

Agenda Item #17.B.1.



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



COVER SHEET

SUBJECT: Homestead Schools Vocational Nursing Program – Consideration of Placement on Provisional Approval (Director: Adelwisa V. Blanco, Torrance, Los Angeles County, Private)

Homestead Schools Vocational Nursing Program is presented to the Board for consideration of placement on provisional approval due to noncompliance with regulatory requirements.

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

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

On December 18, 2015, the Acting Executive Officer considered a report regarding the Homestead Schools Vocational Nursing Program’s request for ongoing approval and the program’s request for approval to admit three (3) classes of students. The program was reviewed to determine compliance with Article 5 of the Vocational Nursing Rules and Regulations. The program was also reviewed to determine adequacy of resources to support the requested students.

With a total of six (6) violations identified, four (4) of which remained uncorrected, the Acting Executive Officer denied the request for ongoing approval, denied the request to admit students, and referred the program to the full Board for consideration of placement on provisional approval due to violations of the Vocational Nursing Rules and Regulations.

On January 6 and 7, 2016, an unannounced program inspection was conducted by two Board representatives. Additional violations were identified and a *Notice of Violations* was forwarded to the program via electronic and certified mail on January 12, 2016.

Recommendations:

1. Place the Homestead Schools Vocational Nursing Program on provisional approval for the two (2) year period from February 5, 2016 through February 28, 2018, and issue a notice to the program to identify specific areas of non-compliance and

requirements for correction as referenced in Section 2526.1 (e) of the California Code of Regulations. (See Attachment N)

2. Place the program on the Board's **February 2018** agenda for reconsideration of provisional approval.
3. Require the program to admit no additional classes without prior approval by the full Board.
4. 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 **February 15, 2016**.
5. Require the program to submit for Board approval the following:
 - a. Curriculum objectives no later than **February 15, 2016**.
 - b. A revised policy for the evaluation of student performance to determine the need for remediation or removal from the program no later than **March 1, 2016**.
 - c. A revised attendance policy that identifies criteria for attendance, the specific course objectives for which make-up time is required, and acceptable methods for make-up that are specific for theory and clinical time missed, and timely make-up of missed hours that maintains theory to clinical correlation no later than **March 1, 2016**.
 - d. A revised policy for the admission, screening, and selection of applicants to the program that defines the number and frequency of allowable retakes on an admission test and steps to be taken to ensure that the policy is followed, including appropriate interview of applicants no later than **March 1, 2016**.
 - e. Evidence of training of all involved personnel regarding the transfer credit policy that was submitted to the Board on December 1, 2015, including credit to be given for certified nurse assistant courses, and how this new policy is to be implemented no later than **March 1, 2016**.
6. Require the program to submit documentation of implementation of the Board-approved Instructional Plans for both the full-time and the part-time programs **no later than March 1, 2016**.
7. Require the program to submit documentation of placements consistent with the Board-approved Instructional Plans and with adequate faculty for all **currently enrolled** students **no later than March 1, 2016**.
8. Require the program to submit follow up reports in nine (9) months, but no later than **October 1, 2016**, and 21 months, but no later than **October 1, 2017**. The reports must include a comprehensive analysis of the program, specific actions taken to improve pass rates and to correct all violations, a timeline for implementation, and the effect of employed interventions. The analysis must include, but should not be limited, to the following elements:

- 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
9. Require the program to maintain its average annual pass rate no more than (10) ten percentage points below the State average annual pass rate.
 10. Require the program to comply with all approval standards in Article 4 of the Vocational Nursing Practice Act, commencing at Business and Professions Code Section 2880, and Article 5 of the Board's Regulations, commencing at California Code of Regulations, Title 16, Section 2526.
 11. Failure to take these corrective actions may cause the full Board to revoke the program's approval.

Rationale The Homestead Schools Vocational Nursing Program was found to be in violation of the Vocational Nursing Rules and Regulations in July 2015 and a request for approval to admit students was denied at that time. In conjunction with the program survey conducted every four (4) years and in conjunction with the program's request for approval to admit students, an additional two (2) violations were identified in December 2015 and the request to admit students was again denied. Given the identified violations and significant concern regarding the program, an unannounced program inspection was conducted in January 2016 and an additional three (3) violations were identified.

The program's current average annual pass rate is **67%**, which is within the range considered consistent with the Vocational Nursing Rules and Regulations. The data presented above documents that since January 2012, the program average annual pass rate has been **below** the state average annual pass rate with the exception of two (2) quarters in 2013 when the program's average annual pass rate was the **same** as the state's average annual pass rate. However, it is the number and nature of program's **uncorrected** violations that is consistent with a recommendation for provisional approval.

The recent inspection identified that the program has not been delivering curriculum content and hours consistent with the full- or part-time Instructional Plans that were approved by the Board. Significant concerns regarding curriculum delivery, including lack of correlation between theory and clinical, failure to utilize curriculum objectives, and lack of progressive mastery of skills and knowledge, were identified during the recent program inspection. In addition, concerns regarding the failure to follow policies related to attendance were identified and, while the program does evaluate student progress, the program fails to remove students with repeated course failures and failed attendance probations from the program.

With a history of multiple complaints from students from 2012 to 2014; a previous history of violations, including unauthorized admissions; significant concerns regarding program policies; and problems with documentation from the program within the last several months, including discrepancies in enrollment data and misrepresentation in clinical facility applications, the program is now found to have **six (6) uncorrected violations.**

As such, it is recommended that the program be placed on provisional approval. It is also recommended to require the program to correct all violations and provide documentation of the adequate use of faculty and facility resources, in a manner consistent with the Board-approved Instructional Plan, prior to approving any request to admit students.

Agenda Item #17.B.1.



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



DATE: January 25, 2016

TO: Board Members

FROM: 
Donna G. Johnson, RNP, MS, MA
Nursing Education Consultant

SUBJECT: Homestead Schools Vocational Nursing Program – Consideration of Placement on Provisional Approval (Director: Adelwisa V. Blanco, Torrance, Los Angeles County, Private)

Homestead Schools Vocational Nursing Program is presented to the Board for consideration of placement on provisional approval due to noncompliance with regulatory requirements.

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

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

On December 18, 2015, the Acting Executive Officer considered a report regarding the Homestead Schools Vocational Nursing Program’s request for ongoing approval and the program’s request for approval to admit three (3) classes of students. The program was reviewed to determine compliance with Article 5 of the Vocational Nursing Rules and Regulations. The program was also reviewed to determine adequacy of resources to support the requested students.

With a total of six (6) violations identified, four (4) of which remained uncorrected, the Acting Executive Officer denied the request for ongoing approval, denied the request to admit students, and referred the program to the full Board for consideration of placement on provisional approval due to violations of the Vocational Nursing Rules and Regulations.

On January 6 and 7, 2016, an unannounced program inspection was conducted by two Board representatives. Additional violations were identified and a *Notice of Violations* was forwarded to the program via electronic and certified mail on January 12, 2016.

History of Prior Board Actions

(See Attachment A, History of Board Action)

Enrollment

The program offers full – time day and evening courses of instruction that are 50 weeks in length and a part – time weekend course of instruction that is 81 weeks in length. Board approval is required prior to the admission of each class.

The following table represents **current and proposed** student enrollment based on current class starts and completions. The table indicates a **maximum enrollment of 121 students** for the period from **January 2012 through January 2016**.

ENROLLMENT DATA				
CLASS DATES		# Students Admitted	# Students Current or Completed	Total Enrolled
Start	Complete			
1/12 FT (Day)		30	24	24
2/12 FT (Eve)		11	20	24 + 20 = 44
4/12 PT		12	3	44 + 3 = 47
5/12 FT (Day)		27	7	47 + 7 = 54
9/12 FT (Eve)		20	14	54 + 14 = 68
9/12 FT (Day)		20	9	68 + 9 = 77
	12/12 (1/12 FT Day Class)		-24	77 - 24 = 53
1/13 FT (Day)		20	10	53 + 10 = 63
	1/13 (2/12 FT Eve)		-20	63 - 20 = 43
4/13 PT		22	10	43 + 10 = 53
	4/13 (5/12 FT Day Class)		-7	53 - 7 = 46
4/13 FT (Eve)		16	13	46 + 13 = 59
5/13 FT (Day)		30	11	59 + 11 = 70
	9/13 (9/12 FT Eve Class)		-14	70 - 14 = 56
	9/13 (9/12 FT Day Class)		-9	56 - 9 = 47
10/13 FT (Day) (Approved for 9/16/13)		26	10	47 + 10 = 57
11/13 PT (Approved for 9/21/13)		20	9	57 + 9 = 66
	12/13 (4/12 PT class)	12	-3	66 - 3 = 63
	1/14 (1/13 FT Day Class)		-10	63 - 10 = 53

ENROLLMENT DATA				
CLASS DATES		# Students Admitted	# Students Current or Completed	Total Enrolled
Start	Complete			
2/14 FT (Day) (Approved for 6/24/13)		26	10	53 + 10 = 63
2/14 FT (Eve) (Approved for 9/16/13)		19	6	63 + 6 = 69
3/14 PT (Approved for 6/29/13)		11	9	69 + 9 = 78
	4/14 (5/13 FT Day Class)		-11	78 - 11 = 67
	4/14 (4/13 FT Eve Class)		-13	67 - 13 = 54
6/14 FT (Day) (Approved for 4/8/14)		29	10	54 + 10 = 64
6/14 PT (Approved for 4/21/14)		20	11	64 + 11 = 75
6/14 FT (Eve) (Approved for 4/21/14)		12	7	75 + 7 = 82
	9/14 (10/13 FT Day Class)		-10	82 - 10 = 72
	11/14 (4/13 PT Class)		-10	72 - 10 = 62
1/15 FT (Day)		28	22	62 + 22 = 84
1/15 FT (Eve)		20	15	84 + 15 = 99
	2/15 (2/14 FT Day Class)		-10	99 - 10 = 89
	2/15 (2/14 FT Eve Class)		-6	89 - 6 = 83
	2/15 (4/13 PT Class)		-10	83 - 10 = 73
4/15 PT	1/17	22	18	73 + 18 = 91
4/15 FT (Day)	4/16	20	20	91 + 20 = 111
5/15 FT (Eve)	5/16	10	10	111 + 10 = 121
	5/15 (6/9/14 FT Day Class)		-10	121 - 10 = 111
	6/15 (6/14 FT Eve Class)		-7	111 - 7 = 104
	6/15 (11/13 PT Class)		-9	104 - 9 = 95
	12/15 (1/15 FT Day Class)		-22	95 - 22 = 73
	1/16 (1/15 FT Eve Class)		-15	73 - 15 = 58

ENROLLMENT DATA				
CLASS DATES		# Students Admitted	# Students Current or Completed	Total Enrolled
Start	Complete			
	1/16 (3/14 PT Class)		-9	58 - 9 = 49
	1/16 (6/14 PT Class)		-11	49 - 11 = 38

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 2012 through December 2015, specify the pass percentage rates for graduates of the Homestead Schools Vocational Nursing Program on the National Council Licensure Examination for Practical (Vocational) Nurses (NCLEX-PN®) and the variance from state average annual pass rates.

NCLEX-PN® Licensure Examination Data							
Quarterly Statistics					Annual Statistics*		
Quarter	# Candidates	# Passed	% Passed	State Quarterly Pass Rate	Program Average Annual Pass Rate	State Average Annual Pass Rate [CCR §2530(I)]	Variance from the State Average Annual Pass Rate
Jan - Mar 2012	11	7	64%	77%	61%	74%	-13
Apr - Jun 2012	8	5	63%	72%	62%	74%	-12
Jul - Sep 2012	17	11	65%	74%	62%	74%	-12
Oct - Dec 2012	19	15	79%	70%	69%	74%	-5
Jan - Mar 2013	19	15	79%	75%	73%	73%	0
Apr - Jun 2013	26	18	69%	78%	73%	73%	0
Jul - Sep 2013	21	12	57%	75%	71%	74%	-3
Oct - Dec 2013	27	18	67%	76%	68%	76%	-8
Jan - Mar 2014	26	17	65%	74%	65%	76%	-11
Apr - Jun 2014	15	7	47%	66%	61%	73%	-12
Jul - Sep 2014	14	11	79%	72%	65%	73%	-8
Oct - Dec 2014	9	7	78%	72%	66%	72%	-6
Jan - Mar 2015	5	3	60%	73%	65%	71%	-6
Apr - Jun 2015	9	4	44%	69%	68%	72%	-4
Jul - Sep 2015	15	11	73%	73%	66%	72%	-6
Oct - Dec 2015	10	8	80%	75%	67%	72%	-5

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 the State Average Annual Pass Rate
*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.”

As demonstrated in the data for the most recent period, October through December 2015, the program’s average annual pass rate was **67%**. The California average annual pass rate for graduates from approved vocational nursing programs who took the NCLEX-PN® for the first time is 72%. Based on this data the program’s average annual licensure pass rate is **five (5) percentage points below** the state’s average annual pass rate.

The data presented above also documents that since January 2012, the program average annual pass rate has been **below** the state average annual pass rate with the exception of two (2) quarters in 2013 when the program’s average annual pass rate was the **same** as the state’s average annual pass rate. For a total of **five (5)** of those 13 quarters when the program average was below the state average, the program’s average annual pass rate has been **greater than ten (10) percentage points below** the state annual average pass rate.

Faculty and Facilities

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

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

The total number of Board approved faculty is 37, including the program director, three (3) Additional Faculty, and one (1) Teacher Assistant. The director has 100% administrative duties. Of the total faculty, 30 are approved to teach in the clinical area.

Based on a maximum enrollment of 121 students, nine (9) instructors are needed. Therefore, the **total** number of current faculty is **adequate** for the current 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.”

As submitted in documentation in support of the request to admit students that was considered in December 2015, and as noted during the program inspection, the program **lacks** clinical facilities that are adequate as to type and variety of patients treated to enable current and proposed students to meet clinical objectives in accordance with Section 2534(b) of the Vocational Nursing Rules and Regulations.

Other Considerations

The Homestead Schools Vocational Nursing Program was evaluated for consideration of ongoing approval on March 6, 2012, at which time the Executive Officer continued approval of the Homestead Schools, Inc., Vocational Nursing Program for a four-year period, from November 7, 2011, through November 6, 2015, and **rescinded** approval of the program's ongoing admission of all classes. Approval for ongoing admissions was rescinded due to the discovery that the program had **admitted six (6) classes in addition** to the approved pattern of ongoing admissions and had increased the number of students per class in one (1) class. The violations occurred in 2010 and 2011. In addition, concern was expressed regarding the large number of graduates not taking the licensure examination. At that time, (55.2%) of the program's graduates had taken the licensure examination; 44.8% of the graduates had not taken the exam.

Board records substantiate that a number of consumer complaints regarding the Homestead Schools Vocational Nursing Program have been filed since the first full approval of the program in November 2007. Since that time, the Board has received a number of complaints from students. In June 2012, multiple complaints were received on a single day alleging a number of serious concerns. In November 2012, the Board received complaints from 10 students from one (1) class. A total of six (6) students filed complaints together in 2013, and one (1) student filed a complaint in 2014.

Investigation of the most recent complaint, July 2014, led to consultation with the program director regarding problems with the policy for evaluation of student progress, the remediation policy, and the exit requirements. The director subsequently submitted a revised policy for evaluation of student progress that gave more weight to final exams in courses. The remediation policy as proposed by the program continued to allow students multiple attempts to pass the program despite multiple course failures. Inconsistencies in the exit requirements were eliminated.

During evaluation of documentation in support of a request to admit students in August 2014, the assigned consultant sent written correspondence to the program regarding deficits in the plan for clinical experiences for the proposed students. This resulted in a minor curriculum revision such that **eight (8)** hours of simulation was included for Maternity Nursing as of October 2014.

Concern regarding the low number of graduates taking the licensing examination persisted after 2012, and in 2014 the program was required to submit an analysis of the issue and a plan of correction.

On January 23, 2015, the Board received the report from the program. According to the program, at that time, a total of **759** students had been admitted since the program's inception in 2007. The program reported that **233** students dropped out for a variety of reasons, leaving **526** students who completed the 1549 program hours. The program further reported that of the 526 students, **27** students were listed as "pending" due to tuition still owed to the school. The program stated that a total of **382** students had completed all requirements, including passing the exit examination. The program reported that **117** students had completed program hours but failed to meet requirements of the exit examination.

The following statistics, furnished by Homestead Schools Vocational Nursing Program in the January 23, 2015 report and 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" from the period January 2008 through December 2014, specify Homestead Vocational Nursing Program student outcomes. Statistics regarding NCLEX-PN® scores are presented in the second table.

HOMESTEAD VOCATIONAL NURSING STUDENT OUTCOMES			
Students	Number	Percentage Based on Total Number Admitted	Percentage Based on # Completing Program Hours
Admitted	759	100%	
Completed Program Hours	526	69.30%	100%
Completed Exit Requirements	382	50.32%	72.62%
Failed Exit Requirements	117	15.41%	22.24%
Dropped Out	233	30.69%	
Pending	27	3.55%	5.13%

NOTE: In the column, Percentage Based on Admissions, adding the percentage of program hour completers and the percentage of drop outs yields a total of 99.99%. In the column, Percentage Based on Completed Program Hours, adding the percentage of exit requirement completers, exit requirement failures, and pending, yields a total of 99.99%.

HOMESTEAD VOCATIONAL NURSING STUDENT OUTCOMES				
Students	Number	Percentage Based on # Admitted (759)	Percentage Based on # Completing Program Hours (526)	Percentage Based on # Completing Exit Requirements (382)
Total First Time NCLEX Candidates	377	50.98%	71.67%	98.69%
Total First Time Candidates Passing	257	33.86%	48.85%	67.27%

The program's attempt to address some of the concerns was also presented in the April 2015 report to the Board, including:

1. Reduce attrition by using interviews with students, "career counseling," admission preference to individual working in health care, student orientation;
2. Use of promissory notes from students;
3. Financial incentives if conditions are fulfilled and NCLEX passed on first attempt;
4. Strategies to encourage taking the NCLEX.

In conjunction with the program's request for approval to admit students in June, 2015, a detailed analysis of placement plans for the proposed students was conducted. As presented in the submitted documentation, the placement plans for proposed students described violations of the Vocational Nursing Rules and Regulations. As a result, the three (3) classes for which approval had been requested were denied in July 2015 and a *Notice of Violations* was sent to the program. (See Attachment B).

On August 12, 2015, the Board was notified of the termination of the program director. On August 13, 2015, a new director was approved.

On September 2, 2015, after discovering significant discrepancies in no less than five (5) clinical facility applications, a phone consultation with the program director was initiated by the assigned consultant and the Board forwarded a letter to the director regarding the **misrepresentation** in the applications. (See Attachment C). The program director later forwarded correspondence stating there had been "miscommunications" and withdrew a number of clinical facility applications. (See Attachment D).

Between September 2015 and December 4, 2015, the program director submitted materials related to correction of the violations, the Program Record Survey (PRS), and the current request for approval to admit students.

The program's response to identified violations was received on October 2, 2015. (See Attachment E).

The assigned consultant conducted seven (7) phone consultations with the new director between August and November 2015. With multiple deficits identified in the PRS (see Attachment F), the assigned consultant initiated a meeting with the director at Board headquarters on November 24, 2015. At that meeting, the deficits were discussed in detail, consultation and written materials were provided, and the director had opportunities to discuss questions and concerns.

During the November 24, 2015 meeting with the program director, the consultant also addressed the discrepancies in submitted documentation regarding program enrollment. The enrollment data table, above, is based on documentation submitted by the program on December 1, 2015 and updated with data collected during the January 2016 program inspection. The previously identified discrepancies, as presented to the director on November 24, 2015, are depicted in Attachment G. The discrepancies include statistics for admissions and graduations that were in previous years, as opposed to classes still in session.

The program's response to identified PRS deficits was received on December 1, 2015. (See Attachment H). The documentation submitted by the program presents a number of concerns and further violations. **A summary of concerns regarding the program's response follows.**

1. The program director reported on December 1, 2015 that the program could not locate the Board-approved Instructional Plan for the part-time program. On December 4, 2015, the director reported the part-time Instructional Plan had been located and it was forwarded to the Board on that date. However, the document forwarded lists only 32 hours of maternity clinical experience (the full-time curriculum lists 72) and 32 hours of pediatric clinical experience (the full-time program lists 72). Further, theory hours do not match the full-time program. Other inconsistencies were also noted.
2. The program now has presented a revised methodology for curriculum evaluation that includes a curriculum committee and twice yearly review of primarily two indicators: student performance and the use of a single survey to be utilized by both faculty and students. While more appropriate and effective indicators are available, the program now has a methodology for evaluation of the curriculum, including frequency of review, and the program submitted copies of student and faculty surveys completed during 2015.
3. The program has revised instruments to be utilized to collect data regarding clinical facilities. Both students and faculty provided evaluations of facilities. It is of concern that the revised policy does not specify the director's role in the evaluation of clinical facilities.
4. The program has revised policies related to admissions, screening, and selection of applicants to the program. Of concern is that the program plans to continue utilizing a "School-made Entrance Test" and that, while an interview rubric has now been presented, the program has not identified who will be conducting interviews of applicants to the program.
5. The program has submitted a copy of the methodology for evaluation of student progress that discussed the need for remediation or removal from the program. However, similar concerns were identified by the assigned consultant in September 2014, at which time the policy was not approved.
 - a. The frequency with which the director will monitor student grades and issue warnings for inadequacies is not specified; therefore, it is possible struggling students will not be offered early intervention and failing grades will not be identified until the end of the term.
 - b. The program's policy states: "Remediation actions for unsatisfactory academic progress are required to be allowed to continue in the program." Clarification of this statement was requested and none was offered.
 - c. While the policy states that students may only fail one (1) course per term, students may continue to fail in each term and still remain in the program, providing a remediation test and remediation assignment are completed.
 - d. The program's policy also states the following: "If the student continues to be unsuccessful, counseling will be offered and advised to make and present an academic plan should the student has intention to be readmitted."
 - e. The remediation process was not described other than "The student will be sent to the Student Learning Resource Center Coordinator for tutoring and practice tests as early interventions."

6. The program has submitted a revised attendance policy. However, that policy combines acceptable make-up methods for both theory and clinical, with the result that, according to the policy, missed clinical time could be made up with all didactic time and assignments. Further, and consistent with faculty concerns on the evaluations, students may miss 50 minutes of theory or clinical and not be counted as absent. As written, the policy allows students to miss 150 minutes (a total of three times tardy, up to 50 minutes each) of class or clinical and not make up the missed time.
7. The program provided additional information regarding physical resources to achieve the program's objectives. The information provided leaves some concern regarding the ability to accommodate the large number of students most often requested by the program. According to the school's website and the Bureau for Private Postsecondary Education, the school offers five (5) on-site programs, one of which is the Vocational Nursing Program. The other programs are health related and at least four (4) of the offered programs involve some degree of skills training that would involve use of skills labs.

While the program has made progress with adding clinical facilities for maternity and pediatric clinical experiences and improvements have been made in how proposed placements are scheduled, detailed examination of documentation submitted in support of the November 2015 request for approval to admit students **again** revealed violations of the Vocational Nursing Rules and Regulations. Specific issues are outlined in Attachment I and the violations are listed below, in this report.

Given the serious concerns and identified violations, an unannounced program inspection was conducted on January 6 and 7, 2015. During the inspection, a *Notice of Violations* dated January 5, 2016 was hand-delivered to the program director. This same letter was also sent via electronic and certified mail on January 8, 2016. (See Attachment J). It was explained to the program director that this *Notice* represented violations identified **prior** to the program inspection.

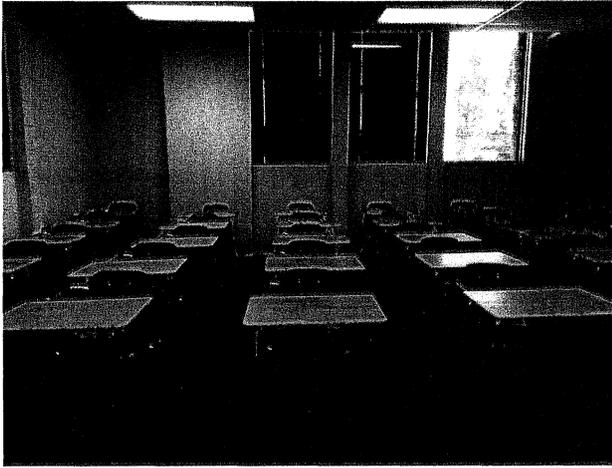
Unannounced Program Inspection

On January 6 and 7, 2016, two (2) representatives of the Board conducted an unannounced program inspection of the Homestead Schools Vocational Nursing Program. During the two-day visit, Board representatives assessed the physical resources for the program, inspected records for newly graduated and currently-enrolled students, met with students engaged in didactic activities in skills lab in lieu of clinical hours, interviewed students in a clinical site, interviewed faculty on campus and in a clinical setting, interviewed clinical facility staff, and facilitated discussions with the program director and other staff members. An assessment of program resources follows.

Classroom Space

Homestead Schools offers five (5) different programs, four (4) of which include a skills component. The Vocational Nursing Program is one of programs that includes a skills component. A total of five (5) classrooms were noted, the largest with 42 seats; however, not all seats have view of the front of the room. Other classrooms have 35, 29, or 24 desks, with

one (1) classroom having 17 seats arranged around large tables. The classrooms are equipped with computers, projectors, and white boards.



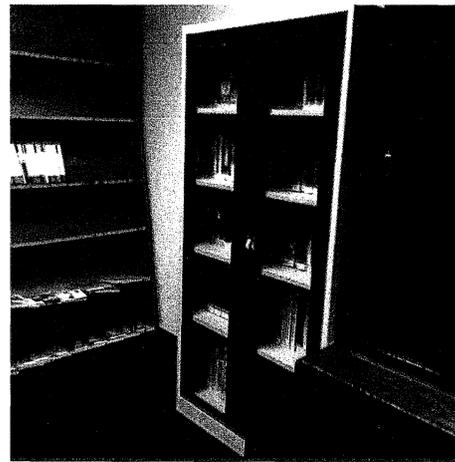
Classrooms

Computer Lab, Library, and Other Physical Resources

A computer lab with 32 stations was noted, as were numerous offices, a student lounge, and a faculty lounge. The physical library holds a small collection and students are given access to electronic databases as well as laptop loaded with tests and learning activities and assessments.



Computer Lab



Library

Student Records

Program staff and faculty made available records of all students, including recording of grades and remediation.

The program does have a policy for evaluation of student progress and evidence of that evaluation was presented during the inspection. However, a **very significant concern is the program's failure to determine the need for removal from the program when students have been documented to fail multiple courses.** Documentation provided to the

Board during the program inspection substantiates that students are retained despite failing multiple subjects. Such students are said to have “remediated” and are often moved from “batch” to “batch” (the program uses the term “batch” to refer to a cohort of students). This results in students being kept in the program, despite obvious difficulty mastering the content. This represents students most likely to fail the licensing examination, should they eventually complete exit requirements. This problem is related to the ambiguous remediation policy that has been in place and repeatedly questioned by Board staff.

Student Interviews

Students interviewed in the skills lab and at a clinical facility noted that there was a need for more hands-on experience in three (3) out of four (4) clinical settings and they reported limitations placed on students, such as being allowed only observation, not performing treatments, being assigned only basic care of patients such as vital signs and personal care, and administering medications on no greater than two (2) patients, including after the first term of study. Students in the later portion of the third of four terms described spending the second half of the clinical day writing care plans and “drug study” as opposed to active engagement in the care of skilled nursing facility residents. Both groups of students were not able to describe engagement in clinical activities such as would be expected of students near the end of their program of study. No theory classes were scheduled during the days of the inspection. A review class that had been scheduled for the evening of January 6, and which the consultants intended to observe, was canceled, reportedly due to a storm.

Faculty Interviews

The instructor responsible for coordination of remediation described meeting with students and that students were retested until they passed the course. A clinical instructor interviewed described that students in the third term of the program were involved in basic care and administration of medication to up to two patients in the morning. Afternoons were spent on “paperwork.” On the day of the site visit at the clinical facility, the instructor was supervising administration of 9 AM medications at 11:30 AM. The instructor further described the students not knowing the actions of medications being administered and that students completed make-up hours unrelated to subjects taught.

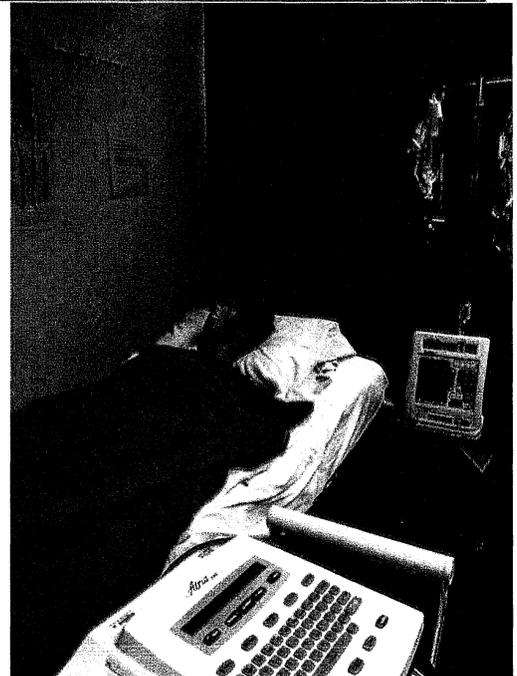
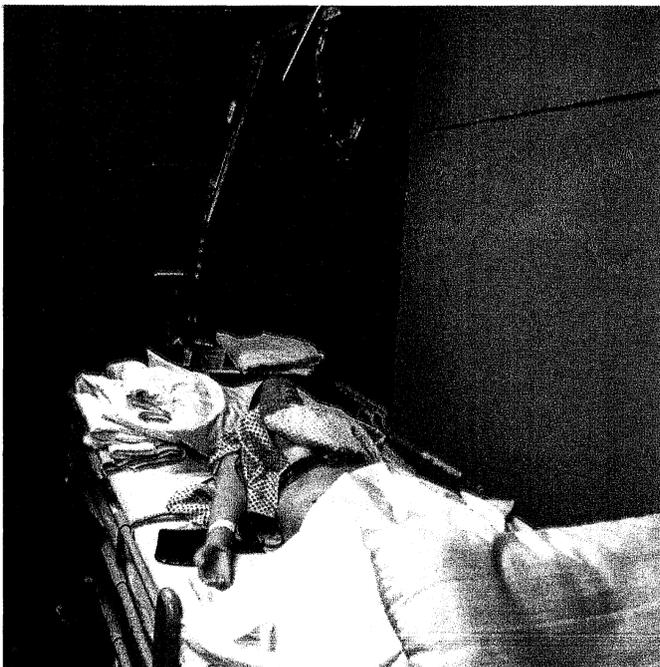
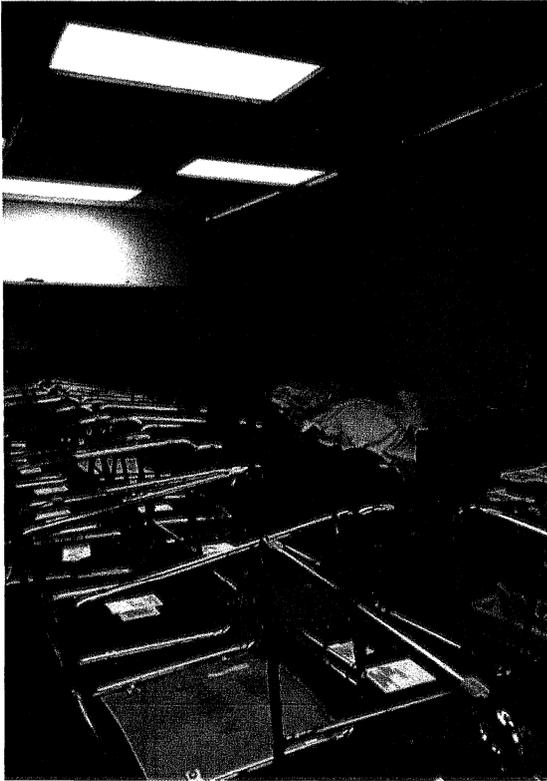
Interviews with Facility Administration

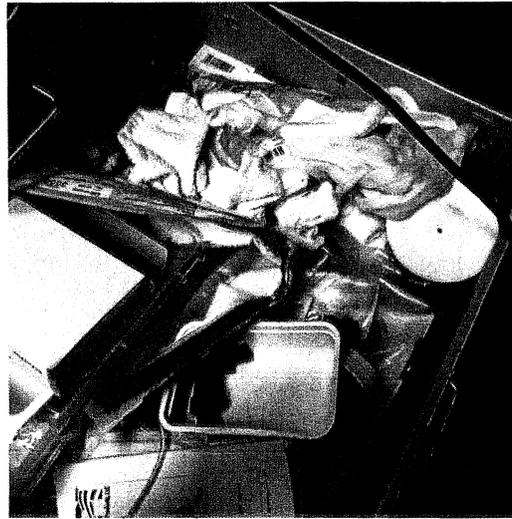
Interviews with these individuals corroborated that students are not engaged in administering treatments to patients and, as an example, catheters are always changed when students are not present. Students are not allowed to administer medications during the first few weeks of the term (this was in the third of four terms in the program) and were involved in only basic care such as hygiene and vital signs during that time.

Skills Laboratory

The skills lab assigned to the Vocational Nursing Program contains two (2) patient beds, both of which are pushed against a wall and only allow access on one (1) side of the bed, limiting the number of students who can be accommodated during demonstrations in the lab. Each bed has a mannequin. In one (1) bed, the mannequin is chained to the bed with a heavy chain and padlock. That mannequin has inflexible arms and allows tracheostomy care and catheter insertion. The other mannequin has a broken arm but allows for stoma care and catheter insertion. The skills lab has a portable sink, requiring manual pumping to access water.

The skills lab assigned to the Nursing Assistant (NA), Intravenous Therapy (IV), and Home Health Aid (HHA) programs has two (2) patient beds allowing access on two (2) sides, two (2) mannequins, and two sinks. A third skills lab, which is utilized by the NA, IV, and HHA programs has one (1) bed, one (1) mannequin and two (2) scales. Between the first two (2) skills labs described, while not completely organized, the equipment necessary for meeting program objectives was found. A maternity torso, neonatal mannequin, sterile gloves and dressing supplies, trach and catheter care and insertion kits, medication administration, and personal protective equipment was found, as were needles and syringes.





Violations

Based on documentation submitted by the program, the current status of the violations identified in July and December 2015 is described, below, followed by violations identified during the course of the program inspection. A *Notice of Violations* was sent to the program on January 12, 2016. (See Attachment K). Inserted into this section is a consideration of the program's latest response, submitted on January 15, 2016. Other issues related to program inspection findings and discussion of some of the elements of concern are presented following the description of identified 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 #1:

As presented in the documentation in support of the June 2015 request for approval to admit students, there are inadequate faculty and facilities as noted by:

- 1) Scheduling some instructors to clinically instruct more than one level of students at the same time and more than 15 students at a time;
- 2) Limitations on number of students allowed in some facilities, along with limited number of facilities and faculty, result in scheduling maternity and pediatric clinical in a manner not consistent with the regulations (see below)

Status of Violation #1:

This violation is **not** corrected. Documentation submitted in support of the November 2015 request to admit students indicates full-time students would receive a total of 36 hours of clinical experience in Maternity Nursing and 36 hours of clinical experience in Pediatric Nursing, both delivered over the course of one (1) week. The Board-approved Instructional Plan calls for a total of 72 hours in both areas, with each area occurring over a period of three (3) weeks and a total of eight (8) to 12 hours of theory content delivered each week. While the submitted documentation lists a total of one (1) week for each content area, the Board-approved Instructional plan lists four (4) weeks for each area. Documentation submitted in the November 2015 request also indicated two (2) instructors scheduled at the same time in different locations and a Teacher Assistant was listed as solely responsible for a group of students in the clinical setting.

Required Correction:

Provide documentation of the Board-approved Instructional Plans for both full- and part-time programs, documentation of implementation of the approved plans, and documentation of clinical placements consistent with the Board-approved Instructional Plans and with adequate faculty, for currently enrolled students. **Due no later than March 1, 2016.**

Status as of 1/15/16:

This violation is **not** as yet corrected.

The program submitted a full-time and a part-time Instructional Plan. In preliminary examination, some discrepancies persist, primarily in maternity clinical nursing. Clinical placements presented for currently enrolled students indicate that the program has adequate clinical facilities for the class of 10 students. The week-end class and the larger full-time class currently enrolled will be able to complete the required number of clinical hours in specialty rotations, but not in accord with the Board-approved Instructional Plans.

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

“Vocational nursing programs shall include theory and correlated clinical experience.”

Violation #2: As presented in the documentation in support of the June 2015 request for approval to admit students, students are scheduled for specialty rotations in the middle of Medical-Surgical Nursing theory and clinical experience. While the program states that students are divided into multiple groups to accommodate limitations related to specialty facilities, individual students experience specialty clinical rotations when they are also engaged in other rotations.

Status of Violation #2: *Based on documents submitted in November 2015 that described a proposed sequence of clinical rotations, this violation was reported as corrected **prior** to the program inspection*

During the program inspection, loss of the critical correlation of theory and clinical experience was noted during examination of documents titled “Clinical Make-up Attendance Contract.” As found in the student files, the make-up attendance contracts document delays of up to several months in making up missed clinical hours. Examination of those documents also noted “banking” of clinical hours prior to planned absences. No mention of missed clinical objectives were noted on the make-up contracts. The above findings indicate that theory and clinical are not correlated for the students with excessive absences. The above findings indicate that theory and clinical are not correlated for the students with excessive absences.

This violation is **not** corrected.

Required Correction: Submit for Board approval a proposed policy regarding timely make-up of missed clinical hours such that theory and clinical are correlated. **Due no later than March 1, 2016.**

Status as of 1/15/16: This violation is **not** as yet corrected.

There was no change to the proposed policy in the document submitted on January 15, 2016.

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

“Curriculum content shall be taught in a sequence that results in students’ progressive mastery of knowledge, skills and abilities.”

Violation #3: For some students in full-time day and evening classes, including current and proposed students, Pediatric and Maternity skills labs

are scheduled **after** the clinical rotations in those areas. Other students are scheduled for Pediatric and Maternity skills lab experiences **prior** to clinical rotations in those areas.

In addition, the scheduling of Maternity and Pediatric content and clinical while also engaged in Medical-Surgical Nursing and Leadership content and clinical interferes with progressive mastery of knowledge, skills, and abilities.

Status of Violation #3: *Based on documents submitted in November 2015 that described a proposed sequence of clinical rotations, this violation was reported as corrected prior to the program inspection.*

As identified during the program inspection, there is a lack of progressive mastery of knowledge, skills, and abilities. This was noted in interviews with students, a clinical instructor, and clinical facility administrators, and by observation at a clinical site. Further, student assignments found in student files examined at the school are noted to focus on memorization, handwriting material from textbook pages, and a lack of focus on more complex cognitive tasks and assignments, including at the end of the program of study. Description of clinical experiences offered by students, instructor, and facility staff indicate that during the last few weeks of Term 3 (of four terms) students are not engaged in more complex clinical tasks, such as treatments, suctioning patients, insertion of nasogastric tubes, or insertion of catheters or administration of medications to more than two (2) patients per day. It was also noted that homework completed by students was not corrected even though credit was given. This prevents students from progressing in their knowledge and understanding of important content and concepts.

Required Correction: Submit for Board-approval a plan to provide didactic and clinical training that allows for progressive learning and mastery of the more complex tasks demanded of entry-level Vocational Nursing practice. Describe how students will be assigned to clinical facilities that accommodate the increasing complexity of clinical skills required of entry-level Vocational Nursing practice. **Due no later than March 1, 2016.**

Status as of 1/15/16: This violation is **not** as yet **corrected**.

The plan submitted by the program would require substantial changes in order to deliver curriculum content that reflects progressive mastery. The program did not comment on the need for clinical facilities to be involved with such a change, given that facilities must be able to accommodate increasing complexity of clinical objectives.

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

“All curricular changes that significantly alter the program philosophy, conceptual framework content, objectives, or other written documentation as required in Section 2526, shall be approved by the Board prior to implementation.”

Violation #4: The manner of scheduling the last term of the Vocational Nursing program is not consistent with the Board-approved Instructional Plan, including scheduling Maternity and Pediatric skills lab **prior** to related clinical experiences and interspersing Maternity and Pediatric rotations with Medical-Surgical Nursing and Leadership rotations.

Status of Violation #4: This violation is **not** corrected. Documentation submitted in support of the November 2015 request to admit students corrected how skills labs were scheduled, but those documents also indicate full-time students would receive a total of 36 hours of clinical experience in Maternity Nursing and 36 hours of clinical experience in Pediatric Nursing, both delivered over the course of one (1) week for full-time students and two (2) weeks for part-time students. The Board-approved Instructional Plan calls for a total of 72 hours in both areas, with each area occurring over a period of three (3) weeks in the full-time program with eight (8) to 12 hours of theory content also delivered each week. **Further, a valid, Board-approved Instructional Plan for the part-time program has not been produced by the program.**

In addition, during the program inspection, the director's calendar of theory and clinical hours for the cohort that graduated in December 2015 was examined. According to this schedule of faculty, placements, and student cohorts, students that graduated in December 2015 received only **24 hours** of Maternity Nursing clinical experience and no greater than **24 hours** of Pediatric Nursing clinical experience.

Required Correction: Submit a copy of the Board-approved Instructional Plan for the part-time program. **Due no later than March 1, 2016.**

Provide documentation of implementation of the Board-approved Instructional Plans for both full- and part-time programs. **Due no later than March 1, 2016.**

Provide signed documentation that all students currently enrolled receive the required number of theory and clinical hours prior to graduation from the program, including all students scheduled to graduate in January and February 2016. **Due prior to any further graduations.**

Status as of 1/15/16: This violation is **not** as yet corrected.

The program submitted a full-time and a part-time Instructional Plan. In preliminary examination, some discrepancies persist, primarily in maternity clinical nursing. Clinical placements presented for currently enrolled students indicate that the program has adequate clinical facilities for the class of 10 students. The week-end class and the larger full-time class currently enrolled will be able to complete the required number of clinical hours in specialty rotations, but not in accord with the Board-approved Instructional Plans.

Based on the December 1, 2015 documentation submitted by the program, the following violations of the Vocational Nursing Rules and Regulations were identified (to avoid confusion, numbering of the violations begins with #5)

Section 2526(a)(4) 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 ...
... (4) Curriculum objectives.”

Violation #5: Based upon documents submitted by the program in conjunction with the PRS and the program’s response to deficits in the PRS, the program has not identified curriculum objectives. The program has submitted only terminal objectives. There is no evidence that curriculum objectives have been in use in the program.

Status of Violation #5: This violation is **not** corrected.

Required Correction: Submit for Board approval curriculum objectives **no later than February 15, 2016.**

Status as of 1/15/16: This violation is **not** as yet corrected.

There was no change to the program response in the document submitted on January 15, 2016.

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

“Each teacher assistant shall work under the direction of an approved instructor. No more than one teacher assistant may be assigned to each instructor. Each teacher assistant shall assist the instructor in skill lab and clinical teaching only. The instructor to whom the teacher assistant is assigned shall be available to provide direction to the teacher assistant as needed.”

Violation #6: Board records confirm a specific individual was approved as a Teacher Assistant on May 29, 2013. Further, the program director submitted an updated faculty list on November 13, 2015 which

lists the individual as a Teacher Assistant and the program director completed the PRS on December 1, 2015 listing the individual as a Teacher Assistant.

Documents submitted in support of the November 2015 request to admit students indicate the individual is listed as assigned faculty for a group of currently enrolled students at a clinical facility in February 2016 and the individual is also listed as the assigned faculty for a group of proposed students in April and May of 2016. No other faculty is listed as assigned for those students, leaving the Teacher Assistant with responsibilities that are inconsistent with regulations governing such utilization. During the program inspection the director again presented the assignment of a Teacher Assistant as solely responsible for a group of students in clinical experience.

Status of Violation #6: This violation is now **corrected**. On January 11, 2016, the program submitted documentation that a Board-approved instructor was replacing the Teacher Assistant for all clinical groups.

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 #7: Board files indicate the program has a policy for the admission, screening and selection of applicants. The program’s policy indicates applicants are to have an interview and a minimum score of 76 on the program’s assessment test. Examination of 61 student files during the program inspection, representing entire classes in some cases and random checks of a percentage of a class in other cases, identified a total of 17 files without documentation of an interview. Examination of student files during the program inspection identified four (4) files with below minimum passing score followed by one (1) to two (2) additional handwritten scores, all on the same Scantron form. These findings indicate that the program is not following the policy for the admission, screening, and selection of applicants.

It is also noted that the program's policy does not address the number and frequency of allowable retakes on the assessment test, which was created by the school.

Required Correction: Submit a revised policy for the admission, screening, and selection of applicants to the program that defines the number and frequency of allowable retakes on an admission test. Describe steps to be taken to ensure that the policy is followed. **Due no later than March 1, 2016.**

Status as of 1/15/16: The program has submitted a plan that, if consistently implemented, would prevent further occurrence of this violation.

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 #8: Board records document that the program has an approved policy for attendance and make-up of missed theory and clinical hours. According to program documents,

"All absences for theory and/or clinical must be made-up. Students will be placed on probation after two (2) absences in any given Term and terminated from the program after three absences in any one Term."

The program failed to follow their attendance policy as noted by the documentation in student files indicating that students with over 60 hours of missed clinical were not placed on probation and students placed on probation due to excessive absences are moved to a different class, rather than terminated from the program when the terms of probation are violated by the students. Records examined during the program inspection also indicate that students are allowed to "bank" clinical hours in anticipation of absences and that make-up of missed clinical hours may occur greater than six (6) weeks after the absence. No notation of missed objectives are included in the "Clinical Make-up Attendance Contract."

Required Correction: Submit for Board approval a proposed policy regarding timely make-up of missed clinical hours such that theory and clinical are

correlated, hours are not “banked,” and that students with excessive absences are not allowed to progress. Submit a written description of how this policy will be consistently implemented. **Due no later than March 1, 2016.**

Status as of 1/15/16: This violation is **not** as yet corrected

There was no change to the proposed policy in the document submitted on January 15, 2016.

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.

- (a) Transfer credit shall be given for related previous education completed within the last five years. This includes the following courses:
 - (1) Approved vocational or practical nursing courses.
 - (2) Approved registered nursing courses.
 - (3) Approved psychiatric technician courses.
 - (4) Armed services nursing courses.
 - (5) Certified nurse assistant courses.
 - (6) Other courses the school determines are equivalent to courses in the program.
- (b) Competency-based credit shall be granted for knowledge and/or skills acquired through experience. Credit shall be determined by written and/or practical examinations.”

Violation #9: An analysis of student records confirmed that the program failed to grant credit for prior education and experience as prescribed by regulation. Specifically, students with recent certificates from certified nursing assistant courses were given no credit for certified nurse assistant courses, as is required in the regulation.

Required Correction: Submit evidence of training of all involved personnel regarding the Board-approved transfer credit policy and that describes credit to be given for certified nurse assistant courses. Describe how this policy is to be implemented such that credit is granted for certified nurse assistant courses and how such credit will be determined. **Due no later than March 1, 2016.**

Status as of 1/15/16: The program has submitted a revised policy and a plan that, if consistently implemented, would prevent further occurrence of this violation.

On January 11, 2016, the program submitted a letter regarding intent to oppose the decisions rendered in December 2015. (See Attachment L). The letter included a number of attachments, including the program’s depiction of program pass rates, which are based on a calendar year, as opposed to the average of the most recent four (4) quarters. Lists of faculty and facilities were redacted, rather than enter names of faculty and the program’s facility

roster into the public record. The program has been found to have an adequate **total** number of faculty and facilities; however program documents indicated inadequacy of faculty and facilities based on how the program proposed to utilize the resources, as described above in this report and in Attachment I. Restrictions on the number of students allowed in facilities impact this and it is possible that the reliance on part-time faculty also impacts this. The program has a total of seven (7) full-time faculty, including the program director. The rest of the faculty are part-time employees. The program's physical resources, including equipment, skills lab, and library, have not been found to be in violation of the regulations.

On January 11, 2016, the program also submitted materials in response to the *Notice of Violations* dated January 5, 2016. The program submitted the same documents described above for faculty, facilities, and physical resources. In addition, the program submitted a draft of curriculum objectives, documentation that a Board-approved instructor would replace the Teacher Assistant, a proposed policy for Evaluation of Student Progress, and a proposed attendance policy. (See Attachment M). The program also submitted a copy of the full-time Instructional Plan that the Board approved **prior** the minor curriculum change of 2014 that allowed eight (8) hours of simulation for maternity clinical experience. No other curriculum changes were made in 2014. Again, the program did not submit a part-time curriculum. A summary of other concerns regarding the program's submissions follows:

Curriculum Objectives

Curriculum objectives identify competencies expected of the students at the end of each term of the program. Curriculum objectives in subsequent terms are intended to reflect expected student progress and mastery. As such, curriculum objectives are important indicators of student progress through a program of study. Terminal objectives describe expected student outcomes upon successful completion of the program.

On August 17, 2015, the program director, who has experience working with Vocational Nursing programs, completed an orientation that included discussion of curriculum objectives. The assigned consultant provided written information regarding curriculum objectives, examples of curriculum and terminal objectives, and discussion of their use during the November 24, 2015 consultation. On December 1, 2015, the program director again submitted terminal objectives and no curriculum objectives.

The proposed curriculum objectives submitted on January 11, 2016 are a list of course objectives for each term and do not offer a realistic expectation of expected clinical competencies at the end of each term. As an example, it is expected that at the end of the first term, students will need considerable assistance from instructors when "apply[ing] knowledge of nutrition in the holistic care of patient in the health care setting." Students in term 2 are expected to need assistance of the instructor when attempting to apply the types of knowledge listed in the program's draft of curriculum objectives. By later terms in the program, the student should need far less assistance of the instructor. Curriculum objectives describe for students and faculty the progressive mastery and application of skills and knowledge. With the lack of progressive mastery identified during the program inspection, appropriate curriculum objectives will be of particular assistance as the program updates the curriculum and the delivery of instruction.

Evaluation of Student Progress and Remediation

The program's proposed policy, as submitted on January 11, 2016, fails to define how frequently the director monitors progress, what constitutes "inadequate" grades or "cause for concern" and how many times students may repeat different terms. As noted during the program inspection, while the program does evaluate student progress, students who failed multiple terms and students with excessive absences and failed probation for absences were maintained in the program. This is despite the fact that such students are most likely to have difficulty completing exit requirements or, if they do pass exit requirements, difficulty passing a licensing examination.

Attendance Policy

The program has appropriately decreased the amount of time a student may be tardy before the missed time is considered an absence. However, the program failed to limit the amount of times students with failed attendance probation or failure to remediate each theory absence may "join the next class." The program has also failed to clearly specify appropriate make-up for clinical absence (as required in the regulation). The last line of the program's proposed policy also allows students to proceed to the next term without making up all theory and clinical absences, allowing the violation of lack of theory and clinical correlation due to absence to continue uncorrected.

Summary

While the program does present evidence of evaluation of student progress, the program does not present evidence of removal of failing students from the program. Students with evidence of having failed multiple courses are said to be "remediated" and allowed to continue the program. Likewise, students with excessive absences and failure to meet the terms of probation for excessive absence are not removed from the program. In addition, the program has not presented adequate resources to support the requested number of students and the program has failed to follow the Board-approved Instructional Plan. Between July 2015 and January 2016, a total of **nine (9)** violations have been identified.

The program has corrected one (1) violation and has presented plans that, should they be consistently implemented, would correct two (2) violations. The program currently has **six (6) uncorrected violations**, including failure to follow the Board-approved Instructional Plan, failure to follow attendance policies, and failure to follow all regulations related to curriculum content and clinical experience. The materials most recently submitted by the program continue to demonstrate critical deficiencies in the program.

Recommendations:

1. Place the Homestead Schools Vocational Nursing Program on provisional approval for the two (2) year period from February 5, 2016 through February 28, 2018, and issue a notice to the program to identify specific areas of non-compliance and requirements for correction as referenced in Section 2526.1 (e) of the California Code of Regulations. (See Attachment N)
2. Place the program on the Board's **February 2018** agenda for reconsideration of provisional approval.

3. Require the program to admit no additional classes without prior approval by the full Board.
4. 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 **February 15, 2016**.
5. Require the program to submit for Board approval the following:
 - a. Curriculum objectives no later than **February 15, 2016**.
 - b. A revised policy for the evaluation of student performance to determine the need for remediation or removal from the program no later than **March 1, 2016**.
 - c. A revised attendance policy that identifies criteria for attendance, the specific course objectives for which make-up time is required, and acceptable methods for make-up that are specific for theory and clinical time missed, and timely make-up of missed hours that maintains theory to clinical correlation no later than **March 1, 2016**.
 - d. A revised policy for the admission, screening, and selection of applicants to the program that defines the number and frequency of allowable retakes on an admission test and steps to be taken to ensure that the policy is followed, including appropriate interview of applicants no later than **March 1, 2016**.
 - e. Evidence of training of all involved personnel regarding the transfer credit policy that was submitted to the Board on December 1, 2015, including credit to be given for certified nurse assistant courses, and how this new policy is to be implemented no later than **March 1, 2016**.
6. Require the program to submit documentation of implementation of the Board-approved Instructional Plans for both the full-time and the part-time programs **no later than March 1, 2016**.
7. Require the program to submit documentation of placements consistent with the Board-approved Instructional Plans and with adequate faculty for all **currently enrolled** students **no later than March 1, 2016**.
8. Require the program to submit follow up reports in nine (9) months, but no later than **October 1, 2016**, and 21 months, but no later than **October 1, 2017**. The reports must include a comprehensive analysis of the program, specific actions taken to improve pass rates and to correct all violations, a timeline for implementation, and the effect of employed interventions. The analysis must include, but should not be limited, to the following elements:
 - 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
9. Require the program to maintain its average annual pass rate no more than (10) ten percentage points below the State average annual pass rate.
 10. Require the program to comply with all approval standards in Article 4 of the Vocational Nursing Practice Act, commencing at Business and Professions Code Section 2880, and Article 5 of the Board's Regulations, commencing at California Code of Regulations, Title 16, Section 2526.
 11. Failure to take these corrective actions may cause the full Board to revoke the program's approval.

Rationale The Homestead Schools Vocational Nursing Program was found to be in violation of the Vocational Nursing Rules and Regulations in July 2015 and a request for approval to admit students was denied at that time. In conjunction with the program survey conducted every four (4) years and in conjunction with the program's request for approval to admit students, an additional two (2) violations were identified in December 2015 and the request to admit students was again denied. Given the identified violations and significant concern regarding the program, an unannounced program inspection was conducted in January 2016 and an additional three (3) violations were identified.

The program's current average annual pass rate is **67%**, which is within the range considered consistent with the Vocational Nursing Rules and Regulations. The data presented above documents that since January 2012, the program average annual pass rate has been **below** the state average annual pass rate with the exception of two (2) quarters in 2013 when the program's average annual pass rate was the **same** as the state's average annual pass rate. However, it is the number and nature of program's **uncorrected** violations that is consistent with a recommendation for provisional approval.

The recent inspection identified that the program has not been delivering curriculum content and hours consistent with the full- or part-time Instructional Plans that were approved by the Board. Significant concerns regarding curriculum delivery, including lack of correlation between theory and clinical, failure to utilize curriculum objectives, and lack of progressive mastery of skills and knowledge, were identified during the recent program inspection. In addition, concerns regarding the failure to follow policies related to attendance were identified and, while the program does evaluate student

progress, the program fails to remove students with repeated course failures and failed attendance probations from the program.

With a history of multiple complaints from students from 2012 to 2014; a previous history of violations, including unauthorized admissions; significant concerns regarding program policies; and problems with documentation from the program within the last several months, including discrepancies in enrollment data and misrepresentation in clinical facility applications, the program is now found to have **six (6) uncorrected violations**.

As such, it is recommended that the program be placed on provisional approval. It is also recommended to require the program to correct all violations and provide documentation of the adequate use of faculty and facility resources, in a manner consistent with the Board-approved Instructional Plan, prior to approving any request to admit students.

- Attachment A: History of Prior Board Actions
- Attachment B: Notice of Violations Dated July 30, 2015
- Attachment C: Board Correspondence Dated September 2, 2015
- Attachment D: Program Correspondence Dated September 14, 2015
- Attachment E: Program Correspondence Dated September 25, 2015
- Attachment F: Board Correspondence Dated November 23, 2015
- Attachment G: Enrollment Data Table
- Attachment H: Program Correspondence Received December 1, 2015
- Attachment I: Summary of Concerns with Placements
- Attachment J: Notice of Violations Dated January 5, 2016
- Attachment K: Notice of Violations Dated January 12, 2016
- Attachment L: Program Correspondence #1 Dated January 11, 2016
- Attachment M: Program Correspondence #2 Dated January 11, 2016
- Attachment N: Draft Notice of Change in Approval Status

Agenda Item #17.B.1., Attachment A

HOMESTEAD SCHOOLS, INC. VOCATIONAL NURSING PROGRAM

HISTORY OF PRIOR BOARD ACTIONS:

- On October 3, 2006, the Executive Officer approved the Homestead Schools, Inc., request to begin a vocational nursing program with an initial class of 15 students on October 23, 2006, only, and approved the program curriculum for 1549 hours, including 589 theory, and 960 clinical hours.
- On December 16, 2006, the director of the Homestead Schools, Inc. Vocational Nursing Program notified the Board that the start date of October 23, 2006, had been delayed to January 8, 2007, due to low recruitment of students.
- On January 8, 2007, the director notified the Board that she had tendered her resignation effective immediately.
- **On April 2, 2007, the Board approved a new director of the Homestead Schools, Inc. Vocational Nursing Program.**
- On August 29 – 30, 2007, the assigned consultant inspected the Homestead Schools, Inc. Vocational Nursing Program to determine compliance with Article 5 of the Vocational Nursing Rules and Regulations.
- **On September 9, 2007, the Board approved a new director of the Homestead Schools, Inc. Vocational Nursing Program.**
- On November 7, 2007, the Executive Officer approved initial full accreditation for the Homestead Schools, Inc. Vocational Nursing Program for the period from November 7, 2007, through November 6, 2011, and issued a certificate accordingly.

The Executive Officer also approved the following program requests.

- a. Admit a full-time evening class of 15 students beginning January 7, 2008, only to **replace** students graduating on December 21, 2007, with a projected graduation date of December 19, 2008.
- b. Admit a second evening full-time class of 15 students beginning on January 7, 2008, only, with a projected graduation date of December 19, 2008.
- c. Admit a third and fourth full-time day class of 15 students each beginning on January 7, 2008, only, with a projected graduation date of December 19, 2008.

- On January 17, 2008, the director notified the Board that the program was experiencing low recruitment for their replacement class and had accepted 12 transfer students to go into the third and fourth terms to start classes on January 15, 2008, and graduate on July 6, 2008.
- On February 26, 2008, the administrator notified the Board that the program planned to start the third class start in March 2008 with approximately 12 students.
- On March 24, 2008, the director notified the Board that the program planned to start their fourth approved class on May 17, 2008.
- On September 17, 2008, the Executive Officer approved the following requests of the Homestead Schools Vocational Nursing Program.
 - a. Admit 30 students into a full-time evening class beginning on September 22, 2008, only to **replace** the students who graduated on July 27, 2008, thereby increasing class size from 15 students to 30 per class.
 - b. Admit 15 students into a part-time day class beginning on September 20, 2008, only, thereby increasing frequency of admissions.
 - c. Admit 15 students into a full-time day class beginning on November 17, 2008, only, thereby increasing frequency of admissions.
- On December 8, 2008, the Executive Officer approved the Homestead Schools, Inc. Vocational Nursing Program's request to admit 30 students into a full-time evening class starting on January 5, 2009 to **replace** students who will graduate on December 19, 2008, thereby increasing class size from 15 to 30 students. The proposed class will graduate on December 18, 2009. The Executive Officer also approved the program's request for ongoing admissions only, with the following stipulations:
 - a. No additional classes are added to the program's approved pattern of admissions without prior Board approval. The program's pattern of admissions includes one full-time (50 week) evening class of 30 students to start in January, April, July and October each year; one full-time (50 week) day class of 30 students to start April, July and October each year; and one part-time (81 week) week-end day class of 15 students to start in April, and July each year. And
 - b. The director documents that adequate resources, i.e. faculty and facilities, are available to support each admitted class of students.
- **On June 16, 2011, the Board approved a new program director.**
- On January 13, 2012, a notice of violation was sent to the program for non-compliance with the California Rules and Regulations, Section 2530 (k). The director was required to submit a plan to prevent future occurrences by January 27, 2012.

- On January 30, 2012, the Board received the program's plan to prevent further class admissions without prior Board approval.
- On March 6, 2012, the Executive Officer approved full accreditation of the Homestead Schools, Inc., Vocational Nursing Program for a four-year period, from November 7, 2011, through November 6, 2015, and issued a certificate accordingly; and, **rescinded** approval of the program's ongoing admission of all classes; **and**, required the program to obtain Board approval prior to the admission of each class.
- On April 16, 2012, the Executive Officer approved the Homestead School's request to admit 30 students into a Full-time day class commencing on April 23, 2012, only, graduating on April 23, 2013, to **replace** students who graduated on November 25, 2011; **and**, approved the program's request to admit 15 students into a part-time, weekend class commencing on April 28, 2012, only, graduating December 21, 2013, to **replace** students who graduated March 25, 2012; **and**, required the program to continue to obtain Board approval prior to the admission of each class.
- **On June 19, 2012, the Board approved a new program director.**
- On August 15, 2012, the Executive Officer denied the Homestead Schools Vocational Nursing Program's request to admit 30 students into a full-time day class commencing on August 20, 2012, only, graduating on September 6, 2013, to **replace** students who graduated on March 2, 2012; **and**, approved the program's admission of 20 students into a full-time day class commencing on August 20, 2012, only, graduating on September 6, 2013, to **replace** students who graduated on March 2, 2012; **and**, denied the program's request to admit a class of 30 students into a full-time evening class, commencing on August 20, 2012; graduating on September 6, 2013, to **replace** students who graduated on March 2, 2012; **and**, approved the program's admission of a class of 20 students into a full-time evening class, commencing on August 20, 2012, only; graduating on September 6, 2013, to **replace** students who graduated on March 2, 2012; **and**, denied the program's request to admit 30 students into a part-time, weekend class commencing on August 20, 2012, graduating April 13, 2014; and, required the program to perform an analysis and submit a written report which identifies deficiencies and strategies to correct identified deficiencies relevant to the following elements of the program by September 14, 2012:
 - a. Admission Criteria
 - b. Screening and Selection Criteria
 - c. Grading Criteria
 - d. Probation Policy and related Actions
 - e. Remediation Plan
 - f. Evaluation of Student Achievement
 - g. Evaluation of Faculty Performance
 - h. Evaluation of Facility Adequacy; **and**,

Required the program to continue to obtain Board approval prior to the admission of each class.

- On February 28, 2013, the Executive Officer approved Homestead Schools Vocational Nursing Program's request to admit a class of 30 students into a full-time evening class, commencing on March 4, 2013; graduating on February 28, 2014, to **replace** students who graduated on January 25, 2013; **and**, approved the program to admit 30 students into a full-time, day class commencing on March 4, 2012; graduating February 28, 2014, to **replace** students who graduated December 7, 2012; **and**, approved the program to admit 30 students into a part-time, week-end class, commencing on March 25, 2013; graduating October 24, 2014, to **replace** students that will March 18, 2013.
- On April 27, 2013, the Executive Officer Approve the Homestead Schools Vocational Nursing Program's request to admit a class of 30 students into a full-time day class, commencing on September 16, 2013, only, graduating on September 15, 2014, to **replace** students who graduated on September 5, 2013; **and**, approved the program to admit 30 students into a full-time, evening class, commencing on September 16, 2013, only, graduating September 15, 2014, to **replace** students that graduated September 5, 2013; **and**, approved the program to begin an additional part-time class with 30 students on September 21, 2013, graduating June 28, 2015; **and**, required the program to continue obtaining Board approval prior to the admission of each class.
- On June 20, 2013, the Executive Officer approved the Homestead Schools Vocational Nursing Program's request to admit 30 students into a full-time, day class commencing on June 24, 2013, only; graduating June 16, 2014, to **replace** students who graduated April 26, 2013; **and**, approved the program's request to admit 30 students into a part-time, week-end class, commencing on June 29, 2013, only; graduating February 8, 2015, to **replace** students that graduated June 10, 2013; **and**, required the program to continue obtaining Board approval prior to the admission of each class.
- On April 10, 2014, the Executive Officer approved the Homestead Schools Vocational Nursing Program's request to admit a class of 30 students into a full-time day class, commencing on April 8, 2014, only, graduating April 1, 2015, to **replace** students who graduated January 10, 2014; **and** approved the program's request to admit an additional part-time class with 30 students on April 12, 2014, graduating December 6, 2015, to **replace** students that graduated December 01, 2013; **and** approved the program's request to admit 30 students into a full-time, evening class, commencing on April 21, 2014, only, graduating April 14, 2015, to **replace** students that graduated April 10, 2013; **and** required the program to continue obtaining Board approval prior to the admission of each class.
- On July 10, 2014, the Board received a request to admit students. Analysis by the assigned consultant indicated a lack of adequate clinical facilities.
- On October 24, 2014, the Board received a request to admit students. This request included a minor curriculum revision such that eight (8) hours of simulation may now be used for maternity nursing.
- On December 15, 2014, the Executive Officer approved the program's admission of a **full – time day** class of **thirty (30)** students to start on January 5, 2015 and graduating on December 21, 2015 to **replace** the class that graduated April 25, 2014 **and denied**

approval of the program's request to admit a class of **twenty (20)** students to the part – time weekend class to start on January 10, 2015 and graduating on September 10, 2016, **and** approved the program's admission of a full – time evening class of **thirty (30)** students to start on January 5, 2015 and graduating December 21, 2015 to **replace** the class that graduated September 30, 2014, **and** required the director to submit a report, due **by January 30, 2015**, identifying reasons for the disparity between the number of program graduates and the number of candidates taking the examination. The report must also identify a plan of correction. **In addition**, the EO approved the following: Require the program to admit classes on the date approved, **only, and** continue the program's requirement to obtain Board approval prior to the admission of each class.

- On January 23, 2015, the Board received the required report.
- On February 16, 2015, the Board received a request to admit students.
- On February 25, 2015, the Board received a new request to admit students that the program stated superseded the February 16, 2015 request to admit students.
- On April 14, 2015, the Executive Officer approved the following recommendations: Deny approval of the program's admission of a full – time day class of thirty (30) students to start on April 20, 2015 and graduating on April 15, 2016. This class would replace the class that graduated February 27, 2015, **and** approve the program's admission of a **full – time day class of twenty (20)** students to start on April 20, 2015 and graduating on April 15, 2016 to **replace** the class that graduated February 27, 2015, **and** deny approval the program's request to admit a class of twenty (20) students to the part – time weekend class to start on April 18, 2015 and graduating on February 19, 2017 to **replace** the class that graduated February 7, 2015, **and** approve the program's request to admit a class of **ten (10)** students to the **part – time** weekend class to start on April 18, 2015 and graduating on February 19, 2017 to **replace** the class that graduated February 7, 2015, **and** deny approval of the program's admission of a full – time evening class of thirty (30) students to start on April 20, 2015 and graduating April 15, 2016 to **replace** the class that graduated February 27, 2015, **and** approve the program's admission of a **full – time evening class of twenty (20)** students to start on April 20, 2015 and graduating April 15, 2016 to **replace** the class that graduated February 27, 2015, **and** continue to require the program to admit classes on the date approved, **only, and** continue the program's requirement to obtain Board approval prior to the admission of each class.
- On April 15, 2015, the program submitted the following request:
 1. "For the full-time evening class, instead of 20 students, we'll admit 10 students. Allow us to start the class on May 18, 2015, instead of April 20, 2015.
 2. For the part-time weekend class, instead of 10 students, allow us to admit 20 students on April 18, 2015."
- On April 27, 2015, the Executive Officer rendered the following decisions: approve the program's request to delay the full – time evening class from April 20, 2015 to May 18, 2015, **only, and** contingent upon decreasing the full – time evening class beginning May

18, 2015 to no more than ten (10) students, approve the program's request to admit 20 (twenty) students to the part – time weekend class beginning April 18, 2015 and graduating February 19, 2017, only, **and** continue to require the program to admit classes on the date approved, **only, and** continue the program's requirement to obtain Board approval prior to the admission of each class.

- On July 20, 2015, the Board received the last of the documentation requested in support of the June 22, 2015 request to admit students.
- On July 30, 2015, the Acting Executive Officer approved the following:
Deny the Homestead Schools Vocational Nursing Program's request to admit a class of 30 students to a full-time day class beginning on August 10, 2015, graduating August 12, 2016, to **replace** the class that graduated May 29, 2015, **and** deny the program's request to admit a class of 30 students to a full-time evening class beginning on August 10, 2015, graduating August 12, 2016, to **replace** the class that graduated June 12, 2015, **and** deny the program's request to admit a part-time class beginning August 15, 2015, graduating April 2, 2017, **and** require the program to submit placement plans for all currently enrolled students that are consistent with the Vocational Nursing Rules and Regulations and the Board-approved Instructional Plan no later than **October 1, 2015, and** continue to require the program to admit classes on the date approved, only, **and** continue the program's requirement to obtain Board approval prior to the admission of each class.
- On August 13, 2015, the Board approved a new program director.
- On December 18, 2015, the Acting Executive Officer approved the following:
 1. Deny the Homestead Schools Vocational Nursing Program's request for ongoing approval.
 2. Place the Homestead Schools Vocational Nursing Program on the Board's February 2016 agenda for consideration of provisional approval.
 3. Deny the Homestead Schools Vocational Nursing Program's request for approval to admit one (1) full-time Day class of 30 students to begin January 19, 2016 and to graduate January 20, 2017
 4. Deny the Homestead Schools Vocational Nursing Program's request for approval to admit one (1) part-time Weekend class of 24 students to begin January 23, 2016 and to graduate November 25, 2017
 5. Deny the Homestead Schools Vocational Nursing Program's request for approval to admit one (1) full-time Evening class of 30 students to begin February 23, 2016 and to graduate February 24, 2017.
 6. Require the program to submit for Board approval curriculum objectives appropriate to the Board-approved Instructional Plan no later than February 15, 2016.

7. Require the program to submit documentation that demonstrates a qualified instructor will be responsible for clinical instruction, rather than a teacher assistant. Due no later than January 29, 2016.
 8. Require the program to submit for Board approval a revised policy for the evaluation of student performance to determine the need for remediation or removal from the program no later than February 15, 2016.
 9. Require the program to submit for Board approval a revised attendance policy that identifies criteria for attendance, the specific course objectives for which make-up time is required, and acceptable methods for make-up that are specific for theory and clinical time missed no later than February 15, 2016.
 10. Continue the program's requirement to obtain Board approval prior to the admission of each class.
 11. Continue to require the program to admit classes on the date approved, **only**.
- On January 6 and 7, 2016, two Board representatives conducted an unannounced program inspection.



Agenda Item #17.B.1., Attachment B.

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



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

CERTIFIED MAIL

July 30, 2015

Mila Rose Reyes, Director
Vocational Nursing Program
Homestead Schools
23800 Hawthorne Blvd #200
Torrance, CA 90505

Subject: Notice of Violations

Dear Ms. Reyes,

As presented in the documentation in support of the current request to admit students, the placement plans for proposed students and the placements described for upcoming rotations for current students violate the Vocational Nursing Rules and Regulations.

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 #1: As presented in the documentation in support of the current request for approval to admit students, there are inadequate faculty and facilities as noted by:

- 1) Scheduling some instructors to clinically instruct more than one level of students at the same time and more than 15 students at a time;
- 2) Limitations on number of students allowed in some facilities, along with limited number of facilities and faculty, result in scheduling maternity and pediatric clinical in a manner not consistent with the regulations (see below)

Status of Violation #1: This violation is **not** corrected.

Required Correction: Submit placement plans for all currently enrolled students that are consistent with the Vocational Nursing Rules and Regulations and the Board-approved Instructional Plan no later than **October 1, 2015**.

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

“Vocational nursing programs shall include theory and correlated clinical experience.”

Violation #2: As presented in the documentation in support of the current request for approval to admit students, students are scheduled for specialty rotations in the middle of Medical-Surgical Nursing theory and clinical experience. While the program states that students are divided into multiple groups to accommodate limitations related to specialty facilities, individual students experience specialty clinical rotations when they are also engaged in other rotations.

Status of Violation #2: This violation is **not** corrected.

Required Correction: Submit placement plans for all currently enrolled students that are consistent with the Vocational Nursing Rules and Regulations and the Board-approved Instructional Plan no later than **October 1, 2015**.

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

“Curriculum content shall be taught in a sequence that results in students’ progressive mastery of knowledge, skills and abilities.”

Violation #3: For some students in full-time day and evening classes, including current and proposed students, Pediatric and Maternity skills labs are scheduled **after** the clinical rotations in those areas. Other students are scheduled for Pediatric and Maternity skills lab experiences prior to clinical rotations in those areas.

In addition, the scheduling of Maternity and Pediatric content and clinical while also engaged in Medical-Surgical Nursing and Leadership content and clinical interferes with progressive mastery of knowledge, skills, and abilities.

Status of Violation #3: This violation is **not** corrected.

Required Correction: Submit placement plans for all currently enrolled students that are consistent with the Vocational Nursing Rules and Regulations and the Board-approved Instructional Plan no later than **October 1, 2015**.

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

“All curricular changes that significantly alter the program philosophy, conceptual framework content, objectives, or other written documentation as required in Section 2526, shall be approved by the Board prior to implementation.”

Violation #4: The manner of scheduling the last term of the Vocational Nursing program is not consistent with the Board-approved Instructional Plan, including scheduling Maternity and Pediatric skills lab **prior** to related clinical experiences and interspersing Maternity and Pediatric rotations with Medical-Surgical Nursing and Leadership rotations.

Status of Violation #4: This violation is **not** corrected.

Required Correction: Submit placement plans for all currently enrolled students that are consistent with the Vocational Nursing Rules and Regulations and the Board-approved Instructional Plan no later than **October 1, 2015**.

Be advised that the continuation of such violations 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 #17.B.1., 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

September 2, 2015

Adelwisa Blanco, Director
Vocational Nursing Program
Homestead Schools
23800 Hawthorne Blvd #200
Torrance, CA 90505

Dear Ms. Blanco,

The Board of Vocational Nursing and Psychiatric Technicians (Board) is in receipt of a total of six (6) clinical facility applications which are being returned to you for serious inaccuracies that may be considered a misrepresentation of facts. As discussed with you in a phone consultation today, such inaccuracy and/or misrepresentation in documents signed by program directors of Board-approved Vocational Nursing Programs is not consistent with the Board's mandate to protect consumers.

In an effort to verify clinical opportunities reported to be available to Vocational Nursing students at Homestead Schools, Board staff contacted the facilities. In the instance of five (5) of the clinical facility applications listed below, phone contact with the facilities was accomplished on September 2, 2015.

An application for Lawndale Health Care Clinic was submitted for clinical experience in maternity nursing. The application states 30 maternity patients are seen daily and that a total of eight (8) vocational nursing students could be accommodated from 7 AM to 3:30 PM during weekdays and from 7 AM to 7 PM on Saturdays. According to the facility, this is a Family Practice office and maternity care is not provided. This application was signed by you, the program director on August 25, 2015.

An application for Lawndale Health Care Clinic was submitted for clinical experience in pediatric nursing. The application states 30 pediatric patients are seen daily and that a total of eight (8) vocational nursing students could be accommodated from 7 AM to 3:30 PM during weekdays and from 7 AM to 7 PM on Saturdays. According to the facility, this is a Family Practice office and, while some pediatric care is provided, children are not seen in the clinic every day. This application was signed by you, the program director on August 25, 2015.

An application for Tri-City Medical Group was submitted for clinical experience for both maternity and pediatric nursing. The application states that 30 maternity patients and 20 pediatric patients are seen per day and that the facility would accommodate a total of eight (8) students at a time. Board staff were informed that the designated contact for the

facility does not work there. The individual in the office assigned to coordinating student experience stated that the facility is a single provider, general practice office. The average maternity census per day is a total of two (2) patients and up to 10 pediatric patients may be seen on an average day. According to the facility the maximum number of students that can be accommodated is three (3) at a time. The application states students could be accommodated between the hours of 7 AM through 3:30 PM. According to the facility, they are open from 9 AM to 12 noon and from 2 PM to 6 PM. This application was signed by you, the program director on August 24, 2015.

An application for Total Care Medical Clinic in Wilmington was submitted for clinical experience in maternity, pediatric, and adult medical-surgical nursing. This application was signed by the previous director on October 15, 2014 and submitted on August 6, 2015. As reported to you previously, multiple messages had been left for the designated contact, without response. The designated contact was reached today and referred this consultant to another individual associated with the site. The application states that seven (7) maternity and five (5) pediatric patients are seen per day and that five (5) adult medical patients are seen per day. The application states that five (5) students can be accommodated at a time. According to the facility, maternity care is not provided at this site. While this consultant received a variety of answers to the question of how many providers are available to see children per day, the facility did make it clear that the maximum number of students at any one time was up to two (2). It was not clear that pediatric patients are seen every day at this site.

An application for Total Care Medical Clinic in Los Angeles was submitted for clinical experience in maternity, pediatric, and adult medical-surgical nursing. This application was signed by the previous director on October 15, 2014 and submitted on August 6, 2015. As reported to you previously, multiple messages had been left for the designated contact, without response. The designated contact was reached today and referred this consultant to another individual associated with the site. The application states that eight (8) maternity and five (5) pediatric patients are seen per day and that seven (7) adult medical patients are seen per day. The application states that five (5) students can be accommodated at a time. According to the facility, approximately eight (8) to 10 maternity patients are seen when maternity providers are available. According to the site, one (1) provider sees maternity patients up to 35 or 36 weeks gestation, at which point the patients are scheduled with another provider who attends once per week. According to the facility, a pediatric provider is available three (3) days per week. According to the facility, no more than one (1) student can be accommodated per day for pediatric experience and only one (1) or two (2) students can be accommodated for maternity at a time.

An application for All Women Care, Santa Isabel Clinic was submitted for clinical experience for maternity nursing. The application states that 40 – 50 maternity patients are seen per day and that the facility would accommodate a total of eight (8) students at a time. The available hours listed as accommodating students are greater than the hours reported as open hours on the answering service message. In addition, as submitted, you have indicated students would complete a total of 80 hours at the site, which would appear

to be an error. The site could not be reached to verify the application. The application was signed by you, the program director, on August 24, 2015.

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

“A material misrepresentation of fact by a vocational nursing program in any information submitted to the Board is cause for denial or revocation of approval or provisional approval.”

Be informed that submitting false clinical facility applications may jeopardize the approval of the Homestead Schools Vocational Nursing Program. You may wish to note that all clinical facility applications will be verified. To facilitate this process, you may wish to withdraw and carefully review any pending applications. In addition, you may wish to provide accurate contact information, including medical providers in proposed clinical facilities. In the event that clinics and medical offices are proposed, it is recommended to have the licensed medical director or provider sign and date a letter clearly describing specifics of patient census, operating hours, number of students that can be accommodated, and review of proposed clinical objectives. Further, it will be necessary to allow additional time for processing all clinical facility applications so that the verification process can be completed.

Should you have questions or require clarification, please contact me.

Sincerely,

Donna G. Johnson

Donna G. Johnson, RNP, MS, MA

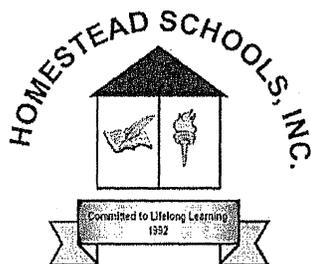
Nursing Education Consultant

donna.johnson@dca.ca.gov

916-263-7842

Cc: C. Anderson, SNEC

Agenda Item #17.B.1., Attachment D



HOMESTEAD SCHOOLS, INC.
23800 HAWTHORNE BLVD., SUITE 200
TORRANCE, CA 90505
Tel. (310) 791-9975 / Fax (310) 791-0135

September 14, 2015

Donna G. Johnson, RNP, MS, MA
Nursing Education Consultant
Board of Vocational Nursing
2535 Capital Oaks Drive, Suite 205
Sacramento, Ca. 95833-2945

Dear Donna:

I've reviewed your letter of September 2, 2015 and compared the information given to us by the contact person who generally is the medical provider, administrator or director. Many of these contacts were made before I came on board as director of nursing.

Based on this review, I would like to withdraw the following applications due to the miscommunication with the provider, the contact person and the person who signed the forms.

1. Lawndale Health Care Clinic for experience in Maternity nursing signed by me on August 25, 2015.
2. Lawndale Health Care Clinic for experience in pediatrics signed by me on August 25, 2015.
3. Tri-City medical Group for clinical experience for both maternity and pediatric nursing signed by me on August 25, 2015.
4. Total Care Medical Clinic in Wilmington submitted on August 6, 2015 by the previous director.

Attached please find the following Clinical Facility approval application forms for your review and approval.

1. All Women Care: Clinical Santa Isabel and all supporting documents.
2. Sharon Care Center and all the supporting documents.

I also have pending approvals sent 9/8/2015 for:

1. Lomita Post Acute Care Center and
2. Torrance Care Center West.

All of these forms were confirmed and signed by the administrator, Director and Director of Nursing.

As always, thank you for your continued support.

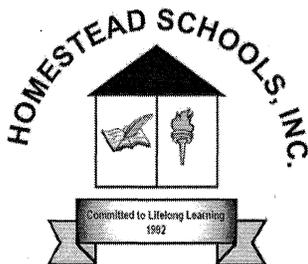
Sincerely,

A handwritten signature in cursive script that reads "Adel Blanco".

Adel Blanco, M.S., R.N.-BC
Director of Nursing
Homestead Schools, Inc.

P.S. Our Program Review Survey report is being sent to you for overnight delivery. I appreciate your consideration.

Agenda Item #17.B.1., Attachment E.



HOMESTEAD SCHOOLS, INC.
23800 HAWTHORNE BLVD., SUITE 200
TORRANCE, CA 90505
Tel. (310) 791-9975 / Fax (310) 791-0135

September 25, 2015

Donna G. Johnson, RNP, MS, MA
Nursing Education Consultant
Board of Vocational Nursing
2535 Capital Oaks Drive, Suite 205
Sacramento, Ca. 95833-2945

Dear Ms. Johnson:

This is our response to your letter on July 30, 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."

A. Violation #1: Refers to Section 2530(a) above and specifically pointed out:

- 1) Scheduling some instructors to clinically instruct more than one level of students at the same time and more than 15 students at a time;**
- 2) Limitations on number of students allowed in some facilities, along with limited number of facilities and faculty, result in scheduling maternity and pediatric clinical in a manner not consistent with the regulations.**

Violation #1 is now corrected. As directed in the July 30, 2015 "Notice of Violations" we are submitting placement plans and class calendars for all currently enrolled students as an attachment to this response letter. In the placement plan and calendar you will find:

- 1) Instructors are scheduled to instruct students according to their level per subject matter with proper correlation of clinical to its theory content.
- 2) Limited facilities and limited students allowed have created a very challenging task for us but we have managed to creatively placed and schedule all current students consistent to the Board's regulations.

The attached class calendars, I believe, will paint a better picture of the theory and clinical correlation and the placement plans will show the ratio of instructor to students is in accordance to the number of students allowed by each facility approved by the Board.

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

"Vocational nursing programs shall include theory and correlated clinical experience."

- B. Violation #2: "While the program states that students are divided into multiple groups to accommodate limitations related to specialty facilities, individual students experience specialty clinical rotations when they are also engaged in other rotations."*

Violation #2 is now corrected. The placement plans and class calendars as submitted will show students' rotations are properly correlated specifically to the theory subject matter being covered.

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

"Curriculum content shall be taught in a sequence that results in students' progressive mastery of knowledge, skills and abilities."

- C. Violation #3: "For some students in full-time day and evening classes, including current and proposed students, Pediatric and Maternity skills labs are scheduled after the clinical rotations in those areas. Other students are scheduled for Pediatric and Maternity skills lab experiences prior to clinical rotations in those areas."*

In addition, the scheduling of Maternity and Pediatric content and clinical while also engaged in Medical-Surgical Nursing and Leadership content and clinical interferes with progressive mastery of knowledge, skills, and abilities."

Violation #3 is now corrected. For each subject containing skills hours to be completed, as shown on the placement plan and class calendar, the subject is taught in the following order: Theory, Skills, and Clinicals.

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

"All curricular changes that significantly alter the program philosophy, conceptual framework content, objectives, or other written documentation as required in Section 2526, shall be approved by the Board prior to implementation."

- D. The manner of scheduling the last term of the Vocational Nursing program is not consistent with the Board-approved Instructional Plan, including scheduling Maternity and Pediatric skills lab prior to related clinical experiences and interspersing Maternity and Pediatric rotations with Medical-Surgical Nursing and Leadership rotations*

Violation #4 is now corrected. As mentioned earlier, we are faced with a very challenging task, however, it is not one that we can't solve. The grouping was never intended to significantly alter anything it was supposed to creatively provide the students the training with what's available to our disposal. I believe we now have a better placement plan submitted to the Board. I firmly believe the attached class calendars will paint a better picture of the theory and clinical correlation and where applicable the skills as well. The placement plan will show the ratio of instructor to students is in accordance to the number of students allowed by each facility approved by the Board.

Agenda Item #17.B.1., Attachment F.

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



November 23, 2015

Adelwisa Blanco, Director
Vocational Nursing Program
Homestead Schools
23800 Hawthorne Blvd #200
Torrance, CA 90505

Dear Ms. Blanco,

The Board of Vocational Nursing and Psychiatric Technicians (Board) is in receipt of the Program Record Survey, received September 15, 2015. Analysis of the documents indicates the following:

- 1) Curriculum Objectives were not submitted; handout to be provided at the scheduled meeting on November 24, 2015.
- 2) Instructional Plan was incomplete as only weeks one through seven of Term 1 was attached; it is necessary to present the program's entire Board-approved Instructional Plan for both the full-time and the part-time programs.
- 3) A revised methodology for evaluation of the curriculum was presented; this has not been approved by the Board, it is incomplete, and no documentation of evaluation of the curriculum was presented.
 - a. It will be necessary to define exactly what will be utilized to evaluate the curriculum, who will comprise the curriculum committee, and what will be the frequency of evaluation, as well as a timeline for implementation.
- 4) A revised methodology for evaluation of clinical facilities was presented; this has not been approved by the Board.
 - a. The methodology should specify frequency of evaluation, including by program administration, and there should be indication that program administration is considering student and faculty feedback.
 - b. The Clinical Visit Checklist provided in the PRS does not gather data on whether or not the facility can provide experiences that facilitate accomplishment of clinical objective and correlation with theory.
- 5) Policies for admission, screening, and selection of applicants did not provide information regarding what admission test is to be utilized, what a minimum passing score will be, the allowable number of retakes on the admission test, the frequency of retakes, or an interview rubric (other than background check data).

- 6) A revised methodology for evaluation of student progress was presented; this has not been approved by the Board.
 - a. Several deficits in the methodology were noted.
- 7) No list of resources for the provision of counseling services was provided; faculty are not qualified to counsel students in need of mental health, crisis, or other such services.
- 8) The program's submitted policy for transfer credit and credit for experience are not consistent with regulations. This is a violation of the Vocational Nursing Rules and Regulations.
- 9) The program's attendance policy must specify acceptable methods of make-up.
- 10) The program has not provided adequate evidence of sufficient resources
 - a. Specify exactly what resources are available for use by the Vocational Nursing program, including number of computers, skills lab equipment, any on-line library resources, and how multiple classes of vocational nursing students can accomplish objectives with a total of six patient care units.
- 11) Submitted faculty evaluations were not signed.
- 12) List other schools sharing clinical facilities; "information unavailable" is insufficient documentation.
- 13) On page 17 of the PRS, the program director listed "N/A" for use of Teacher Assistants; however, a TA is listed on the faculty list.
- 14) A total of three faculty members have not signed that they have access to the Instructional Plan.
- 15) The program has provided incorrect information regarding how to contact the Board.
- 16) On page 26 of the PRS, the program director did not complete the section regarding Additional Faculty; the program lists a total of three Additional Faculty on the faculty list.

The above will be discussed with you in the scheduled meeting on November 24, 2015. It will be important that the program correct these deficits prior to completion of the report regarding the recently submitted request to admit students. Further, correction of these issues is necessary prior to completion of a report regarding the program's request for ongoing approval.

I look forward to meeting with you to discuss the Homestead Schools Vocational Nursing Program.

Sincerely,

Donna G. Johnson

Donna G. Johnson, RNP, MS, MA

Nursing Education Consultant

donna.johnson@dca.ca.gov

916-263-7842

Agenda Item #17.B.1., Attachment G.

ENROLLMENT DATA				
CLASS DATES		# Students Admitted	# Students Current or Completed	Total Enrolled
Start	Complete			
1/12 FT (Day)		30	24	24
2/12 FT (Eve)		11	20	24 + 20 = 44
4/12 PT		12	15 <u>3</u>	44 + 15 = 59
5/12 FT (Day)		27	24 <u>7</u>	59 + 24 = 83
9/12 FT (Eve)		20	20 <u>14</u>	83 + 20 = 103
9/12 FT (Day)		20	19 <u>9</u>	103 + 19 = 122
	12/12 (1/12 FT Day Class)		-24	122 - 24 = 98
1/13 FT (Day)		20	18 <u>10</u>	98 + 18 = 116
	1/13 (2/12 FT Eve)		-20	116 - 20 = 96
4/13 PT		22	16 <u>10</u>	96 + 16 = 112
	4/13 (5/12 FT Day Class)		-24	112 - 24 = 88
4/13 FT (Eve)		16	10 <u>13</u> <u>10</u>	88 + 10 = 98
5/13 FT (Day)		30	15 <u>11</u> <u>15</u>	98 + 15 = 113
	9/13 (9/12 FT Eve Class)		-20	113 - 20 = 93
	9/13 (9/12 FT Day Class)		-19	93 - 19 = 74
10/13 FT (Day) (Approved for 9/16/13)		26	11 <u>10</u> <u>11</u>	74 + 11 = 85
11/13 PT (Approved for 9/21/13)		20	9	85 + 9 = 94
	12/13 (4/12 PT class)	12	-15	94 - 15 = 79
	1/14 (1/13 FT Day Class)		-18	79 - 18 = 61
2/14 FT (Day) (Approved for 6/24/13)		26	17 <u>10</u> <u>17</u>	61 + 17 = 78
2/14 FT (Eve) (Approved for 9/16/13)		15 <u>19</u>	11 <u>6</u> <u>11</u>	78 + 11 = 89
3/14 PT (Approved for 6/29/13)	11/15	9 <u>11</u>	10 <u>9</u> <u>10</u>	89 + 10 = 99
	4/14 (5/13 FT Day Class)		-15	99 - 15 = 84

Agenda Item #17.B.1., Attachment G.

ENROLLMENT DATA				
CLASS DATES		# Students Admitted	# Students Current or Completed	Total Enrolled
Start	Complete			
	4/14 (4/13 FT Eve Class)		-10	84 - 10 = 74
6/14 FT (Day) (Approved for 4/8/14)		30 <u>29</u>	24 <u>10</u>	74 + 24 = 98
6/14 PT (Approved for 4/21/14)	1/16	20 <u>12</u>	11	98 + 11 = 109
6/14 FT (Eve) (Approved for 4/21/14)		20 <u>12</u>	14 <u>7</u>	109 + 14 = 123
	9/14 (10/13 FT Day Class)		-11	123 - 11 = 112
	11/14 (4/13 PT Class)		-16	112 - 16 = 96
1/15 FT (Day)	12/15	30 <u>28</u>	27 <u>22</u>	96 + 27 = 123
1/15 FT (Eve)	12/15	30 <u>20</u>	21 <u>15</u>	123 + 21 = 144
	2/15 (2/14 FT Day Class)		-17	144 - 17 = 127
	2/15 (2/14 FT Eve Class)		-11	127 - 11 = 116
	2/15 (4/13 PT Class)		-16	116 - 16 = 100
4/15 PT	2/17	20 <u>22</u>	20 <u>18</u>	100 + 20 = 120
4/15 FT (Day)	4/16	20	20	120 + 20 = 140
5/15 FT (Eve)	4/16	10	9 <u>10</u>	140 + 9 = 149
	5/15 (6/9/14 FT Day)		-24	149 - 24 = 125
	6/15 (6/14 FT Eve Class)		-14	125 - 14 = 111
	6/15 (11/13 PT Class)		-9	111 - 9 = 102

Underline – data from PRS, 8 and 9/2015

Italics – data from request 11/15

Black – data previously submitted by program – most recent is June 2015 request to admit students.

Agenda Item #17.B.1., Attachment H.

RESPONSE TO DONNA'S LETTER DATED NOVEMBER 23, 2015

1. Curriculum Objectives were not submitted

Response:

It was included in the PRS (Section 2526.a.4). I'm submitting the original document, please see Exhibit A.

2. Instructional Plan was incomplete as only weeks on through seven of Term 1 was attached; it is necessary to present the programs; entire Board-approved Instructional Plan for both the full-time and the part-time programs.

Response: Please see Exhibit B for the entire Instructional Plan for full-time. The Instructional Plan for part-time cannot be found in the DON's Office. However, we are ready to develop one and will submit as soon as possible.

3. A revised methodology for evaluation of the curriculum was presented; this has not been approved by the Board. It is incomplete, and no documentation of evaluation of the curriculum was presented.
 - a. It will be necessary to define exactly what will be utilized to evaluate the curriculum, who will comprise the curriculum committee, and what will be the frequency of evaluation, as well as a timeline for implementation.

Response: I'm submitting the methodology for evaluation of the curriculum for your approval.

Please see Exhibit C for the Curriculum Assessment Questionnaire; Exhibit D for the completed questionnaire from students and faculty;

The evaluation tool was patterned after the Guidelines for Assessing the Key Components of a Curriculum by Sarah Keating "Curriculum Development and Evaluation in Nursing". That includes the following components; mission, philosophy, organizing framework, overall purpose and goal of the program, student learning outcomes, and implementation plan.

Please see Exhibit E for the copy of Guidelines for Assessing the Key Components of a Curriculum and Exhibit F for the Curriculum Committee that included the frequency of evaluation as well as the timeline for implementation.

4. A revised methodology for evaluation of clinical facilities was presented; this has not been approved by the Board.
 - a. The methodology should specify frequency of evaluation; including by program administration, and there should be indication that program administration, and there should be indication that program administration is considering student and faculty feedback
 - b. The Clinical Visit Checklist provided in the PRS does not gather data on whether or not the facility can provide experiences that facilitate accomplishment of clinical objective and correlation with theory.

Response: I'm submitting the revised methodology for evaluation of clinical facilities for your approval.

Please see Exhibits G and H for the revised forms addressing deficiencies mentioned above.

5. Policies for admissions, screening, and selection of applicants did not provide information regarding what admission test is to be utilized, what a minimum passing score will be, the allowable number of retakes on the admission test, the frequency of retakes, or an interview rubric (other than background check data).

Response: Please see Exhibit I for the revised Admissions Policy and Exhibit J for the interview rubric.

6. A revised methodology for evaluation of student progress was presented; this has not been approved by the Board.
 - a. Several deficits in the methodology were noted

Response: The methodology that was revised was developed based on your recommendations to the former DON, Ms. Mila Rose and was submitted last November 2014 for your approval.

I'm submitting the revised policy for your approval.

Please see Exhibit K for the revised Evaluation Methodology for Student Progress Policy.

7. No list of resources for the provision of counseling services was provided; faculty are not qualified to counsel students in need of mental health, crisis, or other such services.

Response. Please see Exhibit L for Counseling Service Resources.

8. The program's submitted policy for transfer credit and credit for experience are not consistent with regulations. This is a violation of the Vocational Nursing Rules and Regulations.

Response: Please see Exhibit M for the revised Credit Granting Policy

9. The program's attendance policy must specify acceptable methods of make-up.

Response: Please see Exhibit N for the revised Attendance Policy.

10. The program has not provided adequate evidence of sufficient resources.
 - a. Specify exactly what resources are available for use by the Vocational Nursing program, including number of computers, skills lab equipment, any on-line library resources, and how multiple classes of vocational nursing students can accomplish objectives with a total of six patient care units.

Response: Please see Exhibit O for the Physical Facilities & Resources.

11. Submitted Faculty Evaluations were not signed.

Response: Please see Exhibit P for the signed faculty evaluations.

12. List other schools sharing clinical facilities; "information unavailable" is insufficient documentation.

Response: Please see Exhibit Q for the List of Schools Sharing Facilities.

13. On page 17 of the PRS, the program director listed "N/A" for use of Teacher Assistants; however, a TA is listed on the faculty list.

Response: Please see Exhibit R for the corrected page.

14. A total of three faculty members have not signed that they have access to the Instructional Plan.

Response: Please see Exhibit S for the Signed Acknowledgment of Receipt of Instructional

Plan.

15. The program has provided incorrect information regarding how to contact the the Board.

Response: Please see Exhibit T for the corrected information.

16. On page 26 of the PRS, the program director did not complete the section regarding Additional Faculty; the program lists a total of three Additional Faculty on the faculty list.

Response: Please see Exhibit U for the corrected page.

Adelvisa V. Blanco MS, RN-BC
DON
Homestead Schools, Inc.

Agenda Item #17.B.1., Attachment I.

SUMMARY OF CONCERNS WITH PROPOSED PLACEMENTS HOMESTEAD SCHOOL VOCATIONAL NURSING PROGRAM 12.1.15

For the proposed full-time day students:

1. In terms 1 and 3, a clinical facility that will accept no greater than 10 students per one (1) instructor was listed as taking 15 students with only one (1) instructor.
2. In term 2, a clinical facility that will accommodate students on evenings and weekends was listed as taking 15 students on the day shift.
3. In term 3, two (2) instructors are listed as instructing students during the day shift. Both instructors are listed as teaching another group of students in the evening on many of the same days. While one of the instructors is scheduled at the same facility for both shifts, the other is scheduled at another facility with shifts that overlap.
4. In term 4, **only 36, rather than the required 72, hours of clinical instruction are offered in both maternity and pediatric nursing.** Further, maternity and pediatric nursing clinical experiences are consolidated into one week each, as opposed to the three weeks described in the Board-approved Instructional Plan.
5. In term 4, all 30 students are scheduled for either pediatric or maternity simulation at the same time and with two instructors; the program lists only one skills lab with three (3) beds. It is unclear how the number of students can be accommodated with only two (2) instructors and to accomplish both maternity and pediatric objectives.

For the proposed part-time weekend students:

1. In term 1, a group of currently enrolled students is scheduled to be at the same facility on some of the same days; the facility accepts one (1) group of 15 students at the single unit facility.
2. In term 2, a group of students is scheduled for a facility that is currently only approved for use in term 1.
3. In term 3, a group of students is scheduled for a facility that is currently only approved for use in term 1.
4. In term 4, maternity and pediatric clinical experiences are not offered in accordance with the Board-approved Instructional Plan.

For the proposed full-time evening students:

1. In term 1, **a teacher assistant is listed as assigned faculty** for a group of students (see Violation #6, below).
2. In term 1 a group of 15 students with one instructor is assigned to a facility that only accepts 10 students per instructor.
3. In term 3, two (2) instructors are assigned to different groups on the same days (see proposed full-time students, above).
4. In term 4, students are listed as having maternity and pediatric clinical experiences in the evening in facilities that do not provide evening services. In addition, as

Agenda Item #17.B.1., Attachment I.

described above for the proposed full-time students, the curriculum is not offered in accordance with the Board-approved Instructional Plan.



Agenda Item #17.B.1., Attachment J.

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

January 5, 2016

Adelwisa Blanco, Director
Vocational Nursing Program
Homestead Schools
23800 Hawthorne Blvd #200
Torrance, CA 90505

Subject: Notice of Violations

Dear Ms. Blanco,

In the course of reviewing documents submitted for the Program Record Survey and the most recent request to admit students, violations of the Vocational Nursing Rules and Regulations were identified. Following is a listing of violations identified as of December 18, 2015 and the required corrective actions.

Based on documentation submitted by the program, the current status of the violations identified in July 2015, is described, below.

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 #1:

As presented in the documentation in support of the current request for approval to admit students, there are inadequate faculty and facilities as noted by:

- 1) Scheduling some instructors to clinically instruct more than one level of students at the same time and more than 15 students at a time;
- 2) Limitations on number of students allowed in some facilities, along with limited number of facilities and faculty, result in scheduling maternity and pediatric clinical in a manner not consistent with the regulations (see below)

Status of Violation #1: This violation is **not** corrected. Documentation submitted in support of the current request to admit students indicates full-time students would receive a total of 36 hours of clinical experience in maternity nursing and 36 hours of clinical experience in pediatric nursing, both delivered over the course of one (1) week. The Board-approved Instructional Plan calls for a total of 72 hours in both areas, with each area occurring over a period of three (3) weeks and theory content delivered each week. While the submitted documentation lists a total of one (1) week for each content area, the Board-approved Instructional plan lists four (4) weeks for each area.

Required Correction: Provide documentation of the Board-approved Instructional Plans for both full- and part-time programs and documentation of placements for currently enrolled students that are consistent with the Board-approved Instructional Plans. **Due no later than March 1, 2016.**

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

“Vocational nursing programs shall include theory and correlated clinical experience.”

Violation #2: As presented in the documentation in support of the current request for approval to admit students, students are scheduled for specialty rotations in the middle of Medical-Surgical Nursing theory and clinical experience. While the program states that students are divided into multiple groups to accommodate limitations related to specialty facilities, individual students experience specialty clinical rotations when they are also engaged in other rotations.

Status of Violation #2: This violation is **corrected**.

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

“Curriculum content shall be taught in a sequence that results in students’ progressive mastery of knowledge, skills and abilities.”

Violation #3: For some students in full-time day and evening classes, including current and proposed students, Pediatric and Maternity skills labs are scheduled **after** the clinical rotations in those areas. Other students are scheduled for Pediatric and

Maternity skills lab experiences prior to clinical rotations in those areas.

In addition, the scheduling of Maternity and Pediatric content and clinical while also engaged in Medical-Surgical Nursing and Leadership content and clinical interferes with progressive mastery of knowledge, skills, and abilities.

Status of Violation #3: This violation is **corrected**.

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

“All curricular changes that significantly alter the program philosophy, conceptual framework content, objectives, or other written documentation as required in Section 2526, shall be approved by the Board prior to implementation.”

Violation #4: The manner of scheduling the last term of the Vocational Nursing program is not consistent with the Board-approved Instructional Plan, including scheduling Maternity and Pediatric skills lab **prior** to related clinical experiences and interspersing Maternity and Pediatric rotations with Medical-Surgical Nursing and Leadership rotations.

Status of Violation #4: This violation is **not** corrected. Documentation submitted in support of the current request to admit students indicates full-time students would receive a total of 36 hours of clinical experience in maternity nursing and 36 hours of clinical experience in pediatric nursing, both delivered over the course of one (1) week for full-time students and two (2) weeks for part-time students. The Board-approved Instructional Plan calls for a total of 72 hours in both areas, with each area occurring over a period of three (3) weeks in the full-time program and theory content delivered each week. Further, a valid, Board-approved Instructional Plan for the part-time program has not been produced by the program.

Required Correction: Provide documentation of the Board-approved Instructional Plans for both full- and part-time programs. **Due no later than March 1, 2016.**

Based on the most recent documentation submitted by the program, the following violations of the Vocational Nursing Rules and Regulations are identified (to avoid confusion, numbering of the violations begins with #5)

Section 2526(a)(4) 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 ...
(4) Curriculum objectives.”

Violation #5: Based upon documents submitted by the program in conjunction with the PRS and the program’s response to deficits in the PRS, the program has not identified curriculum objectives. The program has submitted only terminal objectives.

Curriculum objectives identify competencies expected of the students at the end of each term of the program. Curriculum objectives in subsequent terms are intended to reflect expected student progress and mastery. As such, curriculum objectives are important indicators of student progress through a program of study. Terminal objectives describe expected student outcomes upon successful completion of the program.

On August 17, 2015, the program director completed an orientation that included discussion of curriculum objectives and the assigned consultant provided written information regarding curriculum objectives, examples of curriculum and terminal objectives, and discussion of their use during the November 24, 2015 consultation. On December 1, 2015, the program director again submitted terminal objectives and no curriculum objectives.

Status of Violation #5: This violation is **not** corrected.

Required Correction: Submit for Board approval curriculum objectives appropriate to the Board-approved Instructional Plan **no later than February 15, 2016.**

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

“Each teacher assistant shall work under the direction of an approved instructor. No more than one teacher assistant may be assigned to each instructor. Each teacher assistant shall assist the instructor in skill lab and clinical teaching only. The instructor to whom the teacher assistant is

assigned shall be available to provide direction to the teacher assistant as needed.”

Violation #6: Board records confirm a specific individual was approved as a teacher assistant on May 29, 2013. Further, the program director submitted an updated faculty list on November 13, 2015 which lists the individual as a teacher assistant and the program director completed the PRS on December 1, 2015 listing the individual as a teacher assistant.

Documents submitted in support of the current request to admit students indicate the individual is listed as assigned faculty for a group of currently enrolled students at a clinical facility in February 2016 and the individual is also listed as the assigned faculty for a group of proposed students in April and May of 2016. No other faculty is listed as assigned for those students, leaving the teacher assistant with responsibilities outside the scope of the regulations.

Status of Violation #6: This violation is **not** corrected.

Required Correction: Submit documentation that demonstrates a qualified instructor will be responsible for clinical instruction. **Due no later than January 29, 2016.**

This letter will be sent via certified mail on January 8, 2016 and, in addition, this letter is being hand delivered at the conclusion of an unannounced program inspection on January 6 and 7, 2016. At that time an opportunity for questions and clarification will be available. In the event that any other violations are identified during the course of the program inspection, a subsequent *Notice of Violations* will be sent to you.

Sincerely,

Donna G. Johnson

Donna G. Johnson, RNP, MS, MA
Nursing Education Consultant
donna.johnson@dca.ca.gov
916-263-7842

Agenda Item #17.B.1., Attachment K.



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

January 12, 2016

Adelwisa Blanco, Director
Vocational Nursing Program
Homestead Schools
23800 Hawthorne Blvd #200
Torrance, CA 90505

Subject: Notice of Violations

Dear Ms. Blanco,

With uncorrected violations in place, the Board of Vocational Nursing and Psychiatric Technicians (Board) conducted an unannounced program inspection on January 6 and 7, 2016. Additional violations were identified. Below please find the current status of previously identified violations as well as the most recently identified violations. Numbering of the specific violations is continuous with the violations identified, and as yet uncorrected, since July 2015. Required corrective actions are listed with each violation.

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 #1:

As presented in the documentation in support of the June 2015 request for approval to admit students, there are inadequate faculty and facilities as noted by:

- 1) Scheduling some instructors to clinically instruct more than one level of students at the same time and more than 15 students at a time;
- 2) Limitations on number of students allowed in some facilities, along with limited number of facilities and faculty, result in scheduling maternity and pediatric clinical in a manner not consistent with the regulations (see below)

Status of Violation #1:

This violation is **not** corrected. Documentation submitted in support of the November 2015 request to admit students

indicates full-time students would receive a total of 36 hours of clinical experience in maternity nursing and 36 hours of clinical experience in pediatric nursing, both delivered over the course of one (1) week. The Board-approved Instructional Plan calls for a total of 72 hours in both areas, with each area occurring over a period of three (3) weeks and a total of eight (8) to 12 hours of theory content also delivered each week. While the submitted documentation lists a total of one (1) week for each content area, the Board-approved Instructional plan lists four (4) weeks for each area. Documentation submitted in the November 2015 request also indicated two (2) instructors scheduled at the same time in different locations and a Teacher Assistant was listed as solely responsible for a group of students in the clinical setting.

Required Correction: Provide documentation of the Board-approved Instructional Plans for both full- and part-time programs, documentation of implementation of the approved plans, and documentation of clinical placements consistent with the Board-approved Instructional Plans and with adequate faculty, for currently enrolled students. **Due no later than March 1, 2016.**

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

“Vocational nursing programs shall include theory and correlated clinical experience.”

Violation #2: As presented in the documentation in support of the June 2015 request for approval to admit students, students are scheduled for specialty rotations in the middle of Medical-Surgical Nursing theory and clinical experience. While the program states that students are divided into multiple groups to accommodate limitations related to specialty facilities, individual students experience specialty clinical rotations when they are also engaged in other rotations.

Status of Violation #2: *Based on documents submitted in November 2015 that described a proposed sequence of clinical rotations, this violation was reported as corrected **prior** to the program inspection.*

During the program inspection, loss of the critical correlation of theory and clinical experience was noted during examination of documents titled “Clinical Make-up Attendance

Contract.” As found in the student files, the make-up attendance contracts document delays of up to several months in making up missed clinical hours. Examination of those documents also noted “banking” of clinical hours prior to planned absences. No mention of missed clinical objectives were noted on the make-up contracts. The above findings indicate that theory and clinical are not correlated for the students with excessive absences.

This violation is **not** corrected.

Required Correction: Submit for Board approval a proposed policy regarding timely make-up of missed clinical hours such that theory and clinical are correlated. **Due no later than March 1, 2016.**

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

“Curriculum content shall be taught in a sequence that results in students’ progressive mastery of knowledge, skills and abilities.”

Violation #3: For some students in full-time day and evening classes, including current and proposed students, Pediatric and Maternity skills labs are scheduled **after** the clinical rotations in those areas. Other students are scheduled for Pediatric and Maternity skills lab experiences prior to clinical rotations in those areas.

In addition, the scheduling of Maternity and Pediatric content and clinical while also engaged in Medical-Surgical Nursing and Leadership content and clinical interferes with progressive mastery of knowledge, skills, and abilities.

Status of Violation #3: *Based on documents submitted in November 2015 that described a proposed sequence of clinical rotations, this violation was reported as corrected **prior** to the program inspection.*

As identified during the program inspection, there is a lack of progressive mastery of knowledge, skills, and abilities. This was noted in interviews with students, a clinical instructor, and clinical facility administrators, and by observation at a clinical site. Further, student assignments found in student files examined at the school are noted to focus on memorization, handwriting material from textbook pages, and a lack of focus

on more complex cognitive tasks and assignments, including at the end of the program of study. Description of clinical experiences offered by students, instructor, and facility staff indicate that during the last few weeks of Term 3 (of four terms) students are not engaged in more complex clinical tasks, such as treatments, suctioning patients, insertion of nasogastric tubes, or insertion of catheters or administration of medications to more than two (2) patients per day. It was also noted that homework completed by students was not corrected even though credit was given. This prevents students from progressing in their knowledge and understanding of important content and concepts.

Required Correction: Submit for Board-approval a plan to provide didactic and clinical training that allows for progressive learning and mastery of the more complex tasks demanded of entry-level Vocational Nursing practice. Describe how students will be assigned to clinical facilities that accommodate the increasing complexity of clinical skills required of entry-level Vocational Nursing practice. **Due no later than March 1, 2016.**

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

“All curricular changes that significantly alter the program philosophy, conceptual framework content, objectives, or other written documentation as required in Section 2526, shall be approved by the Board prior to implementation.”

Violation #4: The manner of scheduling the last term of the Vocational Nursing program is not consistent with the Board-approved Instructional Plan, including scheduling Maternity and Pediatric skills lab **prior** to related clinical experiences and interspersing Maternity and Pediatric rotations with Medical-Surgical Nursing and Leadership rotations.

Status of Violation #4: This violation is **not** corrected. Documentation submitted in support of the November 2015 request to admit students corrected how skills labs were scheduled, but those documents also indicate full-time students would receive a total of 36 hours of clinical experience in maternity nursing and 36 hours of clinical experience in pediatric nursing, both delivered over the course of one (1) week for full-time students and two (2) weeks for part-time students. The Board-approved Instructional Plan calls for a total of 72 hours in both

areas, with each area occurring over a period of three (3) weeks in the full-time program with eight (8) to 12 hours of theory content also delivered each week. **Further, a valid, Board-approved Instructional Plan for the part-time program has not been produced by the program.**

In addition, during the program inspection, the director's calendar of theory and clinical hours for the cohort that graduated in December 2015 was examined. According to this schedule of faculty, placements, and student cohorts, students that graduated in December 2015 received only **24 hours** of maternity nursing clinical experience and no greater than **24 hours** of pediatric nursing clinical experience.

Required Correction: Submit a copy of the Board-approved Instructional Plan for the part-time program. **Due no later than March 1, 2016.**

Provide documentation of implementation of the Board-approved Instructional Plans for both full- and part-time programs. **Due no later than March 1, 2016.**

Provide signed documentation that all students currently enrolled receive the required number of theory and clinical hours prior to graduation from the program, including all students scheduled to graduate in January and February 2016. **Due prior to any further graduations.**

Based on the December 1, 2015 documentation submitted by the program, the following violations of the Vocational Nursing Rules and Regulations were identified (to avoid confusion, numbering of the violations begins with #5)

Section 2526(a)(4) 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 ...
(4) Curriculum objectives."

Violation #5: Based upon documents submitted by the program in conjunction with the PRS and the program's response to deficits in the PRS, the program has not identified curriculum objectives. The program has submitted only terminal objectives. There is no evidence that curriculum objectives have been in use in the program.

Status of Violation #5: This violation is **not** corrected.

Required Correction: Submit for Board approval curriculum objectives **no later than February 15, 2016.**

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

“Each teacher assistant shall work under the direction of an approved instructor. No more than one teacher assistant may be assigned to each instructor. Each teacher assistant shall assist the instructor in skill lab and clinical teaching only. The instructor to whom the teacher assistant is assigned shall be available to provide direction to the teacher assistant as needed.”

Violation #6: Board records confirm a specific individual was approved as a teacher assistant on May 29, 2013. Further, the program director submitted an updated faculty list on November 13, 2015 which lists the individual as a teacher assistant and the program director completed the PRS on December 1, 2015 listing the individual as a teacher assistant.

Documents submitted in support of the November 2015 request to admit students indicate the individual is listed as assigned faculty for a group of currently enrolled students at a clinical facility in February 2016 and the individual is also listed as the assigned faculty for a group of proposed students in April and May of 2016. No other faculty is listed as assigned for those students, leaving the teacher assistant with responsibilities outside the scope of the regulations. During the program inspection the director again presented the assignment of a Teacher Assistant as solely responsible for a group of students in clinical experience.

Status of Violation #6: This violation is **not** corrected.

Required Correction: Submit documentation that demonstrates a qualified instructor will be responsible for clinical instruction. **Due no later than January 29, 2016.**

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 #7:

Board files indicate the program has a policy for the admission, screening and selection of applicants. The program's policy indicates applicants are to have an interview and a minimum score of 76 on the program's assessment test. Examination of 61 student files during the program inspection, representing entire classes in some cases and random checks of a percentage of a class in other cases, identified a total of 17 files without documentation of an interview. Examination of student files during the program inspection identified four (4) files with below minimum passing score followed by one (1) to two (2) additional handwritten scores, all on the same Scantron form. These findings indicate that the program is not following the policy for the admission, screening, and selection of applicants.

It is also noted that the program's policy does not address the number and frequency of allowable retakes on the assessment test, which was created by the school.

Required Correction:

Submit a revised policy for the admission, screening, and selection of applicants to the program that defines the number and frequency of allowable retakes on an admission test. Describe steps to be taken to ensure that the policy is followed. **Due no later than March 1, 2016.**

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 #8: Board records document that the program has an approved policy for attendance and make-up of missed theory and clinical hours. According to program documents,

"All absences for theory and/or clinical must be made-up. Students will be placed on probation after two (2) absences in any given Term and terminated from the program after three absences in any one Term."

The program failed to follow their attendance policy as noted by the documentation in student files indicating that students with over 60 hours of missed clinical were not placed on probation and students placed on probation due to excessive absences are moved to a different class, rather than terminated from the program when the terms of probation are violated by the students. Records examined during the program inspection also indicate that students are allowed to "bank" clinical hours in anticipation of absences and that make-up of missed clinical hours may greater than six (6) weeks after the absence. No notation of missed objectives are included in the "Clinical Make-up Attendance Contract."

Required Correction: Submit for Board approval a proposed policy regarding timely make-up of missed clinical hours such that theory and clinical are correlated, hours are not "banked," and that students with excessive absences are not allowed to progress. Submit a written description of how this policy will be consistently implemented. **Due no later than March 1, 2016.**

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.

- (a) Transfer credit shall be given for related previous education completed within the last five years. This includes the following courses:
 - (1) Approved vocational or practical nursing courses.
 - (2) Approved registered nursing courses.

- (3) Approved psychiatric technician courses.
 - (4) Armed services nursing courses.
 - (5) Certified nurse assistant courses.
 - (6) Other courses the school determines are equivalent to courses in the program.
- (b) Competency-based credit shall be granted for knowledge and/or skills acquired through experience. Credit shall be determined by written and/or practical examinations.”

Violation #9: An analysis of student records confirmed that the program failed to grant credit for prior education and experience as prescribed by regulation. Specifically, students with recent certificates from certified nursing assistant courses were given no credit for certified nurse assistant courses, as is required in the regulation.

Required Correction: Submit evidence of training of all involved personnel regarding the Board-approved transfer credit policy and that describes credit to be given for certified nurse assistant courses. Describe how this policy is to be implemented such that credit is granted for certified nurse assistant courses and how such credit will be determined. **Due no later than March 1, 2016.**

Please contact me should you have any questions.

Sincerely,

Donna G. Johnson

Donna G. Johnson, RNP, MS, MA
Nursing Education Consultant
donna.johnson@dca.ca.gov
916-263-7842

Agenda Item #17.B.1., Attachment L.

Homestead Schools, Inc.
23800 Hawthorne Blvd., Ste 200
Torrance, CA 90505
(310) 791-9975

January 11, 2016

Donna G. Johnson, RNP, MS, MA
Nursing Education Consultant
Board of Vocational Nursing
2535 Capitol Oaks Drive, Suite 205
Sacramento, CA 95833-2945

SENT VIA E-MAIL
U.S. MAIL

Re: Consideration of Provisional Approval
Denial of Requests to Admit Students

Dear Ms. Johnson,

Apropos your letter of January 5, 2016 that carried the recommendations that Homestead Schools be placed on provisional approval and that its requests for approval to admit students in the day, evening and weekend classes be denied, we intend to oppose these recommendations at the February 2016 meeting on the following grounds.

1. Deficiencies mentioned in the letter of January 5, 2016 (Notice of Violations and also Notice of Decisions) are being corrected promptly.

The letter listed a total of six violations, two of which were admitted corrected, the three other violations corrected on January 11, 2016 and the remaining will be corrected within the next 3-4 days. Full documentation on each of these violations is being e-mailed to the board consultant on this date.

2. The school has sufficient approved faculty in relation to the requested student population.

Exhibit A attached to this letter lists approved instructors which totals 37.

The board generally requires a ratio of 1 instructor for 10 students. The school clearly exceeds this ratio.

3. The school has sufficient approved clinical facilities for the requested student population.

Exhibit B attached to the letter lists approved clinical facilities. Of critical interest are facilities that provide maternity and pediatric experiences to its students; I'm listing these below:

<u>Facility</u>	<u>Date of Board Approval</u>
All Women Care/Santa Isabel Clinic	10/20/15
Centinela Medical Hospital	10/16/15
Central Neighborhood Health Foundation	11/13/15
His Nesting Place	10/24/14
Pico Clinica Medica	08/10/15
Tri-City Medical Group	10/24/14
Totally Kids Specialty Healthcare	10/28/11
Total Care Medical Clinic	11/02/15

The school has made a concerted effort in the last three months to secure these specialized facilities in response to board directive in anticipation of opening three classes mentioned above. The school has submitted documentation in support of the current request to admit students utilizing these additional resources showing the placement of students day-by-day, week-by-week for their clinical rotation at these facilities. Further, the two violations mentioned in the letter dated January 5, 2016, Violation #1 and Violation #4, were corrected on January 11, 2016.

4. The school has sufficient critical program resources.

Attached to this letter are Exhibit C–The school's Physical Facilities & Equipment, Exhibit D – Skills Laboratory Supplies, Exhibit E–Texts, Periodicals, Reference Materials, Audio-Visual Aids & NCLEX Review Softwares which collectively show that the school's request to admit students is well supported.

5. The school's average annual pass rate is well within that required by board regulation.

California Code of Regulations section 2530 (l) states:

“The program shall maintain a yearly average 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.”

As noted in the letter dated January 5, 2016, the current licensing examination average annual pass rate for the program is 66%, which is six percentage points below the state average annual pass rate, well within the requirements of CCR section 2530 (l). Further, the school's average annual pass rate has not remained greater than 10 percentage points below the average annual pass rate for more than three consecutive quarters over the course of the program's history.

I'm attaching Exhibit F which shows the history of Homestead School's quarterly and average annual pass rates from the inception of the program till September 2015. For the

five quarters previous to that date, the school has remained within 10 percentage points of the state average annual pass rate (-6%, -5%, -6%, -6%, -8%). Here's a more telling statistic: Since inception of the program, 406 candidate took the NCLEX of which 275 passed on the first attempt giving the school an overall pass rate of 67.73%

Based on the foregoing, we do not feel that Homestead Schools deserves to be put on provisional approval. We've complied with all directives of the nursing education consultant in a timely and responsive manner. Our requests to admit students has been pending before the board now for several months and during that time we've continued to make improvements in the program's clinical facility, faculty and other critical resources. Without the continued classes, the school will find it impossible to maintain these resources and demonstrate the effectiveness of various steps taken to improve its performance.

Kindly let us know if there's any further documentation that needs to be prepared and forwarded to you for the board meeting.

Sincerely,

Adel Blanco

Adel Blanco, M.S., R.N.-BC
Director of Nursing
Homestead Schools, Inc.

HOMESTEAD SCHOOLS, INC.

Based on Quarterly Reports from the Board of Vocational Nursing & Psychiatric Technicians

Date Range: Homestead Schools' First-Time Candidates NCLEX data from inception.

Q	Quarter	# Candidates	# Passed	Homestead Quarterly Pass Rate	Homestead Average Annual Pass Rate	State Average Annual Pass Rate	Percent Below/Above State Annual Pass Rate
Q2	Apr – Jun 2008	3	3	100%	100%	74%	26%
Q3	Jul – Sep 2008	3	2	67%	83%	74%	9%
Q4	Oct – Dec 2008	7	6	86%	85%	72%	13%
2008 Annual Pass Rate:		13	11	85%			
Q1	Jan – Mar 2009	3	3	100%	88%	72%	16%
Q2	Apr – Jun 2009	2	1	50%	80%	71%	9%
Q3	Jul – Sep 2009	7	6	86%	84%	72%	12%
Q4	Oct – Dec 2009	7	4	57%	74%	73%	1%
2009 Annual Pass Rate:		19	14	74%			
Q1	Jan – Mar 2010	4	2	50%	65%	74%	-9%
Q2	Apr – Jun 2010	14	11	79%	72%	75%	-3%
Q3	Jul – Sep 2010*	9	4	44%	62%	75%	-13%
Q4	Oct – Dec 2010	19	15	79%	70%	76%	-6%
2010 Annual Pass Rate:		46	32	70%			
Q1	Jan – Mar 2011	23	18	78%	74%	77%	-3%
Q2	Apr – Jun 2011	23	14	61%	69%	76%	-7%
Q3	Jul – Sep 2011	16	10	63%	70%	76%	-6%
Q4	Oct – Dec 2011	25	15	60%	66%	75%	-9%
2011 Annual Pass Rate:		87	57	66%			
Q1	Jan – Mar 2012*	11	7	64%	61%	74%	-13%
Q2	Apr – Jun 2012*	8	5	63%	62%	74%	-12%
Q3	Jul – Sep 2012*	17	11	65%	62%	74%	-12%
Q4	Oct – Dec 2012	19	15	79%	69%	74%	-5%
2012 Annual Pass Rate:		55	38	69%			
Q1	Jan – Mar 2013	19	15	79%	73%	73%	0%
Q2	Apr – Jun 2013	26	18	69%	73%	73%	0%
Q3	Jul – Sep 2013	21	12	57%	71%	75%	-4%
Q4	Oct – Dec 2013	27	18	67%	68%	76%	-8%
2013 Annual Pass Rate:		93	63	68%			
Q1	Jan – Mar 2014*	26	17	65%	65%	76%	-11%
Q2	Apr – Jun 2014*	15	7	47%	61%	73%	-12%
Q3	Jul – Sep 2014	14	11	79%	64.63%	73%	-8%

Q4	Oct - Dec 2014	9	7	78%	66%	72%	-6%
2014 Annual Pass Rate:		64	42	66%			
Q1	Jan - Mar 2015	5	3	60%	65%	72%	-6%
Q2	Apr - Jun 2015	9	4	44%	68%	72%	-5%
Q3	Jul - Sep 2015	15	11	73%	65.79%	72%	-6%
2015 Annual Pass Rate:		29	18	62%			

Total from Inception: 406 275 67.73%

* Quarters below 10 percentage point of the state average annual pass rate

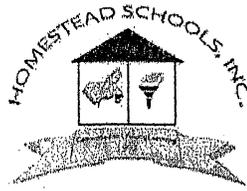
Important Note to Remember: (Homestead Staff)

Section 2530(L) of the Code states:

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

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

Agenda Item #17.B.1., Attachment M.



Item #6 - from the Notice of Decision Letter dated January 5, 2016.

Require the program to submit for Board approval curriculum objectives appropriate to the Board-approved Instructional Plan no later than February 15, 2016.

Response:

Please see the attached revised Curriculum Objectives for Board approval.



HOMESTEAD SCHOOLS, INC.
 23800 HAWTHORNE BLVD., SUITE 200
 TORRANCE, CA 90505
 Tel. (310) 791-9975 / Fax (310) 791-0135

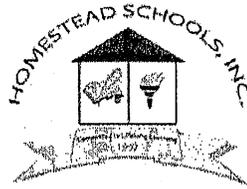
VOCATIONAL NURSING PROGRAM CURRICULUM OBJECTIVES

The curriculum coordinates clinical and theoretical objectives in the major areas of nursing.

TERM I	TERM II	TERM III	TERM IV
<p>Upon completion of Term I, the student will:</p> <p>Utilize the basic knowledge of normal anatomy and physiology when planning and providing holistic nursing care to patients; discuss the age-specific appropriate care for patient groups and explain the rationale for the nursing actions given; apply knowledge of Nutrition in the holistic care of patient in the health care setting; differentiate the role of the Vocational Nurse in the health care team; apply knowledge of the legal and ethical responsibilities when providing nursing care; demonstrate competence in the performance of basic nursing skills; recognize each patient a unique individual with specific psychosocial, physical and</p>	<p>Upon completion of Term II, the student will:</p> <p>Acquire knowledge and skills in the administration of drug therapy in the health care setting and apply knowledge of etiology, symptoms, diagnostic procedures, nursing care and treatment of common <i>integumentary system disorders, musculo skeletal disorders, endocrine system disorders, respiratory system disorders, and fluid and electrolyte disorders</i> including drug therapy, alternative therapy and rehabilitation.</p>	<p>Upon completion of Term II, the student will:</p> <p>Apply knowledge of etiology, symptoms, diagnostic procedures, nursing care and treatment of common disorders of the following systems including drug therapy, alternative therapy and rehabilitation: <i>neurologic system, cardiovascular system, hematopoietic system, immune system, sensory system, and mental health.</i></p>	<p>At the end of term 4, the student will:</p> <p>Apply knowledge of etiology, symptoms, diagnostic procedures, nursing care and treatment of common <i>pediatric, obstetrics, reproductive system, geriatric and rehabilitation, urinary system, gastrointestinal system disorders</i> including drug therapy, alternative therapy and rehabilitation.</p> <p>Demonstrate leadership/supervisory skills Demonstrate effective interviewing skills when applying for a job. Prepare for licensure to become a Licensed Vocational Nurse.</p>

<p>spiritual needs; identify cultural and social factors that contribute to health and disease; promote maintenance and prevention of disease.</p> <ul style="list-style-type: none"> • Utilize the nursing process as a framework for priority and performance of nursing actions. • Apply principles of therapeutic communication when interacting with patients, family and health care team members. • Identify learning needs and resources that will restore and maintain the patient's optimal level of functioning. • Critically analyze given case studies and other exercises as to the right thing to do versus the wrong thing to do. • Explain the rationale for the decisions and the laws violated. 			
---	--	--	--

<ul style="list-style-type: none">• Apply critical thinking and reasoning skills when given a scenario and NCLEX test questions.• Apply knowledge of the various cultures in the care of patient. Consider how contemporary medicine impacts other cultural practices.• Apply concepts learned about death and dying in case studies and in practice.			
---	--	--	--



VIOLATION #6:

Board records confirm a specific individual was approved as a teacher on May 29, 2013. Further, the program director submitted an updated faculty list on November 13, 2015 which lists the individual as a teacher assistant and the program director completed the PRS on December 1, 2015 listing the individual as a teacher assistant.

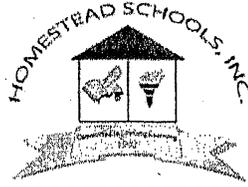
Documents submitted in support of the current request to admit students indicate the individual is listed as assigned faculty for a group of currently enrolled students at a clinical facility in February 2016 and the individual is listed as the assigned faculty for a group of proposed students in April and May of 2016. No other faculty is listed as assigned for those students, leaving the teacher assistant with responsibilities outside the scope of the regulations.

Required Correction:

Submit documentation that demonstrates a qualified instructor will be responsible for clinical instruction. Due no later than January 29, 2016.

Response:

At this time, I replaced the teacher assistant [REDACTED] with the Board-approved instructor [REDACTED]. Please see the attached Board approval for [REDACTED]

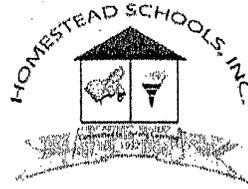


Item #8 from Notice of Decision Letter dated January 5, 2016.

Require the program to submit for Board approval a revised policy for the evaluation of student performance to determine the need for remediation or removal from the program no later that February 15, 2016.

Response:

Please see the attached revised Evaluation Methodology for Student Progress Policy for Board approval.



Evaluation Methodology for Student Progress Policy

Students must achieve a grade of 76% or better to successfully pass the subject and must maintain a cumulative grade weighted average of 76% throughout the term. Grades are based on students passing all examinations, assignments, quizzes, and clinical evaluations (performance both in skills lab and the clinical settings).

The student must pass both theory and clinical in order to progress in the Vocational Nursing program.

Evaluation Criteria:

A. Theory:

Quiz/Homework	5%
Unit Test	35%
Final Exam	60%
Total	100%

The Program Director monitors a student's grades and issues an appropriate warning if grades are inadequate. If upon reviewing student's academic standing, there is a cause for concern that needs urgent intervention. The student will be sent to the Student Learning Resource Center Coordinator for tutoring and practice tests as early interventions.

Any student who is not making satisfactory academic progress is subject to further review and possible disqualification from the program.

Remediation actions for unsatisfactory academic progress are required to be allowed to continue in the program. The student will be expected to take an remediation test on the material covered in the original course exam and complete a remediation assignment and will be considered to have successfully passed the course when the student has achieved a passing score of 76% or better.

Students are allowed a maximum of **one** failed courses to be remediated for each term. If a student fails a second course during a term, the student will not be allowed to proceed to the next term; the student will have to repeat the term.

If the student continues to be unsuccessful, counseling will be offered and advised to make and present an academic plan should the student has intention to be readmitted.

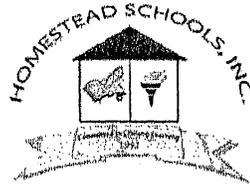
B. Clinical:

Nursing Care Plan	15%
Drug Study	15%
Skills	70%
Total	100%

Percentage Equivalent	Rating Scale
76%-Above	Pass
75% - Below	Fail

Upon completion of the clinical skill competencies with passing mark, students will be considered to have successfully met the Satisfactory Academic Progress and will be allowed to progress to the next term. If a student fails the clinical component of the subject, no remediation will be offered and the student will have to repeat the entire course.

Revised. 1/08/16

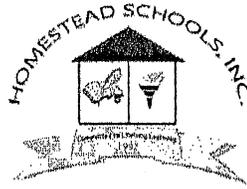


Item #9 from Notice of Decision Letter dated January 5, 2016.

Require the program to submit for Board approval a revised attendance policy that identified criteria for attendance, the specific course objectives for which make-up time is required, and acceptable methods for make-up that are specific for theory and clinical time missed no later than February 15, 2016.

Response:

Please see the attached revised Attendance Policy for Board approval.



Attendance Policy

The school emphasizes the need for all students to attend classes on a regular and consistent basis in order to develop the knowledge, skills and attitudes necessary to complete the program. Consistent attendance is a requirement for graduation.

The following rules govern the theory and clinical absences that a Vocational Nurse student may acquire during his/her program:

1. Students are tardy when they arrive five (5) minutes late at the start of class or are five (5) minutes late returning from any break. Students are tardy if they leave any class period prior to class being dismissed by the instructor. Tardy students may remain in class for the lecture, but will receive an assignment to ensure any missed material is presented to the student which is due at the next meeting for that theory class. Failure to turn in will result in issuance of an Attendance Probation. Tardiness disrupts the learning environment and is discouraged. Continued excessive tardiness in any class could lead to disciplinary action up to and including dismissal. Three tardies equal one absence
2. Students will be placed on probation after two (2) absences in any given Term and terminated from the program after three absences in any one Term. A student terminated for attendance reasons may elect to join the next class based on space availability.
3. Should an emergency arise, the clinical instructor must be notified by calling the clinical facility at least one hour prior to the expected beginning time. Contagious illnesses, the demise of a family member, and equally catastrophic absences will be taken into consideration for student retention. Students absent from three consecutive sessions for reasons of illness must provide a physician's release to be allowed to return to classes or clinical education.
4. Objectives that have been missed because of absences will have to be met before the student progresses to the next term. All missed theory periods must be remediated by fulfilling course objectives through the completion of a specific assignment within 14 days after the last day of the course. Arrangements have to be made with the instructor and approved by the Program Director.

5. Any examination missed due to absence from a theory class must be made up by the 7th day after the student returns to school or a grade of zero will be assigned to the examination. Regardless of the score achieved on the makeup exam, the maximum grade that will be entered into the student's grade record for any makeup examination in a theory class will be 76%.
6. A student is permitted to remediate a maximum of 18 hours of theory absences during any term. Acceptable methods of make-up include the following:
 - a. Attending ongoing theory classes
 - b. Review/tutorial sessions
 - c. ATI sessions through practice tests, focused review materials, videos.
 - d. Case studies
 - e. Library research
7. Should a student not remediate each absence from theory sessions prior to the start of the new term, he/she will be dismissed from the program and will have the opportunity to re-enroll.
8. All clinical absences in a given term must be remediated within 14 calendar days or prior to the start of the new term, whichever is shorter. The student should see the Program Director for clinical assignment and assigned instructor for make-up. If the student has not registered the remediation date by the 15th day, the student will be dismissed from the program. Under certain extenuating circumstances, such as the death of a family member, a serious medical emergency, or another emergency situation, the school administration may grant a waiver to the policy that requires all theory and clinical absences to be remediated before the start of a new term.

Revised: 1/08/16



Agenda Item #17.B.1., Attachment N.

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

February X, 2016

Adelwisa Blanco, Director
Vocational Nursing Program
Homestead Schools
23800 Hawthorne Blvd #200
Torrance, CA 90505

Subject: Notice of Change in Approval Status

Dear Ms. Blanco:

Pursuant to the action of the Board of Vocational Nursing and Psychiatric Technicians (Board) on February 5, 2016, the Homestead Vocational Nursing Program has been placed on provisional approval for the two – year period from February 5, 2016 through February 28, 2016.

The purpose of this letter is to explain the areas of noncompliance identified 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 **XXXX, 2016**

AREAS OF NON-COMPLIANCE (VIOLATIONS(S))

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."

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

"Vocational nursing programs shall include theory and correlated clinical experience."

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

“Curriculum content shall be taught in a sequence that results in students’ progressive mastery of knowledge, skills and abilities.”

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

“All curricular changes that significantly alter the program philosophy, conceptual framework content, objectives, or other written documentation as required in Section 2526, shall be approved by the Board prior to implementation.”

Section 2526(a)(4) 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 ...
(4) Curriculum objectives.”

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.

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.”

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.

- (a) Transfer credit shall be given for related previous education completed within the last five years. This includes the following courses:
 - (1) Approved vocational or practical nursing courses.
 - (2) Approved registered nursing courses.
 - (3) Approved psychiatric technician courses.
 - (4) Armed services nursing courses.
 - (5) Certified nurse assistant courses.
 - (6) Other courses the school determines are equivalent to courses in the program.
- (b) Competency-based credit shall be granted for knowledge and/or skills acquired through experience. Credit shall be determined by written and/or practical examinations.”

REQUIRED CORRECTION(S)

1. Require the program to admit no additional classes without prior approval by the full Board.
2. 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 **February 15, 2016**.
3. Require the program to submit for Board approval the following:
 - a. Curriculum objectives no later than **February 15, 2016**.
 - b. A revised policy for the evaluation of student performance to determine the need for remediation or removal from the program no later than **March 1, 2016**.
 - c. A revised attendance policy that identifies criteria for attendance, the specific course objectives for which make-up time is required, and acceptable methods for make-up that are specific for theory and clinical time missed, and timely make-up of missed hours that maintains theory to clinical correlation no later than **March 1, 2016**.
 - d. A revised policy for the admission, screening, and selection of applicants to the program that defines the number and frequency of allowable retakes on an admission test and steps to be taken to ensure that the policy is followed, including appropriate interview of applicants no later than **March 1, 2016**.
 - e. Evidence of training of all involved personnel regarding the transfer credit policy that was submitted to the Board on December 1, 2015, including credit to be given for certified nurse assistant courses, and how this new policy is to be implemented no later than **March 1, 2016**.

4. Require the program to submit documentation of implementation of the Board-approved Instructional Plans for both the full-time and the part-time programs **no later than March 1, 2016**.
5. Require the program to submit documentation of placements consistent with the Board-approved Instructional Plans and with adequate faculty for all currently enrolled students **no later than March 1, 2016**.
6. Require the program to submit follow up reports in nine (9) months, but no later than **October 1, 2016**, and 21 months, but no later than **October 1, 2017**. The reports must include a comprehensive analysis of the program, specific actions taken to improve pass rates and to correct all violations, a timeline for implementation, and the effect of employed interventions. The analysis must include, but should not be limited, to the following elements:
 - a. Admission Criteria
 - b. Screening and Selection Criteria
 - c. Terminal Objectives
 - d. Curriculum Objectives
 - e. Instructional Plan
 - f. Theory and Clinical Objectives for Each Course
 - g. Lesson Plans for Each Course
 - h. Textbooks
 - i. Attendance Policy
 - j. Remediation Policy
 - k. Evaluations of Theory and Clinical Faculty
 - l. Evaluations of Theory Presentations
 - m. Evaluations of Clinical Rotations and Their Correlation to Theory Presentations
 - n. Evaluation of Student Achievement
 - o. Current Enrollment
7. Require the program to maintain its average annual pass rate no more than (10) ten percentage points below the State average annual pass rate.
8. Require the program to comply with all approval standards in Article 4 of the Vocational Nursing Practice Act, commencing at Business and Professions Code Section 2880, and Article 5 of the Board's Regulations, commencing at California Code of Regulations, Title 16, Section 2526.
9. Failure to take 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 2018** 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 3 and 4, 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: **Approval by the full Board is required prior to the admission of 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,

JOHN BROOKS
Acting Executive Officer

Enclosures

cc: Board Members

JB: dgj