

Agenda Item #12.A.5.



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 – Reconsideration of Provisional Approval; Consideration of Request to Admit Students (Director: Adelwisa V. Blanco, Torrance, Los Angeles County, Private)

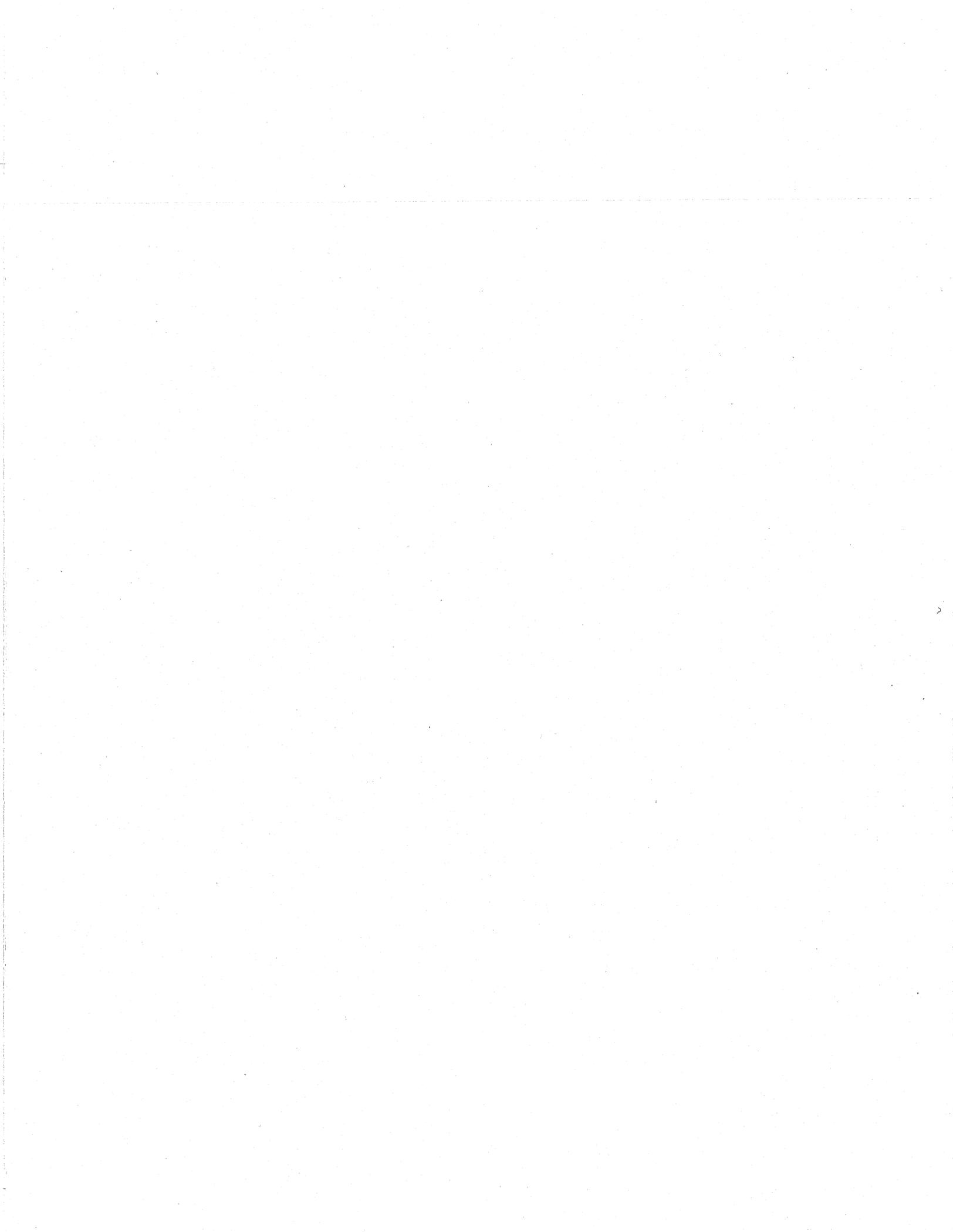
Homestead Schools Vocational Nursing Program is presented for reconsideration of provisional approval. Extension of provisional approval is recommended. Approval of two (2) of the three (3) requested classes is recommended.

Recommendations

1. Extend the provisional approval of the Homestead Schools Vocational Nursing Program for the two (2) year period from May 13, 2016 through May 31, 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.
2. Place the program on the Board's **May 2018** agenda for reconsideration of provisional approval.
3. Continue to require the program to admit no additional classes without prior approval by the full Board.
4. Approve the program's request to admit one (1) full-time Day class of 24 students beginning May 16, 2016, graduating May 12, 2017, **only**.
5. **Deny** the program's request to admit one (1) part-time class of 24 students beginning May 21, 2016, graduating April 1, 2018, **only**.
6. Approve the program's request to admit one (1) full-time Evening class of 24 students beginning June 12, 2016, graduating June 9, 2017, **only**.
7. 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 **July 1, 2016 and every three (3) months, thereafter**.
8. Continue to 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. Continue to 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. Continue to 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.



Agenda Item #12.A.5.



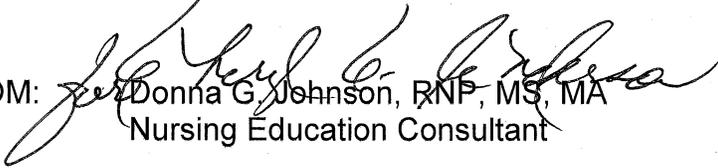
BUSINESS, CONSUMER SERVICES AND HOUSING AGENCY • GOVERNOR EDMUND G. BROWN JR.

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: April 29, 2016

TO: Board Members

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

SUBJECT: Homestead Schools Vocational Nursing Program – Reconsideration of Provisional Approval; Consideration of Request to Admit Students (Director: Adelwisa V. Blanco, Torrance, Los Angeles County, Private)

Homestead Schools Vocational Nursing Program is presented for reconsideration of provisional approval. Extension of provisional approval is recommended. Approval of two (2) of the three (3) requested classes is recommended.

The program was placed on provisional approval for the three-month period February 5, 2016 through May 31, 2016, due to noncompliance with regulatory requirements.

In addition, the program has requested approval to admit three (3) classes.

One (1) full-time day class of 24 students beginning May 16, 2016, graduating May 12, 2017.

One (1) part-time class of 24 students beginning May 21, 2016, graduating April 1, 2018.

One (1) full-time evening class of 24 students beginning June 12, 2016, graduating June 9, 2017.

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 June 2016**.

Note: The table, below, is based on data submitted on April 4, 2016. See **Other Considerations**.

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
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

ENROLLMENT DATA				
CLASS DATES		# Students Admitted	# Students Current or Completed	Total Enrolled
Start	Complete			
	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	2/17	22	15	73 + 15 = 88
4/15 FT (Day)		20	20	88 + 20 = 108
5/15 FT (Eve)		10	10	108 + 10 = 118
	5/15 (6/9/14 FT Day Class)		-10	118 - 10 = 108
	6/15 (6/14 FT Eve Class)		-7	108 - 7 = 101
	6/15 (11/13 PT Class)		-9	101 - 9 = 92
	12/15 (1/15 FT Day Class)		-22	92 - 22 = 70
	1/16 (1/15 FT Eve Class)		-15	70 - 15 = 55
	1/16 (3/14 PT Class)		-9	55 - 9 = 46
	4/16 (4/15 FT Day Class)		-20	46 - 20 = 26

ENROLLMENT DATA				
CLASS DATES		# Students Admitted	# Students Current or Completed	Total Enrolled
Start	Complete			
	4/16 (formerly to be 1/16) (6/14 PT Class)		-11	26 - 11 = 15
	5/16 (5/15 FT Eve Class)		-10	15 - 10 = 5
5/16 FT (Day) (Proposed)	5/17	24		5 + 24 = 29
5/16 PT (Proposed)	4/18	24		29 + 24 = 53
6/16 FT (Eve) (Proposed)	6/17	24		53 + 24 = 77

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 March 2016, 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 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

NCLEX-PN® Licensure Examination Data							
Quarterly Statistics					Annual Statistics*		
Quarter	# Candidates	# Passed	% Passed	State Quarterly Pass Rate	Program Average Annual Pass Rate	State Average Annual Pass Rate [CCR §2530(I)]	Variance from State Average Annual Pass Rate
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
Jan – Mar 2016	2	2	100%	73%	69%	73%	-4

*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(I) states:

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

As demonstrated in the data for the most recent period, January through March 2016, the program’s average annual pass rate was **69%**. The California average annual pass rate for graduates from approved vocational nursing programs who took the NCLEX-PN® for the first time is **73%**. Based on this data, the program’s average annual licensure pass rate is **four (4) percentage points below** the state average annual pass rate.

The data presented above also documents for the 17 quarters represented, the program’s average annual pass rate has been **below** the state average annual pass rate for **15 quarters**. During two (2) quarters in 2013, the program’s average annual pass rate was the **same** as the state’s average annual pass rate.

Faculty and Facilities

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

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

The total number of Board approved faculty is 36, including the program director, three (3) Additional Faculty, and two (2) Teacher Assistants. The director has 100% administrative duties. Of the total faculty, 29 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.”

The program now has 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

As noted in the February 2016 report, Board records substantiate ongoing communication with the program since 2014 regarding concerns with the following.

- Policies related to the evaluation of student performance to determine the need for remediation or removal from the program.
 - This resulted in correspondence with the program, as documented in previous reports to the Board, but without change in the policy.
- Adequacy of clinical facilities and proposed placement of students in clinical experiences.
 - This resulted in denial of requested numbers of students to be admitted, but without significant change in proposed plans for clinical experiences for students.
- Concern regarding the low number of graduates taking the licensure examination. The concern, identified prior to 2012, continued into 2014 when a report was required.
 - This resulted in the program’s own data demonstrating that **over 20% of the students who complete program hours are unable to complete the program’s exit requirements.** (Details and table describing the data were presented in the February 2016 report to the Board).

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.

At that time, a total of six (6) violations had been identified and four (4) violations remained uncorrected. Therefore, 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 non-compliance with regulatory requirements.

Following that decision, an unannounced program inspection was scheduled for January 6 and 7, 2016. Two (2) Board representatives conducted the inspection. Three (3) additional violations were identified and a *Notice of Violations* was forwarded to the program via electronic and certified mail on January 12, 2016. (See Attachment B) **Based on the**

program's response to that *Notice of Violations*, the status of the identified violations **as of January 15, 2016**, was presented in the February 2016 report to the Board.

At the time of the meeting on February 5, 2016, the program had corrected one (1) violation and had presented plans that, should they be consistently implemented, would correct two (2) violations. The program at that time had **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. Accordingly, the Board placed the program on provisional approval for the three-month period ending May 31, 2016.

On February 8, 2016, the Board forwarded to the program, via certified mail, a *Notice of Change in Approval Status*, specifying identified deficiencies, required corrective actions, and timeline for correction. (See Attachment C)

Since that time, the program has presented a number of revised policies and documents. Based on the most recently submitted materials, received by the Board on February 12, February 15, and March 1, 2016, the **current** status of the previously identified violations follows.

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)

Documentation submitted in support of the November 2015 request to admit students again indicated significant discrepancies between the Board-approved Instructional Plan and the program’s proposed placement plans for clinical experiences related to Maternity and Pediatric Nursing. That documentation also indicated two (2) instructors were 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.

Status #1: This violation is **corrected**.

On February 12, 2016, the program submitted clinical placements that are consistent with the Board-approved Instructional Plans for full- and part-time classes, documentation of implementation of the approved plans, and with adequate faculty, for currently enrolled students.

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 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.

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 and “banked” hours.

Status #2: On February 12, 2016, the program submitted revisions to scheduling of specialty rotations and a revised attendance policy. The specialty rotations now allow better correlation with theory. Specialty clinical rotations are scheduled, allowing better correlation with theory. The attendance policy which now states, “All clinical absences in a given term must be remediated in a timely manner to maintain theory to clinical correlation.”

The program has submitted a revised policy that, if consistently implemented, would prevent further occurrence of this violation.

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, Pediatric and Maternity skills labs were 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.

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. Descriptions 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.

Status #3: The program has submitted a statement regarding progressing from simple to higher level learning. (See Attachment D)

Should the program consistently implement the principles identified in the attached statement, this would prevent further occurrence of this violation.

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.

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.

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.

Status #4: This violation is **corrected**.

After January 15, 2016, the program provided the instructional plan for the part-time class, and a description of implementation. While documentation of placements was not signed, the program submitted documentation of appropriate placements.

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 #5: This violation is now **corrected**.

On February 12, 2016, the program submitted revised curriculum objectives.

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 skills 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 #6: This violation is **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 approved criteria 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.

Status #7: On February 12, 2016, the program submitted a revised policy and a plan for the admission and screening of program applicants and selection of students that defines the number and frequency of allowable retakes on an admission test.

If consistently implemented, the revised policy and plan will 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.”

Status #8: On February 12, 2016, the program submitted a revised attendance policy which now states, “All clinical absences in a given term must be remediated in a timely manner to maintain theory to clinical correlation.” The policy further states that students will be placed on probation after two (2) absences in any given term and terminated after three (3) absences in any one term. Implementation of the policy, including oversight by the program director was described.

The program has submitted a revised policy that, if consistently implemented, would prevent further occurrence of this violation.

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.

Status #9: On February 12, 2016, the program submitted a revised policy and a plan that, if consistently implemented, would prevent further occurrence of this violation.

Based on the recommendations approved at the February 2016 Board meeting, the program was required to submit a revised policy for the evaluation of student performance to determine the need for remediation or removal from the program. The program revised the policy such that it now states:

“If a student fails a second course during a term, the student will have to repeat the term. Occurrence of the same in a repeated Term, the student will be disqualified from the program.”

However, the program still has not identified administrative oversight of the remediation process or how many different terms may be failed before the student is determined to have failed the program. As noted during the program inspection, students have been allowed to fail multiple terms and remain in the program after “remediating” the term.

The program was also required to revise the policy for the admission, screening, and selection of applicants; to submit documentation of training of all involved personnel regarding the transfer credit policy that was submitted to the Board on December 1, 2015; and to submit documentation of implementation of the Board-approved Instructional Plans

for both the full-time and the part-time programs. The program submitted the required documentation.

It must also be noted that data supplied by the program on **April 4, 2016** was utilized to create the Enrollment Data Table, above. On that date, the program also submitted a list of all currently enrolled students and expected dates of graduation. Based on the **list of enrolled students**, there will be a total of **15** students enrolled after the last graduation (May 2016) listed on the table. However, using the Enrollment Data Table figures submitted by the program, **only five (5) students remain**. It was noted in the February 2016 report to the Board that discrepancies in the Enrollment Data submitted by the program have been identified. The discrepancies previously identified are found in Attachment E. The program's April 4, 2016 data, with names redacted, is attached. (See Attachment F)

Summary

The program has now corrected four (4) violations and submitted plans that, ***if consistently implemented***, would correct the remaining five (5) violations. In addition, the program has submitted documentation of adequate faculty and facility resources to support the proposed students.

The January 2016 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. In addition, the program failed to remove from the program students with repeated course failures and failed attendance probations. A discrepancy in enrollment data has been identified.

Recommendations

1. Extend the provisional approval of the Homestead Schools Vocational Nursing Program for the two (2) year period from May 13, 2016 through May 31, 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 G)
2. Place the program on the Board's **May 2018** agenda for reconsideration of provisional approval.
3. Continue to require the program to admit no additional classes without prior approval by the full Board.
4. Approve the program's request to admit one (1) full-time Day class of 24 students beginning May 16, 2016, graduating May 12, 2017, **only**.
5. **Deny** the program's request to admit one (1) part-time class of 24 students beginning May 21, 2016, graduating April 1, 2018, **only**.

6. Approve the program's request to admit one (1) full-time Evening class of 24 students beginning June 12, 2016, graduating June 9, 2017, **only**.
7. 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 **July 1, 2016** and **every three (3) months, thereafter**.
8. Continue to 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. Continue to 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. Continue to 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: Board records of the Homestead Schools Vocational Nursing Program document the following:

- 1) A history of complaints from students from 2012 to 2014;
- 2) A previous history of violations, including unauthorized admissions;
- 3) Concerns regarding program policies;
- 4) Discrepancies in enrollment data;

- 5) Misrepresentation in clinical facility applications;
- 6) Over 20% of the students who complete program hours are unable to complete the program's exit requirements.

Board records also document that a total of **nine (9) violations** of regulatory requirements were identified in 2015 during the course of analyzing intended clinical placements, evaluating the Program Record Survey submitted by the program, and conducting an unannounced program inspection in January 2016.

The violations identified included failure to follow policies related to attendance and admissions, failure to deliver curriculum content and hours consistent with the full- or part-time Instructional Plans that were approved by the Board, failure to provide correlation between theory and clinical, failure to utilize curriculum objectives, and lack of progressive mastery of skills and knowledge.

The above concerns, the number and nature of the violations, the lack of time to monitor consistent implementation of the plans and proposals that will be required to verify correction of the violations, and the duty to protect consumers, warrant extending the program's provisional approval status for a two-year period. Further, extension of provisional approval will allow the Board to better monitor the enrollment data provided by the program and compliance with all regulations.

With only two (2) candidates testing during the most recent quarter, the program's average annual pass rate is currently at **69%**. While compliant with regulations, the program's average annual pass rate has remained **below** the state average annual pass rate for **15 of the last 17** quarters since January 2012.

The program has now presented documentation indicating adequate faculty and facility resources to support the proposed students. Limited approval of the request to admit students is recommended in order to protect consumers while also allowing the program time to demonstrate regulatory compliance and time to improve pass rates to a level at least that of the state average annual pass rate.

- Attachment A: History of Prior Board Action
- Attachment B: Board Correspondence Dated January 12, 2016
- Attachment C: Notice of Change in Approval Status
- Attachment D: Program Correspondence Received January 22, 2016
- Attachment E: Enrollment Data
- Attachment F: Program Enrollment Data Received April 4, 2016
- Attachment G: Draft Notice of Change in Approval Status

Agenda Item #12.A.5., 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.
 - On January 12, 2016, the Board forwarded a *Notice of Violations* to the program.
 - On February 5, 2016, the Board approved the following:
 1. Place the Homestead Schools Vocational Nursing Program on provisional approval for the three (3) month period from February 5, 2016 through May 31, 2016, and issue a notice to the program to identify specific areas of non-compliance and requirements for correction as referenced in Section 2526.1 (e) of the California Code of Regulations.
 2. Place the program on the Board's **May 2016** 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.



Agenda Item # 12.A.5 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

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



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 12, 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 three (3) month period from February 5, 2016 through May 31, 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 **February 29, 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 **May 2016** 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,

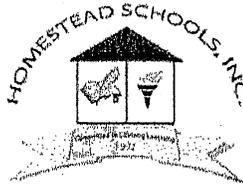
JOHN BROOKS
Acting Executive Officer

Enclosures

cc: Board Members

JB: dgj

Agenda Item #12.A.5 Attachment D



Homestead's Vocational Nursing concepts are taught from a simple to a higher level throughout the curriculum. The nursing program is further organized into three (3) distinct areas: theory, skills, and clinical. The theoretical portion of the nursing curriculum presents concepts and knowledge essential to the practice of nursing. The skills laboratory portion of the curriculum allows the development of manual skills required for nursing practice. The clinical portion of the curriculum provides the opportunity to apply both knowledge (theory) and skills in the direct care of clients. 7

Implementation of our vocational nursing curriculum is based on the following principles:

1. Courses and topics of study are designed so that the student moves from the simple/basic aspects to the complex/more difficult aspects.
2. The sequence of topics among nursing courses is planned to correlate theory with clinical application in delivering patient care.
3. Courses are structured to provide didactic instruction, skills laboratory, simulation exercises, group discussions, and direct clinical practice at a high level of correlation.
4. Classroom assessments cover cognitive, affective, and psychomotor domains.
5. The curriculum has cognitive assessments that involve more complex tasks and assignments intellectual activities such as interpreting, applying, problem solving, reasoning, analyzing, and thinking critically.
6. Bloom's cognitive taxonomy is often used in our assessment tools with each successive level representing a more complex type of cognitive process. Starting with the simplest and moving to the most complex involving comprehension, application, analysis, synthesis, and evaluation.

To carry out these principles, the following are teaching-learning strategies that were developed to provide our students a didactic and clinical training that allows for progressive learning and mastery of the more complex tasks demanded of entry-level Vocational Nursing practice:

1. Presentation of concepts and theories from basic to a more advanced areas of nursing care.
2. Demonstration of basic to a more complex nursing skills.
3. Engaging from basic to a 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.
4. Providing written tests, assignments and homework that invite higher critical thinking.

To validate the readiness of students to progress in their knowledge and understanding of important content and concepts will include the following assessment tools:

1. Theory grades
2. Skills checklist
3. Clinical evaluation

To validate if our students have met the expected clinical objectives both simple and complex, the program director will distribute evaluation and survey forms to provide information on their clinical training experience. This evaluation shall be conducted at the end of each clinical rotation. The program director upon receipt of the evaluation, will hold conference with the instructor designated in the facility with the facility administrator/director of nursing to address identified concerns and recommend immediate interventions to optimize student clinical training experience.

Agenda Item #12.A.5., Attachment E.

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> 10	88 + 10 = 98
5/13 FT (Day)		30	15 <u>11</u> 15	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> 11	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> 17	61 + 17 = 78
2/14 FT (Eve) (Approved for 9/16/13)		15 <u>19</u>	11 <u>6</u> 11	78 + 11 = 89
3/14 PT (Approved for 6/29/13)	11/15	9 <u>11</u>	10 <u>9</u> 10	89 + 10 = 99
	4/14 (5/13 FT Day Class)		-15	99 - 15 = 84

Agenda Item #12.A.5., Attachment E.

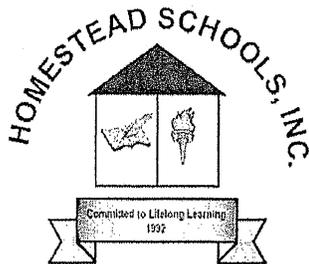
ENROLLMENT DATA				
CLASS DATES		# Students Admitted	# Students Current or Completed	Total Enrolled
Start	Complete			
	4/14 (4/13 FT Eve Class)		-10	84 - 10 = 74
6/14 FT (Day) (Approved for 4/8/14)		30 <u>29</u>	24 <u>10</u>	74 + 24 = 98
6/14 PT (Approved for 4/21/14)	1/16	20 <u>12</u>	11	98 + 11 = 109
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 to admit 11/15

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

Agenda Item #12.A.5., Attachment F



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

April 4, 2016

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

In the list of currently enrolled students sent to you dated Feb 15, 2016, we declared 16 students which did not match with enrollment data provided. We are submitting the revised enrollment table showing 15 currently enrolled students with anticipated end date 2/28/17, and the revised list of currently enrolled students reflecting 15 students from this batch. Please note that 18 have been reduced to 15 because I terminated 3 students due to attendance policy violation.

Thank you for your continued support.

Sincerely,

Adelwisa Blanco
Adelwisa Blanco M.S RN-BC
Director of Nursing

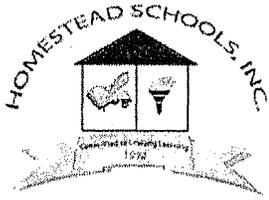
Please complete the following Enrollment Data Table for all classes since January 2012, including currently enrolled students, and proposed students. Indicate if the class was/is full-time, part-time, day, evening, or weekend. Include the next planned admission.

ENROLLMENT DATA			
CLASS DATES		#Students Admitted at time of class start	#Students who have graduated or are still in the class
List ALL classes to date. Include if FT or PT and include proposed classes	Date class will Complete		
35) 01/02/2012 FTD	12/07/2012	30	24
36) 02/06/2012 FTE	01/25/2013	11	20
37) 04/28/2012 PT	12/01/2013	12	3
38) 05/14/2012 FTD	04/26/2013	27	7
39) 09/04/2012 FTD	09/05/2013	20	9
40) 09/04/2012 FTE	09/05/2013	20	14
41) 01/14/2013 FTD	01/10/2014	20	10
42) 04/13/2013 PT	02/07/2015	22	10
43) 04/15/2013 FTE	04/10/2014	16	13
44) 05/06/2013 FTD	04/25/2014	30	11
45) 10/07/2013 FTD	09/30/2014	26	10
46) 11/02/2013 PT	06/21/2015	20	9
47) 02/03/2014 FTD	02/27/2015	26	10
48) 02/03/2014 FTE	02/27/2015	19	6
49) 03/01/2014 PT	11/08/2015	11	9
50) 06/09/2014 FTD	05/29/2015	29	10
51) 06/23/2014 FTE	06/12/2015	12	7
52) 06/22/2014 PT	04/24/2016	20	11
53) 01/05/2015 FTD	12/21/2015	28	22
54) 01/05/2015 FTE	12/21/2015	20	15
55) 04/18/2015 PT	02/26/2017	22	15
56) 04/20/2015 FTD	04/22/2016	20	20

ENROLLMENT DATA			
CLASS DATES		#Students Admitted at time of	#Students who have
57) 05/18/2015 FTE	05/13/2016	10	10
58) Proposed FTD: 05/16/2016	05/12/2017	24	
59) Proposed PT: 05/21/2016	04/01/2018	24	
60) Proposed FTE: 06/13/2016	06/09/2017	24	

FTE: Full Time Evening FTD: Full Time Day PT: Part Time

Signature: Adeluisa Blanco Date: 4/4/2016



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

LIST OF CURRENTLY ENROLLED STUDENTS

	Name	Date of Admission	Placement in the Curriculum	Expected Date of Graduation
1		6/23/14	GU	4/24/16
2		5/4/15	OB	4/22/16
3		6/22/14	GU	4/24/16
4		4/18/15	ENDO	2/26/17
5		4/18/15	ENDO	2/26/17
6		4/18/15	ENDO	2/26/17
7		5/4/15	OB	4/22/16
8		5/4/15	OB	4/22/16
9		4/18/15	ENDO	2/26/17
10		11/2/13	GU	4/24/16
11		5/4/15	OB	4/22/16
12		6/22/14	GU	4/24/16
13		5/4/15	OB	4/22/16
14		5/26/15	MH	5/13/16
15		5/26/15	MH	5/13/16
16		4/18/15	ENDO	2/26/17
17		5/4/15	OB	4/22/16
18		4/18/15	ENDO	2/26/17
19		5/26/15	MH	5/13/16
20		5/26/15	MH	5/13/16
21		4/18/15	ENDO	2/26/17
22		5/4/15	OB	4/22/16
23		6/22/14	GU	4/24/16
24		5/4/15	OB	4/22/16
25		2/3/14	GU	4/24/16
26		4/18/15	ENDO	2/26/17
27		2/3/14	GU	4/24/16
28		5/4/15	OB	4/22/16
29		4/18/15	ENDO	2/26/17

30		6/22/14	GU	4/24/16
31		4/18/15	ENDO	2/26/17
32		4/18/15	ENDO	2/26/17
33		5/26/15	MH	5/13/16
34		6/22/14	GU	4/24/16
35		5/4/15	OB	4/22/16
36		4/18/15	ENDO	2/26/17
37		6/22/14	GU	4/24/16
38		5/4/15	OB	4/22/16
39		5/26/15	MH	5/13/16
40		6/9/14	ENDO	5/13/16
41		6/22/14	GU	4/24/16
42		5/4/15	OB	4/22/16
43		11/2/13	GU	4/24/16
44		5/4/15	OB	4/22/16
45		5/4/16	MH	5/13/16
46		4/18/15	ENDO	2/26/17
47		5/4/15	OB	4/22/16
48		5/4/15	OB	4/22/16
49		1/5/15	GU	4/24/16
50		7/16/11	OB	4/22/16
51		4/18/15	ENDO	2/26/17
52		5/4/15	OB	4/22/16
53		4/18/15	ENDO	2/26/17
54		5/4/15	OB	4/22/16
55		5/4/15	OB	4/22/16
56		5/26/15	MH	5/13/16
57		5/4/15	OB	4/22/16

I certify, under penalty of perjury, that the information presented above is true and correct.

Adel Blanco

Adel Blanco
 Director of Nursing
 Homestead Schools, Inc,

Date: April 4, 2016



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

May XX, 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 May 13, 2016, the Homestead Vocational Nursing Program has been placed on provisional approval for the two-year period from May 13, 2016 through May 31, 2018.

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 **May XX, 2016**

AREAS OF NON-COMPLIANCE (VIOLATIONS(S))

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

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

Section 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 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. Continue to 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 **July 1, 2016** and **every three (3) months, thereafter**.
3. Continue to 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
4. Continue to require the program to maintain its average annual pass rate no more than (10) ten percentage points below the State average annual pass rate.
5. Continue to 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.

6. 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 **May 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,

Kameka Brown, PhD, MBA, NP
Executive Officer

Enclosures

cc: Board Members
KB: dgj