

# Agenda Item #19.C.3.



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

**BOARD OF VOCATIONAL NURSING & PSYCHIATRIC TECHNICIANS**

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## COVER SHEET

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

Homestead Schools Vocational Nursing Program is presented for consideration of a request to admit students. Denial of the one (1) requested class is recommended.

### Recommendations:

1. Deny Homestead Schools, Inc., Vocational Nursing Program's request to admit one (1) full-time day class of 24 students beginning January 16, 2017.
2. Require the program to submit for Board approval:
  - a. A revised curriculum by **November 15, 2016**.
  - b. Lesson plans consistent with the curriculum to be used for Board approval by **November 15, 2016**.
  - c. Proposed policy for evaluation methodology of student progress for theory and clinical to demonstrate mastery of knowledge, skills, and abilities prior to advancing in the program and determination of the need for remediation or termination from the program including but not limited to:
    - i. Plan for early identification of student deficiencies;
    - ii. Limits on number of failed courses and terms allowed;
    - iii. Timeline for implementation;
    - iv. List of criteria for measuring student performance in both theory and clinical;
    - v. Objectives to be achieved; and
    - vi. Follow-up and documentation of outcomes
3. Continue to require the program to admit no additional classes without prior approval by the full Board.
4. Continue to 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 **January 1, 2017** and **every three (3) months, thereafter**.

5. Continue to require the program to submit follow-up reports every three (3) months. The reports must include a comprehensive analysis of the program, specific actions taken to improve pass rates and to correct all violations, a timeline for implementation, and the effect of employed interventions. The analysis must include, but should not be limited, to the following elements:
  - a. Admission Criteria
  - b. Screening and Selection Criteria
  - c. Terminal Objectives
  - d. Curriculum Objectives
  - e. Instructional Plan
  - f. Theory and Clinical Objectives for Each Course
  - g. Lesson Plans for Each Course
  - h. Textbooks
  - i. Attendance Policy
  - j. Remediation Policy
  - k. Evaluations of Theory and Clinical Faculty
  - l. Evaluations of Theory Presentations
  - m. Evaluations of Clinical Rotations and Their Correlation to Theory Presentations
  - n. Evaluation of Student Achievement
  - o. Current Enrollment
6. Continue to require the program to maintain its average annual pass rate no more than 10 percentage points below the state average annual pass rate.
7. 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.
8. Failure to take these corrective actions may cause the full Board to revoke the program's approval.
9. Continue the program's placement on the Board's **May 2018** agenda for reconsideration of provisional approval.



# AGENDA ITEM #19.C.3.



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

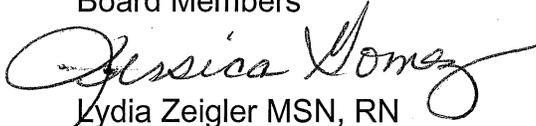
## BOARD OF VOCATIONAL NURSING & PSYCHIATRIC TECHNICIANS

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DATE: October 21, 2016

TO: Board Members

FROM:   
Lydia Zeigler MSN, RN  
Nursing Education Consultant

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

Homestead Schools Vocational Nursing Program is presented for consideration of a request to admit students. Denial of the one (1) requested class is recommended.

The Board initially placed the program on provisional approval for the three (3) month period from February 5, 2016 through May 31, 2016, due to noncompliance with regulatory requirements. At that time, the program had six (6) uncorrected violations.

On May 13, 2016, the Board extended the program's provisional approval for the two (2) year period from May 13, 2016 through May 31, 2018, due to specific areas of non-compliance with regulatory requirements. Additionally, the Board approved the program's admission of two (2) of the three (3) requested classes.

The program now requests approval to admit: one (1) full-time day class of 24 students beginning January 16, 2017, and graduating January 19, 2018.

### History of Prior Board Actions

(See Attachment A, History of Board Action)

### Enrollment

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

The following table represents **past, current and proposed** student enrollment based on current class starts and completions. The table indicates a **maximum enrollment** of **95** students for the period from **January 2012 through June 2016**. Currently, the

program has three (3) classes enrolled. Total enrollment for the three (3) currently enrolled and the proposed program would be **88 students**.

ENROLLMENT DATA				
CLASS DATES		# Students Admitted	# Students Current or Completed	Total Enrolled
Start	Complete			
1/12 FT (Day)		30	24	24
2/12 FT (Eve)		11	20	24 + 20 = 44
4/12 PT		12	3	44 + 3 = 47
5/12 FT (Day)		27	7	47 + 7 = 54
9/12 FT (Eve)		20	14	54 + 14 = 68
9/12 FT (Day)		20	9	68 + 9 = 77
	12/12 (1/12 FT Day Class)		-24	77 - 24 = 53
1/13 FT (Day)		20	10	53 + 10 = 63
	1/13 (2/12 FT Eve)		-20	63 - 20 = 43
4/13 PT		22	10	43 + 10 = 53
	4/13 (5/12 FT Day Class)		-7	53 - 7 = 46
4/13 FT (Eve)		16	13	46 + 13 = 59
5/13 FT (Day)		30	11	59 + 11 = 70
	9/13 (9/12 FT Eve Class)		-14	70 - 14 = 56
	9/13 (9/12 FT Day Class)		-9	56 - 9 = 47
10/13 FT (Day) (Approved for 9/16/13)		26	10	47 + 10 = 57
11/13 PT (Approved for 9/21/13)		20	9	57 + 9 = 66
	12/13 (4/12 PT class)	12	-3	66 - 3 = 63
	1/14 (1/13 FT Day Class)		-10	63 - 10 = 53
2/14 FT (Day) (Approved for 6/24/13)		26	10	53 + 10 = 63
2/14 FT (Eve) (Approved for 9/16/13)		19	6	63 + 6 = 69
3/14 PT (Approved for 6/29/13)		11	9	69 + 9 = 78
	4/14 (5/13 FT Day Class)		-11	78 - 11 = 67

ENROLLMENT DATA				
CLASS DATES		# Students Admitted	# Students Current or Completed	Total Enrolled
Start	Complete			
	4/14 (4/13 FT Eve Class)		-13	67 - 13 = 54
6/14 FT (Day) (Approved for 4/8/14)		29	10	54 + 10 = 64
6/14 PT (Approved for 4/21/14)		20	11	64 + 11 = 75
6/14 FT (Eve) (Approved for 4/21/14)		12	7	75 + 7 = 82
	9/14 (10/13 FT Day Class)		-10	82 - 10 = 72
	11/14 (4/13 PT Class)		-10	72 - 10 = 62
1/15 FT (Day)		28	22	62 + 22 = 84
1/15 FT (Eve)		20	15	84 + 15 = 99
	2/15 (2/14 FT Day Class)		-10	99 - 10 = 89
	2/15 (2/14 FT Eve Class)		-6	89 - 6 = 83
	2/15 (4/13 PT Class)		-10	83 - 10 = 73
4/15 PT	2/17	22	15	73 + 15 = 88
4/15 FT (Day)		20	20	88 + 20 = 108
5/15 FT (Eve)		10	10	108 + 10 = 118
	5/15 (6/9/14 FT Day Class)		-10	118 - 10 = 110
	6/15 (6/14 FT Eve Class)		-7	110 - 7 = 103
	6/15 (11/13 PT Class)		-9	103 - 9 = 94
	12/15 (1/15 FT Day Class)		-22	94 - 22 = 72
	1/16 (1/15 FT Eve Class)		-15	72 - 15 = 57
	1/16 (3/14 PT Class)		-9	57 - 9 = 48
	4/16 (4/15 FT Day Class)		-20	48 - 20 = 28
	4/16 (formerly to be 1/16) (6/14 PT Class)		-11	28 - 11 = 17

ENROLLMENT DATA				
CLASS DATES		# Students Admitted	# Students Current or Completed	Total Enrolled
Start	Complete			
	5/16 (5/15 FT Eve Class)		-10	17 - 10 = 7
5/16 FT (Day)	5/17	24	17	7 + 17 = 24
6/16 FT (Eve)	6/17	24	23	24 + 23 = 47
9/16 PT	7/18	24	24	47 + 24 = 71
1/17 FT (Day) (Proposed)	1/18	24		71 + 24 = 95

### Licensing Examination Statistics

The following statistics, furnished by Pearson Vue and published by the National Council of State Boards of Nursing as "Jurisdictional Summary of All First-Time Candidates Educated in Member Board Jurisdiction" for the period January 2012 through September 2016, specify the pass percentage rates for graduates of the Homestead Schools Vocational Nursing Program on the National Council Licensure Examination for Practical (Vocational) Nurses (NCLEX-PN®) and the variance from state average annual pass rates.

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

NCLEX-PN® Licensure Examination Data							
Quarterly Statistics					Annual Statistics*		
Quarter	# Candidates	# Passed	% Passed	State Quarterly Pass Rate	Program Average Annual Pass Rate	State Average Annual Pass Rate [CCR §2530(l)]	Variance from State Average Annual Pass Rate
Apr – Jun 2015	9	4	44%	69%	68%	72%	-4
Jul – Sep 2015	15	11	73%	73%	66%	72%	-6
Oct – Dec 2015	10	8	80%	75%	67%	72%	-5
Jan – Mar 2016	2	2	100%	73%	69%	72%	-3
April – Jun 2016	5	5	100%	75%	81%	74%	+7
Jul – Sep 2016	7	6	86%	72%	88%	72%	+16

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

California Code of Regulations section 2530(l) states:

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

As demonstrated in the data for the most recent period, July through September 2016, the program’s average annual pass rate was **88%**. The California average annual pass rate for graduates from approved vocational nursing programs who took the NCLEX-PN® for the first time is **72%**. Based on this data, the program’s average annual pass rate is **16** percentage points **above** the state average annual pass rate.

The data presented above substantiates the programs **compliance** with section 2530(l) of the Vocational Nursing Regulations for **14** of the **previous 19 quarters** represented (January 2012 – September 2016).

### **Faculty and Facilities**

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

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

The total number of Board approved faculty is 29, including the program director, 25 instructors, and two (2) Additional Faculty. The director has 100% administrative duties. Of the total faculty, 26 are approved to teach in the clinical area.

Based on a current and proposed maximum enrollment of 88 students, six (6) instructors are required for clinical instruction. Therefore, the **total** number of current faculty is **adequate** for the current and proposed enrollment.

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

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

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

### **Other Considerations**

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

- a) Policies related to the evaluation of student performance to determine the need for remediation or removal from the program;
- b) Adequacy of clinical facilities and proposed placement of students in clinical experiences; and
- c) Concern regarding the low number of graduates taking the licensure examination. This concern was identified prior to 2012 and continued into 2014 when the program’s own data demonstrated that **over 20% of the students who complete program hours are unable to complete the program’s exit requirements.**

An unannounced program inspection was performed on January 6 and 7, 2016. Two (2) Board representatives conducted the inspection. Three (3) additional violations were identified and a *Notice of Violations* was forwarded to the program via electronic and certified mail on January 12, 2016.

At the time of the Board Meeting on February 5, 2016, the program had corrected one (1) violation and had presented plans that, should they be consistently implemented, would correct two (2) additional violations. The program at that time had six (6) uncorrected violations. Accordingly, the Board placed the program on provisional approval for the three-month period ending May 31, 2016. On May 13, 2016, the Board extended the program’s provisional approval through May 31, 2018, and scheduled reconsideration of the program’s status for the May 2018 Board meeting.

Further, based on the recommendations approved at the February 2016 Board meeting, the program was required to submit a revised policy for the evaluation of student performance. The program provided the Board with a revised remediation policy. The program still has not identified administrative oversight of the remediation process or how many different terms may be failed before the student is determined to have failed the

program. As noted during the program inspection, students have been allowed to fail multiple terms and remain in the program after “remediating” the term.

On July 11, 2016, the NEC consulted with the program director about the supporting documentation for the program’s current request to admit three (3) cohorts. The NEC communicated the following concerns:

- The program had scheduled some instructors to clinically instruct more than one group of students at the same time.
- Skills labs for pediatric and maternity rotations are not shown in faculty/student assignment grids or on the part-time/full-time Instructional plan.
- The maternity rotation schedule is not consistent with the Board-approved instructional plan, including maternity clinical rotations being scheduled almost two months apart.
- The enrollment data provided by the program has discrepancies.

On August 26, 2016, the Board approved one (1) part-time class of 24 students beginning September 10, 2016, only.

### ***Analysis of Program’s Comprehensive & Pass Rate Improvement Plan***

On October 1, 2016, the Board received the required comprehensive analysis and pass rate improvement plan. A summary of the plan follows. (See Attachment B)

1. Admission Criteria: An applicant must pass an Entrance Exam with 76%. The students are more engaged and motivated to learn while in the program. This has been in effect since August 2016. An applicant is given two (2) attempts to pass an exam, including the initial attempt.
2. Screening and Selection Criteria: The program has placed an emphasis on an interview process, utilizing an interview rubric.
3. Terminal Objectives: The program’s terminal objectives do not correlate with curriculum objectives or to course lesson plans. In October 2016 faculty workshops will begin for improving teaching effectiveness both in theory and clinical. They will conduct classroom and clinical assessments to ensure theory to clinical correlation is maintained.
4. Curriculum Objectives: The program revised their curriculum objectives in February 2016, and subsequently were approved by the Board and implemented by the program.
5. Instructional Plan: The instructional plan was found not consistent with a simple – to - complex teaching format.
6. Theory and Clinical Objectives: The program will revise theory and clinical objectives to correlate to coincide with the revised instructional plan.
7. Lesson Plans: Faculty are not following course lesson plans derived from the instructional plan, causing a lack of correlation between theory and clinical.

Lesson plans are under revision to coincide with the program's revised instructional plan.

8. Textbooks: Textbooks will be updated with the most current editions.
9. Attendance Policy: The program's attendance policy was revised in May 2016 and approved by the Board. If consistently followed this should prevent future violations related to attendance.
10. Remediation Policy: Revised remediation policy does present evidence of removal of failing students from the program but does not provide remediation for students in clinical component. It does not describe clear director oversight of the remediation process.
11. Evaluations of theory and clinical faculty: the program reports findings based on student evaluations that faculty are not, a) clearly presenting learning objectives, b) meeting theory/learning objectives, and c) providing theory correlated clinical experiences. The director reports faculty are observed in theory and clinical settings once a year and that students evaluate faculty at the end of each term.
12. Evaluation of clinical rotations and their correlation to theory: The program provided a structured clinical program activity guideline, a student routine activity checklist, and a cognitive learning guideline for faculty.
13. Evaluation of student achievement: A grade of 76% or better is considered passing and is necessary to continue in the program for both theory and clinical.
14. Current enrollment was described by the program as adequate faculty and clinical facilities for all currently enrolled students.

The program has revised policies related to admissions, screening, and selection of applicants to the program. Of concern is that the program plans to continue utilizing a "School-made Entrance Test" and that, while a passing score of 76% is given, an explanation as to what specific criteria is tested is not mentioned. This is of concern especially since the program has had only 10% of program graduates take the licensing exam in 2016. The program has identified a lack of the curriculum to develop progressive mastery of skills, knowledge and abilities by students' performance at the clinical setting and class observations. This eyewitness report is indicative of significant lack of clinical judgment by the director for continuing to place students in the clinical setting with having knowledge of their poor theory and clinical performance. The program revised their evaluation of student progress to include parameters for terminating a student from the program. However, the policy failed to include a remediation for students in clinical. This practice is not consistent with regulatory requirements or educational standards to develop competent and safe nurses.

As of the writing of this report, and based on previously submitted materials from February and March 2016, the **current** status of the previously identified violations follows.

The program has submitted plans that, *if consistently implemented*, would correct the remaining five (5) violations:

- *Section 2533(a)* : Lack of theory and correlated clinical experience
- *Section 2533(c)*: Failure to provide curriculum content in a sequence of progressive mastery of content related to students not engaging in more complex tasks in clinical setting and clinical placements that are consistent with the Board-approved Instructional Plans.
- *Section 2526(a)(12)(13)*: Failure to follow polices related to admission, screening and selection of applicants.
- *Section 2530(h)*: Failure to follow the attendance policy, including timely and appropriate make-up of missed hours.
- *Section 2535*: Failure to follow policies toward giving credit toward curriculum requirements.

### ***Evaluation of Student Progress and Remediation***

The program's proposed policy, as submitted on September 12, 2016, fails to define how frequently the director monitors progress, what constitutes "inadequate" grades or "cause for concern" or a plan for identifying students who are at risk for failure. Further, the program has failed to limit the number of times the remediation exam can be taken or a required time frame for completion.

Of concern is the fact that the program has said they will not be remediating students who fail clinical.

"If a student fails the clinical component of the subject, no remediation will be offered and the student will have to repeat the entire course."

This indicates students will not be assessed by the instructor while at the clinical setting for achieving progressive mastery of clinical performance expectations. This also signifies students who are performing below a satisfactory level will not be identified early in the term which can lead to safety concerns in patient care.

It was noted in the February and May 2016 reports to the Board that discrepancies in the Enrollment Data submitted by the program have been identified.

### **Summary**

While the program submitted plans in May 2016, that if consistently implemented, would correct the remaining violations, as of this writing the consultant cannot make a determination as to the status of the remaining five (5) violations.

The program submitted documentation demonstrating that curriculum presentation does not support progressive mastery of skills and knowledge nor does it demonstrate correlation between theory content and clinical experience. Further, after consultation with the Supervising NEC and the program's consultant, the program determined that a curriculum revision was indicated. However, it is also noted that the published

examination statistics evidence the program's compliance with regulatory requirements for nine (9) consecutive quarters.

**Recommendations:**

1. Deny Homestead Schools, Inc., Vocational Nursing Program's request to admit one (1) full-time day class of 24 students beginning January 16, 2017.
2. Require the program to submit for Board approval:
  - a. A revised curriculum by **November 15, 2016**.
  - b. Lesson plans consistent with the curriculum to be used for Board approval by **November 15, 2016**.
  - c. Proposed policy for evaluation methodology of student progress for theory and clinical to demonstrate mastery of knowledge, skills, and abilities prior to advancing in the program and determination of the need for remediation or termination from the program including but not limited to:
    - i. Plan for early identification of student deficiencies;
    - ii. Limits on number of failed courses and terms allowed;
    - iii. Timeline for implementation;
    - iv. List of criteria for measuring student performance in both theory and clinical;
    - v. Objectives to be achieved; and
    - vi. Follow-up and documentation of outcomes
3. Continue to require the program to admit no additional classes without prior approval by the full Board.
4. Continue to 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 **January 1, 2017** and **every three (3) months, thereafter**.
5. Continue to require the program to submit follow-up reports every three (3) months. The reports must include a comprehensive analysis of the program, specific actions taken to improve pass rates and to correct all violations, a timeline for implementation, and the effect of employed interventions. The analysis must include, but should not be limited, to the following elements:
  - a. Admission Criteria
  - b. Screening and Selection Criteria
  - c. Terminal Objectives
  - d. Curriculum Objectives
  - e. Instructional Plan
  - f. Theory and Clinical Objectives for Each Course
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- 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 to require the program to maintain its average annual pass rate no more than 10 percentage points below the state average annual pass rate.
  7. 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.
  8. Failure to take these corrective actions may cause the full Board to revoke the program's approval.
  9. Continue the program's placement on the Board's **May 2018** agenda for reconsideration of provisional approval.

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

Additionally, the consultant's observation of the placement of students in the clinical setting with the director's/faculty's knowledge of the student's poor theory and clinical performance substantiates an egregious lack of clinical judgment by the director. Such actions jeopardize the safety of the consumer.

Given the above concerns, denial of the requested class admission is recommended.

Attachment A: History of Board Action



# Agenda Item #17.C.3., Attachment A

## HOMESTEAD SCHOOLS, INC. VOCATIONAL NURSING PROGRAM

### HISTORY OF PRIOR BOARD ACTIONS:

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

The Executive Officer also approved the following program requests.

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

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

- On March 6, 2012, the Executive Officer approved full accreditation of the Homestead Schools, Inc., Vocational Nursing Program for a four-year period, from November 7, 2011, through November 6, 2015, and issued a certificate accordingly; and, **rescinded** approval of the program's ongoing admission of all classes; **and**, required the program to obtain Board approval prior to the admission of each class.
- On April 16, 2012, the Executive Officer approved the Homestead School's request to admit 30 students into a Full-time day class commencing on April 23, 2012, only, graduating on April 23, 2013, to **replace** students who graduated on November 25, 2011; **and**, approved the program's request to admit 15 students into a part-time, weekend class commencing on April 28, 2012, only, graduating December 21, 2013, to **replace** students who graduated March 25, 2012; **and**, required the program to continue to obtain Board approval prior to the admission of each class.
- **On June 19, 2012, the Board approved a new program director.**
- On August 15, 2012, the Executive Officer denied the Homestead Schools Vocational Nursing Program's request to admit 30 students into a full-time day class commencing on August 20, 2012, only, graduating on September 6, 2013, to **replace** students who graduated on March 2, 2012; **and**, approved the program's admission of 20 students into a full-time day class commencing on August 20, 2012, only, graduating on September 6, 2013, to **replace** students who graduated on March 2, 2012; **and**, denied the program's request to admit a class of 30 students into a full-time evening class, commencing on August 20, 2012; graduating on September 6, 2013, to **replace** students who graduated on March 2, 2012; **and**, approved the program's admission of a class of 20 students into a full-time evening class, commencing on August 20, 2012, only; graduating on September 6, 2013, to **replace** students who graduated on March 2, 2012; **and**, denied the program's request to admit 30 students into a part-time, weekend class commencing on August 20, 2012, graduating April 13, 2014; and, required the program to perform an analysis and submit a written report which identifies deficiencies and strategies to correct identified deficiencies relevant to the following elements of the program by September 14, 2012:
  - a. Admission Criteria
  - b. Screening and Selection Criteria
  - c. Grading Criteria
  - d. Probation Policy and related Actions
  - e. Remediation Plan
  - f. Evaluation of Student Achievement
  - g. Evaluation of Faculty Performance
  - h. Evaluation of Facility Adequacy; **and**,

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

- On February 28, 2013, the Executive Officer approved Homestead Schools Vocational Nursing Program's request to admit a class of 30 students into a full-time evening class, commencing on March 4, 2013; graduating on February 28, 2014, to **replace**

students who graduated on January 25, 2013; **and**, approved the program to admit 30 students into a full-time, day class commencing on March 4, 2012; graduating February 28, 2014, to **replace** students who graduated December 7, 2012; **and**, approved the program to admit 30 students into a part-time, week-end class, commencing on March 25, 2013; graduating October 24, 2014, to **replace** students that will March 18, 2013.

- On April 27, 2013, the Executive Officer Approve the Homestead Schools Vocational Nursing Program's request to admit a class of 30 students into a full-time day class, commencing on September 16, 2013, only, graduating on September 15, 2014, to **replace** students who graduated on September 5, 2013; **and**, approved the program to admit 30 students into a full-time, evening class, commencing on September 16, 2013, only, graduating September 15, 2014, to **replace** students that graduated September 5, 2013; **and**, approved the program to begin an additional part-time class with 30 students on September 21, 2013, graduating June 28, 2015; **and**, required the program to continue obtaining Board approval prior to the admission of each class.
- On June 20, 2013, the Executive Officer approved the Homestead Schools Vocational Nursing Program's request to admit 30 students into a full-time, day class commencing on June 24, 2013, only; graduating June 16, 2014, to **replace** students who graduated April 26, 2013; **and**, approved the program's request to admit 30 students into a part-time, week-end class, commencing on June 29, 2013, only; graduating February 8, 2015, to **replace** students that graduated June 10, 2013; **and**, required the program to continue obtaining Board approval prior to the admission of each class.
- On April 10, 2014, the Executive Officer approved the Homestead Schools Vocational Nursing Program's request to admit a class of 30 students into a full-time day class, commencing on April 8, 2014, only, graduating April 1, 2015, to **replace** students who graduated January 10, 2014; **and** approved the program's request to admit an additional part-time class with 30 students on April 12, 2014, graduating December 6, 2015, to **replace** students that graduated December 01, 2013; **and** approved the program's request to admit 30 students into a full-time, evening class, commencing on April 21, 2014, only, graduating April 14, 2015, to **replace** students that graduated April 10, 2013; **and** required the program to continue obtaining Board approval prior to the admission of each class.
- On July 10, 2014, the Board received a request to admit students. Analysis by the assigned consultant indicated a lack of adequate clinical facilities.
- On October 24, 2014, the Board received a request to admit students. This request included a minor curriculum revision such that eight (8) hours of simulation may now be used for maternity nursing.
- On December 15, 2014, the Executive Officer approved the program's admission of a **full – time day** class of **thirty (30)** students to start on January 5, 2015 and graduating on December 21, 2015 to **replace** the class that graduated April 25, 2014 **and denied** approval of the program's request to admit a class of **twenty (20)** students to the part – time weekend class to start on January 10, 2015 and graduating on September 10, 2016, **and** approved the program's admission of a full – time

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

- On January 23, 2015, the Board received the required report.
- On February 16, 2015, the Board received a request to admit students.
- On February 25, 2015, the Board received a new request to admit students that the program stated superseded the February 16, 2015 request to admit students.
- On April 14, 2015, the Executive Officer approved the following recommendations: Deny approval of the program's admission of a full – time day class of thirty (30) students to start on April 20, 2015 and graduating on April 15, 2016. This class would replace the class that graduated February 27, 2015, **and** approve the program's admission of a **full – time day class of twenty (20)** students to start on April 20, 2015 and graduating on April 15, 2016 to **replace** the class that graduated February 27, 2015, **and** deny approval the program's request to admit a class of twenty (20) students to the part – time weekend class to start on April 18, 2015 and graduating on February 19, 2017 to **replace** the class that graduated February 7, 2015, **and** approve the program's request to admit a class of **ten (10)** students to the **part – time** weekend class to start on April 18, 2015 and graduating on February 19, 2017 to **replace** the class that graduated February 7, 2015, **and** deny approval of the program's admission of a full – time evening class of thirty (30) students to start on April 20, 2015 and graduating April 15, 2016 to **replace** the class that graduated February 27, 2015, **and** approve the program's admission of a **full – time evening class of twenty (20)** students to start on April 20, 2015 and graduating April 15, 2016 to **replace** the class that graduated February 27, 2015, **and** continue to require the program to admit classes on the date approved, **only, and** continue the program's requirement to obtain Board approval prior to the admission of each class.
- On April 15, 2015, the program submitted the following request:
  1. "For the full-time evening class, instead of 20 students, we'll admit 10 students. Allow us to start the class on May 18, 2015, instead of April 20, 2015.
  2. For the part-time weekend class, instead of 10 students, allow us to admit 20 students on April 18, 2015."
- On April 27, 2015, the Executive Officer rendered the following decisions: approve the program's request to delay the full – time evening class from April 20, 2015 to May 18, 2015, **only, and** contingent upon decreasing the full – time evening class beginning May 18, 2015 to no more than ten (10) students, approve the program's

request to admit 20 (twenty) students to the part – time weekend class beginning April 18, 2015 and graduating February 19, 2017, only, **and** continue to require the program to admit classes on the date approved, **only, and** continue the program's requirement to obtain Board approval prior to the admission of each class.

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

7. Require the program to submit documentation that demonstrates a qualified instructor will be responsible for clinical instruction, rather than a teacher assistant. Due no later than January 29, 2016.
  8. Require the program to submit for Board approval a revised policy for the evaluation of student performance to determine the need for remediation or removal from the program no later than February 15, 2016.
  9. Require the program to submit for Board approval a revised attendance policy that identifies criteria for attendance, the specific course objectives for which make-up time is required, and acceptable methods for make-up that are specific for theory and clinical time missed no later than February 15, 2016.
  10. Continue the program's requirement to obtain Board approval prior to the admission of each class.
  11. Continue to require the program to admit classes on the date approved, **only**.
- On January 6 and 7, 2016, two Board representatives conducted an unannounced program inspection.
  - On January 12, 2016, the Board forwarded a *Notice of Violations* to the program.
  - On February 5, 2016, the Board approved the following:
    1. Place the Homestead Schools Vocational Nursing Program on provisional approval for the three (3) month period from February 5, 2016 through May 31, 2016, and issue a notice to the program to identify specific areas of non-compliance and requirements for correction as referenced in Section 2526.1 (e) of the California Code of Regulations.
    2. Place the program on the Board's **May 2016** agenda for reconsideration of provisional approval.
    3. Require the program to admit no additional classes without prior approval by the full Board.
    4. Require the program director to submit, under penalty of perjury, the names of all enrolled students, date of admission, placement in the curriculum, and expected date of graduation by **February 15, 2016**.
    5. Require the program to submit for Board approval the following:
      - a. Curriculum objectives no later than **February 15, 2016**.
      - b. A revised policy for the evaluation of student performance to determine the need for remediation or removal from the program no later than **March 1, 2016**.

- c. A revised attendance policy that identifies criteria for attendance, the specific course objectives for which make-up time is required, and acceptable methods for make-up that are specific for theory and clinical time missed, and timely make-up of missed hours that maintains theory to clinical correlation no later than **March 1, 2016**.
  - d. A revised policy for the admission, screening, and selection of applicants to the program that defines the number and frequency of allowable retakes on an admission test and steps to be taken to ensure that the policy is followed, including appropriate interview of applicants no later than **March 1, 2016**.
  - e. Evidence of training of all involved personnel regarding the transfer credit policy that was submitted to the Board on December 1, 2015, including credit to be given for certified nurse assistant courses, and how this new policy is to be implemented no later than **March 1, 2016**.
6. Require the program to submit documentation of implementation of the Board-approved Instructional Plans for both the full-time and the part-time programs **no later than March 1, 2016**.
7. Require the program to submit documentation of placements consistent with the Board-approved Instructional Plans and with adequate faculty for all **currently enrolled students no later than March 1, 2016**.
8. Require the program to submit follow up reports in nine (9) months, but no later than **October 1, 2016**, and 21 months, but no later than **October 1, 2017**. The reports must include a comprehensive analysis of the program, specific actions taken to improve pass rates and to correct all violations, a timeline for implementation, and the effect of employed interventions. The analysis must include, but should not be limited, to the following elements:
- a. Admission Criteria
  - b. Screening and Selection Criteria
  - c. Terminal Objectives
  - d. Curriculum Objectives
  - e. Instructional Plan
  - f. Theory and Clinical Objectives for Each Course
  - g. Lesson Plans for Each Course
  - h. Textbooks
  - i. Attendance Policy
  - j. Remediation Policy
  - k. Evaluations of Theory and Clinical Faculty
  - l. Evaluations of Theory Presentations
  - m. Evaluations of Clinical Rotations and Their Correlation to Theory Presentations
  - n. Evaluation of Student Achievement
  - o. Current Enrollment
9. Require the program to maintain its average annual pass rate no more than (10) ten percentage points below the State average annual pass rate.

10. Require the program to comply with all approval standards in Article 4 of the Vocational Nursing Practice Act, commencing at Business and Professions Code Section 2880, and Article 5 of the Board's Regulations, commencing at California Code of Regulations, Title 16, Section 2526.
  11. Failure to take these corrective actions may cause the full Board to revoke the program's approval.
- On May 13, 2016, the Board reconsidered the program's status. The following decisions were rendered.
    1. Extend the provisional approval of the Homestead Schools Vocational Nursing Program for the two (2) year period from May 13, 2016 through May 31, 2018, and issue a notice to the program to identify specific areas of non-compliance and requirements for correction as referenced in Section 2526.1 (e) of the California Code of Regulations. (See Attachment G)
    2. Place the program on the Board's **May 2018** agenda for reconsideration of provisional approval.
    3. Continue to require the program to admit no additional classes without prior approval by the full Board.
    4. Approve the program's request to admit one (1) full-time Day class of 24 students beginning May 16, 2016, graduating May 12, 2017, **only**.
    5. **Deny** the program's request to admit one (1) part-time class of 24 students beginning May 21, 2016, graduating April 1, 2018, **only**.
    6. Approve the program's request to admit one (1) full-time Evening class of 24 students beginning June 12, 2016, graduating June 9, 2017, **only**.
    7. Require the program director to submit, under penalty of perjury, the names of all enrolled students, date of admission, placement in the curriculum, and expected date of graduation by **July 1, 2016** and **every three (3) months, thereafter**.
    8. Continue to require the program to submit follow up reports in nine (9) months, but no later than **October 1, 2016**, and 21 months, but no later than **October 1, 2017**. The reports must include a comprehensive analysis of the program, specific actions taken to improve pass rates and to correct all violations, a timeline for implementation, and the effect of employed interventions. The analysis must include, but should not be limited, to the following elements:
      - a. Admission Criteria
      - b. Screening and Selection Criteria
      - c. Terminal Objectives

- d. Curriculum Objectives
  - e. Instructional Plan
  - f. Theory and Clinical Objectives for Each Course
  - g. Lesson Plans for Each Course
  - h. Textbooks
  - i. Attendance Policy
  - j. Remediation Policy
  - k. Evaluations of Theory and Clinical Faculty
  - l. Evaluations of Theory Presentations
  - m. Evaluations of Clinical Rotations and Their Correlation to Theory Presentations
  - n. Evaluation of Student Achievement
  - o. Current Enrollment
9. Continue to require the program to maintain its average annual pass rate no more than (10) ten percentage points below the State average annual pass rate.
  10. Continue to require the program to comply with all approval standards in Article 4 of the Vocational Nursing Practice Act, commencing at Business and Professions Code Section 2880, and Article 5 of the Board's Regulations, commencing at California Code of Regulations, Title 16, Section 2526.
  11. Failure to take these corrective actions may cause the full Board to revoke the program's approval.
- On August 26, 2016, the Board approved the program's admission of one (1) part-time class of 24 students beginning September 10, 2016, only.
  - On September 20, 2016, the assigned consultant and SNEC met with the program director and school administrator relative to program deficiencies.
  - On October 1, 2016, the Board received the program's comprehensive analysis and pass rate improvement plan.