



BUSINESS, CONSUMER SERVICES AND HOUSING AGENCY • GAVIN NEWSOM, GOVERNOR  
**Board of Vocational Nursing and Psychiatric Technicians**  
 2535 Capitol Oaks Drive Suite 205, Sacramento, CA 95833-2945  
 P (916) 263-7800 | F (916) 263-7855 | [www.bvnpt.ca.gov](http://www.bvnpt.ca.gov)



<b>DATE</b>	November 12, 2024
<b>TO</b>	Board Members
<b>REVIEWED BY</b>	Judith D. McLeod, DNP, CPNP, RN Supervising Nursing Education Consultant (SNEC)
<b>PREPARED BY</b>	M. Brigid Barrett, MSN, RN Nursing Education Consultant (NEC)
<b>SUBJECT</b>	Consideration of Recommendation to Rescind the Program's Pattern of Admission
<b>PROGRAM</b>	Pacific College, Cerritos, Vocational Nursing Program (Program) (Program Director: Lu Ping Gamble, Cerritos, Los Angeles County, Private)

Please note: Board Nursing Education Consultants make recommendations. The recommendations are forwarded to the Education and Practice Committee for review and recommendation or to the Executive Officer or full Board for action.

**BACKGROUND:**

The Nursing Education Consultant (NEC) has received 12 student complaints about the Program between March and August 2024.

On June 11-12, 2024, the NEC conducted an unannounced site visit due to complaints alleging the lack of adequate resources. The Program Director stated they were in the process of transferring to another location. On July 29-31, 2024, two NECs conducted a second unannounced visit due to additional student complaints received after the June 2024 site visit. Four violations were identified.

**STAFF ANALYSIS:**

The NEC reviewed and analyzed the documents provided by the Program Director to verify adequate resources including faculty, clinical facilities, and classrooms to accommodate the students' learning needs and ability to meet the Program's approved objectives. The Program Director submitted inconsistent and incorrect information regarding faculty and clinical facilities. During the site visits, the NEC noted the following lack of adequate resources:

1. The Program Director stated lack of faculty caused the combination of classes with Pacific College, Costa Mesa. The Program Director co-taught the two most recently admitted cohorts due to lack of faculty.

2. The campus was physically located in a trailer in an adult school campus. The trailer had two rooms with a door that would not close as a barrier between the rooms. The enrollment data sheet showed more cohorts were admitted than could be accommodated in the available classroom space.
3. There was no space available on the campus for students to come in early and study. The students complained that they were asked to leave the campus early. The student class schedule was from 5:00 p.m. to 10:00 p.m. but the security guard at the campus instructs the students to leave at 9:00 p.m.
4. There was no Financial Aid and Student Services available at the campus.
5. The Program does not have a computer lab or laptops for students to use when testing and sends students to another Program to use computers.

The Program's average annual pass rates did not reflect accurate data. The Program Director, who oversees two vocational nursing programs, submitted the incorrect Record of Nursing Program (RONP) to the licensing division and failed to designate students to their correct program resulting in inaccurate annual average licensure examination pass rates for seven quarters.

Additionally, the NEC noted the following findings during the two unannounced site visits:

1. The Program taught theory classes online without prior BVNPT approval.
2. The Program combined their online theory classes with that of Pacific College, Costa Mesa, Vocational Nursing Program.
3. Two of the faculty teaching the online theory class of Pacific College, Costa Mesa, did not have approval to teach at Pacific College, Cerritos.
4. During the June 2024 site visit, the NEC observed a faculty member, who did not have BVNPT approval, teaching a theory class.

The recommendation to remove the pattern of admission will ensure that the Program will have adequate resources including faculty and clinical facilities prior to each cohort admission.

#### **STAFF RECOMMENDATIONS:**

1. Rescind the pattern of admission for Pacific College, Cerritos, Vocational Nursing Program, effective November 22, 2024.
2. Require the Program to comply with all requirements listed below.

## **PROGRAM REQUIREMENTS**

1. Require the Program to correct all identified deficiencies by January 13, 2024.
2. Require the Program to admit no additional classes without prior approval by the Board.
3. Require the Program, when requesting approval to admit students, to:
  - a. Submit all documentation in final form, using the forms provided by the BVNPT, no later than second month preceding the month of the meeting.
  - b. Provide complete and accurate 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 the California Code of Regulations, Title 16, Section 2530(l).
4. Notify the NEC in the event a current class is displaced from clinical sites.
5. Continue the Program's requirement to comply with all the approval standards in Article 4 of the Vocational Nursing Practice Act, commencing with California Business and Professions Code, Section 2880, and in Article 5 of the California Code of Regulations, Title 16, commencing with Section 2525.
6. Board staff will continue to monitor the Program's effectiveness by tracking class admissions, the effectiveness of employed interventions, and the Program's licensure examination pass rates each quarter.

## **RELEVANT PROGRAM ELEMENTS**

### **Enrollment**

California Code of Regulations, Title 16, Section 2530(k) states:

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 is approved to offer a 74-week part-time class. The Program's approved pattern of admission is three part-time classes of 45 students per year, replacing graduating classes only.

The following table represents current student enrollment based on current class starts and completion dates. The table indicates a maximum enrollment of 56 students for the period February 2023 through June 2024.

**ENROLLMENT DATA TABLE**

Class Start Dates	Class Completion Dates	Number of Students Admitted	Number of Students Current	Number of Graduated	Total Enrolled
2/20/2023 *(12/22/2024)		20	18		18
7/5/2023 *(3/16/2025)		15	5		18+5=23
9/5/2023 *(5/11/2025)		30	18		23+18=41
3/4/2024 *(11/16/2025)		9	5		41+5= 46
6/24/2024 *(3/22/2026)		12	10		46+10=56

\*Indicates projected graduation date

**Licensing Examination Statistics**

California Code of Regulations, Title 16, 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 October 2022 through September 2024, specify the pass percentage rate for graduates of the Program on the National Council Licensure Examination for Practical/Vocational Nurses (NCLEX-PN®) and the variance from the state average annual pass rate.

## NCLEX-PN® LICENSURE EXAMINATION DATA

Quarterly Statistics					Annual Statistics		
Quarter	# Candidates in Quarter	# Passed in Quarter	% Passed in Quarter	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 2023	17	9	53%	73%	53%	72%	-19
Apr - Jun 2023	3	2	67%	85%	55%	75%	-20
Jul - Sep 2023	3	3	100%	86%	61%	78%	-17
Oct – Dec 2023	10	9	90%	84%	70%	81%	-11
Jan- Mar 2024	3	2	67%	87%	84%	86%	-2
Apr- Jun 2024	6	6	100%	85%	91%	85%	+6
Jul -Sep 2024	5	3	60%	83%	83%	85%	-2

\*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 current data available (July 2024 through September 2024), the Program's average annual pass rate is 83 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 85 percent. The average annual pass rate for the Program is two percentage points below the state average annual pass rate.

### **Faculty and Facilities**

California Code of Regulations, Title 16, Section 2534(d) states:

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

The current number of approved faculty totals 35, including the Program Director. The Program Director has 100 percent administrative duties. Of the total faculty, 28 are designated to teach clinical. Based upon a maximum proposed enrollment of 56 students, four instructors are required for clinical supervision. However, the Program Director submitted inconsistent and incorrect information regarding faculty and clinical facilities. The NECs verified during the site visit that the Program did not have adequate faculty who are available to teach. California Code of Regulations, Title 16, Section 2534(b) 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 documentation indicates the Program has sufficient clinical facilities to afford the number, type and variety of patients that will provide clinical experience consistent with Board-approved competency-based objectives and theory being taught for current student enrollment. However, the Program Director submitted inconsistent and incorrect information regarding faculty and clinical facilities. The NECs verified during the site visit that the Program did not have adequate clinical facilities.

The recommendation to remove the pattern of admission will ensure that the Program will have adequate resources including faculty and clinical facilities prior to each cohort admission.

### **Violations**

California Code of Regulations, Title 16, Section 2526(j)(1) requires an institution, as a condition for the continued approval of a postsecondary school or educational program offering a course of instruction in vocational nursing, to submit a completed "Continuing Approval Application for a Vocational Nursing School or Program," Form 55M-15 (New 04/2022), the requirements of which are incorporated by reference into the section.

### **Violation #1**

Form 55M-15, at Section 13 on page 5, Instructional Plan, requires the institution to submit: Vocational Nursing or Psychiatric Technician Program Curriculum Content - Instructional Plan (Form 55M-2W) (New 04/2022). An instructional plan is a document that correlates theory and clinical content and hours on a weekly basis and provides an overview of the teaching schedule; the document shall commit to curriculum in which theory hours precede clinical hours.

**Violation:** During the student interview, the term 4 students stated they attend theory classes online.

During interviews, five theory faculty stated they teach theory classes online.

During the interview, both the Program Director and the former Assistant Program Director stated six out of seven cohorts attend theory classes online.

The Program does not have BVNPT approval for online teaching modality.

Status: The violation is corrected.  
On October 20, 2024, the Program Director submitted evidence to the BVNPT that the Program is following the approved Instructional Plan. All classes are held on the ground.

## **Violation #2**

California Code of Regulations, Title 16, Section 2529(a) states:

A school shall submit the qualifications of the proposed faculty members for approval by the Board prior to employment.

**Violation:** 1) Term 1 class:

During the record review, the following was noted:

- a) A document entitled "Clinical Schedule 2024" indicated two faculty were on the schedule as teaching Term 1 students.
- b) There was no evidence of the two faculty members' names on the faculty roster.
- c) There was no evidence of BVNPT faculty approvals 55M-10, "Verification of Faculty Qualifications Form" for the two faculty members.

During the interview, the lead faculty member stated that she assigned these two faculty members to teach Term 1 class.

During the interview, the Program Director stated that the two faculty members were assigned to teach Term 1 students by the lead instructor and that the two faculty members did not have BVNPT faculty approvals to teach.

2) Term 3 class:

During the site visit on June 11, 2024, a faculty member was observed teaching the Term 3 theory class.

During the record review, the following was noted:

- a) The class attendance sheet for the Term 3 class on June 11, 2024, indicated that the observed faculty member's name and signature was on the attendance sheet.
- b) There was no evidence of the observed faculty's name on the faculty roster.
- c) There was no evidence of a BVNPT faculty approval 55M-10, "Verification of Faculty Qualifications Form" for the observed faculty member.

During interview, the Program Director stated that the observed faculty member did not have a BVNPT faculty approval to teach the theory class.

Status: The violation is corrected.

On October 4, 2024, the Program Director submitted to the BVNPT Verification of Faculty Qualifications Forms, Form 55M-10, for all unapproved faculty members.

### **Violation #3**

California Code of Regulations, Title 16, Section 2529(b) states:

Each vocational nursing program shall have one faculty member, designated as director who meets the requirements of subsection (c)(1) herein, who shall actively administer the program. The director is responsible for compliance with all regulations in Chapter 1, Article 5 (commencing with Section 2525 et seq.)

**Violation:** During record review, the following was noted:

- 1) There were 77 graduates from Program inception in 2022 to July 2024.
- 2) Student files indicated 66 of 77 graduates (86%) had the incorrect program name written on the Record of Nursing Program (RONP).
- 3) National Council for State Boards of Nursing (NCSBN) data revealed there were 11 testers (graduates) from 2022 to 2024 from this Program, indicating only 11 RONPs were filled out correctly during the two-year period.

During the interview, the Program Director stated she was unaware there were only 11 licensure exam results recorded by NCSBN for the Program, despite having 77 graduates.



**Status:** The violation is corrected.

On September 12, 2024, the Program Director submitted corrected RONPs for the 66 graduates.

**Violation #4**

California Code of Regulations, Title 16, Section 2530(a) states:

The program shall have sufficient resources, faculty, clinical facilities, library, staff and support services, physical space, skills laboratory and equipment to achieve the program's objectives.

**Violation:** The following violations were identified under Section 2530(a):

1) Skills laboratory and equipment

The Program recently moved on July 22, 2024. An initial complaint site visit was performed on June 11, 2024, that showed that the Program did not have enough physical space to meet the objectives of the Program. A virtual site visit to approve the change in location was done on July 22, 2024. The Program Director stated that they were ready to move with minimal disturbance to student learning.

A follow-up site visit was done with another NEC on July 29, 2024. During the visit, the skills lab equipment and supplies were noted to be in boxes on the floor. There were no available cabinets to store supplies and therefore supplies were disorganized and there was no running water in the sink. The Program plans to use a sink in a nearby restroom, however, the restroom is approximately 500 feet away from the skills lab. The skills lab has 8 beds that are too close together. One manikin is missing an arm and a leg, another manikin is missing an arm and genitals, and a third manikin is missing an injector pad on the leg area. No pediatric manikins were available. The medication cart is not well-stocked.

During the interview, the students stated there were not enough supplies to practice skills, i.e., foley catheter supplies. Term four students stated they have not performed foley catheter insertion in skills lab due to the lack of supplies.

During an interview, the skills lab coordinator stated that the foley catheter supplies were on back order.

During the interview, the Program Director verified that there were not enough supplies available.

2) Lack of Faculty and Clinical Facilities

During the interview, the term 4 students stated that there are not enough faculty as evidenced by: (a) The Program Director is co-teaching Term 1 students with an unapproved instructor from a different program, Pacific College, Costa Mesa; (b) The students are not aware of who their faculty will be until the night before the clinical rotation and (c) They are in combination classes with another vocational nursing program (Pacific College, Costa Mesa).

During the interview, the faculty stated they are getting called “at the last minute” to teach for the skills lab or clinical because there are no regularly scheduled faculty for some classes. The faculty also stated that it has been “challenging” to have enough clinical sites for all the students.

During a record review of the Program’s clinical schedule and concurrent interview, the Program Director stated that (a) The Program lacks a total of five faculty (two clinical instructors in Term 5 class, one clinical instructor each for Term 1, Term 2, and Term 4 classes) and (b) The Program lacks a total of three clinical sites (two for Term 5 clinical sites, one for Term 1 clinical site). The Program Director also stated that there are no regularly scheduled faculty due to lack of faculty willing to teach every weekend. She stated it is difficult to find and hire faculty committed to teaching on the weekends, and to show up every weekend.

### 3) Physical Space, and Staff and Support Services

During observation, at the new campus location, the Program Director’s office is empty – no desk, no computer, no equipment, no file cabinets. There is no dedicated faculty workspace and there is no dedicated area for financial aid, admission, or student services.

During the interview, the Program Director verified the lack of resources (i.e., skills lab and equipment; physical space; staff and support services and faculty and facility shortages). The Program Director stated the lack of resources was one of the reasons the Program began to combine the students with another vocational nursing program, Pacific College, Costa Mesa.

**Status:** The violation is **not** corrected.

**ATTACHMENTS:**

Attachment A: Program History

## **PACIFIC COLLEGE, CERRITOS VOCATIONAL NURSING PROGRAM**

### **Program History**

On November 23, 2020, the Executive Officer rendered the following decisions:

1. Granted initial approval to Pacific College, Cerritos, Vocational Nursing Program for a four-year period beginning November 23, 2020, and issued a certificate accordingly.
2. Approved the Program's request to begin a vocational nursing program with an initial part-time evening class of 45 students on November 24, 2020. The projected graduation date is July 10, 2022.
3. Required the Program to comply with all requirements listed below.

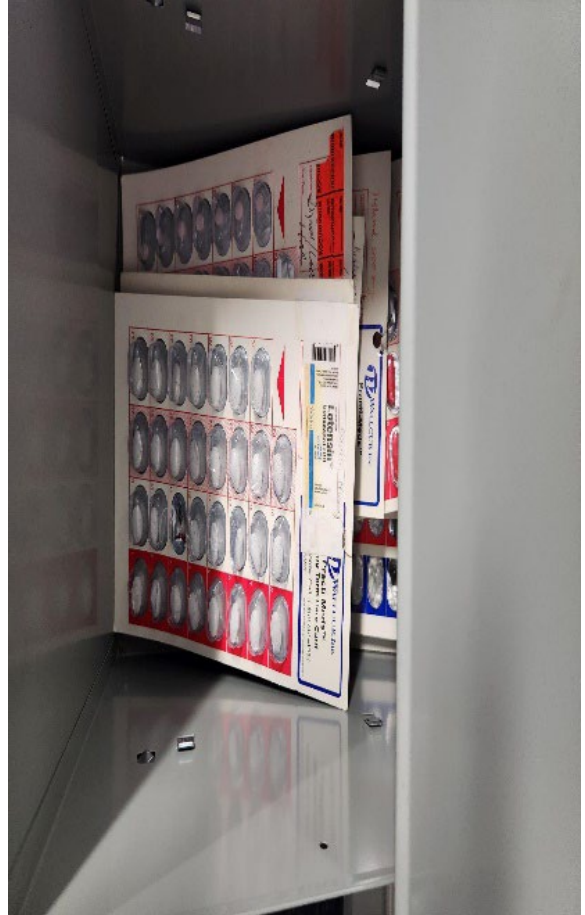
### **PROGRAM REQUIREMENTS:**

1. Close the Pacific College, Citadel, satellite location effective November 30, 2021 once all current students have graduated. No further classes will be admitted at the Citadel location.
2. Approved the Pacific College, Cerritos, Vocational Nursing Program for a pattern of admission. The Program's pattern of admission will include admission of three part-time classes of 45 students per year, replacing graduating classes only.
3. The Program Director documents that adequate resources, i.e., faculty and facilities, are available to support each admitted class of students.
4. Notify the NEC in the event a current class is displaced from clinical sites.
5. Notify the NEC one month prior to the start of each cohort and submit documentation of adequate resources during the COVID 19 pandemic.
6. Board staff will continue to monitor the program by tracking its licensure examination pass rates each quarter, the number of graduates taking the licensure examination, reviewing Annual Reports submitted by the program director, and conducting continuing approval visits.
7. Required 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, commencing with Section 2525.

**Agenda Item 7.E.III  
Attachment B**



**Sink without plumbing**



**Faux Medications**



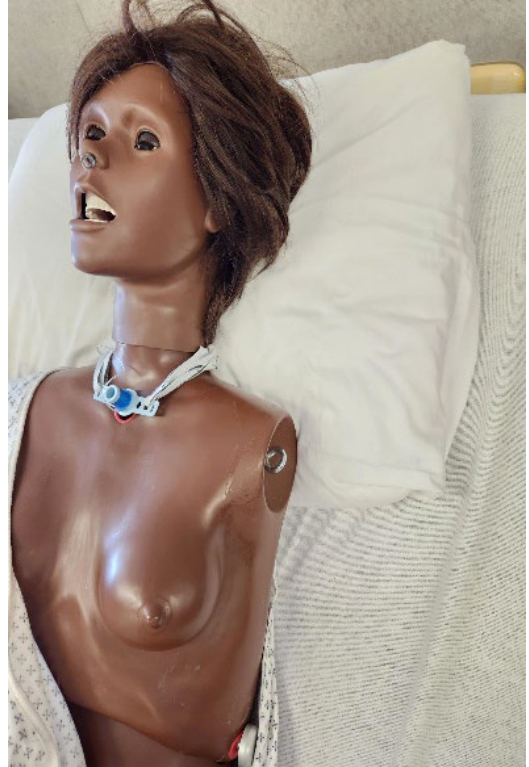
**Unstocked Medicine Cart**



**Broken manikin**



Missing injector pad



Broken manikin



Bedside table & scale



Manikins in beds in skills lab



Birthing manikin and baby