

## AGENDA ITEM #5.E.II



BUSINESS, CONSUMER SERVICES, AND HOUSING AGENCY • GAVIN NEWSOM, GOVERNOR

**Board of Vocational Nursing and Psychiatric Technicians**

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<b>DATE</b>	August 21, 2020
<b>TO</b>	<input checked="" type="checkbox"/> Board Members <input type="checkbox"/> Education and Practice Committee <input type="checkbox"/> Executive Officer Review
<b>FROM</b>	<input type="checkbox"/> Education and Practice Committee <input type="checkbox"/> Executive Officer <input checked="" type="checkbox"/> SNEC
<b>REVIEWED BY</b>	Marie Cordeiro, MN, RN Supervising Nursing Education Consultant (SNEC)
<b>PREPARED BY</b>	Jessica Gomez, MSN, RN Nursing Education Consultant (NEC)
<b>SUBJECT</b>	Request to Admit Students
<b>PROGRAM</b>	Curam College of Nursing, Vocational Nursing Program (Program) (Director: Wayne Williams, Sacramento, Sacramento County, Private)

Please note: The NECs make recommendations. The recommendations are forwarded to one or more: the Executive Officer Review, the Education and Practice Committee and/ or the full Board for action.

### **PROGRAM REQUEST:**

Admit a class of 20 students to commence on September 7, 2020, with a graduation date of July 9, 2021.

### **BACKGROUND:**

On August 2, 2019 during an unannounced onsite Program inspection, it was identified that the program director was not following the Board-approved admission policy and plan to increase Program pass rates submitted in April 2019. The Program admitted students in June 2019 who did not meet any of the qualifications specified in the improvement plan. This violated Section 2526(g) of the Vocational Nursing Rules and Regulations which states:

- (b) "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."

The Program was placed on provisional approval at the November 23, 2019 Board Meeting due to six violations identified during an unannounced onsite program inspection. On June 2, 2020 documents submitted identified that all violations appear to have been corrected. However, due to travel restrictions, a site visit was not conducted to evaluate the implementation of the submitted plan.

### **STAFF ANALYSIS:**

The Program provided documentation of adequate resources including faculty and facilities to provide the students with the Program's Board-approved learning objectives. The Program is meeting the recommended 50 percent simulation and 50 percent clinical placement for fundamentals and throughout the remaining terms of the Program.

According to Person VUE the Program's current Quarter 2 pass rate is compliant with regulation at 71 percent, which is eight percentage points below the state average.

Board staff will continue to monitor the Program's effectiveness by tracking the Program's licensure examination pass rates each quarter. The assigned NEC will conduct a Program inspection of the admission files of the proposed students and monitor student progression throughout the Program.

The Program determined that fewer students for each clinical instructor enable more focused instruction and enhanced learning and allow the instructor to closely monitor and evaluate the clinical performance of students. Since 2016 the Programs applications for approval of clinical sites has requested a student to faculty ratio of a maximum of 10:1.

### **STAFF RECOMMENDATIONS:**

Please note: These are not NEC decisions, rather the recommendations presented at the Executive Officer Review, the Education and Practice Committee and/or the full Board for action.

1. Approve the program director's request to admit a class of 20 students on September 7, 2020 with an expected graduation date of July 9, 2021
2. Admit no additional classes without prior approval by the Board.
3. Place the Program on the Board's November 2021 agenda for reconsideration of provisional approval.
4. Comply with all program requirements listed below.

### **PROGRAM REQUIREMENTS:**

1. Program director to reevaluate the program and submit the report no later than May 22, 2021. The report must include a comprehensive analysis of the program, timeline

for implementation, and the effect of employed interventions. The elements below must be addressed in the analysis:

- a. Terminal Objectives
  - b. Evaluation of current curriculum including:
    - 1- Instructional plan
    - 2- Theory objectives for each term
    - 3- Clinical objectives for each term
    - 4- Lesson plans for each term
  - c. Student Policies including:
    - 1- Admission policy
    - 2- Screening and selection policy
    - 3- Attendance policy
    - 4- Remediation policy
    - 5- Evaluation of student achievement
    - 6- Credit granting policy
  - d. Evaluations of approved clinical facilities which determine adequacy in number and variety of patients to accommodate current and projected students.
  - e. Evaluations of faculty
  - f. Methodologies for:
    - 1- Faculty meetings
    - 2- Clinical evaluations
  - g. Documentation of required clinical resources for all terms for all current cohorts.
2. Continue to provide no less than one instructor for every ten students in clinical experiences. Regulation 2534. (d) states, "For supervision of clinical experience, there shall be a maximum of 15 students for each instructor."
  3. 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.
  4. Refrain from further misrepresentation of fact or the Board may take further action up to and including revocation of the Program.
  5. Demonstrate incremental progress in correcting the violations. If the program fails to satisfactorily demonstrate incremental progress, the full Board may revoke the Program's approval.

## **RELEVANT PROGRAM ELEMENTS**

### **Enrollment**

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

"(k) The program shall have prior Board approval to increase the number of students per class and/or increase the frequency of admission of classes. Criteria

to evaluate a school's request to increase the number of students per class and/or increase the frequency of class admissions include but are not limited to: (1) Sufficient program resources as specified in Section 2530(a). (2) Adequacy of clinical experience as specified in Section 2534. (3) Licensure examination pass rates as specified in Section 2530(l).”

The Program offers a 42-week full-time day class and a 51-week part-time evening class. The Program must have Board-approval prior to admission of any class.

The following table represents current and proposed student enrollment based on current and proposed class starts and completions. The table indicates a maximum enrollment of 30 students for the period from March through September 2020.

ENROLLMENT DATA				
CLASS DATES		#Students Admitted	#Students Current or Completed	Total Enrolled
Start	Complete			
3/20 FT Day *(12/20)		20	10	10
9/20 Proposed *(6/21)		20		10 + 20 = 30

\*Indicates projected graduation date

### **Licensing Examination Statistics**

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.”

The following statistics, furnished by Pearson VUE, and published by the National Council of State Boards of Nursing as "Jurisdictional Summary of All First-Time Candidates Educated in Member Board Jurisdiction," for the period July 2018 through June 2020, specify the pass percentage rates for graduates of the Program on the National Council Licensure Examination for Practical/Vocational Nurses (NCLEX-PN®).

<b>NCLEX-PN® Licensure Examination Data</b>							
<b>Quarterly Statistics</b>				<b>Annual Statistics*</b>			
<b>Quarter</b>	<b># Candidates</b>	<b># Passed</b>	<b>% Passed</b>	<b>State Average Quarterly Pass Rate</b>	<b>Program Average Annual Pass Rate</b>	<b>State Average Annual Pass Rate [CCR § 2530 (l)]</b>	<b>Variance from State Average Annual Pass Rate</b>
Jul – Sep 2018	10	7	70%	77%	70%	76%	-6
Oct – Dec 2018	18	12	67%	79%	68%	79%	-11
Jan – Mar 2019	19	10	53%	80%	63%	81%	-18
Apr-Jun 2019	16	11	69%	83%	63%	81%	-18
Jul – Sep 2019	12	10	83%	79%	66%	79%	-13
Oct – Dec 2019	11	9	82%	79%	69%	79%	-10
Jan – Mar 2020	9	4	44%	78%	71%	79%	-8
April – Jun 2020	9	6	67%	81%	71%	79%	-8

\*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.

Based on the most recent data available, (January through March 2020) the program’s average annual pass rate is 71 percent. 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 79 percent. The pass rate for the Program is eight 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.”

The total number of Board-approved faculty is eight, including the program director. The director has full-time administrative responsibility. A total of eight instructors, including the director, are designated to teach in the clinical area. For a maximum enrollment of 30 students, three clinical instructors are needed. The utilization of faculty at clinical facilities is such that clinical instruction is covered adequately.

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.”

Submitted documents indicate that the Program has sufficient clinical facilities to afford the number, type and variety of patients that will provide clinical experiences consistent with Board-approved competency-based objectives and theory being taught for current and proposed students. The Program is currently meeting the recommended 50 percent simulation and 50 percent clinical placement.

**Program Evaluation and Improvement Plan:**

On June 2, 2020 the program director submitted the required program evaluation. The program director's plan for improvement includes:

- 1- Restructuring of admission policy; students must now meet admission and assessment score of 14 points which includes:
  - a. Evaluation of transcripts.
  - b. Completion of 12<sup>th</sup> Grade.
  - c. CNA certificate.
  - d. Entrance Examination TEAS/P-Nat examination score no less than proficient.
  - e. Two letters of references.
  - f. Admission essay.
  - g. Admission Interview.
  - h. Work experience.
- 2- Development of new curriculum – in progress.
- 3- New instructor orientation.
- 4- Attendance policy– Students must complete all make up prior to moving to the next term.
- 5- Remediation- Must be completed in the current term and cannot be held over to the next term.

Due to the COVID-19 pandemic and travel restrictions, the NEC has not made an onsite visit to evaluate the implementation of the plan, or the correction of the previously identified violations.

**ATTACHMENT:**

Attachment A: History of Prior Board Actions

# **Agenda Item #X.X.X, Attachment A**

## **CURAM COLLEGE OF NURSING VOCATIONAL NURSING PROGRAM**

### **History of Prior Board Actions**

- On May 9, 2011, the Executive Officer approved Curam College of Nursing's request to begin a vocational nursing program with an initial full-time class of 30 students on July 5, 2011, **only**; and, approved the program's curriculum for 1550 hours, including 594 theory and 956 clinical hours.
- On April 26 and 27, 2012 an initial site visit was completed by the Nursing Education Consultant.
- On May 30, 2012, the Executive Officer approved the Curam College of Nursing Vocational Nursing Program for the four – year period from May 30, 2012, through May 29, 2016, and issue a certificate accordingly; **and**, approved the program's request to admit a class of 30 students on June 4, 2012 with a projected graduation date of March 1, 2013, **only**, to **replace** students who graduated May 10, 2012; **and**, required the program to obtain Board approval prior to the admission of additional students.
- On November 2, 2012, the Executive Officer approved the program's request to admit a class of 20 students on November 5, 2012, **only**, with a projected graduation date of August 7, 2013, **only**; **and**, required the program to obtain Board approval prior to the admission of additional students.
- On February 28, 2013, the Executive Officer denied Curam College's request to admit a class of 30 students on March 18, 2013 graduating December 6, 2013, to replace the class that will graduate on March 1, 2013; and, approved the program to admit a class of 20 students on March 18, 2013 **only**, with a projected graduation date of December 6, 2013. This class will replace students scheduled to graduate on March 1, 2013; and, required the program to obtain Board approval prior to the admission of additional students.
- On December 19, 2013, the Executive Officer denied Curam College Vocational Nursing Program's request to admit a class of 30 students on January 21, 2014 graduating September 5, 2014, to **replace** the class that graduated August 7, 2013; and, approved the program's admission of a class of 20 students on January 13, 2014 **only**, with a projected graduation date of September 5, 2014. This class will **replace** students that graduated on August 7, 2013; and, required the program to revise its admission criteria to include the following:
  1. Pre-requisite computer class.

2. Minimum pass rate of 75 percent on the ATI admission test in the following content areas:
    - Reading
    - Language
    - Mathematics
    - Critical Thinking
  3. Require the program to revise its screening and selection criteria to include:
    - Pre – requisite computer class.
    - Essay.
  4. Require the program to submit a revised instructional plan to increase the length of the program from 38 weeks to 44 weeks by January 31, 2014. The additional time would be allocated to terms 2 and 3.
  5. Require the program to obtain Board approval prior to the admission of additional students.
- On January 31, 2014, the director submitted the revised curriculum as directed above.
  - On February 6, 2014, the NECs met with the director regarding revisions that needed to be made to the submitted curriculum.
  - On May 2, 2014, the director was notified the program had four (4) quarters of low licensure pass rates. The director was required to submit a plan to improve the programs licensure pass rates by May 30, 2014.
  - On May 13, 2014, the revised Term 1 was submitted for review and the director’s plan to improve licensure pass rates.
  - On May 22, 2014, the Executive Officer denied Curam College Vocational Nursing Program’s request to admit a class of 20 students on June 16, 2014 graduating April 3, 2015.
  - On July 15, 2014, the Board received electronic correspondence from Curam College requesting approval to admit a new class.
  - On August 13, 2014, the Executive Officer approved Curam College Vocational Nursing Program’s request to admit a class of 20 students on August 18, 2014, only, graduating June 12, 2015, to **replace** students who graduated May 2, 2014; and, required the program to obtain Board approval prior to the admission of additional students.
  - On October 30, 2014, the Executive Officer approved Curam College Vocational Nursing Program’s request to admit a class of 20 students on November 4, 2014, only, graduating September 18, 2015. This class will **replace** students that will graduate



October 3, 2014; and, continued to require the program to obtain Board approval prior to the admission of additional students.

- On February 24, 2015, the Executive Officer denied Curam College Vocational Nursing Program's request to admit a class of 20 students on March 2, 2015, only, graduating September 18, 2016; and, continued to require the program to obtain Board approval prior to the admission of additional students.
- On August 4, 2015, the Board received electronic correspondence from the program director stating that BPPE had provided Curam College of Nursing approval to operate from August 4, 2015 through August 3, 2020.
- On August 6, 2015, the Acting Executive Officer:
  1. Approved the Curam College Vocational Nursing Program's request to admit a class of 20 students starting August 10, 2015, **only**, that would graduate on May 27, 2016, to **replace** the class that graduated on June 12, 2015.
  2. Approved the program's request to admit a class of 20 students starting on October 19, 2015, **only**, that would graduate on August 19, 2016, to **replace** the class graduating on September 18, 2015.
  3. Continued to require the program to obtain Board approval prior to the admission of additional students.
- On January 14, 2016, the Acting Executive Officer approved Curam College Vocational Nursing Program's request to admit a class of 30 students starting February 9, 2016, graduating on December 2, 2016, **only**. This is not a replacement class; and, continued to require the program to obtain Board approval prior to the admission of additional students.
- On May 19, 2016, the Executive Officer continued approval of the Curam Collage of Nursing, Vocational Nursing Program for the four – year period from May 29, 2016, through May 28, 2020, and issued a certificate accordingly, and;
  1. Approved the program's request to admit a class of **20** full-time students commencing on June 6, 2016, **only**, that would graduate on April 14, 2017. To replace the class graduating on May 25, 2016.
  2. Continued to require the program to obtain Board approval prior to the admission of additional students.
- On August 31, 2016, the Executive Officer:
  1. Approved the program's request to admit a class of **20** full-time students commencing on October 10, 2016, **only**, scheduled to graduate on August 4, 2017. To replace the class that graduated on August 19, 2016.
  2. Continued to require the program to obtain Board approval prior to the admission of additional students.
- On December 29, 2016, the Executive Officer:

1. Approved the program's request to admit a class of **20** full-time students commencing on February 13, 2017, **only**, scheduled to graduate on December 1, 2017, to replace the class that graduated on August 19, 2016.
  2. Approved the program's request to admit a class of **20** full-time students commencing on May 21, 2017, **only**, scheduled to graduate on March 10, 2018, to replace the class scheduled to graduate on April 14, 2017.
  3. Continued to require the program to obtain Board approval prior to the admission of additional students.
- On August 30, 2017, the Interim Executive Officer Rendered the following Decisions:
    1. Approved the program's request to admit a class of **20** full-time students commencing on September 19, 2017, scheduled to graduate on August 15, 2018, **only**. The class will **replace** students scheduled to graduate on August 4, 2017.
    2. Approved the program's request to admit a class of **20** full-time students commencing on December 4, 2017, scheduled to graduate on October 5, 2018, **only**. The class will **replace** students scheduled to graduate on December 14, 2017.
    3. Approved the program's request for ongoing admissions, with the pattern of one class of twenty (20) students quarterly, to **replace** graduating students only, with the following stipulations:
      - a. No additional classes are added to the program's pattern of admissions without prior Board approval.
      - b. The director documents that adequate resources, i.e. faculty and facilities, are available to support each admitted class of students; **and**,
      - c. The program maintains an average annual pass rate that is compliant with Section 2530 (l) of the Code.
  - On February 20, 2018 the Board approved the minor curriculum change to accommodate a part-time evening class.
  - On May 11, 2018, the Executive Officer rendered the following decisions:
    1. **Approved** the program's request to admit a class of **20** part-time evening students commencing on June 4, 2018, scheduled to graduate on June 14, 2019, **only**. This is in addition to the approved ongoing admissions.
    2. **Denied** the program's request to increase the current ongoing admissions pattern to include one-day class of twenty (20) students quarterly, and one evening class of 20 students yearly, to **replace** graduating students only.
    3. **Rescinded** the program's approval for ongoing admissions pattern to include one-day class of twenty (20) students quarterly, to **replace** graduating students only.
    4. **Required** the program to obtain Board approval prior to the admission of each class.
  - On July 31, 2018, the Executive Officer rendered the following decisions:

1. **Approved** the program's request to admit a class of 20 full-time day students commencing on August 6, 2018, scheduled to graduate on July 13, 2019, **only**. The class will replace the students graduating July 13, 2018.
  2. **Denied** the directors request to admit a class of 20 students to a full-time day class, commencing on November 5, 2018, scheduled to graduate on August 23, 2019; only.
  3. **Continued to** require the program to obtain Board approval prior to the admission of each class.
  4. **Required** the program to a submit a report in four months, but no later than **November 30, 2018**. The reports must include a comprehensive analysis of the program, specific identified actions required 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. Current Enrollment
    - d. Terminal Objectives
    - e. Curriculum Including:
      - 1- Curriculum Objectives
      - 2- Instructional Plan
      - 3- Theory and Clinical Objectives
      - 4- Correlation of Clinical Rotation to Theory Presentations
    - f. Attendance Policy
    - g. Remediation Policy
    - h. Program resources including but not limited to faculty, facilities, and skills lab.
- On November 20, 2018 the Executive officer rendered the following decisions:
    - 1- **Approved** the program's request to admit a class of 20 full-time day students commencing on December 18, 2018, scheduled to graduate on October 11, 2019, **only**. The class will replace the students who graduated on November 13, 2018.
    - 2- **Continued to** require the program to obtain Board approval prior to the admission of each class.
    - 3- **Required** the program, when requesting approval to admit students, to:
      - a. Submit all documentation in final form, using the forms provided by the Board, no later than two months prior to the requested start date for the class.
      - b. Provide documentation that adequate resources, i.e. faculty and facilities, are available to support each admitted class of students.
      - c. Ensure that the program maintains an average annual pass rate that is compliant with Section 2530(I) of the Vocational Nursing Rules and Regulations.
    - 4- **Continued** 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 California Code of Regulations, Title 16.

- On September 3, 2019 the Executive Officer rendered the following decisions:
  1. Placed the Curam College Vocational Nursing Program on the October 7, 2019 Board Education Committee agenda for consideration of provisional approval.
  2. Denied the program's request to admit a class of 20 full-time day students commencing on September 30, 2019, scheduled to graduate on July 24, 2020, only.
  3. Continued to require the program to obtain Board approval prior to the admission of each class.
  4. Required the program, when requesting approval to admit students, to:
    - a. Submit all documentation in final form, using the forms provided by the Board, no later than two months prior to the requested start date for the class.
    - b. Provide documentation that adequate resources, i.e. faculty and facilities, are available to support each admitted class of students.
    - c. Ensure that the program maintains an average annual pass rate that is compliant with Section 2530(l) of the Vocational Nursing Rules and Regulations.
  5. Continued 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 California Code of Regulations, Title 16.

On November 8, 2019 the Full Board rendered the following decisions:

1. Placed Curam College, Vocational Nursing Program the November 7, Board meeting to consider provisional approval for the two-year period beginning November 22, 2019; and issue a certificate accordingly.
2. Issued a notice of change in approval status to the program identifying specific areas of non-compliance and requirements for correction as referenced in Section 2526.1 and Section 2530(l) of the California Code of Regulations.
3. Required the program to admit no additional classes without prior approval by the Board.
4. Required the program to correct the remaining violations identified and submit documentation of corrections no later than November 30, 2019.
5. Required the program to submit a report to the Board in six months, no later than May 22, 2020, and eighteen months, no later than May 22, 2021. The report must include a comprehensive analysis of the program, timeline for implementation, and the effect of employed interventions. The following elements must be addressed in the analysis.
  - a. Terminal objectives
  - b. Evaluation of current curriculum including:
    - 1- Instructional plan
    - 2- Theory objectives for each term
    - 3- Clinical objectives for each term
    - 4- Lesson plans for each term

- c. Student Policies including:
  - 1- Admission policy
  - 2- Screening and selection policy
  - 3- Attendance policy
  - 4- Remediation policy
  - 5- Evaluation of student achievement
  - 6- Credit granting policy
- d. Evaluations of approved clinical facilities which determine adequacy in number and variety of patients to accommodate current and projected students.
- e. Evaluations of faculty
- f. Methodologies for:
  - 1- Faculty meetings
  - 2- Clinical evaluations
- g. Documentation of required clinical resources for all terms for all current cohorts.
- 6. Require the program to provide no less than one instructor for every ten students in clinical experiences.
- 7. Require the program to comply with all approval standards in Article 4 of the Vocational Nursing Practice Act, commencing at Business and Professionals Code, section 2880, and Article 5 of the Board's Regulations, commencing at California Code of Regulations, Title 16, section 2526.
- 8. Require the program to demonstrate incremental progress in correcting the violations. If the program fails to satisfactorily demonstrate incremental progress, the full Board may revoke the program's approval.
- 9. Place the program on the Board's November 2021 agenda for reconsideration of provisional approval.
- 10. Requested the NEC to update the report for the Board meeting and attempt to include the programs request to admit students if submitted timely.

On February 10, 2020 the Full Board rendered the following decisions:

- 1. Approve the program director's request to admit a class of 20 students on March 2, 2020 with an expected graduation date of December 18, 2020.
- 2. Require the program to admit no additional classes without prior approval by the Board.
- 3. Continue to require the program to submit the previously required reports to the Board no later than May 22, 2020, and the reevaluation due no later than May 22, 2021. The report must include a comprehensive analysis of the program, timeline for implementation, and the effect of employed interventions. The elements below must be addressed in the analysis.
  - a. Terminal objectives
  - b. Evaluation of current curriculum including:
    - 1. Instructional plan
    - 2. Theory objectives for each term
    - 3. Clinical objectives for each term
    - 4. Lesson plans for each term
  - c. Student Policies including:
    - 1- Admission policy
    - 2- Screening and selection policy
    - 3- Attendance policy

- 4- Remediation policy
  - 5- Evaluation of student achievement
  - 6- Credit granting policy
  - d. Evaluations of approved clinical facilities which determine adequacy in number and variety of patients to accommodate current and projected students.
  - e. Evaluations of faculty
  - f. Methodologies for:
    - 1- Faculty meetings
    - 2- Clinical evaluations
  - g. Documentation of required clinical resources for all terms for all current cohorts.
- 4, Require the program to provide no less than one instructor for every ten students in clinical experiences.
  5. Require the program to comply with all approval standards in Article 4 of the Vocational Nursing Practice Act, commencing at Business and Professionals Code, section 2880, and Article 5 of the Board's Regulations, commencing at California Code of Regulations, Title 16, section 2526.
  6. Require the program to refrain from further misrepresentation of fact or the Board may take further action up to and including revocation of the program.
  7. Require the program to demonstrate incremental progress in correcting the violations. If the program fails to satisfactorily demonstrate incremental progress, the full Board may revoke the program's approval.
  8. Place the program on the Board's November 2021 agenda for reconsideration of provisional approval.
  9. program to demonstrate incremental progress in correcting the violations. If the program fails to satisfactorily demonstrate incremental progress, the full Board may revoke the program's approval.
  10. Place the program on the Board's November 2021 agenda for reconsideration of provisional approval.