

December 18, 2018

**ELECTRONIC DELIVERY**

██████████  
The International Culinary Center  
462 Broadway  
New York, New York 10013

**School #M001493**  
**School # B072345**  
**Continued System-wide Probation Order**

Dear ██████████

At the December 2018 meeting, the Accrediting Commission of Career Schools and Colleges (“ACCSC” or “the Commission”) considered the Application for Renewal Accreditation for International Culinary Center located in Campbell, California (#B072345) and its previous decision to continue the ACCSC-accredited schools<sup>1</sup> owned by International Culinary Center LLC and Affiliates (“ICC”) on **System-wide Probation**. Upon review of the October 15, 2018 Team Summary Report that summarizes the findings of the team from the Renewal of Accreditation On-site Evaluation that occurred at the California branch campus, the Commission’s October 19, 2108 Continued System-wide Probation Order and ICC’s responses, the Commission voted to continue each school within the system of ICC schools on Probation with a subsequent review scheduled for ACCSC’s **February 2019** meeting.

**Maximum Timeframe to Demonstrate Compliance**

Based on *Section VII (M), Rules of Process and Procedures, Standards of Accreditation* and that the school’s longest program is fifteen months in length, the maximum timeframe allowed for ICC to achieve and demonstrate compliance with the *Standards of Accreditation* is eighteen months. Thus, the timeframe for ICC to achieve compliance began as of July 10, 2017 and ends on January 10, 2019.<sup>2</sup> In considering the information provided by ICC in response to the Continued System-wide Probation Order, the Commission determined that good cause exists to extend the maximum timeframe established for ICC to demonstrate compliance with accrediting standards and to continue ICC on System-wide Probation until the February 2019 meeting. ██████████ ██████████

██████████ While the Commission found that good cause currently exists to extend the maximum timeframe for ICC to demonstrate compliance from January 10, 2019 until the Commission’s February 2019 meeting, ICC should take this Continued System-wide Probation Order to underscore the seriousness of ACCSC’s concerns regarding the school’s financial viability. Additionally, in reaching the decision to extend the maximum timeframe to demonstrate compliance, the Commission has the explicit expectation that ICC will provide a realistic and workable teach-out plan for both the main school and branch campus in response to this Probation order. If ICC does not submit an [Institutional Teach Out Plan Approval Form](#) and ██████████

██████████, then in accordance with the deadlines established in this letter, the Commission will likely withdraw the school’s accreditation at the February 2019 meeting. Please also be advised that the Commission is under no obligation to wait for the maximum timeframe to expire and may take an adverse action prior to the expiration of the maximum allowable timeframe.

The history of the Commission’s review, reasons for the Commission’s decision, and the Commission’s requirements for the schools to demonstrate compliance are set forth below.

<sup>1</sup> International Culinary Center – New York, New York (M#001493); International Culinary Center – Campbell, California (B#072345)

<sup>2</sup> See ACCSC’s April 19, 2018 letter.

**SYSTEM-WIDE FINANCIAL SOUNDNESS**

**History of the Commission’s Review**

**November 2015 Review**

At the November 2015 meeting, the Commission considered the audited consolidated financial statements for fiscal years ended December 31, 2014 and 2013 submitted by ICC. Upon review of the financial statements, the Commission voted to place ICC on System-wide Financial Reporting. [REDACTED]

- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]

**May 2016 Review**

At the May 2016 meeting, the Commission considered its previous decision to place ICC on System-wide Financial Reporting. Upon review of the Commission’s January 12, 2016 Financial Reporting letter and the school’s response, the Commission voted to continue ICC on System-wide Financial Reporting. [REDACTED]

- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]

**August 2016 Review**

At the August 2016 meeting, the Commission considered its previous decision to continue ICC on System-wide Financial Reporting. Upon review of the Commission’s June 17, 2016 Continued System-wide Financial Reporting letter and the schools’ response, the Commission voted to place ICC on Warning [REDACTED]

- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]

[REDACTED]

[REDACTED]

- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]

**May 2017 Review**

At the May 2017 meeting, the Commission considered its previous decision to place ICC on System-wide Warning. Upon review of the Commission’s September 7, 2016 System-wide Warning letter and the schools’ response, the Commission voted to place ICC on Probation. [REDACTED]

[REDACTED]

- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]

**November 2017 Review**

At the November 2017 meeting, the Commission considered its previous decision to place the ACCSC-accredited schools owned by ICC on Probation. Upon review of the Commission’s July 10, 2017 Probation Order and the school’s response, the Commission voted to continue ICC on Probation. [REDACTED]

[REDACTED]

- [REDACTED]
- [REDACTED]

█ [REDACTED]  
█ [REDACTED]  
█ [REDACTED]  
█ [REDACTED]

In addition, the Commission requested an update on ICC’s current status with the U.S. Department of Education (“the Department”) due to a low composite score. ICC stated that the schools are currently on Heightened Cash Monitoring 1 (“HCM1”). ICC provided a copy of the amended letter of credit with an expiration date of October 15, 2018 along with the September 14, 2017 approval letter to participate in Federal Student Financial Aid Programs.

**May 2018 Review**

At the May 2018 meeting, the Commission considered its previous decision to continue the ACCSC-accredited schools owned by ICC on Probation. In addition, the Commission also considered an Outcomes Report for The International Culinary Center (“ICC-NY”) main school located in New York, New York and an Outcomes Report for The International Culinary Center (“ICC-Campbell”) branch campus located in Campbell, California. Upon review of the Commission’s December 7, 2017 Continued Probation Order and the school’s response, the Commission voted to take the following actions:

1. Continue ICC-NY and ICC-Campbell on Probation due to the Commission’s concerns with the financial soundness of the institution.
2. Revoke the approval for the Italian Culinary Experience (Diploma) program for ICC-NY and direct the school to submit a [Programmatic Teach-Out Approval Form](#) for this program (*Section VII (R)(7), Rules of Process and Procedure, Standards of Accreditation*).

█ [REDACTED]  
█ [REDACTED]

█ [REDACTED]  
█ [REDACTED]  
█ [REDACTED]  
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█ [REDACTED]

█ [REDACTED]

█ [REDACTED]

- | [REDACTED]
- | [REDACTED]

**September 2018 Review**

The Commission determined that ICC has failed to demonstrate that ICC’s financial structure is sound with resources sufficient for the proper operation of the schools and discharge of obligations to its students (*Section I (C)(1), Substantive Standards, Standards of Accreditation*). [REDACTED]

- | [REDACTED]
  - | [REDACTED]
  - | [REDACTED]
  - | [REDACTED]
- [REDACTED]
- [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

**December 2018 Review and Action**

The Commission determined that ICC has failed to demonstrate that it’s financial structure is sound with resources sufficient for the proper operation of the schools and discharge of obligations to its students (*Section I (C)(1), Substantive Standards, Standards of Accreditation*).

- [REDACTED]
- | [REDACTED]
  - | [REDACTED]
  - | [REDACTED]

[REDACTED]

With respect to the branch campus in Campbell, California, ICC provided a copy of an article published November 13, 2018 by the Bay Area News Group announcing that the school had ceased enrollment and that the campus would close in May 2019. With respect to the students attending the Campbell, California branch campus, ICC posits in its response that “[t]hose students currently enrolled will benefit from a full teach-out in California, fully staffed in all student-facing departments. Post-graduation, all students will have access to placement and other alumni services through our New York school.” In considering the school’s response, and despite the school’s stated optimism, even when considering that 3 of 62 students have agreed to transfer to the New York main school, the Commission does not believe that the majority of the remaining students attending the Campbell, California branch campus will view transferring across the country to the New York main school as a viable teach-out option. Therefore, ICC must ensure the teach-out plan for the Campbell, California branch campus submitted in response to this letter outlines a more realistic teach-out scenario.

As stated previously in this letter, in reaching the decision to extend the maximum timeframe to demonstrate compliance, the Commission has the explicit expectation that ICC provide a realistic and workable teach-out plan for both the main school and branch campus in response to this Continued System-wide Probation Order. Additionally, ICC must understand that the Commission is granting good cause to extend the maximum timeframe for ICC to demonstrate compliance in order to provide ICC [REDACTED] and financial resources, required to demonstrate compliance with ACCSC’s accrediting standards and financial viability requirements. [REDACTED]

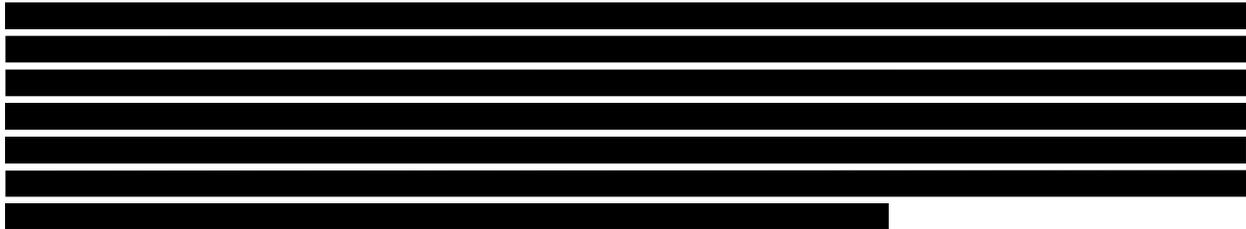
Based on the foregoing, and in order to demonstrate compliance with accrediting standards, the Commission directs ICC to submit the following:

- a. A viable teach-out plan for the Campbell, California branch campus through the submission of an [Institutional Teach Out Plan Approval Form](#);
- b. A viable teach-out plan for the New York main school, [REDACTED], through the submission of an [Institutional Teach Out Plan Approval Form](#); and
- c. [REDACTED]

**PROBATION REQUIREMENTS:**

In cases where the Commission has reason to believe that a school is not in compliance with accreditation standards and other requirements, the Commission may, at its discretion, place a school on Probation. A school subject to a Probation Order must demonstrate corrective action and compliance with accrediting standards. **Failure of the school to demonstrate compliance with accrediting standards or other accrediting requirements by the due date set forth herein may result in a revocation of accreditation action.**

The Commission will not consider substantive changes, a change of location/relocation, or additions (i.e., separate facilities, new programs) to a school or its separate facilities while the school is on Probation.



In accordance with *Section X, Rules of Process and Procedure, Standards of Accreditation*, the Commission, at the same time it notifies the school, will provide notice and the reasons why a school is placed on Probation to the public, U.S. Department of Education, the appropriate state licensing agency, and other accrediting agencies. Moreover, in accordance with *Section X (C)(6), Rules of Process and Procedure, Standards of Accreditation*, the Commission has notified the U.S. Department of Education of this action pertaining to the findings related to the school’s federal financial aid responsibilities.

In accordance with *Section VII (L)(8), Rules of Process and Procedure, Standards of Accreditation*, a school subject to a Probation Order must inform current and prospective students that the school has been placed on Probation and that additional information regarding that action can be obtained from the Commission’s website. Please provide evidence that the school has provided notice of this Probation action to current and prospective students in accordance with the Commission’s requirements.

**MAXIMUM TIMEFRAME TO ACHIEVE COMPLIANCE**

Based on *Section VII (M), Rules of Process and Procedures, Standards of Accreditation* and the school’s longest program of fifteen months, the maximum timeframe allowed for ICC to achieve and demonstrate compliance with the *Standards of Accreditation* is eighteen months. Thus, the timeframe to achieve compliance began as of July 10, 2017 and was scheduled to end on **January 10, 2019**.<sup>3</sup> In considering the information provided by ICC in response to the system-wide continued Probation Order, the Commission determined that good cause exists to extend the maximum timeframe established for ICC to demonstrate compliance with accrediting standards, and to continue ICC on system-wide Probation until its **February 2019 meeting**. Please also be advised that the Commission is under no obligation to wait for the maximum timeframe to expire and may take an adverse action prior to the expiration of the maximum allowable timeframe.

**RESPONSE REQUIREMENTS**

By applying for accreditation, a school accepts the obligation to demonstrate continuous compliance with the *Standards of Accreditation*. While the Commission employs its own methods to determine a school’s compliance with accrediting standards, the burden rests with the school to establish that it is meeting the

<sup>3</sup> See ACCSC’s April 19, 2018 letter.

standards. The Commission's deliberations and decisions are made on the basis of the written record and thus a school must supply the Commission with complete documentation of the school's compliance with accrediting standards.

ICC must provide a response to the items expressed above that provides the information requested along with any additional information that the school believes supports a demonstration of compliance with accrediting standards.<sup>4</sup> If the school's response contains documentation that includes personal or confidential student or staff information that is not required for the Commission's review (e.g., social security numbers, dates of birth, etc.), please remove or redact that information.

ICC must upload the school's electronic response directly to ACCSC's College 360 Database. The ACCSC College 360 database can be accessed by [clicking here](#). Please note that the password utilized by the institution to access the Annual Report Portal is the same to access the School Submission section of the College 360 database. The Instructions for College 360 DMS Submissions can be found [here](#). A detailed overview on how to upload a school submission can be found [here](#).

Keep in mind, the school's response must be prepared in accordance with ACCSC's Instructions for Electronic Submission (e.g., prepared as one Portable Document Format ("PDF") file that has been prepared using Adobe Acrobat software (version 8.0 or higher) and which has a .pdf extension as part of the file name). The school will receive an e-mail confirmation that the file has been received within 24 hours of the submission.

The school's response must include a signed certification attesting to the accuracy of the information and be received in the Commission's office **on or before January 19, 2019**. If a response, the required fee, and the certificate of attesting to the accuracy of the information is not received in the Commission's office **on or before January 19, 2019**, the Commission will consider further appropriate action.

For assistance with the password or for any other questions regarding the electronic submission requirements, please contact [REDACTED]. Please note that any password requests to access College 360 must be made by the school director, or designated member of the school's management team, via e-mail.

For further assistance or additional information, please contact [REDACTED] or [REDACTED]

Sincerely,



Michale S. McComis, Ed.D.  
Executive Director

[REDACTED]

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<sup>4</sup> ACCSC has issued two modules of the **Blueprints for Success Series** – [Organizing an Effective Electronic Submission](#) and [Preparing a Comprehensive Response for Commission Consideration](#) – which provide a framework for submitting a well-documented, organized, electronic response for Commission consideration. ACCSC encourages the school to review these modules when formulating its response to this letter. More information is available in the [Resources section](#) at [www.accsc.org](http://www.accsc.org).