

March 14, 2019

**ELECTRONIC DELIVERY**

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

*School #B072425  
Probation Order*

Dear ██████████

At the February 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 Warning with regards 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 review of the September 12, 2018 Warning letter and the school’s response to that letter, the financial status of the schools, and the accreditation status of IBO Technology Course<sup>1</sup> located in Rio Grande, Puerto Rico the Commission voted to place IBO-San Sebastian on Probation with a subsequent review scheduled for ACCSC’s August 2019 meeting. The reasons for the Commission’s decision are set forth below.

**History of the Commission’s Review:**

**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

---

<sup>1</sup> The Commission voted to place IBO Technology Course (#M070588) on Probation with the next review scheduled for August 2019.

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 Commission Review**

At the February 2019 meeting, the Commission noted that IBO-San Sebastian 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 four 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 raise significant questions with regard to the school’s ability to manage a postsecondary school in compliance with ACCSC’s *Standards of Accreditation*.

1. IBO-San Sebastian 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*). [REDACTED]

[REDACTED]

- [REDACTED]



- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
3. 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 to the Warning letter, IBO-San Sebastian failed to demonstrate that the school engages in institutional assessment and improvement planning. The Commission noted that the institution is working to resolve the issue and is interested in ensuring that the school has a current institution assessment and improvement plan that reflects significant improvement, goal-setting, benchmarking, or implementation activities.

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

- a. The school's current institutional assessment and improvement planning document that includes goals and activities beyond the current year;
  - 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.
4. 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 September 12, 2018 letter, IBO-San Sebastian stated that "all of our programs are 1,080 hours / 36 credits / 45 weeks" the equivalent of 10.5 months to complete. The length of the programs offered by the institution, however, remains unclear. According to the school's Institutional Profile on file with ACCSC, the school's programs are all 12 months in length. The Commission is 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. As such, IBO-San Sebastian failed to demonstrate how students may 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**

Given the serious nature of the issues outlined herein, the Commission directs the school to provide an [ACCSC Institutional Teach-Out Plan 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 (*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.<sup>2</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.

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 June 13, 2019**. If a response, the required fee,<sup>3</sup> and the certificate of attesting to the accuracy of the information is not received in the Commission's office **on or before June 13, 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,

[REDACTED]

Michale S. McComis, Ed.D.  
Executive Director

c: [REDACTED]  
[REDACTED]

---

<sup>2</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).

<sup>3</sup> ACCSC assesses a \$1,000 processing fee to a school placed on Probation..