

AGENDA ITEM #18.B.2.



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

BOARD OF VOCATIONAL NURSING & PSYCHIATRIC TECHNICIANS
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COVER SHEET

SUBJECT: CNI College Vocational Nursing Program – Reconsideration of Provisional Approval; Consideration of Request to Admit Students. (Director: Sasha Rarang, Orange, Orange County, Private)

The CNI College Vocational Nursing Program is presented for reconsideration of provisional approval. In addition, the program has requested approval to admit students. The recommendation is to extend provisional approval through February 2017 and to deny the request to admit students.

Recommendations:

1. Extend provisional approval of the CNI College Vocational Nursing Program for the six (6) month period from September 1, 2016, through February 29, 2017. (Attachment F)
2. Place the program on the February 2017 Board agenda for reconsideration of provisional approval.
3. Deny the program's request to admit one (1) part-time class of 40 students beginning October 17, 2016, graduating April 19, 2018.
4. Deny the program's request to admit one (1) full-time class of 40 students beginning October 24, 2016, graduating January 15, 2017.
5. Continue to require the program to provide no less than one (1) instructor for every ten (10) students in clinical experiences.
6. Continue to require the program to admit no additional classes without prior approval by the Board.
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 **September 15, 2016**.
8. Continue to 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. Continue to require the program to demonstrate progress in correcting the violations. If the program fails to satisfactorily demonstrate progress the full Board may revoke the program's approval.
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 any of these corrective actions may cause the full Board to revoke the program's approval.

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DATE: August 1, 2016

TO: Board Members

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

SUBJECT: CNI College Vocational Nursing Program – Reconsideration of Provisional Approval; Consideration of Request to Admit Students. (Director: Sasha Rarang, Orange, Orange County, Private)

The CNI College Vocational Nursing Program is presented for reconsideration of provisional approval. In addition, the program has requested approval to admit students. The recommendation is to extend provisional approval through February 2017 and to deny the request to admit students.

The following events resulted in the Board placing the program on provisional approval on May 13, 2016, and recommending reconsideration of the program's status after three (3) months.

- Receipt of a series of complaints; some from anonymous sources and some from students and faculty;
- Four (4) quarters of licensure examination pass rates that were non-compliant with regulatory requirements;
- Findings from an unannounced program inspection;
- Identification of a total of 14 violations, including material misrepresentation of fact.

The program has requested to admit one (1) part-time class of 40 students beginning October 17, 2016, graduating April 19, 2018.

The program has also requested to admit one (1) full-time class of 40 students beginning October 24, 2016, graduating January 15, 2017.

History of Prior Board Actions

(See Attachment A, History of Prior Board Actions)

Enrollment

Currently, the program offers full-time classes that are 52 weeks in length. The program also offers part-time classes that are 82 weeks in length. Since September 2015, the program must obtain Board approval prior to admitting students.

The following table represents projected student enrollment based on current and proposed class starts and completions. The table indicates a **maximum enrollment of 168 students** for the period from **February 2012 through October 2016**. Currently, the program has a part-time class of 17 students enrolled and scheduled to graduate January 30, 2017 and a part-time class of 14 students scheduled to graduate August 29, 2016.

ENROLLMENT DATA				
CLASS DATES		#Students Admitted	#Students Current or Completed	Total Enrolled
Start	Completed			
2/27/12 FT		14	12	12
3/26/12 PT		26	17	12 + 17 = 29
5/29/12 FT		8	7	29 + 7 = 36
7/30/12 PT		31	20	36 + 20 = 56
8/27/12 FT		23	20	56 + 20 = 76
11/26/12 FT		19	16	76 + 16 = 92
11/26/12 PT		24	19	92 + 19 = 111
2/4/13 PT		9	6	111 + 6 = 117
	3/4/13 (2/12 FT Class)		-12	117 - 12 = 105
4/1/13 FT		22	13	105 + 13 = 118
	5/24/13 (5/12 FT Class)		-7	118 - 7 = 111
6/27/13 FT		32	25	111 + 25 = 136
7/1/13 PT		26	7	136 + 7 = 143
	8/29/13 (8/12 FT Class)		-20	143 - 20 = 123
9/30/13 FT		42	27	123 + 27 = 150
	10/14/13 (3/12 PT Class)		-17	150 - 17 = 133
	11/21/13 (11/12 FT Class)		-16	133 - 16 = 117
11/25/13 PT		37	22	117 + 22 = 139
1/2/14 FT		20	16	139 + 16 = 155
	3/24/14 (7/12 PT Class)		-20	155 - 20 = 135
	3/28/14 (4/13 FT Class)		-13	135 - 13 = 122
3/31/14 FT		30	21	122 + 21 = 143
4/21/14 PT		36	25	143 + 25 = 168

ENROLLMENT DATA				
CLASS DATES		#Students Admitted	#Students Current or Completed	Total Enrolled
Start	Completed			
	6/23/14 (6/13 FT Class)		-25	168 - 25 = 143
6/30/14 FT		23	19	143 + 19 = 162
	7/14 (11/12 PT Class)		-19	162 - 19 = 143
	8/31/14 (2/13 PT Class)		-6	143 - 6 = 137
9/8/14 PT		24	20	137 + 20 = 157
	9/25/14 (9/13 FT Class)		-27	157 - 27 = 130
9/29/14 FT		32	23	130 + 23 = 153
	12/23/14 (1/14 FT Class)		-16	153 - 16 = 137
1/5/15 FT		23	12	137 + 12 = 149
2/2/15 PT		30	14	149 + 14 = 163
	2/14/15 (7/13 PT Class)		-7	163 - 7 = 156
	3/27/15 (3/14 FT Class)		-21	156 - 21 = 135
4/6/15 FT		20	12	135 + 12 = 147
	6/7/15 (11/13 PT Class)		-22	147 - 22 = 125
	6/29/15 (6/14 FT Class)		-19	125 - 19 = 106
6/29/15 FT		9	4	106 + 4 = 110
6/29/15 PT	1/29/17	22	21	110 + 21 = 131
	9/22/15 (9/14 FT Class)		-23	131 - 23 = 108
	11/15/15 (4/14 PT Class)		-25	108 - 25 = 83
	1/16 (1/15 FT Class)		-12	83 - 12 = 71
	4/16 (4/15 FT Class)		-12	71 - 12 = 59
	4/16 (9/14 PT Class)		-20	59 - 20 = 39
	7/16 (6/15 FT Class)		-4	39 - 4 = 35
	9/16 (2/15 PT Class)		-14	35 - 14 = 21
10/16 PT (Proposed)	4/18	40		21 + 40 = 61

ENROLLMENT DATA				
CLASS DATES		#Students Admitted	#Students Current or Completed	Total Enrolled
Start	Completed			
10/16 FT (Proposed)	1/17	40		61 + 40 = 101

Licensing Examination Statistics

The following statistics, furnished by the Pearson Vue and published by the National Council of State Boards of Nursing as "Jurisdictional Summary of All First-Time Candidates Educated in Member Board Jurisdiction," for the period January 2012 through June 2016, specify the pass percentage rates for graduates of the CNI College 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 (I)]	Variance from State Average Annual Pass Rate
Jan-Mar 2012	22	21	95%	77%	96%	74%	+22
Apr-Jun 2012	23	21	91%	72%	95%	74%	+21
July-Sep 2012	40	35	88%	74%	92%	74%	+18
Oct-Dec 2012	12	8	67%	70%	88%	74%	+14
Jan-Mar 2013	15	15	100%	75%	88%	73%	+15
Apr-Jun 2013	19	13	68%	78%	83%	73%	+10
Jul-Sep 2013	20	17	85%	75%	80%	74%	+14
Oct-Dec 2013	17	16	94%	76%	86%	76%	+10
Jan-Mar 2014	16	13	81%	74%	82%	76%	+6
Apr-Jun 2014	43	34	79%	66%	83%	73%	+10
Jul-Sep 2014	48	30	63%	72%	75%	73%	+2
Oct-Dec 2014	17	9	53%	72%	69%	72%	-3
Jan-Mar 2015	23	13	57%	73%	66%	71%	-5
Apr-Jun 2015	31	17	55%	69%	58%	72%	-14
Jul-Sep 2015	31	19	61%	73%	57%	72%	-15
Oct-Dec 2015	28	13	46%	75%	55%	72%	-17
Jan-Mar 2016	16	11	69%	73%	57%	73%	-16
Apr-Jun 2016	13	10	77%	75%	60%	74%	-14

*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 **60%**. 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 average annual pass rate for the CNI College Vocational Nursing Program is **14** percentage points **below** the state average annual pass rate.

Faculty and Facilities

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

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

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 total number of Board-approved faculty is 21, including the program director. The director has 100% administrative duties. All instructors are approved to teach in the clinical area.

Based on a maximum enrollment of 168 students, 17 instructors are needed. Therefore, the number of current faculty is **adequate** for the current and projected enrollment.

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

“Schools shall have clinical facilities adequate as to number, type, and variety of patients treated, to provide clinical experience for all students in the areas specified by Section 2533. There must be available for student assignment, an adequate daily census of patients to afford a variety of clinical experiences consistent with competency-based objectives and theory being taught.”

The program **lacks** clinical facilities that are adequate as to type and variety of patients treated to enable current and proposed students to meet clinical objectives, in accordance with Section 2534(b) of the Vocational Nursing Rules and Regulations.

Other Considerations

The May 2016 report to the Board detailed the program's previous placement on provisional approval (February 2008 through October 2009), complaints during 2015, decreasing performance on the licensure examination, and the findings of an unannounced program inspection in August 2015. During 2015 and the first quarter of 2016, a total of 14 violations were identified, including a material misrepresentation of fact.

The material misrepresentation of fact was identified after the program was required to respond to a complaint that was submitted to the Board in January 2016. The complainant alleged that the program was not providing clinical experience in the care of sick children. This issue had been identified by the Board in July 2015.

On February 22, 2016, the program director admitted that official Board documents had been signed by the program director indicating that 12 recent graduates had completed all required hours in the program. In fact, the students had not completed the required pediatric clinical hours.

As of July 1, 2016, the program had submitted revised documentation for the 12 graduates initially identified.

Additionally, when required to respond to the January 2016 complaint, the program reported that 36 of 46 individuals from graduating classes in November 2015 and January 2016 had not completed the required pediatric clinical experience and were informed of the need to return to school to complete the required hours. In addition, the following was reported by the program.

- Of 30 graduates from the November 2015 part-time graduation, none of the graduates had completed all required pediatric clinical experience hours. The number of hours needed per student varied from 16 to 40 hours.
- Of the 16 graduates from the January 2016 full-time graduation, three (3) graduates had completed all 40 hours, six (6) graduates were in need of eight (8) to 16 hours, and seven (7) graduates had attended between 16 to 40 hours **greater** than required for pediatric clinical experience.

The status of the violations at the time of the May 2016 Board meeting was as follows.

- A total of three (3) violations had been corrected, including
 - Section 2529(b): Failure to provide active administration of the program
 - Section 2534(a): Failure to obtain Board approval prior to use of a clinical facility
 - Section 2350(a): Inadequate physical resources to support the number of students admitted prior to August 2015.
- The program had presented plans that, if implemented consistently, would correct the following seven (7) violations
 - Section 2526(a)(8): Failure to follow Board-approved policies related to evaluation of the curriculum
 - Sections 2526(a)(11) and 2534(c): Failure to follow policies related to evaluation of clinical facilities
 - Sections 2526(a)(12-13): Failure to follow policies related to admission, screening, and selection of applicants
 - Section 2527(b): Failure to report faculty termination in accordance with regulatory requirements.
 - Section 2530(i): Failure to follow policies related to evaluation of student progress and remediation

- Section 2530(h): Failure to follow the attendance policy, including timely and appropriate make-up of missed hours
 - Section 2533(c): Failure to provide curriculum content in a sequence of progressive mastery of content related to excessive absences.
- A total of two (2) violations were pending correction, including
- Section 2533(a): Failure to correlate theory content and clinical experience related to excessive absences
 - Section 2534(b) Failure to provide adequate clinical facilities to support the objectives of the program and the number of students enrolled.
- A total of two (2) violations were not corrected
- Section 2530(l): Failure to maintain an average minimum pass rate on the licensure examination that is within 10 percentage points of the state average annual pass rate
 - Section 2526(g): Material Misrepresentation of fact.

On May 17, 2016, the Board forwarded a *Notice of Change in Approval Status* to the program and defined the required corrective actions. (See Attachment B)

On June 15, 2016, the program submitted the required follow-up report, (see Attachment C), which is summarized as follows.

- Admission – the program states students were not fully prepared academically. For that reason, the admission policy was revised and subsequently approved by the Board.
- Screening and Selection – applicant interviews were not conducted in the past; a new interview rubric to be used by the program director has been developed.
- Terminal Objectives – revised and submitted for approval
- Curriculum Objectives – the program discussed utilizing QSEN (quality, safety, and education) competencies and KSAs (knowledge, skills, and attitudes) but the program did not provide revised curriculum objectives, as required by the Board
- Instructional Plan – the program submitted a revised instructional plan (*see below*)
- Theory and Clinical Objectives – the program submitted revised syllabi for each course
- Lesson Plans – the program described that QSEN and KSAs will be incorporated; no lesson plans were submitted
- Textbooks – the program states texts were reviewed
- Attendance Policy – the program states that, “faculty and students were made aware of the attendance policy guidelines” and that a revised policy was approved by the Board
- Remediation Policy – the revised remediation policy was approved by the Board; the minimum passing score is now 75%, applicable to all exams and remediation assignments
- Evaluations of clinical and theory faculty – the program reports all faculty are observed by the program director and that students evaluate faculty at the end of each term
- Evaluation of clinical rotations – the program reports that each site was visited by the program director
- Current enrollment was described (see enrollment table, above)

On the same date, the program also submitted a description of campus facilities (including facilities and equipment used by other CNI educational programs), a plan for integration of the

ATI program in the CNI Vocational Nursing Program, and a description of a five (5) day course to be offered to students prior to beginning the Vocational Nursing Program (see Attachment D).

The revised curriculum proposed by the program and received by the Board on June 15, 2016, was for a full-time program, only. **The curriculum cannot be approved as submitted.** The first term of the instructional plan submitted by the program was evaluated by two (2) NECs. Further analysis of the proposed curriculum was halted after the following concerns were identified.

- ✓ The program described the use of ATI learning modules as skills lab hours during most weeks of the term
 - Clinical hours cannot be granted for computer-based content assigned to students; therefore, clinical hours cannot be credited as proposed by the program
- ✓ A portion of the theory and clinical content described is outside the scope of practice of a Licensed Vocational Nurse in the state of California
 - It is a consumer protection issue that vocational nursing students clearly understand role delineation in the care of patients
- ✓ A significant number of clinical objectives were not written in behavioral terms
 - It is not clear what action is expected of the student
 - Some of the clinical objectives are didactic in nature
- ✓ In several content areas, clinical hours were presented prior to covering the related didactic content
 - In these cases, theory and clinical are not appropriately correlated, as described in section 2533(a)
- ✓ In several cases in the first few weeks, students would be presented with more complex content prior to mastering beginning content and skills
 - In these cases, the curriculum content is not taught in a sequence as described in section 2533(c), such that there is progressive mastery of knowledge, skills, and abilities

The documentation submitted in support of the request to admit a full-time class of 40 students was based on use of the unapproved instructional plan. In addition, proposed clinical placement plans would place students in clinical facilities during terms for which those facilities are not approved for use by the Board. Finally, proposed clinical placements for specialty rotations in the full-time class are not consistent with either the current or the proposed curriculum.

Proposed placements for the requested part-time class of 40 students would also place students in clinical facilities during terms for which those facilities are not approved for use by the Board. In addition, proposed clinical placements for specialty rotations in the part-time class are not consistent with the currently approved instructional plan for part-time classes.

The program was required to submit documentation of clinical placements for currently enrolled students. While the documentation submitted describes that students are now scheduled for pediatric clinical experiences in a variety of clinical facilities, that documentation describes placement of students in clinical facilities during terms for which the facilities were not approved. In addition, the documentation submitted indicates that clinical experiences for specialty rotations are still not being scheduled according to the Board-approved Instructional Plan.

On June 30, 2016, the Board was informed of the program director's resignation, effective July 1, 2016. On July 6, 2016, the Board approved the fourth program director since March 2014. On

the date of approval, new director orientation materials were forwarded to the program director. Acknowledgment of those materials has not been received as of July 25, 2016.

An anonymous letter, dated July 10, 2016, was forwarded to members of the Board. The letter, which is signed, "Faculty, families, students, parents and consumers," listed a total of nine (9) assertions. (See Attachment E)

Summary

The program has proposed a revised curriculum that is not consistent with regulatory requirements and cannot be approved as submitted. The program has also requested to admit a total of 80 students and proposed clinical placements for those students based on the curriculum that cannot be approved as submitted. In addition, for both the currently enrolled and the requested students, proposed specialty placements are not consistent with either the proposed or the approved curriculum and some placements are not consistent with Board-approved clinical facility applications.

Uncorrected violations include the failure to provide adequate clinical facilities to support the objectives of the program and the number of students proposed and enrolled, and the failure to maintain an average minimum pass rate on the licensure examination that is within 10 percentage points of the state average annual pass rate. In addition, as previously noted, a material misrepresentation of fact was identified in February of this year. When the misrepresentation was identified, it was also identified that of 46 recent graduates, 36 had not completed all of the required pediatric clinical hours and seven (7) of the recent graduates had between 16 to 40 hours greater than required.

It is also of concern that the program continues to demonstrate administrative instability with the fourth program director since March 2014 having just been approved.

There are two (2) currently enrolled classes, both part-time, with 14 students scheduled to graduate on August 29, 2016 and 21 students scheduled to graduate on January 30, 2017.

Recommendations:

1. Extend provisional approval of the CNI College Vocational Nursing Program for the six (6) month period from September 1, 2016, through February 29, 2017. (Attachment F)
2. Place the program on the February 2017 Board agenda for reconsideration of provisional approval.
3. Deny the program's request to admit one (1) part-time class of 40 students beginning October 17, 2016, graduating April 19, 2018.
4. Deny the program's request to admit one (1) full-time class of 40 students beginning October 24, 2016, graduating January 15, 2017.
5. Continue to require the program to provide no less than one (1) instructor for every ten (10) students in clinical experiences.

6. Continue to require the program to admit no additional classes without prior approval by the Board.
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 **September 15, 2016**.
8. Continue to 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. Continue to require the program to demonstrate progress in correcting the violations. If the program fails to satisfactorily demonstrate progress the full Board may revoke the program's approval.
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 any of these corrective actions may cause the full Board to revoke the program's approval.

Rationale

The program has failed to satisfactorily demonstrate progress in correcting violations. This is noted by the following.

1. The program's current average annual pass rate remains greater than 10 percentage points below the state average annual pass rate.
2. The program continues to schedule students in clinical experiences in a manner that is not consistent with regulatory requirements regarding use of the Board-approved instructional plan and the correlation with theory.

Further, with continued administrative instability, a proposed curriculum that cannot be approved as submitted, and the recent misrepresentation of a material fact as well as the identified problems with pediatric clinical experience requirements, it is in the interest of consumer protection to deny the requested class admissions.

The recommendation to extend provisional approval through February 2017 will allow the remaining students to complete their studies.

- Attachment A: History of Prior Board Action
- Attachment B: Board Correspondence Dated May 17, 2016
- Attachment C: Program Correspondence #1 Dated June 15, 2016
- Attachment D: Program Correspondence #2 Dated June 15, 2016
- Attachment E: Letter to the Board Dated July 10, 2016
- Attachment F: Draft Notice of Change in Approval Status

AGENDA ITEM #18.B.2., Attachment A

CNI COLLEGE VOCATIONAL NURSING PROGRAM

History of Prior Board Actions

- On May 14, 2004, the Board approved Career Networks Institute's request to commence a vocational nursing program with a full-time class of 45 students beginning May 17, 2004, in Orange, California with a projected graduation date of May 10, 2005. The Board also approved the program's curriculum for 1560 hours, including 580 theory and 980 clinical hours.
- On February 4, 2005, the Board approved initial full accreditation for the Career Networks Institute Vocational Nursing Program for the period February 4, 2005, through February 3, 2009, and issued a certificate accordingly.

Additionally, the Board approved the program's request to admit a second full-time class of 45 students beginning February 14, 2005 only, graduating on February 7, 2006, and admit a third full-time class of 45 students beginning May 16, 2005 only, **replacing** students that graduate May 10, 2005.

- On May 13, 2005, the Board approved the program's request to admit a fourth full-time class of 45 students beginning August 15, 2005 only, with a projected graduation date of August 8, 2006.

The Board also approved the program's request to admit a fifth full-time class of 45 students beginning November 14, 2005 only, graduating on November 7, 2006.

- On September 16, 2005, the Board took the following actions.
 1. The Board approved the program's request to admit 45 students into a full-time Class A beginning February 13, 2006, to **replace** students graduating February 7, 2006.
 2. The Board approved the program's request to admit 45 students into a full-time Class B beginning May 15, 2006, to **replace** students graduating May 9, 2006.
 3. The Board approved the program's request for ongoing admissions to **replace** graduating classes only, with the following stipulations:
 - a. No additional classes are added to the program's current pattern of admissions without prior Board approval. The program's current pattern of admissions includes four full-time classes of 45 students admitted each calendar year.
 - b. The director documents that adequate resources, i.e. faculty and facilities, are available to support each admitted class of students.
- **On May 3, 2006, a new program director was approved.**

- On September 15, 2006, the director was notified that the pass rates for Career Networks Institute Vocational Nursing Program had fallen below 10 percentage points of the state average pass rate for four (4) consecutive quarters.
- On December 4, 2006, the program submitted correspondence setting forth its plans to increase NCLEX-PN® pass rates.
- On December 13, 2006, the director was notified that program pass rates had fallen below 10 percentage points of the state average pass rate for five (5) consecutive quarters.
- On April 13, 2007, the director was notified that program pass rates had fallen below 10 percentage points of the state average pass rate for six (6) consecutive quarters.
- On April 30, 2007, the director confirmed implementation of a plan of correction and defined specific employed interventions.
- **On May 22, 2007, a new program director was approved.**
- On June 27, 2007, the director was notified that program pass rates had fallen below 10 percentage points of the state average pass rate for seven (7) consecutive quarters. Additionally, the director was requested to submit the following information: 1) Current enrollment; 2) Current faculty and facility information; 3) Clinical rotation schedules for all current classes; 4) Analysis of program's previously submitted corrective plan identifying those elements that have been successful and those unsuccessful and planned alterations to address the program analysis.
- On June 29, 2007, Board staff met with the program director and Career Networks Institute Vice President to discuss the program's status and strategies for improvement of NCLEX-PN pass rates.
- On July 13, 2007, the Board received the program's analysis of its corrective plan and corresponding actions.
- On August 20, 2007, the program was notified that its pass rates had fallen below 10 percentage points of the state average pass rate for eight (8) consecutive quarters.
- On December 19, 2007, the program director advised that a revision of the curriculum is in progress with completion projected by January 11, 2008.
- On February 1, 2008, the Board placed the program on Provisional Accreditation for the two – year period from February 1, 2008 through January 31, 2010, and issued a notice to the program identifying specific areas of non – compliance and requirements for correction referenced in Section 2526.1 (e) of the California Code of Regulations. **The program was placed on the agenda for the September 2009 Board meeting for reconsideration of the program's accreditation status.**
- On March 28, 2008, the Board issued the program a notice identifying areas of non – compliance and requirements for corrections.

- On June 24, 2009, the Board forwarded correspondence to the program advising that the Board would reconsider its accreditation status at the September 11, 2009 meeting. A comprehensive report was requested by July 17, 2009.
- On July 20, 2009, the Board received the program's comprehensive report.
- On October 7, 2009, the Board approved full accreditation of Career Networks Institute Vocational Nursing Program for the four-year period from September 17, 2009 through September 16, 2013, and issued a certificate accordingly.
- On November 4, 2009, the Executive Officer denied Career Networks Institute Vocational Nursing Program's request to offer a part – time course of instruction with an initial class of 50 students and five (5) alternates in March, July, and November of each year, commencing November 30, 2009. The program's request to offer a part – time course of instruction with an initial class of 50 students and five (5) alternates commencing November 30, 2009 only, at this time was approved. The program must request Board approval for additional commencement of part – time classes.
- On July 20, 2010, the Executive Officer approved the following recommendations:
 1. Approve Career Networks Institute Vocational Nursing Program's request to admit a part – time class of 50 students and five (5) on July 26, 2010. The proposed class is projected to complete program requirements January 30, 2012.
 2. Approve the program's request to admit a part – time class of 50 students and five (5) alternates November 29, 2010, with a projected completion date of May 30, 2012.
 3. Approve the program's request to admit a part – time class of 50 students and five (5) alternates each March, July, and November to **replace** graduating students only. Classes would be offered on evening and weekends.
 4. Continue the program's approval to admit a full-time class of 45 students four (4) times each calendar year to **replace** graduating classes only.
- **On December 8, 2011 a new director was approved by the Board.**
- **On June 22, 2012, a new director was approved by the Board.**
- **On May 30, 2013, the Board was notified that the school changed its name to CNI College.**
- On October 22, 2013, the Board approved the following:

Continue full approval for the CNI College Vocational Nursing Program for the four-year period from September 17, 2013 through September 16, 2017, and issue a certificate accordingly **and** continue approval of the program's ongoing admissions to **replace** graduating classes, only, with the following stipulations:

1. No additional classes are added to the program's pattern of admissions without prior Board approval. The program's pattern of admissions will include admission of:
 - o A full-time class of 45 students four (4) times each calendar year to **replace** graduating classes only.
 - o A part-time class of 50 students each March, July, and November to **replace** graduating students only.
2. The director documents that adequate resources, i.e. faculty and facilities, are available to support each admitted class of students.
3. The program maintains an average annual pass rate that is compliant with Section 2530 (l) of the Code.

- **On March 14, 2014, a new director was approved.**
- **On October 14, 2014, the Board was notified by the program director of his resignation, effective immediately.**
- On December 5, 2014, the Board forwarded correspondence to the program regarding the need for active administration of the program by an approved director.
- On January 8, 2015, the Board approved an assistant director for the program.
- **On January 27, 2015, the Board approved a new director who would assume active administration of the program on April 1, 2015.**
- On March 17, 2015, the Board forwarded correspondence to the program regarding a student/consumer complaint.
- On May 8, 2015, the Board forwarded correspondence to the program regarding a student/consumer complaint.
- On August 18 and 19, 2015, Board representatives conducted an unannounced program inspection.
- On September 2, 2015; the Acting Executive Officer approved the following:
Effective immediately, rescind approval for ongoing admissions and require the CNI College Vocational Nursing 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; **and** require the CNI College Vocational Nursing Program to submit verifiable plans for clinical placements for Pediatric Nursing for students who were to have completed program requirements on September 25, 2015 prior to graduation of those students and no later than September 15, 2015; **and** require the CNI College Vocational Nursing Program to submit verifiable plans for clinical placements for Pediatric Nursing for currently enrolled students, no later than September 30, 2015; **and** require the program to correct violations identified during the onsite inspection and submit a report identifying implemented interventions to include the following no later than November 1, 2015:

- a. Plan, including implementation timeline, for evaluation of the curriculum.
- b. Proposed policies and implementation plan for admission, screening, and selection criteria.
- c. Proposed policy and implementation plan for attendance, including make-up for missed theory and clinical time.
- d. Proposed policy and implementation plan for remediation and determination of the need for removal from the program.
- e. Timeline by which the evaluation of all clinical facilities will be accomplished.
- f. Documentation of verifiable placements for all enrolled students, in a manner consistent with the Board-approved Instructional plan, for clinical experience in the care of sick children; **and**

Submit a written plan for improvement of the program's NCLEX-PN® pass rates no later than **November 1, 2015**.

- On September 14, 2015 the program director submitted the required verifiable placement plans for Pediatric clinical experience for graduating students.
- On September 15, 2015, the program director submitted the response to violations and placement plans for pediatric nursing for currently enrolled students.
- **On September 22, 2015, the Board was notified the program director was no longer employed by the school.**
- On September 28, 2015, the Board forwarded correspondence to the program regarding additional complaints received.
- **On October 1, 2015, the Board approved a new program director.**
- On October 15, 2015, the Board received the program's response to complaints. The Board also received two new complaints on this date.
- On October 19, 2015, the Board notified the program of missing documentation in support of the request to admit students.
- On October 29, 2015 the assigned consultant conducted a phone consultation with the program director regarding missing documentation in support of the request to admit students.
- On November 4, 2015, the assigned consultant again conducted a phone consultation with the program director regarding missing documentation in support of the request to admit students.
- On November 5, 2015, the assigned consultant notified the current director of the requirement to submit a written plan regarding improving program pass rates on the licensure examination, as per the September 2, 2015. A plan was submitted later that day.
- On November 6, 2015, the program submitted final documentation regarding placements for the proposed students.

- On November 10, 2015, the Acting Executive Officer rendered the following decisions: Require the CNI College Vocational Nursing Program to submit for Board approval the following policies and a timeline for implementation of each policy, no later than **December 1, 2015**
 - a. Evaluation methodology for curriculum.
 - b. Evaluation methodology for clinical facilities.
 - c. Admission policy, including all screening, and selection criteria.
 - d. Evaluation of student progress, including determination of the need for remediation or removal from the program.
 - e. Attendance policy, including criteria for attendance and acceptable methods for make-up, **and**

Require the program to submit a written plan for notification to the Board for faculty termination in accord with the regulation no later than **December 1, 2015**, **and** require the program to submit, no later than **January 15, 2016**, documentation that all violations are corrected. This documentation is to be signed, under penalty of perjury, and to include the following:

- a. Attendance records, by class admission date, indicating that all missed hours are made-up by end of term and indicating appropriate make-up for missed hours;
- b. Correlation of theory and clinical experience for make-up hours and specialty rotations, including provision of specialty rotations in accordance with the Board-approved Instructional Plan; and
- c. Adequate clinical facilities to support the enrolled student population in a manner that is consistent with the Board-approved Instructional Plan, **and** require the program to submit, no later than **January 15, 2016**, a licensure pass rate improvement plan that provides for support of all currently enrolled students, including those approaching graduation, **and**

Deny the program's request to admit one (1) part-time class of 40 students beginning November 30, 2015, graduating June 18, 2017, **and** deny the program's request to admit one (1) full-time class of 45 students beginning January 11, 2016, graduating January 13, 2017, **and** continue the program's requirement to obtain Board approval prior to the admission of each class, **and** continue to require the director to document that adequate resources, i.e. faculty and facilities, are available to support each admitted class of students.

- On March 1, 2016, the Acting Executive Officer approved the following:

Deny the CNI College Vocational Nursing Program's request to admit one (1) full-time class of 35 students beginning March 21, 2016 and graduating April 16, 2017, **and** deny the program's request to admit one (1) part-time class of 35 students beginning March 21, 2016 and graduating November 20, 2017, **and** continue the program's requirement to obtain Board approval prior to the admission of each class, **and** require the program to provide documentation of completion of all required pediatric clinical experience using the Pediatric Faculty/Student Clinical Assignment form, including date, location, instructor and total hours. Due as each graduate completes the required experience,

and place the CNI College Vocational Nursing Program on the Board's May 2016 agenda for consideration of placement on provisional approval.

- On May 13, 2016, the Board rendered the following decisions:
 1. Place the CNI College Vocational Nursing Program on provisional approval for the three (3) month period from May 13, 2016 through August 31, 2016, and issue a notice to the program to identify specific areas of noncompliance and requirements for correction as referenced in Section 2526.1 (e) of the California Code of Regulations. (See Attachment O)
 2. Place the program on the Board's **August 2016** agenda for reconsideration of provisional approval.
 3. Deny the program's request to admit one (1) full-time class of 24 students beginning May 23, 2016, graduating May 23, 2017, only.
 4. Deny the program's request to admit one (1) part-time class of 32 students beginning May 23, 2016, graduating May 23, 2017, only.
 5. Require the program to provide no less than one (1) instructor for every ten (10) students in clinical experiences.
 6. Require the program to admit no additional classes without prior approval by the full Board.
 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 **June 15, 2016**.
 8. Require the program to submit a follow up a report no later than **June 15, 2016**. The reports must include a comprehensive analysis of the program, specific actions taken to correct identified violations, specific actions taken to improve pass rates, timeline for implementation, and the effect of employed interventions. The following elements must be addressed in the analysis:
 - a. Admission Criteria
 - b. Screening and Selection Criteria
 - c. Terminal Objectives
 - d. Curriculum Objectives
 - e. Instructional Plan
 - f. Theory and Clinical Objectives for Each Course
 - g. Lesson Plans for Each Course
 - h. Textbooks
 - i. Attendance Policy
 - j. Remediation Policy
 - k. Evaluations of Theory and Clinical Faculty
 - l. Evaluations of Theory Presentations
 - m. Evaluations of Clinical Rotations and Their Correlation to Theory Presentations
 - n. Evaluation of Student Achievement

o. Current Enrollment

9. 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.
 10. Require the program to demonstrate progress in correcting the violations. If the program fails to satisfactorily demonstrate progress the full Board may revoke the program's approval.
 11. 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.
 12. Failure to take any of these corrective actions may cause the full Board to revoke the program's approval.
- On July 6, 2016 the Board approved a new program director.

Agenda Item #18.B.2., 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

Kim Martin, Director
Vocational Nursing Program
CNI College
702 W. Town & Country Road
Orange, CA 96868

Subject: Notice of Change In Approval Status

Dear Ms. Martin:

Pursuant to the action of the Board of Vocational Nursing and Psychiatric Technicians (Board) on May 13, 2016, the CNI College 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(g) of title 16 of the California Code of Regulations and Section 2527(c) of title 16 of the California Code of Regulations states:

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

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..."

CNI College Vocational Nursing Program

Notice of Change in Approval Status

May 17, 2016

Page 2 of 6

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

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

Section 2526(a)(8) 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:

... (8) Evaluation methodology for curriculum."

Section 2526(a)(11) 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:

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

Section 2534(c) of title 16 of the California Code of Regulations states:

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

Section 2526(a)(12) 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:

... (12) Admission criteria.

Section 2526(a)(13) 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:

... (13) Screening and selection criteria.

Section 2526(a)(17)(B) 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:

... (17) Student Policies:

(A) ...

(B) Attendance."

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

CNI College Vocational Nursing Program

Notice of Change in Approval Status

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"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 2530(i) of title 16 of the California Code of Regulations states:

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

Section 2533(a) of title 16 of the California Code of Regulations states:

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

Section 2533(c) of title 16 of the California Code of Regulations states:

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

Section 2534(b) of title 16 of the California Code of 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. Clinical objectives which students are expected to master shall be posted on patient care units utilized for clinical experience."

Section 2882 of the California Business and Professions Code, Division 2 states:

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

CNI College Vocational Nursing Program

Notice of Change in Approval Status

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The program pass rates for the CNI College Vocational Nursing Program for the past 17 quarters are set forth in the following table:

NCLEX-PN® Licensure Examination Pass Rates			
Quarter	State Average Annual Pass Rate	Program Average Annual Pass Rate	Variance from State Average Annual Pass Rate
Jan – Mar 2012	74%	96%	+22
Apr – Jun 2012	74%	95%	+21
Jul – Sep 2012	74%	92%	+18
Oct – Dec 2012	74%	88%	+14
Jan – Mar 2013	73%	88%	+15
Apr – Jun 2013	73%	83%	+10
Jul – Sep 2013	74%	80%	+14
Oct – Dec 2013	76%	86%	+10
Jan – Mar 2014	76%	82%	+6
Apr – Jun 2014	73%	83%	+10
Jul – Sep 2014	73%	75%	+2
Oct – Dec 2014	72%	69%	-3
Jan – Mar 2015	71%	66%	-5
Apr – Jun 2015	72%	58%	-14
Jul – Sep 2015	72%	57%	-15
Oct – Dec 2015	72%	55%	-17
Jan – Mar 2016	73%	57%	-16

REQUIRED CORRECTION(S)

1. Require the CNI College Vocational Nursing Program to provide no less than one (1) instructor for every ten (10) students in clinical experiences.
2. Require the program to admit no additional classes without prior approval by the full Board.
3. 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 15, 2016**.
4. Require the program to submit a follow up a report no later than **June 15, 2016**. The reports must include a comprehensive analysis of the program, specific actions taken to correct identified violations, specific actions taken to improve pass rates, timeline for implementation, and the effect of employed interventions. The following elements must be addressed in the analysis:
 - a. Admission Criteria
 - b. Screening and Selection Criteria

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- 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
5. 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.
 6. Require the program to demonstrate progress in correcting the violations. If the program fails to satisfactorily demonstrate progress the full Board may revoke the program's approval.
 7. 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.
 8. 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 4 through 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

CNI College Vocational Nursing Program

Notice of Change in Approval Status

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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



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.



DATE: May 17, 2016
TO: Education Division
FROM: CNI College Vocational Nursing Program
SUBJECT: *Acknowledgement of Receipt of Board Meeting Materials*

I, Kimberly Martin, hereby acknowledge receipt of the following documents with attachments memorializing board decisions rendered at the May 13, 2016 Board Meeting.

➤ ***CNI College Vocational Nursing Program***

1. *Notice of Provisional Approval.*
2. California Code of Regulations Excerpt Section 2526.1. Provisional Approval.
3. *Certificate of Provisional Approval.*
4. *Acknowledgement of Change in Approval Status.*

Please sign and fax the ***Acknowledgement of Receipt of Board Meeting Materials*** to the Board at (916) 263-7866 by _____.

(Signature, Director)

(Date)

Name of Program: _____

***Please complete this form and fax the Board at
(916) 263-7866 by DATE HERE***



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Board of Vocational Nursing and Psychiatric Technicians
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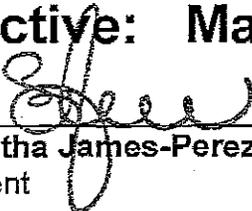
CERTIFICATE OF PROVISIONAL APPROVAL

for

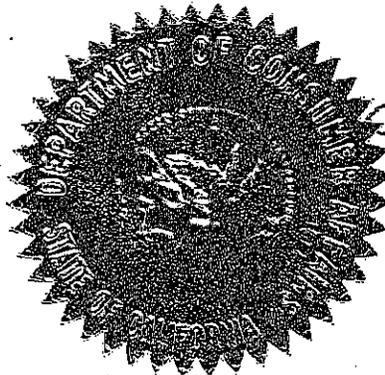
CNI College *Vocational Nursing Program*

This document reflects that the Board of Vocational Nursing and Psychiatric Technicians (Board) has provisionally approved the above-named program pursuant to Article 5 of the Vocational Nursing Practice Act and the Board's Rules and Regulations. A copy of documents related to the provisional approval may be obtained by contacting the Board at the address above. A candidate's completion of an approved vocational nursing program is partial fulfillment of requirements for the vocational nurse licensure examination.

Effective: May 13, 2016



Samantha James-Perez
President



Expires: August 31, 2016



Kameka Brown, PhD, MBA, NP
Executive Officer



BVNPT CNI College Response June 15, 2016

4. Comprehensive Analysis of CNI College Vocational Nursing Program

Upon scrutinizing the reasons for the low NCLEX-PN pass rate, CNI College recognized the need to improve the pass rates of the vocational nursing program through a variety of methods. To understand the rationale for the dropping pass rate, CNI College reviewed the following:

- Nursing Administration – Roles of DON, ADON, Clinical Coordinator, ATI Coordinator, and Faculty.
- Registrar – Input of attendance, grades and schedule tracking.
- Faculty – Use of the Curriculum: Clinical and Theory, ATI integration, lesson plans, policies and procedures.
- Facilities – Meeting Clinical Objectives at clinical sites and in on-campus labs.
- Instructional Plan – Revision of ATI integration, learning objectives, hours/units/subjects, appropriation of hours to course subjects, correlation of theory/clinical, textbooks, teaching and evaluating critical thinking related to course subjects, and integration of clinical and theory objectives.
- Policies – Revision of admissions, screening and selection, make-up, and remediation.

The following items addressed in the analysis include:

a. ADMISSION

Incoming students were not fully prepared academically to be successful in the vocational nursing program, as evidenced by their admissions testing. Therefore, the admissions policy was revised to increase the likelihood of success for the incoming students.

The revised policy was approved by the BVNPT, March 2016.

b. SCREENING AND SELECTION CRITERIA

It was found that the previous director of nursing (DON) did not interview and select the students after the initial admissions standards were met.

The Screening and Selection policy was revised to include the key element of the DON's interview and selection. The rubric with the criteria for selection was submitted to the BVNPT.

The revised policy was approved by the BVNPT, March 2016.

c. TERMINAL OBJECTIVES

The terminal objectives were reviewed and updated to reflect current cultural and nursing practice for the vocational nurse.

See Attachment

4. Comprehensive Analysis of CNI College Vocational Nursing Program

d. CURRICULUM OBJECTIVES

The curriculum was evaluated for effectiveness, development of critical thinking, sequential learning, current evidence-based practice, and implementation of quality, safety and education (QSEN) competencies. These competencies include the targets for knowledge, skills, and attitudes (KSAs) for pre-licensure competency: patient-centered care, teamwork and collaboration, quality improvement, safety, evidence-based practice and informatics. Faculty and student suggestions were incorporated in the updated objectives, curriculum and Instructional Plan, increasing the program's strength in developing student knowledge and outcomes for current safe practice.

See Attachment

e. INSTRUCTIONAL PLAN

The Instructional Plan has been revised to reflect a new mission statement and program philosophy; make the sequence of learning more systematic throughout the program; integrate ATI into the syllabi, resources, and testing in each term; correlate theory and clinical objectives; and incorporate expanded use of additional simulation labs.

See Attachment

f. THEORY AND CLINICAL OBJECTIVES FOR EACH COURSE

The theory and clinical objectives were reviewed for inclusion of the QSEN KSA's to facilitate student learning and safe practice. The objectives are incorporated within the revised syllabi and curriculum for each course.

See Attachment

g. LESSON PLANS FOR EACH COURSE

Lesson plans incorporate critical thinking and develop sequential knowledge, using consistent and standard lessons and assessments for full-time and part-time students in each term. CNI College incorporates the Quality and Safety Education for Nurses (QSEN) knowledge, skills and attitudes (KSAs) necessary to improve quality and safety within the scope of vocational nursing education. Integration of KSA's: Patient-centered care, teamwork and collaboration, evidence-based practice, quality improvement and safety need to be stressed. This process is ongoing and begins within the revised Instructional Plan and curriculum.

4. Comprehensive Analysis of CNI College Vocational Nursing Program

h. TEXTBOOKS

Textbooks were reviewed for appropriate content which supports sequential building of knowledge, developing safe practice and encouraging the practice of critical thinking. The textbooks support the revised curriculum and Instructional Plan. Full use of the online and publisher resources will provide guidance for thorough and comprehensive utilization of textbooks to their full capacity.

i. ATTENDANCE POLICY

The faculty and students were made aware of the attendance policy guidelines. The correlation between theory and clinical is vital to support the learning objectives of each course and allow the students to apply the theoretical concepts at the clinical site. This correlation affords critical thinking vital to safe nursing practice.

The revised policy was approved by the BVNPT, March 2016.

j. REMEDICATION POLICY

The remediation policy currently provides the student with a timely process to acquire the knowledge necessary to progress in the sequence of mastery of content. When a student misses a theory day of instruction, it is necessary to make up or remediate the concepts and hours missed. The correlation between theory and clinical is vital to support the learning objectives of each course and allow the student to apply the theoretical concepts during clinical practice. The purpose of remediation is to assist the student in meeting academic objectives and provide a successful educational outcome. Students are required to achieve a passing grade of 75% or greater on all remedial assignments and exams to progress through the vocational nursing program.

The students who are deficient in any skill or clinical objective are required to have remediation. The remediation includes homework, lab time, individual counseling and instruction. If the student cannot demonstrate a satisfactory skill after remediation, he or she will receive a failing clinical grade.

The revised policy was approved by the BVNPT, March 2016.

k. EVALUATIONS OF CLINICAL AND THEORY FACULTY

Each faculty member is observed by the director of nursing (DON) during a theory presentation or at the clinical site instructing students. The ongoing evaluations of faculty ensure that the standards of the program are followed, student learning objectives are met, and there is adherence to school policy and the demonstration of professional conduct. Faculty members are evaluated for Adaptability, Attendance, Communication, Creativity, Initiative/Problem Solving/Decision Making, Interpersonal Skills, Job Knowledge, Work Habits, and Work Quality/Productivity.

4. Comprehensive Analysis of CNI College Vocational Nursing Program

At the end of the term, students evaluate faculty by utilizing Survey Monkey. This evaluation includes review of the faculty member's syllabus, knowledge of subject matter, meeting of curriculum objectives, maintaining of professional behavior, interest in student achievement, meeting daily and weekly objectives, availability to students, examinations reflecting curriculum objectives, and quality of presentations in classroom.

I. EVALUATION OF THEORY PRESENTATIONS

The curriculum and Instructional Plan have been developed to build on student knowledge, comprehension, critical thinking, and safe practice. Core subjects and concepts progress throughout the four (4) terms to develop knowledge in a sequence that results in progressive mastery of nursing content. The curriculum has been enhanced to provide better outcomes utilizing ATI tools, Socratic reasoning, higher proficiency levels, and licensing exam preparation.

m. EVALUATION OF CLINICAL ROTATIONS AND THEIR CORRELATION TO THEORY PRESENTATIONS

Each clinical site was visited by the director of nursing (DON) and reviewed for the ability to meet clinical objectives. The clinical objectives were posted at the clinical sites, and the clinical faculty member was made aware of the theory objectives taught to the students so that he or she could correlate the theory and clinical objectives in teaching the students.

n. EVALUATION OF STUDENT ACHIEVEMENT

The following items have been revised to achieve the appropriate student outcomes: higher admission scores, use of screening interviews, enforcement of the attendance policy, maintenance of the grading policy and graduation policy, and consistent integration of ATI throughout the curriculum.

The further enhancement of the curriculum and Instructional Plan should only further educate the students for successfully passing their NCLEX-PN on their first attempt.

The current quarterly pass rate is 68.75%, raising the annual rate to 57%.

o. CURRENT ENROLLMENT

The current student enrollment consists of:

4 students – full-time Term 4 completing July 11, 2016.

14 students – part-time Term 4 completing August 29, 2016.

21 students – part-time Term 3 completing January 30, 2017.



CAMPUS FACILITIES

CNI College is conveniently located at 702 West Town and Country Road, Orange, CA, 92868. The College's facility provides approximately 45,000 square feet of classroom and office space.

The campus facility and the equipment it utilizes fully comply with any and all state and local ordinances and regulations, including those requirements for fire safety, building safety, and health safety.

CNI College Nursing Program Learning Center

Includes nursing simulation, skills laboratories, and offices for Nursing Faculty and Administration. The Facility has approximately 45,000 square feet

Classrooms: Wi-Fi access throughout the campus

6 classrooms capacity for 40 to 50

7 classrooms capacity for 25-35

3 study rooms

2 student lounges

169 computers for student use

50 laptops computers for student use

Laboratories:

Skills lab: 2 rooms with 12 manikins/beds total

Mid Fidelity Simulation: 1 with 6 manikins/beds

High Fidelity Simulation: 4 Labs which include: OB (birthing), Pediatrics, Medical Surgical

Cadavers: Proposed 2 for A & P laboratory Science room

In addition, all students have access to the Library Information Resources Network (LIRN) online library database. The LIRN Virtual Library Collection consists of an expanded academic database consisting of holdings from arts and the humanities to social sciences, science and technology.

Smoking is prohibited within the College.

In keeping with the high educational standards of CNI College, the equipment used affords the student the opportunity to develop a practical, working knowledge of the equipment and materials they will be using on the job.



CNI COLLEGE ATI INTEGRATION

The CNI College ATI integration plan is intended to ensure a cultural shift around the implementation of ATI solutions in CNI's vocational nursing program. Grounded in data and consistent process application this plan will enable CNI and ATI to partner to focus on leading indicators that will impact two critical goals:

1. Attain proficiency level 2 on proctored assessments
2. Attain 90% first time aggregate NCLEX pass rate by end of year

Performance Management:

We believe that "what gets measured gets done" and this milestone ensures that CNI's culture and performance management processes supports adoption of ATI. ATI-trained personnel will support faster adoption and speed of delivery of ATI solutions actively in the classroom.

Communication Plan:

Clear communication for both student and faculty responsibilities reinforces improved outcomes and accountability. Our weekly goal review will ensure we are holding each other accountable as partners.

Onboarding and Training:

Structured and rigorous on boarding plans will drive consistency in how ATI is being used. To prepare foundational users for the ATI Champion training in order to create super users who fully utilize the ATI program. Tracking of milestone progression through on boarding program will occur.

Data & Analytics:

Custom dashboards have been created to provide real-time insight into leading indicators of success and an area of focus for nursing and operations leadership. A weekly review and status update with assigned action items will ensure we are continuing to move forward and measuring the impact our actions have on NCLEX pass rates as well as attainment of proficiency level 2 on proctored assessments.

Student Motivation:

Student adoption of ATI and ownership of learning outcomes is equally as important as faculty adoption. By focusing on the positive and recognizing the good behaviors and outcomes through a structured incentive plan we hope to drive increased performance and reinforce a culture that rewards achievement.

Mentorship and Coaching:

Feedback is an important part of our partnership and recognizing opportunities for faculty to improve their active instructional style and support one another through the process is a focus of this milestone.

ATI Policy Review:

ATI process and student usage will be determined during a weekly review.



STRATEGIES FOR NURSING SUCCESS

I. COURSE DESCRIPTION

This course introduces the student to study skills and innovative strategies for academic success. Students will also be introduced to the policies and procedures of CNI College. An intensive orientation on the ATI learning system will be provided to help the students navigate the learning module that has been integrated into the curriculum. Basic drug calculation and medical terminology are discussed. This course will prepare the licensed vocational nursing student for the challenge to acquire the knowledge, skills and attitudes needed to succeed in their educational goals. This course consists of a total of 30 theory hours.

II. COURSE OBJECTIVES

1. Discover effective strategies for managing educational goals.
2. Utilize available learning resources to enhance learning
3. Describe your own learning style.
4. Recognize the importance of essential skills such as reading, taking notes, studying, memorizing and taking tests.

III. INSTRUCTIONAL RESOURCES

1. Assessment Technologies Institute (ATI) website at <http://www.atitesting.com>
2. CNI handbook
3. VN handbook
4. Success Teams
5. Nursing Faculty



STRATEGIES FOR NURSING SUCCESS

Day 1 Welcome to CNI-LVN Program

1. Introduction to the LVN Program
2. Discussions on: student handbook, policies and procedures, attendance policies.
3. CNI Tour- classrooms, skills laboratory, simulation laboratory.
4. Introduction to computer program: ATI, Elsevier

Day 2 CNI culture

1. Orientation and welcome to CNI
2. Meet CNI Success Teams
3. CNI College Handbook
4. Introduction to Computer

Day 3 ATI

1. Introduction to ATI
Create an ATI account
Navigating ATI
2. Introduction to the different teaching modules in ATI; proctored assessments, practice assessments and tutorial modules.
3. Take the Self Inventory Test
4. Take Critical Thinking Entrance Proctored ATI Assessment
5. ATI Achieve Modules:
 - Classroom Skills
 - Strategies for Class Preparation, Strategies for Reading Books Effectively, Strategies for Getting the Most Out of Class, Effective Note-Taking
 - Study Skills
 - Where and When to Study, Planning, Strategies to Stay Focused, Learning Styles and Learning Strategies Based on Student Learning Preferences, Multiple Intelligences, Four Categories of Processing Information, Reading Strategies, Class Notes, Memorizing Facts, Study Groups
 - Test-Taking Skills
 - Strategies to Fight Test Anxiety, Tips to Apply Knowledge, Time Management, Reading Directions, Calculations, Multiple-Choice Questions, Essay Questions
 - Preparing for Clinical Experiences
 - Challenges for ESL Students

Day 4 Math for Nurses

1. Introduction to dosage calculation.
2. Review on arithmetic, ratio and proportion.

Day 5 Terminology and Concepts

1. Introduction to Medical Terminology
2. Introduction to Nursing Concepts

Agenda Item #18.B.2., Attachment E

2016 JUL 22 AM 10:50

July 10, 2016

Board of Vocational Nursing and Psychiatric Technicians
2535 Capitol Oaks Drive, Suite 205
Sacramento, California 95833-2945

Attention: Samantha James-Perez, PT Member, Board President
Andrew Moreno, Public Member, Board Vice President
Vivien Avella, Public Member
Bernice Bass de Martinez, Public Member
Todd D'Braunstein, PT Member
John Dierking, Public Member
Tammy Endozo, LVN Member
Eric Mah, Public Member
Donna Norton, LVN Member
John Vertido, LVN/Educator Member

Regarding: CNI College

Dear Board Members,

We watched the last BVNPT Hearing webcast in horror as we saw then DON Kimberly Martin recount her version as to why she signed the graduates' paperwork when they had not completed the hours required by the BVNPT. She said, "we were as surprised by this as you are" when questioned by Mr. Vertido as to "how could this happen?"

As faculty, parents, students and consumers we feel obligated to set the record straight on this school. Although there may be some private schools that truly operate legally and ethically, we feel that CNI has taken enough financial gain and left the students with nothing as evidenced by the low pass rates. For years, these students have been passed along, faculty and DONs being ridiculed and out voted by the owners and their VP of Operations to allow students that are a danger to the nursing profession to be allowed to graduate. They can't pass the NCLEX-PN.

Due to the vindictive nature of the administration of CNI, we anonymously assert the following:

1. Prior to Ms. Martin's short tenure at CNI, the previous DON notified the CNI administration, the Clinical Coordinator and the faculty that the school was not operating in compliance as far as pediatric sites, clinical hours, theory hours and grades. We were in a staff meeting where the DON insisted that we comply. We agreed but were skeptical because the previous DON had the same issues and walked out. We didn't tell her.

2. We had students admitted that could not pass the "entrance" exams even though the admissions office gave it to them several times. We had no records kept in our building but knew this to be true because they kept failing.
3. Two of us went to the previous DON and reported that several students had failed due to not coming to school and poor test scores. Our DON had our documentation, presented it but was told "there wasn't enough information", by the VP of Operations and the matter was dropped.
4. There were faculty that were letting the students leave clinical practice early or not at all. Some would call the students and cancel or have them go to the campus. There were a few students who were honest enough to let some of us know this. We took it to our DON at the time. She took it to administration and no action was taken.
5. Many students came to some of us at different times complaining about why this was ok. Our DON, she went to the classrooms and talked with the students. She always went to the owners of CNI with out any action taken.
6. At the time of Ms. Martin, there was no registrar. The registrars never kept the hours anyway. Most of the faculty is gone and many have been terminated. CNI does not have the faculty at this time to staff the clinical rotations.
7. We believe that the Nurse Education Consultant, Ms. Donna Johnson, was aware of what was going on there because we knew that when we had the previous DON, she was honest and wanted the best of all of us and the students. Did you know that they fired her? We think it was because she thought she was there to make things better.
8. CNI has had so many DONs since they started the school that they never seem to be trusting enough to do the right thing by the students. That must say SOMETHING.
9. Due to the fact that CNI has "passed along" these students, they cannot possibly pass the NCLEX-PN exam. The student's are left with nothing but debt.

We respectfully request that you take the action you have been obligated to do as our BVNPT Board members. Protect the public from CNI and do not allow them to continue with a nursing program.

Most sincerely,

Faculty, families, students, parents and consumers



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

August XX, 2016

Sasha Rarang, Director
Vocational Nursing Program
CNI College
702 W. Town & Country Road
Orange, CA 96868

Subject: Notice of Change in Approval Status

Dear Ms. Rarang:

Pursuant to the action of the Board of Vocational Nursing and Psychiatric Technicians (Board) on August 26, 2016, the CNI College Vocational Nursing Program has been placed on provisional approval for the six – month period from September 1, 2016 through February 28, 2017.

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 **September X, 2016.**

AREAS OF NON-COMPLIANCE (VIOLATIONS(S))

Section 2526(g) of title 16 of the California Code of Regulations and Section 2527(c) of title 16 of the California Code of Regulations states:

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

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..."

CNI College Vocational Nursing Program

Notice of Change in Approval Status

August XX, 2016

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

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

The program pass rates for the CNI College Vocational Nursing Program for the past 18 quarters are set forth in the following table:

NCLEX-PN® Licensure Examination Pass Rates			
Quarter	State Average Annual Pass Rate	Program Average Annual Pass Rate	Variance from State Average Annual Pass Rate
Jan – Mar 2012	74%	96%	+22
Apr – Jun 2012	74%	95%	+21
Jul – Sep 2012	74%	92%	+18
Oct – Dec 2012	74%	88%	+14
Jan – Mar 2013	73%	88%	+15
Apr – Jun 2013	73%	83%	+10
Jul – Sep 2013	74%	80%	+14
Oct – Dec 2013	76%	86%	+10
Jan – Mar 2014	76%	82%	+6
Apr – Jun 2014	73%	83%	+10
Jul – Sep 2014	73%	75%	+2
Oct – Dec 2014	72%	69%	-3
Jan – Mar 2015	71%	66%	-5
Apr – Jun 2015	72%	58%	-14
Jul – Sep 2015	72%	57%	-15
Oct – Dec 2015	72%	55%	-17
Jan – Mar 2016	73%	57%	16
Apr – Jun 2016	74%	60%	-14

REQUIRED CORRECTION(S)

1. Continue to require the program to provide no less than one (1) instructor for every ten (10) students in clinical experiences.
2. Continue to require the program to admit no additional classes without prior approval by the Board.
3. 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 **September 15, 2016**.

CNI College Vocational Nursing Program

Notice of Change in Approval Status

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4. Continue to 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.
5. Continue to require the program to demonstrate progress in correcting the violations. If the program fails to satisfactorily demonstrate progress the full Board may revoke the program's approval.
6. 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.
7. Failure to take any of these corrective actions may cause the full Board to revoke the program's approval.

FUTURE BOARD ACTION

Your program will be placed on the **February 2017** Board Meeting agenda, at which point the Board may revoke or extend the program's approval. If you have additional information that you wish considered beyond the required corrections listed on pages 2 and 3, you must submit this documentation by the fifteenth day of the second month prior to the Board Meeting.

OTHER IMPORTANT INFORMATION

Please be advised that, pursuant to the Board's regulations, the program will not be authorized to admit new classes beyond the established pattern of admissions previously approved by the Board. The established pattern of admissions approved by the Board is as follows: **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.

CNI College Vocational Nursing Program

Notice of Change in Approval Status

August XX, 2016

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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