

Agenda Item #8.A.4.



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

Board of Vocational Nursing and Psychiatric Technicians
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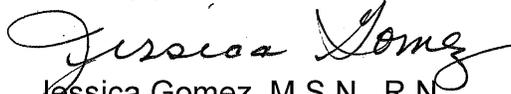


DATE: January 30, 2015

TO: Board Members

FROM:


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


Jessica Gomez, M.S.N., R.N.
Nursing Education Consultant

SUBJECT: Career Care Institute, Inc., Moreno Valley, Vocational Nursing Program – Reconsideration of Provisional Approval; Consideration of Request to Admit Students (Director: Allan Ocampo, Moreno Valley, Riverside County, Private)

Career Care Institute, Inc., Moreno Valley, Vocational Nursing Program was placed on provisional approval for the period September 6, 2012, through September 30, 2014, due to pass rates on the licensure examination that were noncompliant with regulatory requirements as set forth in section 2530 (l) of the Vocational Nursing Rules and Regulations which states:

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

The program was required to bring its average annual pass rate to no more than ten (10) percentage points below the state average annual pass rate of first – time program graduates. Further, the Board directed that the program admit no additional classes without prior approval by the full Board.

On September 12, 2014, the Board extended the program’s provisional status for the five (5) month period from September 12, 2014 through February 28, 2015, and issued a notice identifying specific areas of noncompliance and requirements for correction, as referenced in section 2526.1 (e) of the California Code of Regulations. The Board denied the program’s request to admit a day class of 50 students commencing October 27, 2014, graduating February 26, 2016, to **replace** the class that graduated February 13, 2014.

The program is presented for reconsideration of its provisional status. In addition, the program requests approval to admit a day class of 30 students commencing April 13, 2015, graduating October 20, 2016. This class would **replace** the class that graduated February 13, 2014.

History of Prior Board Actions

(See Attachment A for History of Prior Board Actions)

Enrollment

The program offers a full – time course of instruction that is 62 weeks in length. Prior approval by the full Board is required for the admission of each class.

The following table represents **current and proposed** student enrollment. The table indicates a maximum enrollment of **56** students for the period of **June 2008 to February 2015**.

| ENROLLMENT DATA | | | | |
|-------------------------|-----------------------|--------------------|--------------------------------|---------------------|
| CLASS DATES | | #Students Admitted | #Students Current or Completed | Total Enrolled |
| Start | Complete | | | |
| 6/08 | | 27 | 12 | 12 |
| | 9/09 (6/08 Class) | | -12 | 12 - 12 = 0 |
| 11/09 | | 50 | 30 | 0 + 30 = 30 |
| 11/10 | | 44 | 15 | 30 + 15 = 45 |
| | 4/11 (11/09 Class) | | -30 | 45 - 30 = 15 |
| 5/11 | | 25 | 25 | 15 + 25 = 40 |
| 11/11 | | 25 | 16 | 40 + 16 = 56 |
| | 4/12 (11/10 Class) | | -15 | 56 - 15 = 41 |
| 10/12 | | 23 | 11 | 41 + 11 = 52 |
| | 8/12 (5/11 Class) | | -25 | 52 - 25 = 27 |
| | 2/14 (10/12 Class) | | -11 | 27 - 11 = 16 |
| | 4/13 (11/11 Class) | | -16 | 16 - 16 = 0 |
| 10/13 | | 30 | 29 | 0 + 29 = 29 |
| | 2/15 (10/13 Class) | | -29 | 29 - 29 = 0 |
| 4/15 Proposed | 10/16 | 30 | | 0 + 30 = 30 |

Licensing Examination Statistics

The following statistics, furnished by the Pearson Vue and published by the National Council of State boards of Nursing as "Jurisdictional Summary of All First-Time Candidates Educated in Member Board Jurisdiction," for the period January 2012 through December 2014, specify

the pass percentage rates for graduates of the Career Care Institute, Inc., Moreno Valley, 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 Quarterly Pass Rate | Program Average Annual Pass Rate | State Average Annual Pass Rate [CCR §2530(l)] | Variance from State Average Annual Pass Rate |
| Jan – Mar 2012 | 7 | 4 | 57% | 77% | 60% | 74% | -14 |
| Apr – Jun 2012 | 4 | 0 | 0% | 72% | 52% | 74% | -22 |
| Jul - Sep 2012 | 8 | 7 | 88% | 74% | 59% | 74% | -15 |
| Oct – Dec 2012 | 4 | 2 | 50% | 70% | 57% | 74% | -17 |
| Jan – Mar 2013 | 12 | 6 | 50% | 75% | 54% | 73% | -19 |
| Apr – Jun 2013 | 6 | 5 | 83% | 78% | 67% | 73% | -6 |
| Jul – Sep 2013 | 6 | 3 | 50% | 75% | 57% | 74% | -17 |
| Oct – Dec 2013 | 5 | 4 | 80% | 76% | 62% | 76% | -14 |
| Jan – Mar 2014 | 3 | 0 | 0% | 74% | 60% | 76% | -16 |
| Apr – Jun 2014 | 2 | 2 | 100% | 66% | 56% | 73% | -17 |
| Jul – Sep 2014 | 2 | 2 | 100% | 72% | 67% | 73% | -6 |
| Oct – Dec 2014 | 1 | 1 | 100% | 72% | 63% | 72% | -9 |

*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.”

Based on the most current data available (October through December 2014), the program’s average annual pass rate is 63%. The California average annual pass rate for graduates from approved vocational nursing programs who took the NCLEX-PN® for the first time is 72%. The average annual pass rate for the Career Care Institute, Moreno Valley, Vocational Nursing Program is nine (9) percentage points **below** the state average annual pass rate.

Faculty and Facilities

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

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

The number of Board approved faculty totals seven (7), including the director. The director has 40% administrative duties and 60% teaching duties. Of the total faculty, seven (7) instructors are approved to teach in the clinical area.

Based on a maximum enrollment of 30 students, three (3) instructors are needed. Therefore, the current number of 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 **does not** have adequate clinical facilities as to type and variety of patients treated to enable current and proposed students to meet clinical objectives, in accordance with Section 2534(b) of the Vocational Nursing Rules and Regulations. Specifically, the program lacks adequate pediatric clinical sites, as explained below. This has been verified by the consultant.

Other Considerations

As noted previously, the Board placed the program on provisional approval for due to noncompliance with regulatory requirements relative to program pass rates on the licensure examination. The Board directed the program to complete a thorough analysis and submit a report identifying elements negatively impacting student achievement, and the effectiveness of actions taken to address identified deficiencies. **At that time, the program's average annual pass rate was 52%.** On September 19, 2012, the Board forwarded the Notice of Change in Approval Status (see Attachment B).

On May 8, 2013, the Board approved a new director.

On June 13, 2013, and June 1, 2014, the Board received the program's reports, as required by Corrective Action #5 in the Notice. The director identified problems in critical program elements. As reported in the second report, many of the problems and program actions previously reported persist. Presented program actions are the same as those previously reported.

On June 26, 2014, a new program director was approved by the Board.

On August 11, 2014, the SNEC and assigned NEC conducted a teleconference with program representatives relative to deficiencies in the submitted report. Board staff reviewed the program's status and the performance of program graduates on the licensure examination. Program representatives reported verbally, the completion of additional corrections. Staff recommended the program submit a revised report by August 14, 2014, to include, but not be limited to, the following:

1. Admission Criteria with Identified Revisions.
2. Screening and Selection Criteria with Identified Revisions.
3. Procedure Implemented for Evaluation of Student Progress.
4. Plan for Active Program Administration by the Director.
5. Results of Director's Evaluation of Faculty.

On August 19, 2014, the program submitted updates to its comprehensive analysis. The following information was included in the report.

➤ **Admission Criteria.**

The report included a revised admission criterion which identified an **increase** in the entrance criteria scoring. The following revisions were identified.

1. A **minimum** entrance score of 450 (previously 350) on the English portion of the test.
2. A minimum entrance score of 400 (previously 250) on the Math section.
3. Potential students that are within 50 points of either required score will be admitted on academic support.

It is noted, admission criteria listed on page six (6) of the report does not coincide with information reported on page nine (9).

➤ **Screening and Selection Criteria.**

Students admitted on academic support must achieve a Level 1 score of 70% (previously 75%). This is a **decrease** of five (5) percentage points from what was previously required. The student will enter Level 2 on Probation. The student must achieve a 75% (previously 80%) on the midterm examination or they will be terminated from the program. This is a **decrease** of five (5) percentage points from what was previously required.

Additionally, the program indicates as part of their criteria for selection that potential students must submit to a background check and drug screen. Students are advised that if they have a less than "spotless" background check or drug screen they may "face challenges throughout the program and obtaining licensure. Students who are admitted with a **positive drug screen are admitted on conduct probation** and serial drug test are done; continued positive drug tests results in dismissal from the program".

Analysis of the program's response identified multiple inconsistencies and a failure to hold students accountable. On November 13, 2014, the director submitted a report addressing some of the discrepancies reported above.

➤ **Pass Rates.**

The director reported that past graduates have been contacted and offered a NCLEX review course (ATI based). Students must sign a "contract of commitment" indicating they will comply with the schedule and use of Virtual ATI. Additionally, they must

pass the exit examination in order to be considered a graduate of the program. As of February 2014, eleven (11) students graduated; however seven (7) failed the exit examination. As of November 13, 2014, nine (9) of these graduates are enrolled in the NCLEX review classes.

➤ **Screening and Selection.**

The director reported that the program will continue to use the Wonderlic (Basic Skills Test) as the entrance test for selection of students; however, the pass rate for English and Math will be 400.

Background checks and drug screening will be completed prior to admission. **“Applicants that test positive on the drug screen or whose background check shows legal issues will be advised of rehabilitation and correction of legal issues prior to admission.”**

➤ **Grading and Remediation.**

Any student that falls below 75% must attend remediation the week it occurs and must achieve a score of 75% in order to continue in the program.

Program Survey Visit

On December 1 and 2, 2014, an unannounced onsite program inspection was completed by Board representatives. The purpose of the inspection was to determine the program's compliance with regulatory requirements and required corrections specified in the Notice. During the two-day inspection, the consultants assessed the program's resources including faculty, clinical facilities, library, staff and support services, physical space, skills laboratory and equipment required for achievement of the program's objectives. In addition, the NEC's reviewed records for newly graduated and currently-enrolled students, and facilitated discussions with the Program Director and other staff members.

➤ **General Site Information.**

The school is located in a large shopping mall. The physical site is clean and larger than first appears. There is one (1) main classroom for theory that has 29 individual desks, a teacher desk, white board, skeleton, anatomical torso, screen, and projector for power point presentations.

➤ **Skills Laboratories**

The main Skills Laboratory has three (3) beds and three (3) mannequins. The laboratory is small and the beds are close together. Supplies are adequate with the exception of lacking oxygen equipment, (tubing, masks, and cannulas).

The second lab had a high fidelity mannequin for obstetrics in a hospital bed and a child mannequin, also in a bed. Additionally there is a small laboratory set up for phlebotomy that is also used for the intravenous therapy course post-graduation.

A medication cart is kept in the meeting room. The cart is stocked with adequate supplies.

Based on findings during the visit, the following violations of the California Code of Regulations (Code) were identified (see Attachment C). The director's response to the violations is also reflected here (see Attachment D).

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 program's curriculum; however, the director was unable to identify or provide documents substantiating implementation of the approved methodology.

Status: This violation is **not** corrected. On January 7, 2015, the director submitted a rubric that took into consideration students' test scores, students' evaluations of instructors, and the number of concerns brought up in faculty meetings. However, missing components included student achievement and readiness to practice, lesson plan correlation, and assessment of simple to complex flow of the curriculum, etc.

On January 8, 2015, the NEC provided the director with specific directions recommending revision and resubmission. On January 14, 2015, the Board received the revised curriculum evaluation plan and form. If implemented as presented, the submitted plan will prevent future violations.

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, the director was unable to provide documentation substantiating that clinical facilities had been evaluated.

Status: This violation is **not** corrected; however, on January 14, 2015, the Board received the program's plan of correction. If implemented as presented, the submitted plan will prevent future violations.

As presented, the program will evaluate clinical facilities using Survey Monkey; however, the director failed to identify who will

monitor the surveys and what actions will be taken as a result of the surveys. The submitted plan includes revisions recommended by the consultant.

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 #3: No list of resources for the provision of counseling and tutoring services was found.

Status: This violation is **corrected**. On January 7, 2014, the director submitted lists of resources and tutoring services for students, as prescribed.

Section 2527(b) of the Vocational Nursing Rules and Regulations states:

“A school shall report to the Board within ten days of the termination of a faculty member.”

Violation #4: The program failed to notify the Board of the termination of seven (7) faculty members within the time prescribed by regulation.

Status: This violation is **not** corrected; however, on January 7, 2015, the director submitted a plan to ensure Board notification of terminated faculty consistent with regulatory requirements. If implemented as presented, the submitted plan will prevent future violations.

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 the consultants' observation, the program does not have sufficient resources for the enrolled population to achieve the program's objectives.

Consultants observed the program does not have a physical library. No physical books are provided to students. All access to library resources and the students' text is provided via the internet. As reported, the program provides each student with a portable electronic tablet. These tablets contain required student reading materials. However, students informed the consultants that the tablets are unreliable and internet connection at the college is frequently unavailable.

It is noted, that Board records indicate the program, on multiple occasions, has requested approval to admit 50 students. The Board approved those requests, based on information submitted by the program. Based on observations of the existing classroom, furnishings, Skills Laboratory, etc., Board staff identified that there is **not** adequate room for 50 students in the classroom or laboratories.

Staff observed the program's theory classroom would hold 29 students. There were two (2) small laboratories. One Skills Laboratory had three (3) beds and three (3) mannequins. The room was small for the three (3) beds. If half of a class of 30 were present, it would be very congested. The second Skills Laboratory had two (2) beds, a birthing mannequin and a child mannequin. This room would also hold maximum of 15 students. Additionally, there was a small conference room with a large table and a medication cart. There was also a small room with approximately six (6) blood withdrawal chairs for a phlebotomy class.

When the program representative, Evelyn Orellana, school director, was asked how the program would have accommodated that number of students, she responded they were going to build on if they got approval for that number of students.

Status:

This violation is **not corrected**. The director submitted a list of textbooks that are used for reference by students. The list consisted of 14 educational resources, only four (4) were textbooks and two (2) of these were the same text but different editions. Additionally, three (3) magazines were listed with the notation, "we need to order."

On January 27, 2015, the director submitted pictures of a bookcase filled with nursing texts which included NCLEX review texts, Drug guides, Pharmacology texts, etc., indicating the texts will be used for the library. As presented, this will correct this aspect of the violation.

The director reported that the school has a work order to upgrade the internet connection. To date, the program has failed to submit confirmation that the projected upgrade has been completed. If implemented as reported, this will correct that aspect of the violation; however, it is important to note that the program's educational resources are inadequate as presented.

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."

Violation #6:

Consultants observed that the program had failed to consistently implement and follow its Board approved attendance policy.

Documents in student files indicated overlapping attendance probation periods with failure to follow up. The director stated that the program had not followed the attendance policy regarding make-up time. Based on documents available for review, there was no evidence that students had made up time missed for theory and clinical absences.

Status: This violation is **not** corrected; however, on January 7, 2015, the director submitted a plan to correct the violation. If implemented as presented, the plan will prevent future violations.

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 #7: Program records did not contain documentation confirming the consistent evaluation of students to determine the need for remediation or removal from the program.

Status: This violation is **not** corrected; however, on January 7, 2015, the director submitted a plan and applicable forms to address the violation. If implemented as presented, the submitted plan will prevent future violations.

Section 2882 of the Vocational Nurse Practice Act states:

“The course of instruction of an approved school of vocational nursing shall consist of not less than the required number of hours of instruction in such subjects as the board may from time to time by regulation determine, Together with the required number of hours in the care of medical, surgical, obstetrical patients, sick children, and such other clinical experience as from time to time may be determined by the board.”

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.”

Violation #8: Based on review and analysis of program files, Board files and an interview with the director, it was identified that the program does **not** have clinical sites adequate to provide the type and variety of patients treated to provide clinical experience for all students in areas of the Board approved curriculum. Specifically, the program lacks clinical facilities that provide clinical experience in the care of sick children, as prescribed by existing statutes and regulations and included in the approved curriculum.

In addition there is a problem with the utilization of available clinical facilities and their application consistent with the sequence of presented content.

At the time of the inspection, students were assigned to Maternity at San Dimas Hospital. Board staff contacted San Dimas Hospital and found that the students were scheduled for ER, MS and OB; however on the day of the school site visit, the hospital had Joint Commission visiting and students were not allowed to be there. The students will be allowed to go back on Friday December 5, 2014. The director identified that in lieu of the scheduled clinical day, students were assigned to a Ronald McDonald House. The director indicated that the students were to be released after the 4 hours that day. They were assigned to spend 4 hours at Ronald McDonald House and do a case study on a patient they saw there.

Interviewed students verbalized that they were assigned to cook lunch for the family members staying at Ronald McDonald House.

It is important to note that Ronald McDonald House is a site offering room and meals for family members of children in the local hospital. The facility contains no patients.

Status: This violation is **not corrected**. However, on January 22, 2015, the Board approved three (3) new Pediatric clinical sites for the program. If the director rotates current students through the clinic as identified in the submitted clinical rotation schedule, the submitted plan will prevent future violations.

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 #9: Based on an interview with the director, it was identified that the director failed to evaluate clinical facilities to determine if clinical objectives can be achieved, as prescribed by regulation.

Status: This violation is **not corrected**. However, on January 7, 2015, the director submitted a plan including timeline and forms to evaluate clinical facilities to which students were assigned. If implemented as presented, the submitted plan will prevent future violations.

Section 2535 of the Vocational Nursing Rules and Regulations states:

“Each school shall have a policy, approved by the Board for giving credit toward the curriculum requirements.”

Violation #10: Board files confirm that the program had a Board approved credit granting policy. Based on review and analysis of program materials and student files, it was identified that the program failed to grant credit for prior education and experience as prescribed by regulation. The director stated that the program has not offered credit granting.

Status: This violation is **not corrected**. However, on January 7, 2015, the director submitted a plan to ensure students are granted credit for prior education and experience consistent with regulations. If implemented as presented, the submitted plan will prevent future violations.

Recommendations:

1. Extend Provisional Approval for the Career Care Institute, Inc., Moreno Valley Vocational Nursing Program for one (1) year period from February 28, 2015 through February 28, 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 obtain adequate clinical facilities as to number, type, and variety of patients treated to provide clinical experiences in Pediatric Nursing for all students by **March 31, 2015**.
3. Deny the program's request to admit a day class of 30 full-time students on April 13, 2015 graduating on October 20, 2016, to **replace** a class that graduated February 13, 2014.
4. Approve the program's admission of a day class of 20 full-time students on April 13, 2015 graduating on October 20, 2016, to **replace** a class that graduated February 13, 2014 only, **provided** the program maintains a 1:10 instructor to student ratio for all Skills Laboratory and clinical experience.
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 dates of graduation by **April 31, 2015**.
6. Continue to require the program to admit no additional classes without prior approval by the full Board.
7. Continue to 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.
8. Require the program to submit a follow-up report by **November 1, 2015**. The report shall include a review of the prior comprehensive analysis, timeline for implementation, and the effect of employed corrections.
9. Continue to require the program to comply with all approval standards in Article 4 of the Vocational Nursing Practice Act, commencing at Business Professions 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. In the event additional violations of the approval standards are identified, such violations may result in further corrective action or revocation of provisional approval.
13. Place the program on the **February 2016** Board agenda for reconsideration of provisional approval.

Rationale: As noted previously, the Board placed the Career Care Institute, Inc., Moreno Valley, Vocational Nursing Program on provisional approval for the period September 6, 2012, through September 30, 2014 due to noncompliant licensure pass rates. **At that time, the program's average annual pass rate was 52%, 22 percentage points below the state average annual pass rate.** Currently, the program's average annual pass rate is 63%, an increase of 11 percentage points since placement on provisional approval, and nine (9) percentage points below the state average annual pass rate.

Although the program's licensure pass rates have improved, it is important to note, that over the last three (3) consecutive quarters, only five (5) candidates have taken the licensure examination. As a result of the five (5) candidates testing and passing, the licensure pass rates have risen. Based on the improvement in licensure pass rates, the recommendation to extend the program's provisional approval is warranted; however, careful monitoring of the timing and number of graduates testing in addition to the average annual pass rate is advised.

During the unannounced site visit, ten (10) violations were identified. At this time, one (1) of the ten (10) violations is considered corrected, eight (8) have a plan in place that adequately addresses the violation and if implemented will prevent future violations. Violation #5 (violation related to insufficient resources), remains uncorrected as of this writing. Twenty-nine (29) students are currently enrolled in classes.

Collecting student data will enable the program and Board to more effectively monitor student progress.

Attachment A: History of Prior Board Actions.

Attachment B: Notice Change in Approval Status dated October 22, 2014.

Attachment C: Notice of Violations, dated December 11, 2014.

Attachment D: Program Correspondence – Response to Violations, dated January 7, 2015; Received January 9, 2015.

Agenda Item #8.A.4., Attachment A

CAREER CARE INSTITUTE, Inc., MORENO VALLEY VOCATIONAL NURSING PROGRAM

History of Prior Board Actions

- On June 4, 2008, the Executive Officer approved Career Care Institute, Inc., Moreno Valley's request to begin a vocational nursing program with an initial class of 50 students on June 16, 2008 only, and approved the program curriculum for 1564 hours, including 588 theory and 976 clinical hours.
- On August 27, 2008, Career Care Institute, Moreno Valley, informed the Board that students will be receiving theory instruction at the Career Care Institute, Lancaster campus location, and clinical instruction at facilities approved for the Career Care Institute, Moreno Valley campus. This action was taken in response to requirements of an accrediting agency not affiliated with the Board or the State of California.
- **On February 1, 2009, the Board was notified of the director's resignation.**
- **On July 23, 2009, a new director was approved.**
- On September 3, 2009, the Executive Officer approved initial full accreditation for the Career Care Institute, Moreno Valley, Vocational Nursing Program for the period of September 3, 2009 through September 2, 2013, and directed staff to issue a certificate accordingly, **and** approved the program's request to admit a class of 50 students on October 5, 2009, only, to **replace** students graduating on September 25, 2009. That class is expected to graduate on February 14, 2011.
- **On November 10, 2009, the Board approved a new director.**
- On September 21, 2010, the Executive Officer approved the program's request to admit a class of 50 students commencing October 11, 2010 and graduating December 16, 2011; **and** required the program to continue obtaining Board approval prior to the admission of each class.
- On January 20, 2011, the director notified the Board that commencement of the class scheduled for October 11, 2010, had been delayed to November 29, 2010. Graduation was projected for April 2, 2012.
- On March 24, 2011, the Board was notified that admission of the October 2009 class was delayed to November 2, 2009.
- On April 21, 2011, the Executive Officer **denied** Career Care Institute, Moreno Valley, Vocational Nursing Program's request to admit a class of **50** students

commencing May 9, 2011, and graduating September 1, 2012; **and approved** the program's admission of a class of **25** students commencing May 9, 2011, and graduating September 1, 2012; **and** required the program to continue obtaining Board approval prior to the admission of each class.

- On April 28, 2011, the SNEC and NEC conducted a conference call with the director, Marc Hodges, Associate Campus Director, and Mr. Carrasco, Chief Executive Officer, to discuss the program's concerns relative to the Executive Officer's decisions.
- On August 19, 2011, the Executive Officer deferred action on Career Care Institute, Moreno Valley, Vocational Nursing Program's request to admit a class of 25 students commencing August 29, 2011, to the full Board at the September 9, 2011 meeting.
- On August 26, 2011, the Board received correspondence from the director relative to its pass rates. Additionally, the director withdrew the request "for a new class until the pass rate for the next quarter is available.
- On September 1, 2011, the Board received electronic correspondence from the program director requesting to be returned to the September 2011 Board agenda.
- On September 1, 2011, the assigned consultant forwarded electronic correspondence informing the director that the program remains on the November 2011 Board agenda.
- On September 26, 2011, the program was removed from the Board's agenda due to an increase in licensure pass rates.
- **On November 30, 2011, the Board received notification of the director's resignation.**
- **On February 6, 2012 the Board approved a new director.**
- On February 22, 2012, the Board notified the director that the program's pass rates had fallen more than ten (10) percentage points below the state average annual pass rate for the past six (6) quarters.
- On May 7, 2012, the Board notified the director that the program's pass rates had fallen more than ten (10) percentage points below the state average annual pass rate for the past seven (7) quarters. The program was required to submit a plan to increase their licensure pass rates by June 7, 2012.
- On May 25, 2012, the Board received the director's evaluation of the plan to increase licensure pass rates.
- On July 24, 2012, the assigned consultant forwarded correspondence requesting submission of eighteen (18) copies of pertinent documents and subsequent actions taken to correct identified problems that they desire Board members to consider by August 3, 2012.

- On August 1, 2012, the program director submitted eighteen (18) copies of pertinent documents and subsequent actions taken to correct identified problems that they desire the Board members to consider.
- On September 6, 2012, the Board placed the Career Care Institute, Moreno Valley, Vocational Nursing Program on provisional approval for the two-year period from September 6, 2012, through September 30, 2014, and issued a notice to the program to identify specific areas of noncompliance and requirements for correction as referenced in Section 2526.1 (e) of the California Code of Regulations; **and** required the program to bring its average annual pass rate to no more than ten (10) percentage points below the state average annual pass rate; **and** denied the program's request to admit a day class of 50 full-time students on October 1, 2012, graduating on March 30, 2014, to **replace** a class that graduated April 8, 2012. The program was approved to admit a day class of 20 full-time students on October 1, 2012, graduating on March 30, 2014, to **replace** students that graduated April 8, 2012, was approved.

The program was required to conduct clinical classes with minimally one instructor for every ten students, an instructional ratio of 1:10. Additionally, the program was required to admit no additional classes without prior approval by the full Board.

The program was required to submit follow-up reports in nine 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 taken to improve program pass rates, timeline for implementation, and the effect of employed interventions. The following elements must be addressed in the analysis.

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

The program was required to comply with all accreditation standards in Article 4 of the Vocational Nursing Practice Act, commencing at Business and Professions Code Section 2880, and Article 5 of the Board's Regulations, commencing at

California Code of Regulations, Title 16, Section 2526. The Board directed that the program demonstrate incremental progress in correcting the violations. If the program

fails to satisfactorily demonstrate incremental progress, the full Board may revoke the program's accreditation. The Board specified that the failure to take any of these corrective actions may cause the full Board to revoke the program's accreditation. The program was placed on the **September 2014** Board agenda for reconsideration of provisional approval.

- **On May 8, 2013, the Board approved a new program director.**
- On June 13, 2013, the Board received correspondence from the director and the program's report specified in Corrective Action #5 of the Notice of Change in Approval Status.
- On June 1, 2014, the Board received correspondence from the director and the program's second report as required by Corrective Action #5 of the Notice.
- **On June 26, 2014, the Board approved a new program director.**
- On August 11, 2014, the SNEC and NEC conducted a teleconference with program representatives relative to the submitted report and presented corrections.
- On August 19, 2014, the program submitted an update to the comprehensive analysis.
- On September 12, 2014, the Board **extended** Provisional Approval for the Career Care Institute, Inc., Moreno Valley Vocational Nursing Program for five (5) month period from September 12, 2014 through February 28, 2015 and issued a certificate, 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; **and, denied** Career Care Institute, Moreno Valley, Vocational Nursing Program's request to admit a day class of 50 full-time students on October 27, 2014, graduating on February 26, 2016, to **replace** a class that graduated February 13, 2014; **and**, required the program to admit no additional classes without prior approval by the full Board; **and**, required the program to bring its average annual pass rate to no more than ten (10) percentage points below the State average annual pass rate; **and**, required the program to comply with all approval standards in Article 4 of the Vocational Nursing Practice Act, commencing at Business Professions Code Section 2880, and Article 5 of the Board's Regulations, commencing at California Code of Regulations, Title 16, Section 2526; **and**,

Required the program to demonstrate incremental progress in correcting the violations. If the program fails to satisfactorily demonstrate incremental progress, the full Board may revoke the program's approval; **and**, advised failure to take any of these corrective actions may cause the full Board to revoke the program's approval; and, place the program on the **February 2015** Board agenda for reconsideration of provisional approval.

- On November 13, 2014, the director submitted additional information relevant to the program's pass rates, screening and selection and grading and remediation.



Agenda Item #8.A.4., Attachment B

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

BOARD OF VOCATIONAL NURSING & PSYCHIATRIC TECHNICIANS
2535 Capitol Oaks Drive, Suite 205, Sacramento, CA 95833-2945
Phone (916) 263-7800 Fax (916) 263-7855 Web www.bvnpt.ca.gov



CERTIFIED MAIL

October 22, 2014

Allan Ocampo, B.S., R.N.
Director, Vocational Nursing Program
Career Care Institute, Moreno Valley
22500 Town Circle, Suite 2205
Moreno Valley, CA 92553

SUBJECT: Notice of Extension of Provisional Approval

Dear Mr. Ocampo:

Pursuant to the action of the Board of Vocational Nursing and Psychiatric Technicians (Board) on September 12, 2014, the Provisional Approval of the Career Care Institute, Moreno Valley, 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 Career Care Institute, Moreno Valley, 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

Page 2 of 3

| 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% | 71% | -3 |
| Apr – Jun 2010 | 75% | 78% | +3 |
| Jul – Sep 2010 | 75% | 64% | -11 |
| Oct – Dec 2010 | 76% | 58% | -18 |
| Jan – Mar 2011 | 77% | 40% | -37 |
| Apr – Jun 2011 | 76% | 0% | -76 |
| Jul – Sep 2011 | 76% | 50% | -25 |
| Oct – Dec 2011 | 75% | 62% | -13 |
| Jan – Mar 2012 | 74% | 60% | -14 |
| Apr – Jun 2012 | 74% | 52% | -22 |
| Jul – Sep 2012 | 74% | 59% | -15 |
| Oct – Dec 2012 | 74% | 57% | -17 |
| Jan – Mar 2013 | 73% | 54% | -19 |
| Apr – Jun 2013 | 73% | 67% | -6 |
| Jul – Sep 2013 | 74% | 57% | -17 |
| Oct – Dec 2013 | 76% | 62% | -14 |
| Jan – Mar 2014 | 76% | 60% | -16 |
| Apr – Jun 2014 | 73% | 56% | -17 |

Based on this data, the program failed to comply with regulatory requirements relative to annual average pass rates in fifteen (15) of the last eighteen (18) quarters.

REQUIRED CORRECTION(S)

1. The Career Care Institute, Moreno Valley, Vocational Nursing Program shall continue to obtain approval by the full Board prior to the admission of additional students.
2. The program shall bring its average annual pass rate to no more than ten (10) percentage points below the State average annual pass rate.
3. The program shall continue to conduct clinical classes with minimally one (1) instructor for every ten (10) students, an instructional ratio of 1:10.
4. The program shall comply with all approval standards in Article 4 of the Vocational Nursing Practice Act, commencing at Business and Professions Code section 2880, and Article 5 of the Board's Regulations, commencing at California Code of Regulations, Title 16, section 2526.
5. 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

Page 3 of 3

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 page 2, 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: ph



TITLE 16 CALIFORNIA CODE OF REGULATIONS

2526.1. Provisional Approval.

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



BUSINESS, CONSUMER SERVICES, AND HOUSING AGENCY • GOVERNOR EDMUND G. BROWN JR.
BOARD OF VOCATIONAL NURSING & PSYCHIATRIC TECHNICIANS
2535 Capitol Oaks Drive, Suite 205, Sacramento, CA 95833-2945
Phone (916) 263-7800 Fax (916) 263-7855 Web www.bvnpt.ca.gov



DATE: October 22, 2014
TO: Education Division
FROM: Career Care Institute, Moreno Valley, 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.

➤ *Career Care Institute, Moreno Valley, 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)

(Date)

Name of Program: _____

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

Agenda Item #8.A.4., Attachment C



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 11, 2014

Allen Aldrich Ocampo, Director
Vocational Nursing Program
Career Care Institute- Moreno Valley
22500 Town Circle, Suite 2205
Moreno Valley, CA 92553

Subject: Vocational Nursing Program Notice of Violation

Dear Mr. Ocampo:

On December 1 and 2, 2014 the Board of Vocational Nursing and Psychiatric Technicians (Board) made an unannounced site visit to Career Care Institute, Moreno Valley, Vocational Nursing Program. Based on the visit and review of submitted documents, 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 program's curriculum; however, the director was unable to identify or provide documents substantiating implementation of the program's methodology for evaluation of the Board approved curriculum.

Required Action: Provide the Board with a curriculum evaluation form and a timeline for evaluating the curriculum **by January 9, 2015; AND**, results of the evaluation **by January 30, 2015.**

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...

Violation #2: Board files confirm that the program has methodology and procedure for evaluation of clinical facilities. However, the director was unable to provide documentation substantiating that clinical facilities had been evaluated.

Required Action: Provide the Board with a clinical facility evaluation form and a timeline for evaluating all Board approved clinical facilities **by January 9, 2015; AND**, the results of evaluation of each Board approved facility **by January 30, 2015**.

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 #3: No list of resources for the provision of counseling and tutoring services were found.

Required Action: Provide the Board with a list of all available resources for counseling and tutoring **and** how the program will make these resources available to students **by January 9, 2015**.

Section 2527(b) of the Vocational Nursing Rules and Regulations states:

"A school shall report to the Board within ten days of the termination of a faculty member."

Violation #4: The program failed to notify the Board of the termination of seven (7) faculty members within the time prescribed by regulation.

Required Action: Provide the Board with a list of all current faculty members **by January 9, 2015**.

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 the consultants' observation, the program does not have sufficient resources for the enrolled population to achieve the program's objectives. Consultants observed the program does not have a physical library. No physical books are provided to students. All access to library resources and the student's text is provided via the internet.

The program provides each student with portable electronic tablet. These tablets contain required student reading materials. Students informed the consultants that the tablets are not reliable and internet connection at the college is frequently unavailable.

During the site visit, consultants inspected the program's classroom and laboratories. Based on observations, the theory classroom would hold approximately 20 students. There were two (2) small laboratories. One (1) skills laboratory had three (3) beds and three (3) mannequins. The room was small for the three (3) beds and if half of a class of 30 were in at one time, it would be very congested. The second skills laboratory had two (2) beds, a birthing mannequin and a child mannequin. This room would also hold maximum of 15 students. Additionally, there was a small conference room with a large table and a medication cart. There was also a small room with approximately six (6) blood withdrawal chairs for a phlebotomy class.

Board records indicate the program, on multiple occasions, has requested to admit 50 students. On two (2) of these occasions, the Board approved the program to admit 50 students based on reported resources. However, the classroom space available was observed to not be large enough to accommodate that number of students.

Required Action: Provide the Board with a list of library resources to be purchased **AND**, identify how the program will resolve the unreliable internet connection **by January 9, 2015**.

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 . . .

Violation #6:

Consultants observed that the program had failed to consistently implement and follow its Board approved attendance policy. Documents in student files indicated overlapping attendance

probation periods with failure to follow up. The director stated that the program had not followed the attendance policy regarding make-up time. Based on documents available for review, there was no evidence that students had made up time missed for theory and clinical absences.

Required Action: Provide the Board with a form to be utilized by the program to identify student's attendance and required makeup. This form, minimally, must include objectives to be achieved, methods of achievement, and dates of follow-up evaluation and results of evaluation.

Additionally, provide a tracking form with a timeline that the director will use to track all students needing makeup. This form, with timeline, must be provided **by January 9, 2015**.

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 #7: Program records did not contain documentation confirming the consistent evaluation of students to determine the need for remediation or removal from the program.

Required Action: Provide the Board with a form to be utilized by the program to identify student's needing remediation. This form, minimally, must include objectives to be achieved, methods of achievement, and dates of follow-up evaluation and results of evaluation.

Additionally, provide a tracking form with a timeline that the director will use to track all students needing remediation. This form, with timeline, must be provided **by January 9, 2015**.

Section 2882 of the Vocational Nurse Practice Act states:

"The course of instruction of an approved school of vocational nursing shall consist of not less than the required number of hours of instruction in such subjects as the board may from time to time by regulation determine, Together with the required number of hours in the care of medical, surgical, obstetrical patients, sick children, and such other clinical experience as from time to time may be determined by the board."

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 . . .

Violation #8: Based on review and analysis of program files, Board files and an interview with the director it was identified the program does not have clinical sites adequate to provide the type and variety of patients treated to provide clinical experience for all students in areas of the Board approved curriculum. Specifically, the program lacks a Board approved clinical site to provide care of sick children.

Required Action: The program must submit an application for Board approval of a Pediatric clinical site that will provide clinical experience consistent with Board approved clinical objectives for care of the sick child **by January 9, 2015; AND**, provide a schedule identifying current student rotations in a Board approved Pediatric clinical site for care of the sick child **and** evidence of completion of the rotation **by January 30, 2015.**

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 #9: Based on an interview with the director, it was identified that the director failed to evaluate clinical facilities to determine if clinical objectives can be achieved, as prescribed by regulation.

Required Action: Provide the Board with a form and timeline that the director will use to evaluate clinical sites to determine if the student's clinical objectives can be achieved, as prescribed by regulation. This form, with timeline, must be provided **by January 9, 2015; AND**, provide the results of evaluation of each Board approved facility **by January 30, 2015.**

Section 2535 of the Vocational Nursing Rules and Regulations states:

"Each school shall have a policy, approved by the Board for giving credit toward the curriculum requirements."

Violation #10: Board files confirm that the program had a Board approved credit granting policy. Based on review and analysis of program materials and student files, it was identified that the program failed to grant credit for prior education and experience as prescribed by regulation. The director stated that the program has not offered credit granting.

Required Action: Provide the Board with the following forms to be utilized to evaluate credit for previous education as prescribed by regulation by **January 9, 2015**.

1. Create a document that will be utilized to inform students of the school's Board approved credit granting policy in which the student may choose to have their credit evaluated or decline.
2. Create a form to be utilized to evaluate credit for previous education and/or experience.
3. Create a timeline for implementation.

Be advised that the continuation of such violations jeopardizes your program's approval. A plan and timeline for correction of each violation (1-10) listed above will be required. The Board requires the above information no later than **January 16, 2015**.

As a reminder, the Board is scheduled to reconsider the program's provisional approval at the February 2015 Board meeting.

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

Sincerely,



**PAM HINCKLEY, RN, MSN,
Nursing Education Consultant**



Agenda Item #8.A.4., Attachment D

careercareinstitute

www.ccicolleges.edu

January 7, 2015

BYNPT RECD.EDU
ON 1/9/15 WITH Dg

Board of Vocational Nursing and Psychiatric Technicians
2535 Capital Oaks Drive Suite 205
Sacramento, Ca 95833-2945
Pam Hinckley, RN MSN
Nursing Education Consultant

Dear Ms. Hinckley,

Career Care Institute, Inc., Moreno Valley Vocational Nursing Program is responding to the *Vocational Nursing Program Notice of Violation* dated December 11, 2014.

Section 2526(a)(8) of the Vocational 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 program’s curriculum; however, the director was unable to identify or provide documents substantiating implementation of the program’s methodology for evaluation of the Board approved curriculum.

Required Action: Provide the Board with a curriculum evaluation form and a timeline for evaluating the curriculum **by January 9, 2015; AND,** results of the evaluation **by January 30, 2015.**

Action Plan: **I am submitting a curriculum evaluation form that utilized the Context, Input, Process, and Product Model. This will be utilized through the program’s methodology and procedure for evaluation of the program’s curriculum. The action plan is to implement the curriculum evaluation on a quarterly basis. Attachment Exhibit A is the Curriculum Evaluation Form, Exhibit B is the Evaluation Methodology for Curriculum, and Exhibit C is the curriculum evaluation timeline.**



Section 2526(a)(11) of the Vocational 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...

Violation #2: Board files confirm that the program has a methodology and procedure for evaluation of clinical facilities. However, the director was unable to provide documentation substantiating that clinical facilities had been evaluated.

Required Action: Provide the Board with a clinical facility evaluation form and a timeline for evaluating all Board approved clinical facilities by **January 9, 2015; AND**, the results of the evaluation of each Board approved facility by **January 30, 2015**.

Action Plan: Presented on Exhibit D is the Clinical Site Evaluation Form which is part of the Board approved VN Guidelines. Career Care Institute utilizes a computer based method (Survey Monkey) to conduct clinical site evaluations on a quarterly basis. A sample of which is presented in Exhibit Form E. The timeline for the clinical site evaluation is also attached in Exhibit Form F.

Section 2526(a)(16) of the Vocational 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 #3: No list of resources for the provision of counseling and tutoring services were found.



Required Action: Provide the Board with a list of all available resources for counseling and tutoring **and** how the program will make these resources available to students **by January 9, 2015.**

Action Plan: I am submitting a form that illustrates available resources for counseling and tutoring for student use. These resources are disseminated through bulletin boards and will be communicated through their individual school email account. Exhibit Form G is the tutoring resources form and Exhibit Form H is the Community Assistance Resources Form that can be used for provision of counseling and additional support when needed. This has already been implemented and is currently ongoing.

Section 2527(b) of the Vocational Rules and Regulations states:

“A school shall report to the Board within ten days of the termination of a faculty member.”

Violation #4: The program failed to notify the Board of the termination of seven (7) faculty members within the time prescribed by regulation.

Required Action: Provide the Board with a list of all current faculty members by January 9, 2015.

Action Plan: I am hereby submitting a current updated list of faculty members which includes an additional clinical instructor. Miss. Nickie Harris RN, has been approved by Boards on 01/07/2015. She will be a great addition to the team bringing her expertise in Pediatrics and Maternal Nursing. Exhibit I is the current list of the Board approved faculty members.

Section 2530(a) of the Vocational 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 the Consultants' observation, the program does not have sufficient resources for the enrolled population to achieve the program's objectives. Consultants observed the program does not have a physical library. No physical books are provided to students. All access to library resources and student's text is provided via the internet.

The program provides each student with a portable electronic tablet. These tablets contain required student reading materials. Students informed consultants that the tablets are not reliable and internet connection at the college is frequently unavailable.

...

Required Action: Provide the Board with a list of library resources to be purchased **AND**, identify how the program will resolve the unreliable internet connection by **January 9, 2015**.

Action Plan: **We have purchased a keyed book shelf. Attached in Exhibit J is the Student Library Resource List Form which includes the current available books and the additional books purchased. Career Care Institute's student handbook pg. 16 states: Internet Services: "Internet access is available in the computer centers and student break rooms." Career Care Institute provides internet access to students in the computer lab and lunch room area. We do not provide internet access in the theory classroom in order to control ulterior distractions that may hinder the learning process. CCI has issued students electronic tablets along with electronic text books. Once the electronic books are downloaded to their device, no internet connection is required to access their books. However, CCI has contacted the internet provider which is "TelePacific" and submitted a job ticket (Ref # 2090649) to upgrade the internet speed.**

Section 2530(h) of the Vocational 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 the attendance and the specific course objectives for which make-up time is required..."

Violation #6: Consultants observed that the program had failed to consistently implement and follow its Board approved attendance policy.



Documents in student files indicated overlapping attendance probation periods with failure to follow up. The director stated that the program had not followed the attendance policy regarding make-up time. Based on documents available for review, there was no evidence that students had made up timed missed for theory and clinical absences.

Required Action: Provide the Board with a form to be utilized by the program to identify student's attendance and required makeup. This form, minimally, must include objectives to be achieved, methods of achievement, and dates of follow-up evaluation and results of evaluation

Additionally, provide a tracking form with a timeline that the director will use to track all students needing makeup. This form, with timeline, must be provided by **January 9, 2015**

Action Plan: I am submitting Exhibit K, which is a **Clinical/Theory Make-up Form** that will specify the absence date, objectives to be achieved, methods of achievement, and dates of follow-up evaluation and results of evaluation. Included Exhibit L is the **Attendance and Make/Up status Report Form**. This will serve as a tracking timeline which I will utilize to track students needing to make up missed hours and to monitor and terminate students who do not achieve the requirement. **Career Care Institute's Student handbook pg.23 states: All missed hours resultant from absences must be made up as described in "Make-up Policy". "Make up policy" is described on page 24.**

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

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

Violation #7: Program records did not contain documentation confirming the consistent evaluation of students to determine the need for remediation or removal of the program.

Action Required: Provide the Board with a form to be utilized by the program to identify student's needing remediation. This form, minimally, must



include objectives to be achieved, methods of achievement, and dates of follow-up evaluation and results.

Additionally, provide a tracking form with a timeline that the director will use to track all students needing remediation. This form, with timeline, must be provided by **January 9, 2015**.

Action Plan:

I am submitting a plan for the remediation process. Students who do not meet the standard scores for quizzes and exams shall be given a student remediation notice form (Exhibit M). The Remediation Notice Form will indicate which specific areas have not been met, specific recommendations, objectives to be achieved, and methods of achievement and dates of follow-up evaluation with an area to state results. The process will include a Development Plan (Exhibit N), as well as an Academic/Remediation Report (Exhibit O) that will track the students' progress in remediation. Students who do not demonstrate improvement during the remediation process will be subject to termination.

Section 2882 of the Vocational Nurse Practice Act states:

“The course of instruction of an approved school of vocational nursing shall consist of not less than the required number of hours of instruction in such subjects as the board may from time to time by regulation determine, Together with the required number of hours in the care of medical, surgical, obstetrical patients, sick children, and such other clinical experience as from time to time may be determined by the board.”

Section 2534(b) of the Vocational 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...”

Violation #8

Based on review and analysis of program files, Board files and an interview with the director it was identified the program does not have clinical sites adequate to provide the type and variety of patients treated to provide clinical experience for all students in



areas of the Board approved curriculum. Specifically, the program lacks a Board approved clinical site to provide care of sick children.

Action Required: The Program must submit an application for Board approval of a Pediatric clinical site that will provide clinical experience consistent with Board approved clinical objectives for care of the sick child **by January 9, 2015; AND** provide a schedule identifying current student rotations in a Board approved Pediatric clinical site for care of the sick child **and** evidence of completion of the rotation **by January 30, 2015.**

Action Plan: I previously submitted an application for pediatric clinical sites, however the applications were sent back to me by the Board for corrections. We have attended to the site application corrections and are awaiting response from the sites. We expect this to be resolved within the next seven to ten business days. We have assimilated a plan to use these waiting hours for the sick child utilizing the assimilation lab on campus. I am submitting to you Exhibit P, this form consists of clinical objectives of a sick child, the specific groupings, activities, learning outcomes, and evaluation of the assimilation activity. The assimilation/clinical rotation of eight hours has been scheduled for January 6 and 8, 2015. There were four instructors on campus assisting students in the assimilation lab. Clinical objectives were clearly defined and executed. Attached in Exhibit P, are the simulation results which have been established through feedback and student evaluations. In addition, I have a tentative plan to schedule a Pediatrics communicable field trip during the last week of January at HealthBridge Orange Children's Hospital. We have submitted our request and are awaiting response. This will reinforce the students' learning experience of the sick child.

Section 2534(c) of the Vocational 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 #9 Based on an interview with the director, it was identified that the director failed to evaluate clinical facilities to determine if clinical objectives can be achieved, as prescribed by regulation.

Required Action: Provide the Board with a form and timeline that the director will use to evaluate clinical sites to determine if the student's clinical objectives can be achieved, as prescribed by regulation. This form, with timeline, must be provided by **January 9, 2015; AND,** provide the results of evaluation of each board approved facility by **January 30, 2015.**

Action Plan: I am submitting a **Clinical Site Evaluation Form (Exhibit Q)** that will be utilized and implemented on a monthly basis. My plan is to communicate any changes to the State Board, based on the evaluation report for feedback and recommendations. Included is the **Monthly Clinical Site Evaluation Form (Exhibit R)** that will be utilized by the Director as a timeline for clinical site evaluation.

Section 2535) of the Vocational Rules and Regulations states:

"Each school shall have a policy, approved by the Board for giving credit toward the curriculum requirements."

Violation #10: Board files confirm that the program had a Board approved credit granting policy. Based on the review and analysis of program materials and student files, it was identified that the program failed to grant credit for prior education and experience as prescribed by regulation. The director stated that the program has not offered credit granting.

Required Action: Provide the Board with the following forms to be utilized to evaluate credit for previous education as prescribed by regulation by **January 9, 2015.**

1. Create a document that will be utilized to inform students of the school's Board approved credit granting policy in which the student may choose to have their credit evaluated or decline.

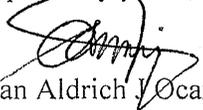


2. Create a form to be utilized to evaluate credit for previous education and/or experience.
3. Create a timeline for implementation.

Action Plan:

Attached is the Credit Granting Policy and Procedure Form for the VN Program (Exhibit S). This form states the policy on credit granting, as well as information for students who choose to accept or decline their credit. Once the Credit Granting form is completed by the student, credits are evaluated by the Director of Nursing. The Credit Granting form includes a second page which defines the process to evaluate credit for previous education and/or experience. In addition, Exhibit T, is an Admissions Check off list which is utilized as a timeline to ensure correct implementation.

Respectfully yours,


Allan Aldrich Ocampo RN, MSN
Director of Nursing