbal and 210 Quantitative) at the 12th Grade level or higher for the Verbal and Quantitative categories to assist the candidate with the demands of being a nursing student. In addition, testing the students' cognitive ability using SLE with a passing score of 14 will be used to assess their readiness and suitability for success in the field of nursing. The candidates will still have to undergo a rigorous interview process using the Rubric criteria which evaluates attitude, skills and experience.

c. TIMELINE:

In effect.

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

- i. Only one student had to drop because of work schedule conflict.
- ii. Since the implementation of the increased WBST and SLE score, there was an increase in the annual pass rate at 20.94 percent between 2012 and 2013.

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 a Level II with an overall passing grade. Failure to reach this level and missing the overall passing grade would mean repeating 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.

4. (d) Utilize the annual reports for ongoing evaluation of factors influencing the program's NCLEX results.
5. (e) Recent plan of action/implementation: The students were asked to sign a form indicating that they will need to get a 90% in their Comprehensive exam before they are allowed to process their NCLEX-PN application papers. Failure to achieve the 90% will result in a retake until they obtain the 90%.

Awaiting results.

c. **TIMELINE:**

The above plans are being implemented and are in progress.

d. **EFFECT OF INTERVENTION:**

- i. The students will be fully prepared to take and successfully pass the ATI-administered comprehensive final exams.
- ii. The school's annual pass rate improved increasing by 20.94% and met the annual minimum pass rate requirements set by the BVNPT.

We are also monitoring the progress the next quarter's progress.

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.



Since the implementation of the new curriculum, the annual pass rate has increased by 20.94% from 51.28% in 2012 to 72.22% in 2013.

- ii. We began using ATI-administered practice exams, proctored exams, and comprehensive 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.
 - iii. We also performed a cross analysis of the curriculum with the detailed clinical case study/NCLEX test plan and course review.
 - iv. We utilized board consultants as needed in program evaluation and curriculum development.
 - v. We included study and test-taking skills early in the program.
 - 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 showed progress academically and clinically prepared in the performance of the nursing tasks and functions. **Since the implementation of the new curriculum, the annual pass rate has increased by 20.94% from 51.28% in 2012 to 72.22% in 2013.**



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.

Since the implementation of the new curriculum, the annual pass rate has increased by 20.94% from 51.28% in 2012 to 72.22% in 2013.

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

The annual pass rate increased by 20.94 percent between 2012 and 2013.

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

Since the implementation of the new curriculum, the annual pass rate has increased by 20.94% from 51.28% in 2012 to 72.22% in 2013.

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

There is an improvement in the annual pass rate from 51.28% in 2012 to 72.22% in 2013.

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

There is a 20.94% increase in the annual pass rate from 2012 and 2013.

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.

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.

We had a total of 3 students in 2013 that were on probation due to excessive absences but none in 2014.

9. Remediation Policies

a. COMPREHENSIVE ANALYSIS:

Remediation policies are being followed accordingly. ATI examinations are being given and students have to complete the remediation templates and hours 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, clinical coordinator and educational service director. With proper completion of remediation, students are able to retake failed exams in the following subjects:

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



- iii. The students are asked to sign a form indicating that they will need to get a 90% in their Comprehensive exam before they are allowed to process their NCLEX-PN application papers. Failure to achieve the 90% will result in a retake until they obtain the 90%.
- 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. Also, by asking the student to obtain at least a 90% on the predictor exam before they are allowed to submit their NCLEX-PN papers for processing ensures at least a 90% chance of passing the NCLEX-PN.

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 continuously being implemented.

- 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.

- 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

- iv. The students are asked to sign a form indicating that they will need to get a 90% in their Comprehensive exam before they are allowed to process their NCLEX-PN application papers. Failure to achieve the 90% will result in a retake until they obtain the 90%.

Awaiting results.

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.

- 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 because by asking the student to obtain at least a 90% on the predictor exam before they are allowed to submit their NCLEX-PN papers for processing ensures at least a 90% chance of passing the NCLEX-PN.

Awaiting results.



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.

In effect.

- ii. Follow theory to clinical hour 1:3 ratio to comply with general educational requirements.

In effect.

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.

Since the implementation of the increased lab practical hours, the annual pass rate has increased by 20.94% from 51.28% in 2012 to 72.22% in 2013.

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 at the end of each term.
 - (c) At the end of the program, the student will be required to pass the predictor exam in order to graduate and be awarded a certificate of completion from the program.
 - (d) The students are asked to sign a form indicating that they will need to get a 90% in their Comprehensive exam before they are allowed to process their NCLEX-PN application papers. Failure to achieve the 90% will result in a retake until they obtain the 90%.
 - 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. We have increased the minimum passing grade 75% to pass the nursing courses.
This has been 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. Also, by asking the student to get at least 90% on the predictor exam before they are allowed to submit their NCLEX-PN papers for processing this will ensure them that their chances of passing the NCLEX-PN on their first try is at least 90%.
 - 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: 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.
One student did not successfully complete the program.



Agenda Item #8.A.2., Attachment C

BUSINESS CONSUMER SERVICES AND HOUSING AGENCY • GOVERNOR EDMUND G. BROWN JR.
BOARD OF VOCATIONAL NURSING & PSYCHIATRIC TECHNICIANS
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Phone (916) 263-7800 Fax (916) 263-7855 Web www.bvnpt.ca.gov



CERTIFIED MAIL

October 22, 2014

RECD IN EDU
ON 10.23.14. WITH DG

Rachelle Cagampanan, B.S., R.N.
Director, Vocational Nursing Program
Bay Area College of Nursing, Daly City
6767 Mission Street
Daly City, CA 94014

SUBJECT: Notice of Extension of Provisional Approval

Dear Ms. Cagampanan:

Pursuant to the action of the Board of Vocational Nursing and Psychiatric Technicians (Board) on September 12, 2014, the Provisional Approval of the Bay Area College of Nursing, Daly City, Vocational Nursing Program has been extended for the five (5) month period from October 1, 2014 through February 28, 2015.

The purpose of this letter is to explain the identified areas of non-compliance 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, October 31, 2014**.

AREAS OF NON COMPLIANCE (VIOLATIONS(S))

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

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

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

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

The program pass rates of the Bay Area College of Nursing, Daly City, Vocational Nursing Program for the past eighteen (18) quarters are set forth in the following table.

Notice of Change in Approval Status

October 22, 2014

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NCLEX-PN® Licensure Examination Pass Rates			
Quarter	State Annual Average Pass Rate	Program Annual Average Pass Rate	Variance from State Annual Average Pass Rate
Jan – Mar 2010	74%	62%	-12
Apr – Jun 2010	74%	71%	-3
Jul – Sep 2010	75%	62%	-13
Oct – Dec 2010	76%	61%	-15
Jan – Mar 2011	77%	61%	-16
Apr – Jun 2011	76%	57%	-19
Jul – Sep 2011	76%	65%	-11
Oct – Dec 2011	75%	54%	-21
Jan – Mar 2012	74%	52%	-22
Apr – Jun 2012	74%	45%	-29
Jul – Sep 2012	74%	45%	-29
Oct – Dec 2012	74%	51%	-23
Jan – Mar 2013	73%	50%	-23
Apr – Jun 2013	73%	74%	+1
Jul – Sep 2013	74%	78%	+4
Oct – Dec 2013	76%	72%	-4
Jan – Mar 2014	76%	62%	-14
Apr – Jun 2014	73%	40%	-33

Based on this data, the program failed to comply with regulatory requirements relative to annual average pass rates in the last two (2) quarters and fourteen (14) of the last eighteen (18) quarters.

REQUIRED CORRECTION(S)

1. The Bay Area College of Nursing, Daly City, Vocational Nursing Program shall continue to obtain approval by the full Board prior to the admission of additional students.
2. The program shall provide no less than one (1) instructor for every ten (10) students in all clinical experiences.
3. The program shall bring its average annual pass rate to no more than ten (10) percentage points below the State average annual pass rate.
4. The program shall comply with all approval standards in Article 4 of the Vocational Nursing Practice Act, commencing at Business and Professionals Code section 2880, and Article 5 of the Board's Regulations, commencing at California Code of Regulations, Title 16, section 2526.
5. In the event additional violations of the approval standards are identified, such violations may result in further corrective action or revocation of provisional approval.
6. The program shall continue 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.

Notice of Change in Approval Status

October 22, 2014

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

FUTURE BOARD ACTION

Your program will be placed on the **February 2015** Board Meeting agenda, at which point the Board may revoke or extend the program's approval. If you have additional information that you wish considered beyond the required corrections listed on pages 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 additional students.**

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 section 2527 of the Board's regulations.

The program may not advertise that it has full approval, and should take steps to correct any ongoing advertisements or publications in that regard.

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

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

Sincerely,



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

Enclosures

cc: Board Members

TBJ: dj



BUSINESS, CONSUMER SERVICES, AND HOUSING AGENCY • TRAVELER INFORMATION BUREAU
BOARD OF VOCATIONAL NURSING & PSYCHIATRIC TECHNICIANS
2635 Capitol Oaks Drive, Suite 205, Sacramento, CA 95833-2945
Phone (916) 263-7800 Fax (916) 263-7855 Web www.bvnpt.ca.gov



DATE: October 22, 2014
TO: Education Division
FROM: Bay Area College of Nursing, Daly City, Vocational Nursing Program

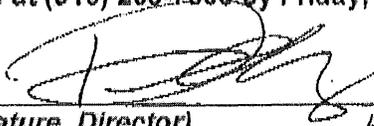
SUBJECT: Acknowledgement of Receipt of Board Meeting Materials

I, hereby acknowledge receipt of the following report with attachments for the September 12, 2014 Board Meeting.

➤ **Bay Area College of Nursing, Daly City, Vocational Nursing Program.**

- 1. Notice of Extension of Provisional Approval
- 2. California Code of Regulations Excerpt, Section 2526.1. Provisional Approval.
- 3. Certificate of Provisional Approval.

Please sign and fax the Acknowledgement of Receipt of Board Meeting Materials to the Board at (916) 263-7866 by Friday, October 31, 2014.



 (Signature, Director) RACHEL C. CAMPBELL 11/3/14 (Date)

Name of Program: VOCATIONAL NURSING DALY CITY

Please complete this form and fax to the Board at (916) 263-7866 by Friday, October 31, 2014.

BVNPT Received on 11/3/14 with EDU



Agenda Item #8.A.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 Web www.bvnpt.ca.gov



CERTIFIED MAIL

December 19, 2014

Ms. Rachelle Cagampan, Director
Vocational Nursing Program
Bay Area College of Nursing, Daly City
824 San Antonio Road
Palo Alto, CA 94303

Subject: Notice of Violation

Dear Ms. Cagampan,

On December 15 and 16, 2014 the Board of Vocational Nursing and Psychiatric Technicians (Board) made an unannounced survey visit to *Bay Area College of Nursing, Daly City*. Based on the survey visit, the following violations were identified:

Section 2526(a)(8) of the Vocational Nursing Rules and Regulations states:

“The institution shall apply to the Board for approval. Written documentation shall be prepared by the director and shall include:

... (8) Evaluation methodology for curriculum.

Violation #1: Board files confirm that the program has a methodology and procedure for evaluation of the curriculum. However, program representatives failed to produce documentation confirming that the curriculum had been evaluated to determine its currency, effectiveness, consistency with the NCLEX/PN® test plan, or need for revision. Documentation was requested, in writing, on the afternoon of December 15, 2014.

Required Action: Provide a plan for evaluation of the curriculum and a timeline in which curriculum evaluation will be accomplished.
Due no later than December 31, 2014.

Section 2526(a)(11) of the Vocational Nursing Rules and Regulations states:

“The institution shall apply to the Board for approval. Written documentation shall be prepared by the director and shall include:

... (11) Evaluation methodology for clinical facilities.”

Violation #2: Board files confirm that the program has a methodology and procedure for evaluation of clinical facilities. However, program representatives failed to produce documentation confirming that clinical facilities had been evaluated by faculty since 2008. The most recent faculty evaluation of a clinical site was from 2008 and included only one site.

Required Action: Provide documentation of evaluation of clinical facilities and a proposed timeline for ongoing evaluation of clinical facilities. Evaluation of clinical facilities should include, but not be limited to:

- 1) Which term(s) in the program the facility is utilized by students;
- 2) Describe the types of experience available as related to the ability of the students to meet the program's stated clinical objectives;
- 3) Description of observed evidence of correlation of theory to clinical;
- 4) Dates students are in the clinical site;
- 5) Identified problems;
- 6) Plan to correct problems.

Due no later than December 31, 2014.

Section 2526(a)(12) of the Vocational Nursing Rules and Regulations states:

"The institution shall apply to the Board for approval. Written documentation shall be prepared by the director and shall include:

... (12) Admission criteria.

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

"The institution shall apply to the Board for approval. Written documentation shall be prepared by the director and shall include:

... (13) Screening and selection criteria.

Violation #3: Based on review of current and recently graduated student files, the program failed to follow its Board approved admission, screening, and selection policies as noted by the lack of any record of interview with the exception of one student. The Comprehensive Analysis submitted by the program in July 2012 stated, "In addition, the candidates will also have to undergo a rigorous interview process (Rubric criteria involve attitude, skills and experience." Further, one student was noted to have taken the same entrance examination a total of **six (6)** times in a one month period before attaining a 12th grade level.

Required Action: Provide a plan for correction that describes how the program will follow the policy for admission, screening and selection of applicants to the program. Provide verification of training, of all individuals associated with the school, regarding admission, screening and selection policies.
Due no later than December 31, 2014.

Section 2526(a)(16) of the Vocational Nursing Rules and Regulations states:

“The institution shall apply to the Board for approval. Written documentation shall be prepared by the director and shall include:

- ... (16) List of resources for provision of counseling and tutoring services for students.

Violation #4: Board files confirm that the program had a list of resources for provision of counseling and tutoring services for students when the program was approved. No list of resources was found on campus or in the Student Catalog. A classroom bulletin board lists that tutoring is available at the school by appointment but does not list other resources. A list of resources for counseling, such as for mental health problems or other life crises, was not provided.

Required Action: Provide a list of resources in the community for other tutoring and counseling services. Provide evidence of how a list of resources is made available to students.
Due no later than December 31, 2014.

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

“The program shall have sufficient resources, faculty, clinical facilities, library, staff and support services, physical space, skills laboratory and equipment to achieve the program’s objectives.”

Violation #5: The program has requested to admit twenty students and currently has as many as ten (10) students enrolled. However, based on survey observations and an analysis of staff and support services, supplies, equipment, and physical space required to accommodate the maximum enrollment, Board representatives identified that the program lacks sufficient resources to achieve its objectives.
No files are kept at the Daly City program site. A total of six (6) computers are available in a small room with computers and chairs in close proximity to each other. There were a total

of eight shelves in the library and the shelves were not full. The program posts that students have access to an online database but the students interviewed were not aware of this. The classroom for the vocational nursing program is located on the third floor of the building and contains fifteen student desks. Projector, monitor screen, and white board are in the classroom. The classroom lacks any visual learning aids. No DVDs, videos, or other instructional aides were present on site. A secondary classroom available to vocational nursing students contains five additional student desks.

The skills laboratory for the vocational nursing students contains four beds, three mannequins (some of which include a tracheostomy and provisions for catheter insertion), one folding screen, and one wheelchair. The spacing in the room and between beds and walls is such that it is possible to imagine approximately twelve students could crowd around the beds, leaving very little room for movement. Supplies in the skills lab were outdated and well used. No feeding supplies were noted. There were very little dressing supplies and needles and syringes were lying loose, unorganized and in an unlocked cabinet. An empty, dirty, and stained medication cart was noted. A box with used and unorganized supplies was sitting on one of the beds. A small sink was located in a small room next to the bathroom.

Required Action: Provide a detailed plan and timeline for improving resources sufficient to achieve the program's objectives.
Provide a list of resources and supplies to be purchased.
Due no later than December 31, 2014.
Provide verification of the purchases as they are made.

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

"Regular faculty meetings shall be held. Minutes shall be available to the Board's representative."

Violation #6: Program representatives produced a binder with agenda items and minutes from general Bay Area College of Nursing meetings. However, there was no evidence of faculty discussion specific to the Daly City Vocational Nursing program.

Required Action: Provide copies of minutes, with attendance documentation, of faculty meetings relative to the Daly City Vocational Nursing Program.
Provide a plan for frequency of faculty meetings relative to the Daly City Vocational Nursing Program.
Provide a schedule and an agenda for the next three (3) faculty meetings.
Due no later than December 31, 2014.

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

“Each school shall have an attendance policy approved by the Board. The policy shall include but not be limited to, criteria for attendance and the specific course objectives for which make-up time is required. Acceptable methods for make-up include:

- (1) Theory: case studies, independent study, written examination, attendance at seminars or workshops, auto-tutorial laboratory, and research reports.
- (2) Clinical: performance evaluation in skills laboratory or additional time in the clinical area with clients/patients.”

Violation #7: Board files confirm that the program has an approved attendance policy. However, based on an analysis of student and program documents, the program failed to implement the approved policy. Student files contained no evidence of follow-up for absences.

Required Action: Provide documentation of make-up of missed hours and specific course objectives for which make-up time is required.
Due no later than December 31, 2014.

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

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

Violation #8: During the survey visit, Board representatives examined files of all current students and the most recent graduates. While the program’s grade records were not available for examination, Board representatives examined files related to remediation and probation.

In multiple cases for one recently graduated cohort there was no follow up noted. Four (4) students in that cohort failed multiple subjects with no clear outcome noted. For all of these

students, after the course was failed and the remediation was failed, the remediation file indicated, “will need to remediate given by the DON” but no outcome was recorded. In some cases, dates of subsequent course failures indicated that students continued in the program and continued without stopping to repeat failed courses. Probation files also failed to note follow-up. One student was placed on probation for absences and no follow-up was noted. That same student later failed a course and failed remediation of that course but proceeded to take a subsequent course and failed that course. Again, no follow-up or outcome was recorded. Only one of the students missing follow-up in remediation files was noted to have not completed the program.

Required Action: Provide a detailed written proposal, including timeline for implementation, for revision of the remediation plan, including appropriate follow-up with students and limits on the number of failed courses that are “remediated”.
Due no later than December 31, 2014.

Section 2530(j)(1) of the Vocational Nursing Rules and Regulations states:

“Each school shall advise students, in writing, of the following:
(1) Right to contact the Board of program concerns.”

Violation #9: While an enrollment document in student files listed the main telephone number for the Department of Consumer Affairs, Board representatives found no evidence that the program had informed students of their right to contact the Board by posting onsite or in the program’s student catalog. One student interviewed asked how to contact the Board.

Required Action: Provide verification that students have access to information regarding the right to contact the Board both on site at the campus and in the Student Catalog.
Due no later than December 31, 2014.

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

“The Board shall maintain a yearly average minimum pass rate on the licensure examination that does not fall below 10 percentage points of the state average

pass rate for first time candidates of approved vocational nursing schools for the same period.”

Violation #10: The program’s average annual pass rate has been **greater than ten (10) percentage points below** the state average annual pass rate for **fifteen of nineteen** quarters for which examination data were reviewed. The program’s average annual pass rate has been between **14 to 33 points below** the state average annual pass rate for the **past three quarters**.

Required Action: Improve pass rates to compliant levels as described in the regulations.

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

“Schools are responsible for the continuous review of clinical facilities to determine if the student’s clinical objectives for each facility are being met.”

Violation #11: As noted in Violation #2, program representatives failed to provide documentation substantiating the evaluation of clinical facilities by faculty or program administration.

Required Action: Provide documentation of evaluation of clinical facilities and a proposed timeline for ongoing evaluation of clinical facilities. Evaluation of clinical facilities should include, but not be limited to:

- 1) Which term(s) the program the facility is utilized by students;
- 2) Describe the types of experience available as related to the ability of the students to meet the program’s stated clinical objectives;
- 3) Description of observed evidence of correlation of theory to clinical;
- 4) Dates students are in the clinical site;
- 5) Identified problems;
- 6) Plan to correct problems.

Due no later than December 31, 2014.

Notice of Violation
December 19, 2014
Page 8 of 8

Be advised that the continuation of such violations further jeopardizes your program's approval.

Should further information be needed, please feel free to contact me.

Sincerely,

Donna G. Johnson

Donna G. Johnson, RNP, MS, MA

Nursing Education Consultant

donna.johnson@dca.ca.gov

916-263-7842

Agenda Item #8.A.2., Attachment E

Recd in EDU
on 1/1/15 with PH, NEC



SINCE 2004
BAY AREA COLLEGE
OF NURSING

Violation #1 Section 2526(a)(8) Response

An evaluation methodology for the curriculum has been in place since its revision and is currently maintained on file at the Palo Alto main campus. In 2012, BVNPT reviewed and approved a major curriculum revision for the Daly City campus. The revised existing curriculum expanded and improved to integrate the following aspects of nursing with the emphasis on active learning in Foundations of Nursing, Basic Pharmacology and ATI. Previous graduates and faculty evaluated the curriculum based on their satisfaction. The administration evaluated the curriculum based on the student and faculty survey results and the outcome of the NCLEX results.

The vocational nursing program was evaluated continuously through the following:

1. Mandatory submission of a program records survey and comprehensive analyses/review to the CA Board of Vocational Nursing and Psychiatric Technician.
2. Submission of program renewals and course review to the Bureau for Private Postsecondary Education and the CA Board of Vocational Nursing.
3. Student feedback through end-of-the program evaluation
4. Faculty feedback through faculty meetings - Faculty feedback occurred both formally and informally in conversations with the school director during business hours and at faculty and staff meetings.
5. Review of national and state pass rates - The school director reviewed the national and state licensure pass rates standards with the administrative officers and faculty members during the quarterly meetings.

Plan/Timelines:

1. Continue ongoing evaluation of the curriculum for its currency, effectiveness, and consistency with the NCLEX test plan.
 - a. Students will be asked to fill out a curriculum evaluation form **at the end of the program.**
 - b. Faculty will be asked to fill out a curriculum evaluation form **every 3rd quarter of the year.**
 - c. Faculty and Administration will review the curriculum based on students' and faculty satisfaction and the outcome of the NCLEX **at the end-of-the- year meeting.**
2. Review and update syllabi as necessary. To be done **every quarter 4 of the year.**
3. Maintain accessible scanned copies of the evaluation documents for the Daly City vocational nursing program. **February 6, 2015**



Violation #2 Section 2526(a)(11) Response

An evaluation methodology for the facility by the faculty for the past 5 years is in place and is currently maintained on file at the Palo Alto main campus and/or at the off-site document storage vault.

Currently, the school's clinical facility evaluation form does not include the description of the types of experience available and the observed evidence of correlation of theory to clinical. However, we provide the instructors and the students a copy of the weekly clinical objectives that correlate with the theory to the clinical.

Plan/Timelines:

1. Continue the evaluation of the clinical facilities by the faculty at the end of each term for review and discussion with the faculty and administration/director **annually during the end-of-the-year meeting.**
2. Create a draft of the revised clinical facility evaluation form for use to include the following content:
 - a. Term in the program the facility is utilized.
 - b. Types of experience available as related to the ability of the students to meet the program's stated clinical objectives.
 - c. Description of observed evidence of correlation of theory to clinical
 - d. Dates of Assignment
 - e. Identified Problems
 - f. Plan of Correction

Draft to be submitted to the board on January 16, 2015
3. Send the draft to the faculty for input. Finalize draft. **January 23, 2015**
4. Submit the finalized clinical facility evaluation form to the board. **January 30, 2015**
5. Maintain accessible scanned copies of the evaluation documents for the Daly City vocational nursing program. **February 6, 2015**

APPENDIX A – Clinical Objectives

APPENDIX B – Clinical Facility Evaluation of Redwood Convalescent Hospital by Ms. Eleuteria Briones for Terms 1-3 of the Current Class.



Violation #3 Section 2526(a)(12) and (13) Response

Interview records for the current students, which include the rubric criteria, were in place and are currently on file at the Palo Alto main campus. The school scheduled and conducted a one-on-one interview to all current students prior to their admission/acceptance. Please note that the interview records, including the rubric criteria, are not kept in the individual student's file folder which was inspected by the board representatives, but are kept in a separate class folder labeled *Interview*.

The following are the contents of each individual student file folder:

1. Information Form
2. Enrollment Agreement
3. School Performance Fact Sheet
4. Notice of Cancellation / Withdrawal
5. Notice of Student Rights
6. Student Applied Learning Experience Agreement
7. Authorization for Release of Records and Information
8. Collection of Tuition
9. Photo/Video Waiver
10. Travel Waiver
11. Credit Granting
12. Credit Option Form
13. Academic Clinical Standards and Policies
14. Disclosure Regarding Voluntary Agreement for an Educational Institution
15. FERPA
16. HIPPA
17. Official Transcript Request Authorization
18. High School Attestation and/or High School Official Transcript of Records
19. Licensing Agreement
20. WBST and SLE Test Results
21. Physical Exam and Immunization Records
22. Copy of CPR card

Records of current students are kept in a locked fireproof file cabinet inside the locked records room in the Palo Alto main campus. Access to these records is limited to authorized personnel only.



There is currently no limit to the number of times an applicant can take the admissions test. The admissions test has two versions – the first and second versions are to be used interchangeably during retakes.

Plan/Timelines:

1. Properly train all individuals associated with the school about the policy for admissions, screening, and selection of applicants to the program, specifically the following:
 - a. Limit the testing of applicants to two tests within a month. To be discussed during the training on **January 16, 2015.**
 - b. Ensure that the second version of the test is administered for the second retake and alternate 1st and 2nd for retakes. To be discussed during the training on **January 16, 2015.**
 - c. Provide an orientation checklist as a guide for the new hire. A quiz about the admissions policy and screening/selection criteria will be administered by the office manager to all individuals associated with the school's admission process after the training. To be administered immediately after the training on **January 16, 2015.**
2. Maintain accessible scanned copies of student admission records, including interview rubric, specifically for the current and incoming students of the Daly City campus. **February 6, 2015**

Please see **APPENDIX C – Interviews/Rubric of Current Class**

Violation #4 Section 2526(a)(16) Response

Academic Advising

Students are advised on both personal and academic issues and are encouraged to discuss their scholastic and vocational goals. The faculty and administrative directors have a sincere interest in the professional welfare of each student and therefore an open-door policy is employed. Students are encouraged to email or call the director 24/7 for any academic issue. The director diligently responds within 24 hours to resolve any concerns.

Professional Counseling Referrals

Students requesting professional counseling services will be referred to local counseling agencies around the bay area.

Plan/Timeline:

A list of tutoring and counseling resources with contact information will be provided during the students' first day of orientation and will be emailed to the current students. The list will



also be posted on the school's bulletin board and copies will be made available upon request. To be completed on **January 16, 2015**.

Please see **APPENDIX D – Contact List for Tutorial and Counseling Resources**

Violation #5 Section 2530 (a) Response

The quantity and the quality of the resources are appropriate for the vocational nursing program offered and for the size of enrollment. Currently only eight (8) students are enrolled.

The school has sufficient resources, faculty and clinical facilities, library and support services, physical space, skills laboratory and equipment to achieve the program's objectives and accommodate the maximum enrollment of 20 students.

Student Records

Current student records and files are kept in the locked records room in a locked fire-proof file cabinet in the Palo Alto main campus. Once the students graduate, their records are moved to a rented off-site storage vault.

Online Database

Information about the online library database is disclosed to the students in the Student Catalog. Students sign confirming that they have read and understood the contents of the School Catalog as evidenced by their signature in the enrollment agreement form. Access to the online database is also discussed during the first day of orientation. The online library integrates EBSCO host Electronic Journals Service (EJS) as the student's gateway to thousands of e-journals containing articles from hundreds of publishers. A student may search and find textbooks, periodicals, news and current events, encyclopedias and dictionaries, economic data, and business directories. A student may conduct a search by title, author, subject area, or key words. Students wanting to utilize the onsite library will have access to resource materials and tutoring

Students and faculty can access full-text electronic journal collections for various degrees remotely 24/7 with the use of a username and password at no cost via the bayareacollege.net website. The library's online databases will require students to verify that they are affiliated with Bay Area College of Nursing before using them.



The quantity and the quality of the resources are appropriate for the programs offered and for the size of enrollment. Currently we only have eight (8) students enrolled.

Library

Faculty and Students have access to a small professional library, but at this time, the use of an electronic database is highly encouraged because of its easy accessibility and is constantly updated. **The quantity and the quality of the resources are appropriate for the programs offered and for the size of enrollment. Currently we only have eight (8) students enrolled.**

Classrooms/Skills Lab

There are three floors in the building. Each floor has a classroom that can fit 10-20 students. The first floor has a classroom that can fit 15 students. The second floor has a classroom that can fit 10 students. The 3rd floor has a large classroom that can fit 20 students. There are 4 beds on the 3rd floor and 2 beds on the second floor.

Student Desks

Fifteen student desks were placed in the classroom of only eight (8) students. The school has more than enough student desks chairs and space for use to accommodate the maximum allowed number of students, as needed.

Plan/Timeline:

1. Needles will be kept locked in a cabinet at all times. **Done immediately.**
2. One bed will be removed from the 3rd floor to be moved to an adjacent room to allow for more space and movement. **To be done on January 9, 2015.**
3. Remind instructors to return all the supplies and equipment that were used in the skills lab neatly folded and in its proper place. Also, remind office staff to check and monitor the rooms for cleanliness and cabinets at the end of the day. **Memo to be emailed on January 5, 2015 and will be placed on agenda to be discussed during the quarterly meeting.**
4. Will list resources and supplies to be purchased after checking inventory.
Inventory check – January 9, 2015
Purchase – January 16, 2015
5. Plan to expand online resources, books and journals.

Please see APPENDIX E– CURRENT INVENTORY



Violation #6 Section 2530(b) Response

Currently (and in the past), the agenda and minutes of the faculty and administrative meetings are generalized and apply to the main campus and satellite locations or campus additions, thus the meetings are not specific only to the Daly City Vocational Nursing Program.

Frequency: Faculty meetings occurred quarterly or as necessary. The school scheduled faculty meetings according to the availability of the faculty members for increased attendance. Quarterly meeting dates were set during the previous meeting and an email reminder sent a week or two in advance. The meeting reminder notice included an agenda of the meeting.

Content: The school set the content of the meeting and encouraged faculty to come up with topics or concerns they wish to raise or discuss during the scheduled faculty meeting. A typical meeting agenda format included updates on the curriculum, proposed actions to improve the programs, accreditation process and status, intra- and extracurricular activities, enforcement of policies and implementation of proper procedures, upcoming class and enrollment status, progress status of covered items during the previous meeting, etc.

Documentation: The office manager circulated a sign-in sheet to document faculty and staff attendance and drafted minutes of the meeting. Meeting minutes were circulated to each faculty and staff meeting for his or her review and information. The office manager maintained files of faculty meeting minutes and attendance records.

Plan/Timelines:

1. Continue quarterly meetings and agenda as scheduled. The content must include updates on the curriculum, proposed actions to improve the programs, accreditation process and status, intra- and extracurricular activities, enforcement of policies and implementation of proper procedures, upcoming class and enrollment status, faculty development/evaluation, student achievement, student retention goal, clinical facility evaluation, the board's visit findings in Daly City, addressing violations and plans of action and follow up progress status of covered items during the previous meetings. Meetings are scheduled on the 4th week of each quarter. **January 23, 2015, April 24, 2015, and July 24, 2015.**
2. Address and document agenda and minutes of meeting, specifically for the Daly City Vocational Nursing Program. **Next meeting January 23, 2015.**
3. Maintain accessible scanned copies of the quarterly meeting agenda and minutes, specifically for the Daly City vocational nursing program.



Violation #7 Section 2530 (h) Response

Make-up records were on file at the Palo Alto main campus. Students were monitored and followed up for absences and missed days were made up accordingly.

Please see APPENDIX E - MAKE-UP FORMS

Violation #8 Section 2530(i) Response

Response to Students on Probation and Remediation

Remediation and probation records were and are being maintained at the Palo Alto main campus. Students who were performing unsatisfactorily or have failed a course were not allowed to proceed to the next term without repeating the failed courses. Students who were placed on probation for absences made up for the absence. Outcomes of the final remediation for those who have unsatisfactory academic standings were recorded on Engrade, an online grading software. Successful completion or satisfactory passing of the terms and conditions set by the director reinstated the students to active satisfactory academic standing as evidenced by the passing overall grade on Engrade. Outcomes of the students on probation due to absences were noted when they made up the absence. Only when an absence was incurred after probation will the student status be reassessed for action. If there is no absence once a student is placed on probation, the student will stay under probation until the term ends.

Since the director was not available during the unannounced visit inspection of records in Daly City due to a simultaneous scheduled visit by the Department of Education in Palo Alto, an email was sent to request more information and details to identify the students being referred to by the board representatives. This will assist us in providing the board with a better explanation of the status of the students in question.

Remediation Policy

If the student's behavior/attendance is unsatisfactory, the student may be placed on remediation by the Instructor. A conference with the student will be scheduled by the instructor by which the student will receive a copy of the Remediation Form. This conference shall include the identification of the problem, the development of a written plan to reinstate satisfactory performance on a specific time frame and an evaluation. Students that are placed on SAP warning or probation must also undergo remediation (see SAP policy for more information).



Plans for correction/improvement may either be a practice and demonstration of the skills needing improvement in the skills laboratory or tutoring/retesting. The center is only allowed to administer one reexamination to the student. A follow-up conference shall then be scheduled and noted on the probation form for the student's reevaluation.

If remediation was not successful, a meeting with the director shall be scheduled to revise and document another remediation plan. Successful remediation shall be documented accordingly. If the outcome of the remediation is unsuccessful, the student may repeat the same course. Failure to pass the same course the second time will result in termination or dismissal from the program. An official letter of termination or dismissal shall be sent to the student.

The student will need to pass the remediation and be cleared of the current term in order to move on to the next term.

Plan/Timeline:

1. Continue to follow the school's remediation plan policy. **Ongoing.**
2. Although the director follows up the outcome of all students under probation/remediation, the director must ensure that the remediation form is completed and an entry of the final outcome is made under the comment section of the probation/remediation form. **Ongoing.**

Violation #9 Section 2530(j)(1) Response

Plan/Timeline:

Posted the right to contact the Board both on site at the Daly City campus and in the Student Catalog. **Done 12/30/2014**

Violation #10 Section 2530 (l) Response

The school's most recent 3rd quarterly pass rate in 2014 is **85.71%** with 6 out of 7 graduates successfully passing the NCLEX-PN on their first try **using the revised curriculum.**

The CA quarterly pass rate for Quarter 3 – 2014 is **72.26%**.

The school has a 13.45 higher percentage point than the CA state average pass rate for first-time program candidates for the most recently reported quarter.

Plan/Timeline:



1. Improve the annual pass rate to meet the minimum required by the BVNPT. **Review and reassess every quarterly meeting.**
2. Continue monitoring and evaluating the academic progress of the students. **Review and reassess every quarterly meeting.**
3. Maintain regulatory compliance as mandated by the board. **Review and reassess every quarterly meeting.**
4. Evaluate faculty, facility and curriculum every quarter.

Violation #11 Section 2534 (c) Response

An evaluation methodology for the facility by the administration/director for the past 5 years is in place and is currently maintained on file at the Palo Alto main campus and/or at the off-site document storage vault.

Currently, the school's clinical facility evaluation form does not include the description of the types of experience available and the observed evidence of correlation of theory to clinical. However, we provide the instructors and the students a copy of the weekly clinical objectives that correlate with the theory to the clinical.

Plan/Timelines:

1. Continue the evaluation of the clinical facilities by the faculty at the end of each term for review and discussion with the director and administration **during the end-of-the-year meeting.**
2. Create a draft of the revised clinical facility evaluation form for use to include the following content:
 - a. Term in the program the facility is utilized.
 - b. Types of experience available as related to the ability of the students to meet the program's stated clinical objectives.
 - c. Description of observed evidence of correlation of theory to clinical
 - d. Dates of Assignment
 - e. Identified Problems
 - f. Plan of Correction

Draft to be submitted to the board on January 16, 2015
3. Send the draft to the faculty for input. Finalize draft. **January 23, 2015**
4. Submit the finalized clinical facility evaluation form to the board. **January 30, 2015**
5. Maintain accessible scanned copies of the evaluation documents for the Daly City vocational nursing program. **February 6, 2015**



SINCE 2004
BAY AREA COLLEGE
OF NURSING

Agenda Item #8.A.2., Attachment F



BAY AREA COLLEGE
OF NURSING

Pam Hinckley, RN M.S.N.
Nursing Education Consultant
BVNPT

RE: 04-0908 Address Change

October 30, 2011

Dear Ms. Hinckley,

I am pleased to inform your office that our Daly City auxiliary teaching site will be moving to a new location on December 1, 2011. Our new campus will be located just five minutes from our present Daly City campus. It is located at 6767 Mission St., Daly City CA 94014, six (6) blocks east of the 280 freeway on the 2nd and 3rd floor of the building. The area of the institute is approximately 2,000 sq. ft. with a front entrance. Expansion for use of the 1st floor is scheduled for July 2012, which will be an additional 1,000 sq. ft. This space is divided into a reception area, two (2) classrooms, three (3) skills labs, one (1) computer lab, a library, and a conference room. The 3rd floor classroom can accommodate 30 students and the 2nd floor classroom can fit 15-20 students. Each lab room can accommodate ten (10) students. Restrooms are available. Instruction is provided in one or more primary classrooms while the computer labs contain individual workstations. Student/faculty lounge is available for relaxation purposes. The facilities have adequate lighting and are air-conditioned. Free ample student parking is available on the street and at a public parking lot approximately two and a half (2 1/2) blocks away. Students receive instruction on college-owned equipment, hardware and software. There are no additional fees to use this equipment. The facility and equipment used fully comply with all federal, state and local ordinances and regulations, including requirements for fire safety, building safety, and health.

Attached please find the diagram of the building's interior.

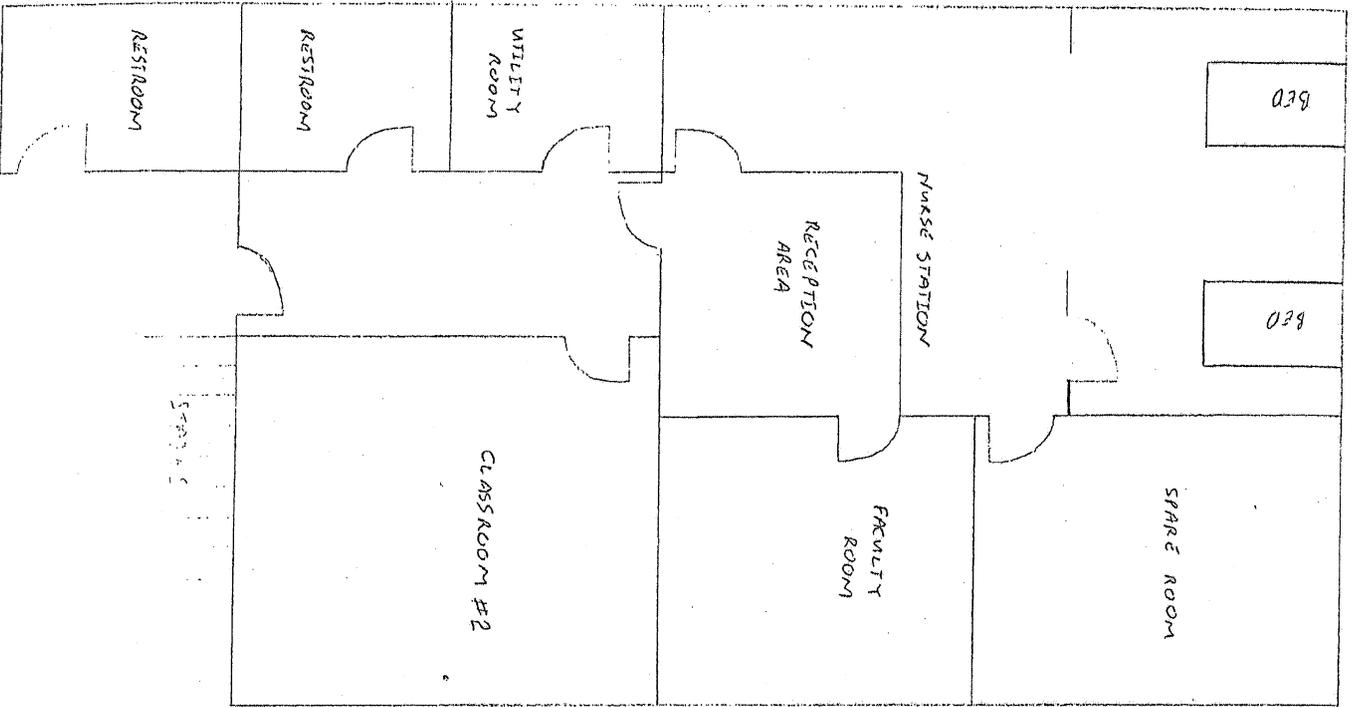
With regards,



Rachelle Cagampan, RN, MSN, MPA

Program Director Daly City
Bay Area College of Nursing Daly City

2ND FLOOR



3RD FLOOR

