



<b>DATE</b>	May 5, 2025
<b>TO</b>	Executive Officer Review
<b>REVIEWED BY</b>	Judith D. McLeod DNP, CPNP, RN Supervision Nursing Education Consultant (SNEC)
<b>PREPARED BY</b>	M. Brigid Barrett, MSN, RN Nursing Education Consultant (NEC)
<b>SUBJECT</b>	Consideration of Placement on Provisional Approval; Request to Admit Students
<b>PROGRAM</b>	<b>California Healthcare Skills Center Vocational Nursing Program (Program)</b> (Program Director: Edith Amadi, Riverside, Riverside 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.

**PROGRAM REQUEST:**

Admit a full-time class of 15 students to commence on June 2, 2025, with a graduation date of June 6, 2026, to replace the class that graduated on September 30, 2024. This will be the Program’s third class.

**BACKGROUND:**

On February 24, 2025, the NEC received a request from the Program Director, along with supporting documentation, to admit students into a third cohort.

On March 4, 2025, the Executive Officer deferred the Program’s request to the full Board due to NCLEX-PN® average annual pass rates below ten percent of the state average annual pass rates for six consecutive quarters and uncorrected violations.

**STAFF ANALYSIS:**

The Program was granted initial approval on May 3, 2022. The first cohort graduated on August 30, 2023. Out of seven graduates, four passed, resulting in 57 percent NCLEX-PN® pass rate. The second cohort graduated on September 30, 2024. Out of ten graduates, two passed, resulting in 25 percent NCLEX-PN® pass rate.

During the most recent six quarters, the Program’s annual average pass rate has ranged between 14 to 57 percent, which is 24 to 70 percentage points below the state

average annual pass rate. Currently, the Program's annual average pass rate is 25 percent, 58 percentage points below the state average annual pass rate.

The Program stated that the decline in NCLEX-PN® annual average pass rates are due to the following reasons:

1. The Program Director identified that students admitted into the first two cohorts were not strong academically and determined that their admission policy required revision.
2. The Program attributed low NCLEX-PN® pass rate to the failure of faculty to effectively utilize the supplemental study and exam materials from Health Education Systems Incorporated (HESI) due to lack of proper training by HESI.
3. The NCLEX-PN® preparation was not effective for the first two cohorts because the student engagement was lower than expected. Students stopped communicating with the Program after graduation, making it difficult for the Program to have the students to come back to campus.
4. The Program identified a lack of dedicated faculty for NCLEX-PN® preparation, along with the need for increased student feedback and the necessity of additional funding to help graduates cover NCLEX-PN® fees to create minimal delay for the students taking the exam after graduation.

The Program will implement the following interventions for the third cohort:

1. The Program Director submitted a revised admission policy, incorporating a mandatory admission test with established minimum scores. Students can choose between two tests-TEAS or Pre-Nursing Assessment Test (PNAT).
2. The Program Director decided to switch from HESI to Assessment Technologies Institute (ATI) for NCLEX-PN® preparation, investing in an ATI bundle that includes an NCLEX-PN® Bootcamp, Next Generation quizzes, exams, and the ATI "Green Light" program. The switch to ATI products will bring a much-needed focus on individual student strengths, as well as a plan to enforce a 4–5-week Boot Camp at the end of the program. All faculty will be trained to effectively use ATI products for best outcomes.
3. The Program Director has hired more staff to teach and work one-on-one with students, to identify at-risk students earlier and has set up a student fund for helping the students have the money to register for NCLEX-PN® soon after graduating.
4. The Program Director also submitted:
  - a. An alignment of the curriculum with ATI NextGen materials.
  - b. Documentation of the attempts to contact and work with the two graduates who have not tested until they have successfully tested.

The Program will not be able to implement the interventions planned due to no students currently enrolled.

The NEC identified three violations during the review of the request to admit students including noncompliance with the attendance policy, exceeding the maximum allowable school hours per week, as well as not following the Instructional Plan. The Notice of Violation letter was issued on March 4, 2025, and the Program Director submitted corrections on April 1, 2025.

The NEC reviewed and analyzed the documents provided by the Program Director to verify adequate resources including clinical facilities and classrooms to accommodate the students' learning needs and ability to meet the Program's approved objectives.

Submitted documentation by the Program Director substantiates adequate resources including faculty and facilities for students to achieve programmatic learning objectives.

### **STAFF RECOMMENDATIONS:**

1. Place the Program on provisional approval for two years effective May 16, 2025.
2. Place the Program on the agenda for the May 2027 Board meeting.
3. Approve the Program's request to admit a full-time class of 15 students to commence on June 2, 2025, with a graduation date of June 6, 2026, to replace the class that graduated on September 30, 2024.
4. Require the Program to comply with all requirements listed below.

### **PROGRAM REQUIREMENTS**

1. Require the Program to submit a comprehensive analysis report in six months but no later than December 1, 2025, in twelve months but no later than June 1, 2026, and in eighteen months, but no later than December 1, 2026. 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.
2. Require the Program to submit documentation of the third class of admitted students, which will be due by June 12, 2025, ten days into the start of the new cohort. The following elements must be addressed in the tracking documentation:
    - a. A list of all students admitted to the class, including name, admission test scores (which test was selected) as well as each item required on the admission and screening and selection policy.
    - b. Unredacted attendance records, indication of start and stop times, individual student signatures and the signature of the faculty with the dates of theory and clinical days.
    - c. Detailed records of student grades, remediation and make-up attempts sent to the NEC monthly on the first of the month, until the class graduation date.
  3. Require the Program to provide one instructor for every ten students in clinical experiences. The 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." Recommendation of one instructor for a maximum of ten students in clinical experiences will enable more focused instruction and enhanced learning to closely monitor and evaluate the clinical performance of students.
  4. Notify the NEC, in writing, within five calendar days, in the event a current class is displaced from clinical sites.
  5. Admit no additional classes without prior approval by the Board.
  6. Continue to require the Program, when requesting approval to admit students, to:
    - a. Submit all documentation in final form, using forms provided by the BVNPT, no later than the fifteenth day of the second month preceding the month of the Board meeting.
    - b. Provide documentation that adequate resources, i.e., faculty and facilities, are available to support each admitted class of students.
    - c. Maintain an average annual pass rate that is compliant with California Code of Regulations, Title 16, Section 2530(*l*).

7. Comply with all the requirements in Article 4 of the Vocational Nursing Practice Act, commencing with California Business and Professions Code Section 2880, and Article 5 of the California Code of Regulations, Title 16, commencing with Section 2525.
8. 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.
9. Failure to take any of these corrective actions may cause the Board to revoke the Program's approval, as specified in California Code of Regulations, Title 16, Section 2526.1(f).
10. Any material changes in circumstances affecting any information contained in the documents submitted by the Program to the Board, require the Program to notify the NEC immediately, in writing, as specified in California Code of Regulations, Title 16, Section 2526(g).

## **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 52-week full-time curriculum. BVNPT approval is required prior to the admission of each class

The following table represents projected student enrollment based on proposed class starts and completion dates. The table indicates a maximum enrollment of 15 students for the period from June 2025 through June 2026.

## ENROLLMENT DATA TABLE

Class Start Dates	Class Completion Dates	Number of Students Admitted	Number of Students Current	Number of Students Considered Graduates	Total Enrolled
6/2/2025 FT Day *(6/6/2026) Proposed		15	Left blank	Left blank	15

\* 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 2023 through March 2025 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 rates.

### 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
Oct – Dec 2023	7	4	57%	84%	57%	81%	-24
Jan - Mar 2024	No tests this quarter				57%	86%	-29
Apr – Jun 2024	No tests this quarter				57%	85%	-28
Jul -Sep 2024	No tests this quarter				57%	85%	-28
Oct -Dec 2024	7	1	14%	81%	14%	84%	-70
Jan -Mar 2025	1	1	100%	82%	25%	83%	-58

\*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 (January- March 2025), the Program's average annual pass rate is 25 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 83 percent. The average annual pass rate for the Program is 58 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 ten, including the Program Director. The Program Director has 50 percent administrative duties and 50 percent teaching responsibilities. Of the total faculty, ten are designated to teach clinical. Based upon a maximum proposed enrollment of 15 students, two instructors are required for clinical supervision. The utilization of faculty at clinical facilities is such that clinical instruction is covered adequately.

California Code of Regulations, Title 16, Section 2534(b) states, in part:

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

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 approved competency-based objectives and theory being taught for the current and proposed student enrollment.

### **Violation #1**

#### **California Code of Regulations, Title 16, Section 2530(h)**

Each school shall have an attendance policy approved by the Board. The policy shall include but not be limited to, criteria for attendance and the specific course objectives for which make- up time is required. Acceptable methods for make-up include: (1) Theory: case studies, independent study, written examination, attendance at seminars or workshops, auto-tutorial laboratory, and research reports.

(2) Clinical: performance evaluation in skills laboratory or additional time in the clinical area with clients/patients.

**Violation:** During record review, the attendance record showed a total of seven students starting on September 11, 2023. The final graduating number of students in the cohort that was submitted by the Program Director was ten. One student dropped in the final term because of financial concerns. There were seven students enrolled and attending class until week four of the term one.

During the interview, the Program Director confirmed that four students were added to the cohort on October 2, 2023, in week four of term one. The Program Director stated she had no criteria in writing for admitting a student “late” into the Program. The students admitted on October 2, 2023, had missed 27 hours of skills and 69 hours of theory.

During review of the school’s attendance policy, it states that missing more than 16 hours of the Program is cause for dismissal. However, the four students admitted late into the Program missed a total of 96 hours and were allowed to continue. The Program did not follow their own policy.

Status: The violation is corrected.

On April 1, 2025, the Program Director sent an updated Attendance Policy supporting no admission of “late starts” into the cohort incurring greater than 16 hours of absence.

**Violation #2**  
**California Code of Regulations, Title 16, Section 2532(c)**

The school week shall not exceed 40 hours per week.

**Violation:** During record review, four students who were making up hours missed were attending make-up time on Friday and Saturday for eight hours a day. This was after attending class full- time Monday through Thursday. The total weekly hours for these four students were 48 hours/week.

Three of the students made up a total of 64 hours, according to the sign-in sheets provided by the Program Director and the number of hours missed was 69 theory hours, so these three students were deficient in five theory hours included in the Instructional Plan.

During the interview, the Program Director confirmed that three “late starts” did make-up their hours over a course of four weeks,



while the fourth student had a schedule two/three weeks longer as he was “not a CNA” and needed to make-up more hours.

Status: The violation is corrected.

On April 1, 2025, the Program Director submitted an audit form and a policy requiring the faculty and staff to be aware of the 40-hour total weekly student hours allowed.

### **Violation #3**

#### **California Code of Regulations, Title 16, Section 2533(c)**

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

**Violation:** During record review, four out of eleven students were admitted to the class as a “late start”. The class start date was September 11, 2023. The students officially started on October 2, 2023, week four in the 13-week Term 1 of the full-time program. During record review, the make-up sheets did not indicate educational objectives for the time in attendance. There was no evidence of the method of how the make-up was accomplished.

During the interview, the Program Director confirmed that the four students were admitted on week 4 of Term 1 and did not receive the term one content in sequential order. On Monday through Thursday, these students were learning week four material, then on Friday and Saturday of the same week, the admitted-late students were learning week one material. The Program Director stated that they do not have a policy regarding admitting students in the middle of the term and do not have a process to ensure that the curriculum is taught in a sequence that results in progressive mastery of knowledge, skills, and abilities for the students who started approximately three weeks after the class start date.

During record review, the make-up sheets did not indicate educational objectives for the time in attendance.

Status: The violation is corrected.

On April 1, 2025, the Program Director submitted new make-up forms for students that included the requirement for educational objectives. She also submitted a plan to re-orient her staff to the use of the Instructional Plan.

**ATTACHMENTS:**

Attachment A: Program History

**Agenda Item # 7.D.I.  
Attachment A**

**California Healthcare Skills Center,  
Vocational Nursing Program**

**Program History**

- On May 3, 2022, the Executive Officer rendered the following decisions:
  1. Granted initial approval to California Healthcare Skills Center Vocational Nursing Program for the four-year period beginning May 3, 2022, and issued the certificate accordingly.
  2. Approved the Program's 52-week full-time curriculum. Each of the four terms are 13 weeks in length including 670 theory hours and 954 clinical, totaling 1624. Program hours.
  3. Approved the California Healthcare Skills Center Vocational Nursing Program's request to begin a vocational nursing program with an initial full-time class of 15 students on June 27, 2022, only, and graduating August 31, 2023.
  4. Required the Program to comply with all Program requirements listed below.

**PROGRAM REQUIREMENTS**

1. Submit Facility Approval Applications for Obstetrics in final form no later than December 31, 2022.
2. Required the Program to obtain prior BVNPT approval before admission of subsequent classes to maintain compliance with the California Code of Regulations, Title 16, section 2526(c)<sup>1</sup>, which on May 3, 2022, stated:

*A Board representative shall make a survey visit prior to graduation of the initial class. A Program shall not commence another class without prior Board approval.*
3. The Director documents that adequate resources i.e., faculty and facilities, are available to support the proposed class of students.
4. Notify the NEC in the event a current class is displaced from clinical sites.

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<sup>1</sup> 16 CCR § 2526(c) was subsequently amended in 2022, 2023, and 2024.

5. Board staff will monitor the Program by tracking its licensure examination pass rate each quarter, the number of graduates taking the licensure examination, reviewing Annual Reports submitted by the Program director, and conducting Program Record Surveys.
  6. Required the Program to comply with all approval standards in Article 4 of the Vocational Nursing Practice Act, commencing at California Business and Professions Code Section 2880, and Article 5 of the California Code of Regulations, Title 16, commencing at Section 2525.
- On March 14, 2023, the Executive Officer rendered the following decisions:
    1. Approved the Program's request to admit a class of 15 full-time students to commence on September 11, 2023, with a graduation date of September 30, 2024. This will be the second class for this program.
    2. Required the Program to comply with all requirements listed below.

#### PROGRAM REQUIREMENTS

1. Notify the NEC in the event a current class is displaced from clinical sites.
2. Obtain BVNPT approval prior to the admission of each class.
3. Continued to require the Program, when requesting approval to admit students, to:
  - a. Submit all documentation in final form, using forms provided by the BVNPT, 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. Maintain an average annual pass rate that is compliant with Section 2530(I) of the California Code of Regulations, Title 16.
4. Comply with all approval standards in Article 4 of the Vocational Nursing Practice Act, commencing at California Business and Professions Code Section 2880, and Article 5 of the California Code of Regulations, Title 16, commencing at Section 2530(I).
5. 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.