

March 14, 2019

ELECTRONIC DELIVERY

██████████
██████████
IBO Technology Course
PR-3 Km27.5, Barrio Zaral Abajo
Rio Grande, Puerto Rico 00721

School #M070588
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 issue a Warning Order to IBO Technology Course (“IBO-Rio Grande”) located in Rio Grande, Puerto Rico regarding the following applications and reports submitted by the school:

- Application for Renewal of Accreditation;
- Application for a New Non-Degree Program – Unrelated; and
- Licensure Report.

Upon review of the September 12, 2018 Warning letter and the school’s response to that letter, the Commission voted to place IBO-Rio Grande 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 I submitted by IBO-Rio Grande. 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 I submitted by IBO-Rio Grande. Upon review of the June 13, 2013 deferral letter and the school’s response, the Commission determined that IBO-Rio Grande has met the requirements for the addition of the branch campus separate facility located in San Sebastian, Puerto Rico (School #B072725). In addition, the Commission voted to place the school on Licensure Reporting.

March 2017

At the March 2017 meeting, the Commission considered the Licensure Report submitted by IBO-Rio Grande. Upon review of the September 8, 2016 Commission letter and the school’s response, the Commission voted to continue IBO-Rio Grande on Licensure Reporting.

August 2018

At the August 2018 meeting, the Commission considered the Application for Renewal of Accreditation, Application for a New Non-Degree Program and Licensure Report submitted by IBO-Rio Grande. Upon

review of the September 12, 2018 Commission letter and the school’s response, the Commission voted to place IBO-Rio Grande on Warning.

February 2019 Commission Review and Action:

At the February 2019 meeting, the Commission noted that IBO-Rio Grande that the most recent grant of accreditation was effective going forward from August 2013 for a period of five years and therefore the school’s accreditation was due for a renewal as of August 2017. Despite the most recent opportunities to demonstrate compliance, IBO-Rio Grande has yet to provide sufficient documentation in the remaining thirteen 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-Rio Grande 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]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Based on the foregoing, the Commission directs IBO-Rio Grande to submit the following:

- a. An update on the effectiveness of the current oversight mechanisms used by the school to ensure members of the management team are qualified to effectively lead an accredited institution in compliance with accrediting standards;
- b. An updated organization chart to include the names and titles of all individuals currently employed by the school;
- c. An updated roster of all management and administrative staff, currently employed by the school including how much time they spend doing each role in the following format;

Name	Position/Department	Date Employment Began (M/YY)	Description of Duties	Time Spent in Role

- d. A professional development plan for each person identified in item (c.) above including timelines for training; and
 - e. Documentation of any professional development completed since August 2018.
3. IBO-Rio Grande must demonstrate that the school applies a fair and equitable refund policy in compliance with applicable requirements (*Section I (D)(5) Substantive Standards, Standards of Accreditation*). In the response, the school stated that 17 students dropped or withdrew from the institution September 1, 2018 to November 30, 2018. The school provided a list of students, their withdrawal status, and withdrawal date. The school failed to provide documentation to substantiate the claims that no refunds were due to the students provided in the list. Given the school’s continued inability to demonstrate compliance with accrediting standards with regard to refunds, the Commission is concerned with the school’s ability to demonstrate that the refund policy is applied consistently.

Based on the foregoing, the Commission directs IBO-Rio Grande to submit the following:

- a. An ACCSC Refund Report for all students who were either dismissed or withdrew between December 1, 2018 and April 15, 2019 to include the enclosed:
 - i. ACCSC Refund Report Summary Sheet;
 - ii. Refund Report Worksheet;
 - iii. Completed attendance tracking forms to include documentation of approved leaves of absence (as applicable); and
 - iv. Copies of all electronic refund transactions and/or checks – front and back – issued for the purpose of student records;
 - b. An explanation for any student for whom a refund was made in excess of the maximum number of days identified in the school’s refund policy; 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 accrediting standards regarding the school’s refund policy or practices.
4. IBO-Rio Grande must demonstrate that tuition changes for currently enrolled students is changed only if authorized in the enrollment agreement and only if advanced notice is provided to the students (*Section I (D)(3), Substantive Standards, Standards of Accreditation*). In response to the Commission’s

concern regarding notification of tuition changes to students, the school stated that it has eliminated the text regarding tuition increases from the enrollment agreement and will no longer apply tuition changes to current students. However, IBO-Rio Grande failed to provide evidence that the enrollment agreement has been changed and the new process and procedure regarding tuition changes has been implemented.

Based on the foregoing, the Commission directs the school to submit the following:

- a. Evidence that the IBO-Rio Grande has updated the enrollment agreement to eliminate the statement regarding tuition changes and
 - b. A sample of executed enrollment agreements from March 15, 2019 to May 31, 2019 to demonstrate that the school has implemented the change.
5. IBO-Rio Grande must demonstrate that instructional materials are sufficiently comprehensive and reflect current occupational knowledge and practice (*Section II (A)(5)(a), Substantive Standards, Standards of Accreditation*). In response to the Commission's concern regarding federal requirements, the school provided an updated Copyright Policy and stated that it will no longer sell textbooks at the campus. The school provided a list of current textbooks and stated that in the future IBO-Rio Grande will inform students of where to purchase textbooks and other materials. The school stated that any additional education materials provided for students is still under review and planned to complete a revised list of supplemental materials in February 2019. As such, IBO-Rio Grande failed to provide evidence that the instructional materials are sufficiently comprehensive and reflect current occupational knowledge.

Based on the foregoing, the Commission directs the school to submit the following:

- a. A detailed list of the instructional materials provided for each program with documentation that the materials are comprehensive and demonstrate current occupational knowledge;
 - b. A copy of the school's policies and procedures for review of instructional materials; and
 - c. Any additional information the school that the school believes will be useful to the Commission in making a determination regarding the school's compliance with accrediting standards regarding instructional materials.
6. IBO-Rio Grande must demonstrate that the school has appropriate administrative and operational policies and procedures to which the school adheres, and reviews and updates as needed (*Section I(A)(1)(d), Substantive Standards, Standards of Accreditation*). During the on-site evaluation, the team expressed concern that while the school appeared to follow a set of written policies and procedures, the school did not demonstrate use of an established process to review and update the policies and procedures. In previous response, IBO-Rio Grande stated that the school updated the Institutional Catalog and presented the updated catalog during a Student Assembly held in May 2018. The Commission noted, however, that IBO-Rio Grande failed to demonstrate that the school actually updated the written administrative and operational policies. Additionally, in response to the Warning Order, IBO-Rio Grande stated that the school is obtaining additional support from external resources and that the school would prepare a draft of its administrative and operational policies. The Commission noted IBO-Rio Grande efforts, however, the school again failed to provide a plan to demonstrate that the school has a process to review and update the school's administrative and operational policies and procedures.

Based on the foregoing, the Commission directs IBO-Rio Grande to submit the following:

- a. A copy of the school's administrative and operational policies and procedures, including a schedule of the school's process for review of administrative policies and procedures and
 - b. Any additional information that the school believes will be useful to the Commission in making a determination regarding the school's compliance with accrediting standards regarding the school's administrative and operational policies or practices.
7. IBO-Rio Grande must demonstrate institutional assessment and improvement goal setting, benchmarking, and implementation activities appropriate to the size and scale of the school's operations, which 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 Faculty Employment Verification achievement outcomes (*Section I (B)(2), Substantive Standards, Standards of Accreditation*). In response to the TSR, IBO-Rio Grande stated that the school planned to institute activities in the areas of academic and faculty development, student services, and curricular evaluation. The school provided a chart with a description of the activities/meetings held between January 2018 and April 2018, including the groups who participated in the activity. The Commission noted that while several of the meetings included topics appear germane to institutional assessment and planning such as faculty development and administrative processes, the school did not provide a copy of the school's current institutional assessment and improvement plan. In response to the November 12, 2018 Commission letter, the school stated that the institution was working to resolve this issue. To date IBO-Rio Grande has, however, failed to show that the activities corresponded with goals set forth in the plan or that the school's on-going institutional assessment and planning process reflects significant goal-setting, benchmarking, or implementation activities. IBO-Rio Grande also failed to provide an explanation as to who at the school is responsible for these activities and to assign a timeframe for activities to be completed.

Based on the foregoing, the Commission directs IBO-Rio Grande 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 institutional assessment and planning 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 the assessment and improvement activities as required by the standards.
8. IBO-Rio Grande must demonstrate that the school verifies prior work experience and maintains documentation of academic credentials of all faculty members and administration (*Section III (A0(4), Substantive Standards, Standards of Accreditation*). The on-site evaluation team found that IBO-Rio Grande did not demonstrate that the school conducted prior work verifications for any administrative employees and faculty. In response to the TSR, IBO-Rio Grande provided information an administrative and faculty chart with resumes in Spanish, but failed to provide policies and procedures for the verification of prior work experience of faculty and administrators. The Commission again requested policies and procedures from the school. In response to the Warning Order, the school provided a description of the process for hiring a new candidate; however, the school did not include policies and procedures for verifying prior employment. As such, IBO-Rio Grande again failed to

demonstrate the school has policies and procedures to verify prior work experience of faculty and administrators.

Based on the foregoing, the Commission directs IBO-Rio Grande to submit the following:

- a. A copy of the school's policies and procedures for verifying prior work experience for administrative and faculty and
 - b. Evidence that the school verified the prior work experience for anyone hired since the November 2018.
9. IBO-Rio Grande must demonstrate that the school prohibits personnel whose primary responsibilities include recruiting and admissions activities to become involved in admission testing or admission decisions, including signing and accepting the enrollment agreement (*Section IV (A)(13), Substantive Standards, Standards of Accreditation*). In response to the November 12, 2018 Commission letter, IBO-Rio Grande indicated that [REDACTED] is no longer employed at the institution; however, the school did not clarify which administrative staff person is now responsible for signing enrollment agreements in [REDACTED] absence and did not provide the school's policy and procedure for signing enrollment agreements. In the response, IBO-Rio Grande provided copies of executed enrollment agreements; however, those agreements are not translated. As such, it remains unclear who is responsible for signing enrollment agreements at the institution.

Based on the foregoing, the commission directs IBO-Rio Grande to submit the following:

- a. A copy of the school's policy and procedures from signing enrollment agreements, including clarification as to which administrative personnel is responsible for signing and
 - b. Copies of executed enrollment agreements from March 15, 2019 to May 1, 2019.
10. IBO-Rio Grande must demonstrate that all advertising, promotional materials, statements, 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 November 12, 2018 letter, IBO-Rio Grande 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-Rio Grande 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-Rio Grande 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.
11. IBO-Rio Grande must demonstrate that the school maintains written and detailed minutes of each Program Advisory Committee ("PAC") meeting that include a comprehensive and clear description of the review of the commentary made by the school representatives and the PAC members (*Section II (A)(6)(d)(i-iii), Substantive Standards, Standards of Accreditation*). In the response, the school provided a copy of minutes from the August 2018 meetings. Upon review of the PAC minutes, the Commission found that the minutes do not identify members of the employment community and practitioners, the minutes lack detail, and the minutes appear to be cut and pasted together. In addition,

the summary provided does not demonstrate that the PAC held a detailed conversation or that the school takes PAC recommendations into consideration.

Therefore, the Commission directs IBO-Rio Grande to submit the following:

- a. PAC minutes from all meetings held in 2019, including a description of each member in attendance (i.e. titles and affiliations) and a notations to which members in attendance represent the employment community or are practitioners;
 - b. The date, time, and location of each meeting;
 - c. A comprehensive and clear description of the review of and commentary made by the PAC members;
 - d. Evidence the school gives consideration to PAC input; and
 - e. Any additional information the school believes will be useful to the Commission in making a determination regarding the school’s compliance with ACCSC’s PAC requirements.
12. IBO-Rio Grande must demonstrate that the Commission can place a high level of reliance upon information, data, and statements provided by the school through supplying verifiable records of graduate initial employment (*Preamble, Introduction, Rules of Process and Procedure; Section VI (C)(2), Substantive Standards, Standards of Accreditation*). The school must also support its reported rates of employment through verifiable records (*Section VI (C)(2) and Section VII (B)(1)(b), Substantive Standards, Standards of Accreditation*). During the on-site evaluation, the school was unable to provide information requested by the team to demonstrate the employment verification process. In response to the November 12, 2018 letter, the school again did not provide the process and procedures for recording and verifying graduate employment. The documentation provided to demonstrate the verification tool used by the school did not include an English translation.

Therefore, the Commission directs IBO-Rio Grande to submit the following:

- a. A description of the school’s process and procedures for recording and verifying graduate employment;
- b. The school’s current verification form or other tool that the school is currently utilizing to verify employment;
- c. For all programs, for each graduate who gained employment in the career field for which the school provided education between March 15, 2019 and June 1, 2019, submit the following information:

Graduate ID#	Program	Start Date	Employer, Address, & Phone#	Employer Point of Contact	Date of Initial Employment	Descriptive Job Title

- d. The school must also provide the following supplementary information:
 - i. A copy of the school’s completed verification form (as indicated in item b. above) for each graduate employed listed in c. above that includes;
 - The graduate’s name and contact information;
 - An attestation that the self-employment is aligned with the individual’s employment goals, is vocational, and is based on and related to the education and training received;

- An attestation that the graduate is earning training-related income; and
 - In cases where licensure is required for employment, and attestation that such licensure has been achieved;
- ii. For each graduate classified as self-employed, provide a signed statement from the graduate verifying that the employment is valid; and
 - iii. For each graduate classified as “career advancement,” provide supporting and verifiable documentation for each graduate to include a signed statement from the graduate or employer acknowledging that the training allowed the graduate to maintain the employment position due to the training provided by the school or that the training supported the graduate’s ability to be eligible or qualified for advancement due to the training provided by the school.

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-Rio Grande to achieve and demonstrate compliance with the *Standards of Accreditation* is eighteen. 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 TO 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-Rio Grande 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.¹ 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-Rio Grande 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,² 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

¹ 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.

² ACCSC assesses a \$1,000 processing fee to a school placed on Probation..

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]