

AGENDA ITEM #18.B.1.



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

BOARD OF VOCATIONAL NURSING & PSYCHIATRIC TECHNICIANS
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COVER SHEET

SUBJECT: Casa Loma College, Van Nuys, Vocational Nursing Program –
Reconsideration of Provisional Approval (Director: Stephanie Ayo-Akinyemil, Van Nuys, Los Angeles County - Private)

The Casa Loma College, Van Nuys, Vocational Nursing Program is presented for reconsideration of provisional approval. Extension of provisional approval through November 30, 2016, is recommended.

Recommendations:

1. Extend the provisional approval of the Casa Loma College, Van Nuys, Vocational Nursing Program from September 1, 2016 through November 30, 2016.
2. Continue the program's requirement to provide no less than one (1) instructor for every ten (10) students in clinical experiences.
3. Continue the program's requirement to admit no additional classes without prior approval by the full Board.
4. Continue the program's requirement to submit clinical placement plans for all enrolled students throughout their program of study using the provided Faculty/Student Clinical Assignment Form, the Maternity Faculty/Student Clinical Assignment Form, and the Pediatric Faculty/Student Clinical Assignment Forms and completing them as instructed. The placement plans were due **no later than June 15, 2016**.
5. Require the program's requirement to submit a comprehensive analysis of the program, specific actions taken to improve pass rates, timeline for implementation, and the effect of employed interventions. The report is due **no later than September 30, 2016**. The following elements must be addressed in the analysis:
 - a. Admission Criteria
 - b. Screening and Selection Criteria
 - c. Terminal Objectives
 - d. Curriculum Objectives
 - e. Instructional Plan

- f. Theory and Clinical Objectives for Each Course
- g. Lesson Plans for Each Course
- h. Textbooks
- i. Attendance Policy
- j. Remediation Policy
- k. Evaluations of Theory and Clinical Faculty
- l. Evaluations of Theory Presentations
- m. Evaluations of Clinical Rotations and Their Correlation to Theory Presentations
- n. Evaluation of Student Achievement
- o. Current Enrollment

- 6. Continue the program's requirement to bring its average annual pass rate to no more than (10) ten percentage points below the State average annual pass rate.
- 7. Continue the program's requirement to demonstrate incremental progress in correcting the violations. If the program fails to satisfactorily demonstrate incremental progress the full Board may revoke the program's approval.
- 8. Continue the program's requirement 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 any of these corrective actions may cause the full Board to revoke the program's approval.
- 10. Place the program on the **November 2016** Board meeting for reconsideration of provisional approval.

Agenda Item #18.B.1.



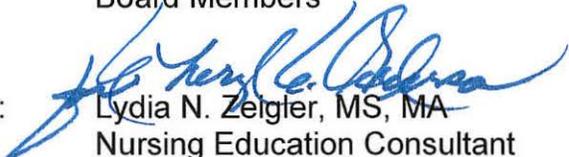
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DATE: August 1, 2016

TO: Board Members

FROM: 
Lydia N. Zeigler, MS, MA
Nursing Education Consultant

SUBJECT: Casa Loma College, Van Nuys, Vocational Nursing Program – Reconsideration of Provisional Approval (Director: Stephanie Ayo-Akinyemil, Van Nuys, Los Angeles County - Private)

The Casa Loma College, Van Nuys, Vocational Nursing Program is presented for reconsideration of provisional approval. Extension of provisional approval through November 30, 2016, is recommended.

The Board initially placed the program on provisional approval for the three (3) month period from May 13, 2016 through August 31, 2016, due to noncompliance with requirements specified in the California Code of Regulations. Specifically, 11 violations were identified during an unannounced program inspection conducted by two (2) Board representatives on February 3 and 4, 2016. Additionally, the program had been noncompliant with regulatory requirements relative to average annual pass rates for five (5) consecutive quarters. The Board scheduled reconsideration of the program's status for the August 2016 meeting. Further, the Board approved the program's request to admit one (1) class of 30 students to begin July 11, 2016, contingent upon receipt of correction of all violations, as determined by the Executive Officer.

On July 15, 2016, the Executive Officer denied the program's request to admit students due to the program's failure to correct all identified violations, as specified by the Board.

History of Prior Board Actions

(See Attachment A, History of Prior Board Actions)

Enrollment

The Casa Loma College, Van Nuys, Vocational Nursing Program was previously approved to admit five (5) full – time day classes per year and one (1) full – time evening class per year. Effective February 17, 2016, the Board rescinded approval of the program's ongoing admissions and required the program to obtain Board approval prior to admitting students. The pattern of admissions for current classes is seen in the enrollment table below.

The following table represents **current and projected** student enrollment based on current and projected class starts and completions. The table indicates a **maximum enrollment of 116**

students for the period January 2013 through July 2016. Based on reported enrollment statistics, 70 students are currently enrolled in three (3) classes.

ENROLLMENT DATA				
CLASS DATES		#Students Admitted	#Students Current or Completed	Total Enrolled
Start	Complete			
1/13 FT/Day		18	16	16
4/13 FT/Day		26	15	16 + 15 = 31
7/13 FT/Day		30	20	31 + 20 = 51
9/13 FT/Day		30	26	51 + 26 = 77
12/13 FT/Day		18	15	77 + 15 = 92
1/14 FT/Day		15	13	92 + 13 = 105
	1/14 (1/13 Class)		-16	105 - 16 = 89
4/14 FT/Day		30	20	89 + 20 = 109
	4/14 (4/13 Class)		-15	109 - 15 = 94
7/14 FT/Day		29	13	94 + 13 = 107
	7/14 (7/13 Class)		-20	107 - 20 = 87
9/14 FT/Day		30	13	87 + 13 = 100
	10/14 (9/13 Class)		-26	100 - 26 = 74
12/14 FT/Day		20	13	74 + 13 = 87
	12/14 (12/13 Class)		-15	87 - 15 = 72
1/15 FT/Day		15	8	72 + 8 = 80
	2/15 (1/14 Class)		-13	80 - 13 = 67
4/15 FT/Eve		12	7	67 + 7 = 74
	4/15 (4/14 Class)		-20	74 - 20 = 54
4/15 FT/Day		20	24	54 + 24 = 78
7/15 FT/Day		24	27	78 + 27 = 105

ENROLLMENT DATA				
CLASS DATES		#Students Admitted	#Students Current or Completed	Total Enrolled
Start	Complete			
	7/15 (7/14 Class)		-13	105 - 13 = 92
9/15 FT/Day	9/16	25	24	92 + 24 = 116
	10/15 (9/14 Class)		-13	116 - 13 = 103
	12/15 (12/14 Class)		-13	103 - 13 = 90
1/16 FT/Day	1/17	22	19	90 + 19 = 109
	1/16 (1/15 Class)		-8	109 - 8 = 101
	4/16 (4/15 Eve Class)		-7	101 - 7 = 94
	4/16 (4/15 Day Class)		-24	94 - 24 = 70
	7/16 (7/15 Class)		-27	70 - 27 = 43
	9/16 (9/15 Class)		-24	43 - 24 = 19
	1/17 (1/16 Class)		-19	19 - 19 = 0

Licensing Examination Statistics

The following statistics, furnished by Pearson VUE, and published by the National Council of State Boards of Nursing as "Jurisdictional Summary of All First-Time Candidates Educated in Member Board Jurisdiction," for the period July 2012 through June 2016, specify the pass percentage rates for graduates of Casa Loma College, Van Nuys, 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 Average Quarterly Pass Rate	Program Average Annual Pass Rate	State Average Annual Pass Rate [CCR §2530 (l)]	Variance from State Average Annual Pass Rate
Jan - Mar 2012	13	8	61%	77%	69%	74%	-5
Apr - Jun 2012	18	9	50%	72%	62%	74%	-17
Jul - Sep 2012	47	25	53%	74%	56%	74%	-18
Oct - Dec 2012	18	12	67%	70%	56%	74%	-18
Jan - Mar 2013	18	14	78%	75%	60%	73%	-13
Apr - Jun 2013	20	14	70%	78%	63%	73%	-10
Jul - Sep 2013	25	19	76%	75%	73%	74%	-1
Oct - Dec 2013	23	20	87%	76%	78%	76%	+2

NCLEX-PN® Licensure Examination Data							
Quarterly Statistics				Annual Statistics*			
Quarter	# Candidates	# Passed	% Passed	State Average Quarterly Pass Rate	Program Average Annual Pass Rate	State Average Annual Pass Rate [CCR §2530 (I)]	Variance from State Average Annual Pass Rate
Jan – Mar 2014	19	16	84%	74%	79%	76%	+3
Apr – Jun 2014	23	13	57%	66%	76%	73%	+3
Jul – Sep 2014	17	13	76%	72%	76%	73%	+3
Oct – Dec 2014	14	6	43%	72%	66%	72%	-6
Jan – Mar 2015	14	8	57%	73%	59%	71%	-12
Apr – Jun 2015	21	7	33%	69%	52%	72%	-20
Jul – Sep 2015	29	12	41%	73%	42%	72%	-30
Oct – Dec 2015	15	9	60%	75%	46%	72%	-26
Jan – Mar 2016	10	2	20%	73%	40%	73%	-33
Apr – Jun 2016	7	3	43%	75%	43%	74%	-31

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

California Code of Regulations section 2530(l) states:

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

Based on the most recent data available (April through June 2016), the program’s average annual pass rate is **43%**. The California average annual pass rate for graduates from approved vocational nursing programs who took the NCLEX-PN® for the first time during the same period is 74%. The pass rate for the Casa Loma College, Van Nuys, Vocational Nursing Program is **31** percentage points **below** the state average annual pass rate. The program’s average annual pass rate has been greater than ten (10) percentage points **below** the state average annual pass rate for the **past six (6) consecutive quarters**.

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.”

However, based on the decision of the Board on May 13, 2016, the program is required to provide no less than one (1) instructor for every 10 students in clinical experiences.

The number of Board-approved faculty totals 22, including the director. The director reports approximately 70 to 80% administrative responsibility. The program has one full – time (1) Teacher Assistant. A total of 15 instructors are approved for clinical instruction. The list includes instructors currently on substitute status.

The program reported a maximum enrollment of 116 students from January 2013 through July 2016. As noted previously, reported enrollment statistics specify a **current** enrollment of 70 students. For a maximum enrollment of **70** students, seven (7) instructors are needed. Therefore, the total number of faculty is **adequate** for the current and proposed enrollment.

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

“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.”

At present, it **cannot be verified** that the program has adequate clinical facilities to afford the number, type, and variety of patients that will provide clinical experiences consistent with competency-based objectives and theory for current and proposed enrollment

Other Considerations

The Casa Loma College, Van Nuys, Vocational Nursing Program was **initially** placed on provisional accreditation in September 2002 and then granted full accreditation in September 2004.

On October 4, 2012, the Executive Officer approved the program for a four (4) year period (from September 9, 2012 through September 8, 2016). At that time, a major curriculum revision and the program's revised request for ongoing admissions were also approved. The new curriculum added 103 theory hours and 22 clinical hours. The program described a need for more time for students to learn and understand content and to integrate ATI throughout the curriculum.

On February 13, 2015, the Board received the program's response to the Board's inquiry regarding the decline in its average annual pass rates on the licensure examination. The director was requested to identify root causes of the decrease and outline improvement plans being implemented to address the concern. **At that time, the program's average annual pass rate was 59%**. The program's correspondence described an increase in admission requirements, the addition of HESI® practice and proctored exams throughout the curriculum, increased tutoring and remediation offered to students, and free, mandatory, live NCLEX® review at the end of the program. According to documentation provided by the program, the overall admission requirements were increased from a grade equivalent of 9.7 in August 2012 to a grade equivalent of 10.9 as of March 2015.

In May 2015, a telephone consultation with the director was facilitated to discuss the program's continued decline in pass rates. Based upon the director's descriptions, the consultant recommended that the program closely examine the curriculum, admissions/screening criteria, the remediation process, and strengthen critical thinking and faculty development.

On June 19, 2015, the Board approved a new program director.

In August 2015, the assigned consultant initiated a telephone consultation with the program director regarding further decline in the program's average annual pass rates. **At that time, the**

program's average annual pass rate was 52%. The director described making changes in faculty assignments and identified the following areas of focus to improve pass rates:

- Improving faculty development and mentoring;
- More use of HESI® including better integration into curriculum. It is now integrated starting with level 2 and students will have more accountability; and
- Enhancing NCLEX® review.

At that time, the director described some resistance to increasing admission criteria and the need to revise the curriculum but did not provide a specific plan or timeline.

As noted previously, the Board placed the program on provisional approval for the three – month period from May 13, 2016 through August 31, 2016, due to noncompliance with regulatory requirements. Based on findings from an unannounced program inspection conducted by two (2) Board representatives on February 3 and 4, 2016 and published examination statistics, 12 violations of the California Code of Regulations were identified. Those violations were detailed in the presented report. Further, **contingent** upon receipt of correction of all violations as determined by the Executive Officer, the Board approved the program's request to admit one (1) class of 30 students to begin July 11, 2016, graduating July 13, 2017.

On May 15, 2016, the Board approved a new program director.

On May 17, 2016, the Board forwarded the *Notice of Change in Approval Status* to the program. That document delineated required corrective actions and timelines specified by the Board. (See Attachment B)

On June 15, 2016, the program submitted a response in support of their request to admit a class of (30) students on July 11, 2016. Additionally, a copy of the program's philosophy and conceptual framework were submitted on June 29, 2016. On July 21, 2016, the Board received a follow – up report from the program.

The following summarizes required corrective actions and timelines delineated in the *Notice*, the program's actions regarding required corrections, and the status of identified violations.

- **Corrective Action #1:** *Require the Casa Loma College, Van Nuys, Vocational Nursing Program to provide no less than one (1) instructor for every ten (10) students in clinical experiences.*

Status of Corrective Action #1:

Based on data submitted to date, the program has sufficient Board – approved faculty to provide no less than one (1) instructor for every ten (10) students in clinical experiences.

Based on submitted statistics, the program's current enrollment includes a maximum of 70 students. Submitted information confirms the program's Board – approved faculty totals 22, including the director. A total of 15 instructors are approved for clinical instruction.

For a maximum enrollment of **70 students**, seven (7) instructors are required. As such, the total number of faculty is **adequate** for the current and proposed enrollment.

Given the foregoing, the program has **complied with Corrective Action #1.**

- **Corrective Action #2:** *Contingent upon the receipt of correction of all violations as determined by the Executive Officer, approve the program's request to admit one (1) class of 30 students to begin July 11, 2016, graduating July 13, 2017.*

Status of Corrective Action #2:

Board files confirm the submission of program documents and information subsequent to the Board meeting. However, those documents and information failed to correct all identified violations as determined by the Executive Officer, as specified in the *Notice*. As a result, on July 15, 2016, the Executive Officer denied the program's request to admit one (1) class of 30 students. As initially submitted, admission of the class was to commence July 11, 2016, with graduation projected for July 13, 2017. (See Attachment C)

Given the foregoing, the program **failed to comply with Corrective Action #2.**

- **Corrective Action #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 **June 1, 2016.***

Status of Corrective Action #4:

On June 1, 2016, the program director **submitted**, under penalty of perjury, the names of all enrolled students, date of admission, placement in the curriculum, and expected date of graduation.

Given the foregoing, the program has **complied with Corrective Action #4.**

- **Corrective Action #5:** *Require the program to submit the following, no later than June 15, 2016*
 - a. *Curriculum Objectives*
 - b. *Copy of the Board – approved Instructional Plan*
 - c. *Proposed methodology and timeline for evaluation of the curriculum*
 - d. *Documentation of evaluation of clinical facilities*
 - e. *Proposed policy for admission, selection, and screening of applicants to the program and steps to ensure consistent implementation of the policy*
 - f. *Plan for provision of resources to meet the objectives of the program*
 - g. *Description of responsibilities of a Teacher Assistant and allocation of Teacher Assistant hours and responsibilities in the program*

- h. Documentation that all faculty have access to the Board – approved Instructional Plan*
- i. Proposed policy for attendance and appropriate make – up and plan for consistent implementation of the policy*
- j. Proposed policy for evaluation of student progress and determination of the need for remediation or termination from the program*
- k. Documentation of posting of clinical objectives on patient care units utilized for clinical experience*
- l. Plan and timeline for correlating theory in clinical practice experiences*
- m. Plan for improvement of NCLEX-PN® pass rates*

Status of Corrective Action #5:

a. Curriculum Objectives (Violation #1)

On June 15, 2016, the Board received correspondence from the program with new curriculum objectives. Upon analysis, the submitted curriculum objectives are inconsistent with the program's philosophy, conceptual framework and instructional plan.

An analysis of program documents submitted in the July 21, 2016 follow – up report indicated no changes. The newly submitted document contained no new revisions.

Based on the submitted documentation, **Violation #1 is not corrected.**

b. A copy of the Board-approved Instructional Plan (Violation #2)

On June 15, 2016, the Board received the Instructional plan that was Board approved in October 2012.

Based on submitted documentation, **Violation #2 is corrected.**

c. Proposed methodology and timeline for evaluation of the curriculum (Violation #3)

As reported at the May Board meeting, official records confirmed the program has an approved methodology for the evaluation of its curriculum. However, the program failed to produce documentation confirming implementation of that methodology. The program failed to produce documentation confirming evaluation of the curriculum.

On July 15, 2016, the Board received the program's proposed methodology and timeline for evaluation of the curriculum for three (3) months. Based on information submitted to the Board, the timeline and methodology are sparse. There is no evidence of implementation or continuity, in that the program would continue to evaluate the curriculum consistently.

The Board relies on faculty meeting minutes, and other documentation to confirm that follow through is completed and deficiencies addressed. There was only a piece

documenting a single faculty meeting submitted where it appeared the topic was being introduced to faculty. Insufficient information and documents were submitted to see results over time.

To date, the director failed to submit documentation confirming completion of a thorough evaluation of the curriculum, including its applicability for the cognitive level or learning styles of students admitted to the program, adequacy and presentation by faculty, consistency with and adequacy of available clinical experience, and adequacy of other critical resources. Further, the director has failed to submit a plan to ensure the ongoing evaluation of the curriculum and plan to address identified deficiencies. This is extremely significant given the program's consistent decline and noncompliant average annual pass rates,

Given that failure, **Violation #3 is not corrected.**

d. Documentation of evaluation of clinical facilities (**Violation #4**)

As reported at the May Board meeting, the program had failed to evaluate all clinical facilities to which students were assigned. Based on submitted information, the program reported that clinical facilities would be evaluated quarterly. On March 22, 2016, the program submitted copies of ten (10) clinical facility evaluations.

On June 15, 2016, the program provided copies of ten (10) clinical facility evaluations completed by faculty dated from September 9, 2015 to February 25, 2016. The evaluations did not include oversight by the current program director. These facility evaluations appeared to be the same evaluations submitted on March 22, 2016.

Based on the information submitted by the program, the number of clinical facilities currently being used for the assignment of students totals fifteen (15). To date, the program has failed to submit documents substantiating the evaluation of the remaining clinical facilities utilized for students' required clinical rotations.

Given that failure, **Violation #4 is not corrected.**

e. *Proposed policy for admission, selection, and screening of applicants to the program and steps to ensure consistent implementation of the policy* (**Violation #5**)

The program submitted a proposed policy for the admission, screening, and selection of students. However, the submitted document does not contain required revisions as identified in the report presented to the Board on May 13, 2016. Further, the submitted follow – up report failed to include required revisions.

The following concerns are identified.

- 1) Applicants to the program would be admitted with below high school level academics. As previously reported, the program has increased its overall admission requirements from a grade equivalent of 9.7 in August 2012, to 10.9 in March 2015, to 11.1 in July 2016.

It is important to note that despite these changes, the program's average annual pass rates have declined substantially.

- 2) Applicants failing the admission examination would be allowed to repeat three (3) times within 30 days.
- 3) The policy states the Director can admit candidates who achieve a score on the admission test that is below the required minimum, however, criteria by which such exceptions are made were not specified.

Given the foregoing, **Violation #5 is not corrected.**

- f. *Plan for provision of resources to meet the objectives of the program (Violation #6)*

During the unannounced inspection, Board representatives confirmed that the program lacked sufficient resources to achieve its educational objectives. Based on observation and interviews, representatives identified that two (2) classes of students lacked textbooks and adequate computer resources. Further, students reported the cancellation of clinical classes due to insufficient faculty. The director reported that some faculty had been furloughed.

On June 15, 2016, the program submitted copies of book and supply sign out sheets that indicate issuance of textbooks and HESI materials to current students. A plan to ensure ongoing provision of resource materials to all future students was not provided.

Given the foregoing, **Violation #6 is not corrected.**

- g. *Description of responsibilities of a Teacher Assistant and allocation of Teacher Assistant hours and responsibilities in the program (Violation #7)*

Information obtained during the unannounced inspection confirmed that the program had failed to utilize its Teacher Assistant consistent with regulatory specifications. Based on analysis of records, the program utilized Teacher Assistants to provide tutoring and counseling services. Such services are inconsistent with regulatory requirements that state:

"Each teach assistant shall work under the direction of an approved instructor... Each teacher assistant shall assist the instructor in skills lab and clinical teaching only..."

On June 15, 2016, the program submitted a job description for an Administrative Assistant and a job description of a Teacher Assistant. A review of the Teacher Assistant job description indicated responsibilities that are consistent with the Vocational Nursing regulations. However, the program failed to submit a schedule and assignments for the Teacher Assistant to confirm utilization consistent with regulatory requirements.

The July 21, 2016 follow – up report states, "...there is no Teacher Assistant in the program." It is noted that the program has not submitted correspondence advising of the termination of the approved Teacher Assistant.

Given the foregoing, **Violation #7 is not corrected.**

- h. *Documentation that all faculty have access to the Board-approved Instructional Plan (Violation #8)*

Observation and analysis of documents provided during the inspection substantiated that the program failed to ensure the availability of its Instructional Plan to all faculty.

On June 15, 2016, the program submitted documentation that eight (8) theory faculty have reviewed and received a copy of the Instructional Plan. There is no documentation indicating that the remaining 14 faculty have reviewed and have access to the Instructional Plan.

Information submitted in the program's follow – up report received on July 21, 2016, contained signatures of the same eight (8) faculty acknowledging receipt of the program's Instructional Plan. Based on the submitted information, the director has failed to submit documentation confirming access of the remaining approved faculty to the Instructional plan.

Given the foregoing, **Violation #8 is not corrected.**

- i. *Proposed policy for attendance and appropriate make-up and plan for consistent implementation of the policy (Violation #9)*

Observation and analysis of documents provided during the inspection substantiated that the program failed to differentiate acceptable methods of make up for theory and clinical absences. Further, the program failed to follow its approved policy in that students not adhering to the policy remained in the program despite exceeding the stated maximum allowable absences.

On June 15, 2016, the program submitted an attendance policy that has clinical make-up methods that are inconsistent with regulatory requirements, allowing case studies for missed clinical time when there is no clinical or laboratory availability. The policy does not identify attendance limits in theory and clinical, nor does it state attendance limits for each term. Further, the policy indicates that the director determines, on a case-by-case basis, the amount of instructional time that can be missed. Such determination allows for the possibility of inequitable application of the policy. A plan for consistent implementation of the policy was not submitted.

Information contained in the program's follow – up report received on July 21, 2016 contained no revisions from previously submitted materials.

Given the foregoing, **Violation #9 is not corrected**

- j. *Proposed policy for evaluation of student progress and determination of the need for remediation or termination from the program (Violation #10)*

Observation and analysis of records during the inspection substantiated that the program failed to note the number of times a student may fail a course and remain in the program.

On June 15, 2016, the program submitted a policy. The submitted policy does not provide the number of times a student may repeat a failed course and re-enroll in the program to repeat a term. The remediation plan fails to clearly identify criteria for measuring student progress and appropriate follow-up with students who are in remediation. The policy does not address a remediation process for students who are failing clinical.

The follow – up report received on July 21, 2016 failed to correct the required deficiencies.

Given the foregoing, **Violation #10 is not corrected.**

- k. *Documentation of posting of clinical objectives on patient care units utilized for clinical experience and timeline for completion of the actions. (Violation #11)*

Observation and information obtained during the program inspection substantiated that the program failed to post clinical objectives at one (1) of the two sites that were inspected. Further, clinical faculty at both sites were unable to identify what students were learning in theory at the time.

On June 15, 2016, the program submitted a proposed plan titled “for theory/clinical faculty relationship.” The documentation states that some clinical facilities do not allow posting of the objectives. When objectives cannot be posted, instructors are to carry the objectives on their clipboards.

The program submitted photos reported to be clinical objectives posted on patient units.

- l. *Plan and timeline for correlating theory in clinical practice experiences. (Violation #11)*

The program submitted documentation of its plan for ensuring the correlation of theory and assigned clinical instruction. As submitted, the program indicated that theory and clinical faculty would have frequent meetings, starting immediately. However, it failed to show the expectations and outcomes of faculty/clinical instructor meetings, including evidence of its implementation and required correlation.

Given the foregoing, **Violation #11 is not corrected.**

- m. *Plan for improvement of NCLEX-PN® pass rates (Violation #12)*

The program submitted a copy of a purchase order for “NCLEX-PN Mastery RN Activity” class and list of past and current students’ names. The program failed to submit a plan to maximize student achievement and improve noncompliant program average annual pass rates on the licensure examination.

Included in the program's July 21, 2016 follow – up report, the director submitted an addendum plan for improvement of NCLEX pass rates. As presented, the program plans to integrate Evolve and Saunders NCLEX/PN Exit examinations with proctored tests beginning in Level 2 of the program.

Given the above failure, **Violation #12 is not corrected.**

➤ **Corrective Action #6**

The program was required to submit clinical placement plans for all enrolled students throughout their program of study using the provided Faculty/Student Clinical Assignment Form, the Maternity Faculty/Student Clinical Assignment Form, and the Pediatric Faculty/Student Clinical Assignment Forms and completing them as instructed, by **June 15, 2016.**

The program submitted clinical placement plans for enrolled students. It is noted that the program did not submit clinical placements plans for all enrolled students by the required due date. It is further noted, that documents submitted with the program's July 21, 2016 follow – up report list the assignment of a Teacher Assistant assigned to one clinical group without an approved instructor.

Given the foregoing, the program **failed to comply** with Correction Action #6 as specified in the Notice.

➤ **Corrective Action #7**

Due Date: June 15, 2016

Additionally, as specified in **Corrective Action #7**, the program was required to submit a comprehensive analysis of the program, specific actions taken to improve pass rates, timeline for implementation, and the effect of employed interventions. That report was **due no later than June 15, 2016.**

The submitted July 21, 2016 follow – up report contained a document titled "**comprehensive report of analysis** with specific actions to improve pass rates." It describes a summary of all the information aforementioned. No information is included on terminal objectives; theory and clinical objectives for each course; lesson plans for each course; textbooks; evaluations of theory and clinical faculty; evaluations of theory presentations; evaluations of clinical rotations and their correlation to theory presentations; evaluation of student achievement; and about current enrollment. While the program did submit some new actions, some plans for implementation are missing. The program did mention two (2) cohorts, 1507AM and 1507PM, who graduated April 2016. Students (31) in those cohorts passed the Saunders Exit Exam with a minimum score of 90%.

Given the foregoing, the program **failed to comply** with Correction Action #7 as specified in the Notice.

Given the program's failure to correct all identified violations, as specified in the Notice, the Executive Officer denied the program's request to admit students on July 15, 2016. (See Attachment C)

On July 18, 2016, the Board received electronic correspondence from the director requesting, "in writing the specific violations that were not corrected based on May 13, 2016 recommendations. I look forward to working with you in correcting the violations and I promise to respond to any recommendation(s) upon receipt from you."

A meeting with the program director is scheduled for August 4, 2016.

Recommendations:

1. Extend the provisional approval of the Casa Loma College, Van Nuys, Vocational Nursing Program from September 1, 2016 through November 30, 2016.
2. Continue the program's requirement to provide no less than one (1) instructor for every ten (10) students in clinical experiences.
3. Continue the program's requirement to admit no additional classes without prior approval by the full Board.
4. Continue the program's requirement to submit clinical placement plans for all enrolled students throughout their program of study using the provided Faculty/Student Clinical Assignment Form, the Maternity Faculty/Student Clinical Assignment Form, and the Pediatric Faculty/Student Clinical Assignment Forms and completing them as instructed. The placement plans were due **no later than June 15, 2016**.
5. Require the program's requirement to submit a comprehensive analysis of the program, specific actions taken to improve pass rates, timeline for implementation, and the effect of employed interventions. The report is due **no later than September 30, 2016**. The following elements must be addressed in the analysis:
 - a. Admission Criteria
 - b. Screening and Selection Criteria
 - c. Terminal Objectives
 - d. Curriculum Objectives
 - e. Instructional Plan
 - f. Theory and Clinical Objectives for Each Course
 - g. Lesson Plans for Each Course
 - h. Textbooks
 - i. Attendance Policy
 - j. Remediation Policy
 - k. Evaluations of Theory and Clinical Faculty
 - l. Evaluations of Theory Presentations
 - m. Evaluations of Clinical Rotations and Their Correlation to Theory Presentations
 - n. Evaluation of Student Achievement
 - o. Current Enrollment

6. Continue the program's requirement to bring its average annual pass rate to no more than (10) ten percentage points below the State average annual pass rate.
7. Continue the program's requirement to demonstrate incremental progress in correcting the violations. If the program fails to satisfactorily demonstrate incremental progress the full Board may revoke the program's approval.
8. Continue the program's requirement 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 any of these corrective actions may cause the full Board to revoke the program's approval.
10. Place the program on the **November 2016** Board meeting for reconsideration of provisional approval.

Rationale:

A recent unannounced program inspection identified a total of 11 violations. Including noncompliance with regulatory requirements relative to average annual pass rates, the program's violations totaled 12. The number and nature of the violations indicate **serious deficiencies** in the program.

Published examination statistics confirm the program's current average annual pass rate is **43%**, which is **31** percentage points **below** the state pass rate. The program has been greater than 10 percentage points **below** the state pass rate for the past **six (6) consecutive quarters**.

On May 13, 2016, the Board placed the program on provisional approval through August 31, 2016. Specific corrections were required.

On May 15, 2016, the Board approved a new program director.

On May 17, 2016, the Board mailed the *Notice of Change in Approval Status* to the program per certified and U.S. mail. That *Notice* specified identified violations, required corrections by the program, and timeline for compliance.

On June 15, 2016, the Board received numerous documents from the program director. A follow – up report and additional documents were received on July 21, 2016.

Of the required Corrective Actions, the program has provided corrections for only two (2). Of particular note is the program's failure to correct identified violations. The corrections that remain outstanding include Corrective Action #2: contingency upon correction of all violations listed under Corrective Action #5, which includes revision of curriculum objectives, methodology of and timeline for evaluation of the curriculum, evaluation of clinical facilities, admission policy; provision of resources to meet program objectives; attendance and make-up; correlating theory and

clinical; and most importantly, a plan for improvement of NCLEX-PN pass rates. Based on analysis of the submitted documentation, these are not in compliance with the regulatory requirements.

Further, Corrective Action 6, the documentation regarding clinical placements for all currently enrolled students was not submitted. Therefore, a determination of adequacy of clinical experiences and resources cannot be made.

It is noted that the director has submitted numerous documents and information; however, those submissions did not correct identified violations. Given that failure to correct all identified violations, as specified in the Notice, the Executive Officer denied the program's request to admit students on July 15, 2016.

The new director has requested identification of specific violations. Board representatives are scheduled to meet with the director on August 4, 2016.

Given the foregoing, extension of the program's provisional approval through November 30, 2016, is recommended.

- Attachment A: History of Prior Board Action
- Attachment B: Notice of Change in Approval Status Dated May 17, 2016
- Attachment C: Board Correspondence Dated July 18, 2016

Agenda Item #18.B.1., Attachment A

Casa Loma College Vocational Nursing Program

History of Prior Board Actions

- In March 1972, the Casa Loma College Vocational Nursing Program was granted initial accreditation. The initial class commenced in October 1971.
- On May 4, 1978, the Board granted approval to increase student enrollment from 45 to 60 students, effective June 19, 1978.
- On September 19, 1980, the Board granted approval to start a part-time vocational nursing program October 1980, with 468 theory hours, 1092 clinical hours for 18 months.
- On January 7, 1982, the Board granted approval to enroll 30 students each time a class is admitted, effective November 23, 1981; and discontinue using the evening shift in the program.
- On May 10, 1985, the Board approved the revised curriculum for 577 theory hours and 954 clinical hours.
- On June 24-26, 1986, an accreditation school survey was conducted at which time there were three violations related to credit granting, theory hours, and curriculum revisions.
- On September 12, 1986, the Board directed that the program submit curriculum revisions for review by October 1, 1986 for Nursing II; November 1, 1986 for Nursing III; December 1, 1986 for Nursing IV; and a follow-up report be presented at the January 1987 Board meeting.
- On March 6, 1987, the Board considered the follow-up report and approved that accreditation be continued for the Casa Loma College Vocational Nursing Program.
- On May 8, 1987, the Board ratified the authorization for revision of Nursing III; course description, content and objectives, effective February 1, 1987.
- On May 8, 1987, the Board considered the program's proposal to change the clinical grading system from a percentage to pass/fail for all classes, and requested the program submit criteria substantiating the rationale, with a follow-up report at the July Board meeting.
- On July 10, 1987, the Board approved the program's proposal to change the clinical grading system from a percentage to pass/fail for all classes.
- On February 25-28, 1992, an accreditation survey was conducted.

- On May 8, 1992, the Board approved that accreditation be continued for the Casa Loma College Vocational Nursing Program.
- On January 22, 1993, the Board ratified the authorization to decrease class size enrollment from 30 to 15 students and admit six times per year, effective January 4, 1993.
- On March 17, 1995, the Board granted approval for admission of 19 additional students on a one time basis, only.
- On September 22, 1995, the Board granted approval to change the admission schedule and increase student enrollment; i.e., Full-time program - Admit 24 students in September, 1995 and Part-time program - Admit 24 students in October, 1995; and requested a report be submitted by October 25, 1995, that addressed the rate of attrition for the full-time and part-time programs, the availability and student utilization of a remediation program, the number of faculty that had been hired and terminated and reasons for termination for the period January 1, 1994, through August 31, 1995; the current number of faculty, listing the status of each relative to full-time or part-time employment and whether the individuals teach theory and/or clinical; the training/orientation for new and substitute faculty, and assessment of the students' performance complete by the clinical facilities, changes that the Program Director has implemented to improve the students' pass rate on the National Council Licensure Examination for Practical Nurses (NCLEX-PN); and changes that the faculty have implemented to improve students' pass rate on the National Council Licensure Examination for Practical Nurses (NCLEX-PN); and a follow-up report, to include third quarter examination statistics and the school's plan to increase the pass percentage rate on the National Council Licensure Examination for Practical Nurses (NCLEX-PN) be presented at the November 1995 meeting.

The Board will consider the program's request to increase enrollment for the January, April and July 1996 classes at its November 1995 meeting.

- On November 17, 1995, the Board approved the admission of 24 full-time students in January, 1996, one time only; requested the program submit to the Board, in writing, on a monthly basis, the attrition rate and reasons for such attrition; and requested a follow-up report be presented at the March 1996 Board meeting to include updated attrition data and examination statistics.

The Board will consider the program's request to admit classes in April, July and September 1996 at its March 1996 meeting.

- On March 22, 1996, the Board approved admission of 24 full-time students in April, July, September and January; admission of 24 part-time students in April, 1996 and, thereafter, admission of 24 students every 20 months.
- **In August 1996, an interim program director was approved.**
- **In November 1996, a new program director was approved.**
- **In May 1997, a new program director was approved.**

- On August 12, 1997, the current program director was no longer affiliated with the college.
- **On August 28, 1997, an interim program director was approved.**
- **On January 15, 1998, a new program director was approved.**
- **On November 2, 1999, a new program director was approved.**
- **On March 9, 2000, a new program director was approved for the Van Nuys campus. The program now has a director at both the Van Nuys and Los Angeles campuses.**
- On September 29, 2000, the Board denied the program's request to admit a class of 36 full-time students on October 2, 2000, and directed the school to adhere to the admission schedule for the part-time program, as approved by the Board at its March 22, 1996, meeting.
- On November 17, 2000, the Board approved the program's request to admit a second part-time class (#2) with 24 students on December 4, 2000.
- On April 27, 2001, the Board approved the program's request to admit a part-time class (#1) with 24 students on August 15, 2001, only.
- **On January 18, 2002, the director at Casa Loma College Los Angeles campus was approved as director for both the Los Angeles and Van Nuys campuses.**
- **On August 1, 2002, a new program director was approved.**
- On September 6, 2002, the Board placed the program on provisional accreditation for the two (2) year period from September 6, 2002, through September 5, 2004 and issued a notice to the program to identify specific areas of noncompliance and requirements for correction as referenced in section 2526.1(e) of the Vocational Nursing Rules and Regulations.
- On May 14, 2004, the Board extended the program's provisional accreditation for a period of one (1) year for the period from May 14, 2004, through May 13, 2005, and approved ongoing admissions to **replace** graduating classes, only, in the Track II part-time class for the Casa Loma College, Van Nuys, Vocational Nursing Program with the stipulation that no additional classes are to be added to the program's current pattern of admissions without prior Board approval. The program's current pattern of admissions for all classes, including the classes previously approved for ongoing admissions, is:
 - a. The 12-month full-time class that admits 24 students four (4) times per calendar year in January, April, July and October;
 - b. The 17.5-month part-time Track I class that admits 24 students every 20 months; and
 - c. The 17.5-month part-time Track II class that admits 24 students every 24 months.

- On September 20, 2004, the Board reinstated full accreditation for the Casa Loma College, Van Nuys, Vocational Nursing Program for the four-year period from September 10, 2004, through September 9, 2008, and issued a certificate accordingly.
- On August 17, 2005, the Board approved the Casa Loma College, Van Nuys, Vocational Nursing Program's request to increase admission from 24 students per class to 30 students per class for all Board-approved classes changing the program's pattern of admissions to the following:
 - a. The 12-month full-time class admits 30 students four (4) times per calendar year in January, April, July and October;
 - b. The 17.5-month part-time Track I class admits 30 students every 20 months; and
 - c. The 17.5-month part-time Track II class admits 30 students every 24 months.
- On June 4, 2008, the Executive Officer approved continued full accreditation of the Casa Loma College, Van Nuys, Vocational Nursing Program for a four-year period from September 9, 2008, through September 8, 2012, and the Board issued a certificate accordingly.
- **On July 31, 2012, a new director was approved and subsequently completed New Director Orientation.**
- On October 4, 2012, the following recommendations were approved by the Executive Officer:
 1. Continue approval of the Casa Loma College, Van Nuys, Vocational Nursing Program for a four-year period from September 9, 2012, through September 8, 2016, and issue a certificate accordingly.
 2. Approve the program's proposed curriculum revision to include 680 theory hours and 976 clinical hours for a total of 1656 program hours.
 3. Approve discontinuance of the part-time evening class.
 4. Approve the program's request to change their approved ongoing admission pattern from 30 students each to full-time classes admitted every January, April, July and October to 30 students each to full-time classes admitted every January, March, June, August and October.
 5. Approve this request for ongoing admissions to **replace** graduating students 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 admission of five day classes of 30 students per year, admitting in January, March, June, August and October.
 - b. The director documents that adequate resources, i.e. faculty and facilities, are available to support each admitted class of students.

- c. The program's average annual pass rates remain compliant with regulatory requirements.
- **On February 12, 2014, Elena Barolet was approved as program director.**
 - On February 4, 2015, the Board received the completed packet regarding a request to begin a full – time evening class.
 - On February 13, 2015, the Board received correspondence from the program regarding steps being taken to improve licensure examination pass rates.
 - On April 1, 2015, the Executive Officer approved the following:
 1. Approve the program's request to admit one (1) full – time evening class of 20 students to start April 6, 2015 and to graduate March 30, 2016, only.
 2. Approve the program's request to change their ongoing pattern of admissions to **replace** graduating students 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 approved pattern of admissions is full – time day classes of 30 students admitted five (5) times per year and one (1) full – time evening class of 20 students admitted once per year.**
 - b) The director documents that adequate resources, i.e. faculty and facilities, are available to support each admitted class of students.
 - c) The program's average annual pass rates remain compliant with regulatory requirements.
 - **On June 19, 2015, the Board approved a new program director.**
 - On September 16, 2015, the Board issued a Notice of Violation to the program.
 - On February 3 and 4, 2016, an unannounced program inspection was conducted by two (2) Board representatives.
 - On February 17, 2016, the Acting Executive Officer approved the following:
 1. Effective immediately, rescind approval for ongoing admissions for the Casa Loma College, Van Nuys, Vocational Nursing Program.
 2. Require the program to obtain Board approval prior to the admission of any students. The program must document adequacy of faculty and facilities to support the objectives of the program prior to the admission of students.
 3. Require the program to correct violations identified during the onsite inspection and submit a report identifying proposed revisions and implemented interventions to include the following no later than **March 15, 2016.**

- a. Curriculum Objectives
 - b. Implementation of and availability to faculty of the current Board-approved Instructional Plan
 - c. Evaluation of the curriculum
 - d. Evaluation of clinical facilities
 - e. Admission, screening, and selection criteria
 - f. Adequacy of resources to meet program objectives
 - g. Responsibilities of a Teacher Assistant consistent with regulations
 - h. Attendance
 - i. Evaluation of student performance and the need for remediation or termination from the program
 - j. Correlation of theory and clinical objectives.
4. Submit a written plan for improvement of the program's NCLEX-PN® pass rates no later than **March 15, 2016**.
 5. Submit clinical placement plans for all enrolled students throughout their program of study using the provided Faculty/Student Clinical Assignment Form, the Maternity Faculty/Student Clinical Assignment Form, and the Pediatric Faculty/Student Clinical Assignment Forms and completing them as instructed, **no later than March 15, 2016**.
 6. Place the Casa Loma College, Van Nuys, Vocational Nursing Program on the Board's May 2016 agenda for consideration of provisional approval.
- On May 13, 2016, the Board placed the Casa Loma College, Van Nuys, Vocational Nursing Program on provisional approval for the three – month period from May 13, 2016 through August 31, 2016; **and** placed the program on the Board's **August 2016** agenda for reconsideration of provisional approval. Additionally, the following decisions were rendered:
 1. Required the program to provide no less than one (1) instructor for every ten (10) students in clinical experiences.
 2. **Contingent** upon the receipt of correction of all violations as determined by the Executive Officer, approve the program's request to admit one (1) class of 30 students to begin July 11, 2016, graduating July 13, 2017.
 3. Require the program to admit no additional classes without prior approval by the full Board, with the exception of the class requested to begin July 11, 2016, which will be considered by the Executive Officer.
 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 **June 1, 2016**.
 5. Require the program to submit the following, no later than **June 15, 2016**.
 - a. Revised Curriculum Objectives
 - b. A copy of the Board-approved Instructional Plan
 - c. Proposed methodology and timeline for evaluation of the curriculum

- d. A proposed policy for admission, selection, and screening of applicants to the program and steps to ensure consistent implementation of the policy
 - e. Plan for provision of resources to meet the objectives of the program
 - f. Allocation of Teacher Assistant hours and responsibilities in the program
 - g. Documentation that all faculty have access to the Board-approved Instructional Plan
 - h. Proposed policy for attendance and appropriate make-up and plan for consistent implementation of the policy
 - i. Proposed policy for evaluation of student progress and determination of the need for remediation or termination from the program
 - j. Documentation of posting of clinical objectives on patient care units utilized for clinical experience
 - k. Plan and timeline for correlating theory in clinical practice experiences
 - l. Plan for improvement of NCLEX-PN® pass rates
6. Submit clinical placement plans for all enrolled students throughout their program of study using the provided Faculty/Student Clinical Assignment Form, the Maternity Faculty/Student Clinical Assignment Form, and the Pediatric Faculty/Student Clinical Assignment Forms and completing them as instructed, **no later than June 15, 2016**.
7. Require the program to submit a comprehensive analysis of the program, specific actions taken to improve pass rates, timeline for implementation, and the effect of employed interventions. The report is due **no later than June 15, 2016**. The following elements must be addressed in the analysis:
- a. Admission Criteria
 - b. Screening and Selection Criteria
 - c. Terminal Objectives
 - d. Curriculum Objectives
 - e. Instructional Plan
 - f. Theory and Clinical Objectives for Each Course
 - g. Lesson Plans for Each Course
 - h. Textbooks
 - i. Attendance Policy
 - j. Remediation Policy
 - k. Evaluations of Theory and Clinical Faculty
 - l. Evaluations of Theory Presentations
 - m. Evaluations of Clinical Rotations and Their Correlation to Theory Presentations
 - n. Evaluation of Student Achievement
 - o. Current Enrollment
8. Require the program to bring its average annual pass rate to no more than (10) ten percentage points below the State average annual pass rate.
9. Require the program to demonstrate incremental progress in correcting the violations. If the program fails to satisfactorily demonstrate incremental progress the full Board may revoke the program's approval.
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 any of these corrective actions may cause the full Board to revoke the program's approval.

- **On May 17, 2016, the Board approved a new program director.**
- On June 15, 2016, the Board received the names of all enrolled students, date of admission, placement in the curriculum and expected date of graduation.
- On June 15, 2016, the Board received documentation for Required Correction #5.
- On July 15, 2016, the Board notified the program director by telephone of the Executive Officer's decision to deny the program's request to admit students on July 11, 2016. A Letter about the Decision from the Executive Officer would be forthcoming.
- On July 18, 2016, the Board forwarded correspondence advising the director of the program's failure to correct all identified violations, as specified in the *Notice of Change in Approval Status*. Given that failure, approval of the requested class of 30 students to commence July 11, 2016 was denied.
- On July 21, 2016, the Board received documents from the program that pertain to the required corrections and violations.

Agenda Item #18.B.1., Attachment B



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

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



CERTIFIED MAIL

May 17, 2016

Greg Malone, President
Vocational Nursing Program
Casa Loma College, Van Nuys
6725 Kester Avenue
Van Nuys, CA 91405

Subject: Notice of Change in Approval Status

Dear Mr. Malone:

Pursuant to the action of the Board of Vocational Nursing and Psychiatric Technicians (Board) on May 13, 2016, the Casa Loma College, Van Nuys, Vocational Nursing Program has been placed on provisional approval for the three-month period from May 13, 2016 through August 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 **May 31, 2016**.

AREAS OF NON-COMPLIANCE (VIOLATIONS(S))

Section 2526(a)(4) of title 16 of the California Code of 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)(7) of title 16 of the California Code of Regulations states:

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

Section 2526(a)(8) of title 16 of the California Code of Regulations states:

REQUIRED CORRECTION(S)

1. Require the Casa Loma College, Van Nuys, Vocational Nursing Program to provide no less than one (1) instructor for every ten (10) students in clinical experiences.
2. **Contingent** upon the receipt of correction of all violations as determined by the Executive Officer, approve the program's request to admit one (1) class of 30 students to begin July 11, 2016, graduating July 13, 2017.
3. Require the program to admit no additional classes without prior approval by the full Board, with the exception of the class requested to begin July 11, 2016, which will be considered by the Executive Officer.
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 **June 1, 2016**.
5. Require the program to submit the following, no later than June 15, 2016
 - a. Curriculum Objectives
 - b. A copy of the Board-approved Instructional Plan
 - c. Proposed methodology and timeline for evaluation of the curriculum
 - d. Documentation of evaluation of clinical facilities
 - e. A proposed policy for admission, selection, and screening of applicants to the program and steps to ensure consistent implementation of the policy
 - f. Plan for provision of resources to meet the objectives of the program
 - g. Description of responsibilities of a Teacher Assistant and allocation of Teacher Assistant hours and responsibilities in the program
 - h. Documentation that all faculty have access to the Board-approved Instructional Plan
 - i. Proposed policy for attendance and appropriate make-up and plan for consistent implementation of the policy
 - j. Proposed policy for evaluation of student progress and determination of the need for remediation or termination from the program
 - k. Documentation of posting of clinical objectives on patient care units utilized for clinical experience
 - l. Plan and timeline for correlating theory in clinical practice experiences
 - m. Plan for improvement of NCLEX-PN® pass rates

6. Submit clinical placement plans for all enrolled students throughout their program of study using the provided Faculty/Student Clinical Assignment Form, the Maternity Faculty/Student Clinical Assignment Form, and the Pediatric Faculty/Student Clinical Assignment Forms and completing them as instructed, **no later than June 15, 2016.**
7. Require the program to submit a comprehensive analysis of the program, specific actions taken to improve pass rates, timeline for implementation, and the effect of employed interventions. The report is due **no later than June 15, 2016.** The following elements must be addressed in the analysis:
 - a. Admission Criteria
 - b. Screening and Selection Criteria
 - c. Terminal Objectives
 - d. Curriculum Objectives
 - e. Instructional Plan
 - f. Theory and Clinical Objectives for Each Course
 - g. Lesson Plans for Each Course
 - h. Textbooks
 - i. Attendance Policy
 - j. Remediation Policy
 - k. Evaluations of Theory and Clinical Faculty
 - l. Evaluations of Theory Presentations
 - m. Evaluations of Clinical Rotations and Their Correlation to Theory Presentations
 - n. Evaluation of Student Achievement
 - o. Current Enrollment
8. Require the program to bring its average annual pass rate to no more than (10) ten percentage points below the State average annual pass rate.
9. Require the program to demonstrate incremental progress in correcting the violations. If the program fails to satisfactorily demonstrate incremental progress the full Board may revoke the program's approval.
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 any of these corrective actions may cause the full Board to revoke the program's approval.

FUTURE BOARD ACTION

Your program will be placed on the **August 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 5 and 6, 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, with the exception of the July 11, 2016 class.**

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



TITLE 16 CALIFORNIA CODE OF REGULATIONS

2526.1. Provisional Approval.

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

Note: Authority cited: Section 2854, Business and Professions Code. Reference: Sections 2880, 2881 and 2883, Business and Professions Code.

Agenda Item #18.B.1., Attachment C



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



July 15, 2016

Stephanie Ayo-Akinyemi, M.S.N., R.N.
Director, Vocational Nursing Program
Casa Loma College
School of Nursing and Allied Health
6725 Kester Avenue
Van Nuys, CA 91405

SUBJECT: Consideration of Request to Admit Students

Dear Ms. Ayo-Akinyemi:

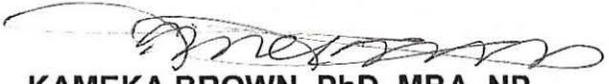
On May 13, 2016, the Board of Vocational Nursing and Psychiatric Technicians (Board) considered the status and request of the Casa Loma College, Van Nuys, Vocational Nursing Program. The Board placed the program on provisional approval for the three – month period from May 13, 2016, through August 1, 2016. On May 17, 2016, the Board forwarded to the program the *Notice of Change in Approval Status (Notice)*, specifying identified violations, required corrections, and timeline for corrections.

On July 15, 2016, the Executive Officer denied the program's request to admit students. As specified in the *Notice*, the Board approved the program's request to admit one (1) class of 30 students to commence July 11, 2016, and graduate July 13, 2017, **contingent** upon the correction of all violations as determined by the Executive Officer.

Board files confirm the submission of program documents subsequent to the Board meeting. However, to date, the program has failed to correct all identified violations, as specified in the *Notice*. It is recommended that you complete required corrections as discussed with Ms. Zeigler, your assigned Nursing Education Consultant.

Should further assistance be needed, please do not hesitate to contact the Board.

Sincerely,



KAMEKA BROWN, PhD, MBA, NP
Executive Officer

cc: Gregory Malone, President
Casa Loma College