



## Agenda Item 7.E.1

<b>DATE</b>	August 6, 2024
<b>TO</b>	Board members
<b>REVIEWED BY</b>	Judith D. McLeod DNP, CPNP, RN Lead Nursing Education Consultant (LNEC)
<b>PREPARED BY</b>	Roberta Thomson Ed.D. RN Nursing Education Consultant (NEC)
<b>SUBJECT</b>	Request to Admit a Second Class; Consideration of Provisional Approval
<b>PROGRAM</b>	Sunrise School of Nursing Vocational Nursing Program (Program) (Program Director: Susan White, Shingles Springs, El Dorado 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 18 students to commence on September 3, 2024, with a graduation date of June 29, 2025, to replace the initial class that graduated March 22, 2024.

### **BACKGROUND:**

On January 9, 2024, an unannounced site visit was made to assess the program for compliance with Article 5 of California Code of Regulations, Title 16.

On January 31, 2024, a request to admit students was received from the Program Director with supporting documentation. The supporting documentation was incomplete.

A Notification of Violations was sent to program on March 12, 2024. Responses to the Notification of Violations were received from the Program Director on March 18, 2024. The responses were reviewed, and the violations that were not corrected were identified.

On April 18, 2024, there was an updated request to admit a second class of 15 students. Documentation of clinical resources, and adequate faculty information were incorrect, incomplete, and not in final form two months prior to proposed start date.

On April 24, 2024, there was an updated request to admit a second class of 15 students to commence on June 24, 2024. Documentation of clinical resources, the faculty and

facilities assignment form and the enrollment table were returned to the Program Director for needed corrections.

On April 26, 2024, Program Director stated she had submitted a corrected faculty and facilities list and documentation of clinical resources. These have not been received.

On May 7, 2024, the NEC informed the Program Director that without complete, correct documentation two months prior to the proposed start date and insufficient correction of all violations from the January 12, 2024, visit, a staff recommendation to admit a second class could not be made.

On May 24, 2024, the Program Director had not submitted the required documents for a request to admit students, two months prior to the proposed start date. The documentation of clinical resources had not been submitted in final form, complete and with all errors corrected.

On May 27, 2024, a TEAMS meeting was scheduled with the Program Director and the NEC to complete the Documentation of Clinical Resources. The Program Director was unable to share her screen. The NEC's copy was emailed to her following the meeting, with instructions to review the documents and submit them by May 31, 2024.

On May 31, 2024, The Program Director revised her request to admit to 18 full-time students on July 8, 2024, and submitted documentation of clinical resources, an enrollment table and a faculty and facility list to support the request. Documents submitted do not demonstrate adequate resources. The documents were returned for correction.

On June 3, 2024, The Program Director was notified by the Licensing Division that the RONPs for her students that graduated on March 22, 2024, were submitted incorrectly, and could not be processed. The forms were returned to the Program Director along with the PowerPoint instructions that were reviewed at the Director Forum on May 8, 2024. It has been 11 weeks since these students graduated from the program and because of Program Director's error their RONPs have not been processed and there is no projection as to when they will be eligible to schedule their NCLEX-PN®.

On June 6, 2024, documents were resubmitted. Corrections were not made, and the revisions made do not demonstrate adequate resources for Term three for Maternity, Pediatrics, Leadership/Supervision or Medical/Surgical Nursing clinical placements or skills. Available clinical slots represented on the documentation of clinical resources for Maternity were six and for Leadership/Supervision were four.

The RONPs were resubmitted to the licensing division. There have been no graduates of Sunrise School of Nursing who have tested during Quarter Two 2024.

Four violations identified during the January 9, 2024; unannounced site visit have not been corrected. Documentation of Clinical Resources in a complete, correct, and final

form did not demonstrate adequate resources to support the Program's request for a second class.

On June 11, 2024, a request for a second class was presented at the Executive Officer meeting. The Program could not demonstrate adequate resources for a class of 18 students and the request was referred to the full Board for review.

No additional submission of documents or correspondence has been received from the Program Director since the notification of the Executive Director's decision on June 12, 2024. The acknowledgment of the decision was to be submitted on June 17, 2024. The form was dated June 17, 2024, but was received by email to the Nursing Education Consultant on June 24, 2024.

Included in this section is the status of the violations that have not been corrected that were identified during the unannounced visit on January 9, 2024.

### **Violation #1**

**Form 55M-15, at Section 13 on page 5: Instructional Plan** requires the institution to submit a complete instructional plan, on the form 55M-2W (New 04/2022) which documents 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:** On June 8, 2024, The Program Director submitted a revised Instructional for the fourth time that was in an incorrect format and did not follow the directions provided on Form 55M-15, in the BVNPT provided in service on November 9, 2023, repeated assistance given by the assigned NEC in writing, during TEAMS Meetings and with NEC prepared examples. The Program Director has been unable to produce the required instructional plan.

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

### **Violation #2**

**Form 55M-15, at Section 14 on page 5: Daily Lesson Plans** requires the institution to attach copies of daily lesson plans for courses of instruction in the following subjects (for theory and skills): diabetes, fundamentals, pediatrics, leadership, and maternity. A daily lesson plan is a document that correlates the theory and practice for each instruction day for the instructor to follow.

**Violation:** On June 8, 2024, The Program Director submitted revised daily lesson plans for the second time that did not meet the requirement for lesson plans. They were cut and paste excerpts of the instructional plan. Written and verbal instruction given by the assigned NEC did not result in usable lesson plans.

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

### **Violation #3**

**Form 55M-15, at Section 15 on page 5: Evaluation Methodology for Curriculum** requires the institution to submit an explanation of the process that identifies the method(s) by which the curriculum is evaluated regularly. Submit complete unredacted curriculum reviews based on your stated methodology. The reviews should cover the period since the initial approval as a sample size.

**Violation:** The Program Director has not submitted a methodology for curriculum evaluation. The document submitted was for classroom evaluation of instructors. No evidence of formal evaluation was evident in a faculty meeting or curriculum committee. During faculty interviews it was stated that the Program Director apparently is teaching all theory and clinical, affording the faculty no ability to evaluate the curriculum.

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

### **Violation # 4**

**Form 55M-15, at Section 17 on page 6: Evaluation Methodology for Clinical Facilities** Attach an explanation of the process for evaluating clinical facilities, including identification of the tool(s) used by the program to evaluate the clinical facilities), e.g., surveys, forms, checklists.

**Violation:** Written and Verbal instruction were given to the Program Director as the requirements for the evaluation methodology for Clinical Facilities. This included the requirements for an annual evaluation by the Program Director, end of rotation evaluations by students and instructor and evaluation by the facility staff. No evaluation forms that meet these requirements have been submitted. No unredacted evaluations have been submitted.

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

## **STAFF ANALYSIS:**

The Program demonstrated compliance with Article 5 of California Code of Regulations, Title 16, except for the four of 10 violations that still have not been corrected and inability to document adequate resources to meet the student learning needs.

## **STAFF RECOMMENDATIONS:**

1. Deny the Program's request to admit a full-time class of 18 students to commence on September 3, 2024, to graduate on June 29, 2025, to replace the class that graduated on March 22, 2024.
2. Place the program on provisional approval for a period of two years beginning August 16, 2024.
3. Approve a class of six students to commence on September 3, 2024, and graduate May 29, 2025, to replace the class that graduated on March 22, 2024.
4. Require the Program to comply with all requirements listed below.

## **PROGRAM REQUIREMENTS**

1. Require that the Program Director allocate at least 50% of her time to the active administration of the Program.
2. The Program will submit corrections for the four remaining violations on or before October 15, 2024.
3. Require the Program to submit a comprehensive analysis report in three months, with a submission date no later than November 15, 2024, in nine months, no later than April 15, 2025, 15 months no later than November 15, 2025, and 21 months no later than May 15, 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- Daily Lesson Plans for each Term
  - c. Student Policies including:
    - 1- Admission Criteria

- 2- Screening and Selection Criteria
  - 3- Attendance Policy
  - 4- Remediation Policy
  - 5- Evaluation Methodology for Student Progress including evaluation of clinical practice.
  - 6- Credit Granting Policy
  - 7- Evaluation Methodology for Curriculum
  - 8- Evaluation Methodology for Facilities
  - d. Evaluations of approved clinical facilities which determine adequacy in number and variety of patients to accommodate current and projected student enrollment.
  - e. Faculty Meeting Methodology
  - f. Documentation of resources, including faculty and facilities, for all terms for all current cohorts.
4. Admit no additional classes without prior approval by the Board.
  5. 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 by 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. Ensure that the Program maintains an average annual pass rate that is compliant with the California Code of Regulations, Title 16, Section 2530(l).
  6. Provide a maximum of ten students for each instructor. 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.
  7. Notify the NEC in the event a current class is displaced from clinical sites.
  8. 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.
  9. The Program is required to demonstrate compliance with NCLEX-PN® licensure examination pass rates each quarter while on provisional approval.

10. Submit a revised Instructional Plan on form 55M 2W which meets the requirements for an instructional plan. If the Program fails to satisfactorily demonstrate incremental progress, the full Board may revoke the Program’s approval.

**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 42-week full-time class. Board 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 18 students for the period September 2024 through May 2025.

**ENROLLMENT DATA TABLE**

Class Start Dates	Class Completion Dates	Number of Students Admitted	Number of Students Current	Number of Graduated	Total Enrolled
3/31/2023 FT *(3/22/2024)		9	9		9
	3/22/24 (3/31/23)	9	0	9	0
9/3/2024 FT *(5/31/2024) <b>Proposed</b>		18			18

\*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 July 2022 through June 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 rates.

As a new program, there are no test results. The first class was eligible to take the exam in the second quarter of 2024. There were no testers during Quarter two 2024. One graduate of the program tested July 1, 2024. The individual did not pass.

### **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 five, including the Program Director. The Program Director has 50 percent administrative duties and 50 percent teaching responsibilities. Of the total faculty, five are designated to teach clinical. Based upon a maximum proposed enrollment of 18 students, two instructor is 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:

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 does not have 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 proposed student enrollment.



**ATTACHMENTS:**

Attachment A: Program History

## Agenda Item 7.E.I

### Attachment A

# SUNRISE SCHOOL OF NURSING VOCATIONAL NURSING PROGRAM

## Program History

- On November 1, 2022, the Executive Officer rendered the following decisions:
  1. Granted initial approval to the Sunrise School of Nursing Vocational Nursing Program for the four-year period beginning November 1, 2022, and issued a certificate accordingly.
  2. Required the Program to obtain prior approval before admission of the initial class of students into the Program.
  3. Approved the Program's 42-week full-time curriculum, two 15-week terms and one 12-week term of 1584 hours, including 618 theory hours and 966 clinical hours.
  4. Required the Program to comply with all requirements listed below.

## PROGRAM REQUIREMENTS

1. Required the Program to obtain prior BVNPT approval before admission of the initial class of students.
  2. The Program is highly recommended to obtain full approval of the VN Program by the BPPE prior to requesting the first class of students.
  3. The Program Director documents that adequate resources, i.e., faculty and facilities, are available to support the proposed class of students.
  4. 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.
  5. Require 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 with Section 2525.
- On January 14, 2023, the Program provided the Letter from the Bureau of Private Postsecondary Education identifying the Program as approved.

- On January 14, 2023, the NEC received a request to admit students from the Program Director with supporting documentation.
- On January 31, 2023, the Executive Officer rendered the following decision:
  1. Approved the Program's request to admit a full-time class of 15 students to commence on March 6, 2023, with a graduation date of March 4, 2024. This is the Program's first class of students.
  2. Required the Program to comply with all requirements listed below.

### PROGRAM REQUIREMENTS

1. 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 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 California Code of Regulations, Title 16, Section 2530(l).
4. 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 with Section 2525.
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.
  - The Initial class was admitted on March 31, 2023.
  - On January 12, 2024, an unannounced visit was made to the campus as required by California Code of Regulations, Title 16, Section 2526(c). Eleven violations were identified.

- On June 12, 2024, The Program's request to admit a second class was reviewed by the Executive Officer, the request was denied, and the Program was referred to the full Board at their August 16, 2024, meeting.