

October 18, 2019

ELECTRONIC DELIVERY

██████████
Director
IBO Technology Course
PR – 111 KM 18.0
San Sebastian, Puerto Rico 00685

██████████
School #B072425
Continued Probation Order

Dear ██████████

At the August 2019 meeting, the Accrediting Commission of Career Schools and Colleges (“ACCSC” or “the Commission”) considered its previous decision to place IBO Technology Course (“IBO-San Sebastian”) located in San Sebastian, Puerto Rico on Probation with regard to the following applications and reports:

- Application for Renewal of Accreditation;
- Application for a New Non-Degree Program – Unrelated;
- Enrollment Agreement Report; and
- Change of Location.

Upon reviewing this matter, the Commission was gravely concerned regarding the financial soundness of the school and as such in an August 14, 2019 letter directed the school cease enrollment in all programs and to submit a completed and acceptable ACCSC Teach-out Agreement. The Commission directed the school to submit evidence of the cessation of enrollment and the executed Teach-out Agreement for review at its September 2019 meeting.

At the September 2019 meeting, the Commission considered its previous directive set forth in an August 14, 2019 letter. Upon review of IBO Technology Course (“IBO”)¹ response to the August 14, 2019 letter the Commission voted to continue IBO-San Sebastian on Probation with a subsequent review scheduled for ACCSC’s December 2019 meeting. The reasons for the Commission’s decision as well as its actions and directives are set forth below.²

Cease Enrollment

At the September 2019 meeting, the Commission considered IBO’s request to rescind the cease enrollment directive and allow the schools to enroll new students. Given the history of the financial concerns, and the failure of the most recent financial submissions to alleviate those concerns, the Commission found that IBO-Rio Grande and IBO-San Sebastian have yet to demonstrate fiscal responsibility that would support a determination that the school is able to fulfill its obligations to students. In addition, in the August 14, 2019 letter, the Commission directed the schools to provide fully executed Teach-Out Agreements to ensure current students would be accommodated should the schools close. IBO stated, however, that it “...still contemplates that it can teach-out its current students internally but continues to count with the willingness of Premier Institute of Education the local school that would take the students via a teach-out agreement.” The Commission considered IBO’s response and found that as IBO did not submit a fully executed teach-out agreement as requested, IBO failed again to provide sufficient evidence that adequate planning has occurred to ensure that students are protected in the event that the schools should close. As such, the

¹ The ownership entity of IBO Technology Course located in Rio Grande, Puerto Rico and IBO Technology Course located in San Sebastian, Puerto Rico.

² The history of the Commission review in this matter is included in Appendix A.

Commission determined that the cease enrollment directive must continue. Therefore, IBO-Rio Grande and IBO-San Sebastian may not recruit and admit new enrollments until the Commission reviews the response to this letter at its December 2019 meeting.

SUBSTANTIVE COMPLIANCE ISSUES:

1. IBO³ must demonstrate that the financial structure of the school is sound, with resources sufficient for the proper operation of the school and discharge of obligations to its students (*Section I (C)(1), Substantive Standards, Standards of Accreditation*). In addition, IBO must demonstrate that the school is in compliance with all applicable federal, state, and local government requirements. In cases where accrediting standards and federal or state government requirements differ, the more stringent will apply. If conflicts exist between federal or state requirements and accrediting standards, the federal or state requirements will take precedence (*Section I (D)(3), Rules of Process and Procedure, Standards of Accreditation*). Given that the financial concerns and the United States Department of Education's Program Review and Audit Review impact both the San Sebastian and Rio Grande campuses, the details required for response to the Commission's financial concerns and compliance with federal regulations are contained in the October 18, 2019 letter to the Rio Grande campus. The Commission expects that the corporate office will respond accordingly to both areas of concern.
2. IBO-San Sebastian must demonstrate institutional assessment and improvement goal setting, benchmarking, and implementation activities appropriate to the size and scale of the school's operations, which much address the areas of management, fiscal condition and budget; administrative policies and practices; student support services; faculty and staff development; educational program curricula; learning resources system, equipment, and supporting materials, facilities; and student achievement outcomes (*Section I (B)(2), Substantive Standards, Standards of Accreditation*). In the response, IBO-San Sebastian submitted a copy of the school's current institutional assessment and improvement plan. The Commission noted that the plan provided does not clearly differentiate activities conducted at the main school location from those conducted at the branch location. As such, the Commission determined that additional monitoring is warranted to ensure that the school's current institutional assessment and improvement plan reflects specific improvement, goal setting, benchmarking, or implementation activities for the San Sebastian location.

Based on the foregoing, the Commission directs IBO-San Sebastian to submit the following:

- a. The school's updated institutional assessment and improvement planning document that includes specific goals, benchmarks, and activities beyond the current year for the San Sebastian location;
 - b. Documentation of implementation of the school's IAIP activities; and
 - c. Any additional information that the school believes will be useful to the Commission in making a determination regarding the school's compliance with ACCSC's IAIP requirements.
3. IBO-San Sebastian must demonstrate that all advertising, promotional materials, statement, and claims are truthful and accurate and avoid leaving any false, misleading, misrepresenting, or exaggerated impressions with respect to the school or its training programs (*Section IV (B)(1), Substantive Standards, Standards of Accreditation*). In response to the March 14, 2019 letter, IBO-San Sebastian stated that the school "communicates the length of the program in the enrollment agreement." The length of the programs offered by the institution, however, remains unclear. In the response the school stated that all programs are 10.5 months in length; however, according to the school's Institutional

³ IBO-San Sebastian is subject to the system-wide probation order for financial concerns and other areas as set forth in the October 18, 2019 Commission letter to the main school located in Rio Grande, Puerto Rico.

Profile on file with ACCSC, the school's programs are all 15 months in length. The Commission remains concerned that the school does not accurately demonstrate the entire time it takes a student to complete a program as the timeframe advertised may not include holidays and recesses. The school stated it "understands that the information it publishes needs to be aligned to the information in its accreditation approval," however, no documentation has been submitted to correct the discrepancy. As such, IBO-San Sebastian again failed to demonstrate how students might successfully complete the program in the time frame advertised in the brochures and on its website. Therefore, the Commission directs IBO-San Sebastian to submit documentation that the school has corrected the program length in all advertising and on the school's website to include the entire duration needed to complete the program.

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. However, a school that is subject to Probation may seek the Commission's approval for the transfer of accreditation that would result from a change of ownership as described in *Section IV, Rules of Process and Procedure, Standards of Accreditation*.

In accordance with *Section X, Rules of Process and Procedure, Standards of Accreditation*, a summary of the Probation Order is made public and provided to the U.S. Department of Education, appropriate State agencies, and appropriate 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)(7), 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.

TEACH-OUT PLAN REQUIREMENT

At this juncture, it is imperative that the school provides evidence that the students will be protected in the event the school should close. The Commission will only consider this requirement fulfilled upon receipt of a completed an updated [ACCSC Institutional Teach-Out Plan Approval Form](#) and a fully executed [ACCSC Teach-Out Agreement Approval Form](#) which must be submitted as part of the response for the items listed above.

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 16 months, the maximum timeframe allowed for IBO-San Sebastian to achieve and demonstrate compliance with the *Standards of Accreditation* is eighteen months. Thus, the timeframe to achieve compliance begins as of the date of this letter and ends on **September 14, 2020**. 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.

NOTIFICATION OF STUDENTS

The school must inform current and prospective students in writing that the school has been placed on Probation and that additional information regarding that action can be obtained from the Commission's website at <http://www.accsc.org/Commission-Actions/Accredited-Schools-on-Probation.aspx> (*Section VII (L)(7) Rules of Process and Procedure, Standards of Accreditation*).

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 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.

IBO-San Sebastian 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.⁴ 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.

IBO-San Sebastian 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 also include a signed certification attesting to the accuracy of the information and be received in the Commission's office **on or before November 18, 2019**. If a response, the required

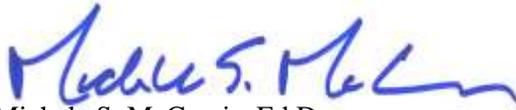
⁴ ACCSC has issued two modules of the **Blueprints for Success Series** – [Organizing an Effective Electronic Submission](#) and [Preparing a Comprehensive Response for Commission Consideration](#) – which provide a framework for submitting a well-documented, organized, electronic response for Commission 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.

fee,⁵ and the certificate of attesting to the accuracy of the information is not received in the Commission's office **on or before November 18, 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

c: [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Encl: Appendix A: History of the Commission's Review

⁵ ACCSC assesses a \$1,000 processing fee to a school placed on Probation.

APPENDIX A – CONTINUED PROBATION ORDER

HISTORY OF THE COMMISSION’S REVIEW
IBO TECHNOLOGY COURSE
SAN SEBASTIAN, PUERTO RICO
SCHOOL #B072425

OCTOBER 18, 2019

May 2016

At the May 2016 meeting, the Commission considered the Application for a Branch Campus – Part II submitted by IBO-San Sebastian. Upon review of the December 7, 2015 Team Summary Report and the school’s response to that report, the Commission voted to defer final action until the August 2016 meeting in order to provide the school with an additional opportunity to demonstrate compliance with accrediting standards.

August 2016

At the August 2016 meeting, the Commission considered its previous decision to defer final action on the Application for a Branch Campus – Part II submitted by IBO-San Sebastian. Upon review of the June 13, 2016 deferral letter and the school’s response, the Commission voted to again defer final action in order to provide the school with an additional opportunity to demonstrate compliance with accrediting standards.

November 2016

At the November 2016 meeting, the Commission considered its previous decision to defer final action on the Application for a Branch Campus – Part II submitted by IBO-San Sebastian. Upon review of the September 9, 2016 deferral letter and the school’s response, the Commission concluded that IBO-San Sebastian and the main school located in Rio Grande, Puerto Rico (#M070588) met the requirements set forth in the *Standards of Accreditation* for the establishment of a branch campus separate facility. In addition, the Commission voted to place IBO-San Sebastian on Enrollment Agreement Reporting. The Commission found that the school did not enforce the option of an addendum to enrollment agreements for students that transferred from the main school to the branch and determined additional monitoring was warranted in order to provide the school with an opportunity to demonstrate the effectiveness of its revised transfer policy between the main and the branch school.

August 2018

At the August 2018 meeting, the Commission considered the Application for Renewal of Accreditation, Application for a New Non-Degree Program – Unrelated, and Enrollment Agreement Report. Upon review April 10, 2018 Team Summary Report and the school’s response, the Commission voted to place IBO-San Sebastian on Warning.

February 2019

At the February 2019 meeting, the Commission considered its previous decision to place IBO-San Sebastian on Warning. Upon review of the September 12, 2018 Warning letter and the school’s response, the Commission voted to place IBO-San Sebastian on Probation.

August 2019 Commission Review and Action:

At the August 2019 meeting, the Commission noted that IBO-San Sebastian's the most recent grant of accreditation was effective going forward from May 2015 for a period of two years and therefore the school's accreditation was due for a renewal as of May 2017. Despite the most recent opportunities to demonstrate compliance, IBO-San Sebastian has yet to provide sufficient documentation in the remaining two areas listed below to demonstrate compliance with accrediting standards. It is imperative that the school provide a thorough and comprehensive response to address the outstanding issues. Failure to do so will result in an immediate revocation of the school's accredited status due to ongoing financial concerns and the school's inability to manage a postsecondary school in compliance with ACCSC's *Standards of Accreditation*.