



Accrediting Commission of Career Schools and Colleges

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July 10, 2017

ELECTRONIC DELIVERY

[REDACTED]
President
The International Culinary Center
700 W. Hamilton Avenue, Suite 300
Campbell, California 95008

*School #B072345
Probation Order*

[REDACTED]

At the May 2017 meeting, the Accrediting Commission of Career Schools and Colleges (“ACCSC” or “the Commission”) considered its previous decision to place the ACCSC-accredited schools owned by International Culinary Center LLC and Affiliates (“ICC”) on System-wide Warning. In addition, the Commission also considered an Outcomes Report for The International Culinary Center (“ICC-Campbell”) located in Campbell, California. Upon review of the Commission’s September 7, 2016 System-wide Warning letter, the December 8, 2016 letter requesting additional information in conjunction with the school’s 2016 Annual Report submission, and the school’s responses, the Commission voted to place ICC-Campbell on Probation with a subsequent review scheduled for ACCSC’s **November 2017** meeting. The reasons for the Commission’s decision and the Commission’s requirements for the schools to demonstrate compliance are set forth below.

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 and Action

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]

May 2017 Review and Action

The Commission has 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]

OUTCOMES REPORTING

ICC-Campbell must demonstrate successful student achievement by maintaining acceptable rates of graduate employment in the career field for which the school provides education (*Section VII (B)(1)(b), Substantive Standards, Standards of Accreditation*). ICC-Campbell submitted a Graduation and Employment (“G&E”) Chart prepared using a December 2016 Report Date in response to ACCSC’s request for additional information regarding the 2016 Annual Report. ICC-Campbell reported the following rates:

Program	Length in Months	ICC-Campbell Employment Rate (7/16 Report Date)	ICC-Campbell Employment Rate (12/16 Report Date)	ACCSC Benchmark Employment Rate
Italian Culinary Experience	7	50%	40%	70%

Upon review of the school’s response regarding the 7-month Italian Culinary Experience, the Commission found that ICC-Campbell reported a 40% employment rate. This represents a decline from the previous report and remains well below ACCSC’s student achievement benchmark rate. In response, the school noted that small cohort size means that each graduate has a bigger impact on the reported rates. In addition, the nature of training that occurs in two very different locations creates challenges in establishing relationships with students.

With regard to program viability, ICC-Campbell drew a comparison between the 7-month Italian Culinary Experience (“ICE”) and the Professional Culinary Arts Immersion (“PCAI”) programs. The school reported 95% employment rate for the 6-month schedule and 86% employment rate for the 9-month schedule in the 2016 Annual Report. Due to the “direct similarities” between those programs, ICC-Campbell claims that achieving the benchmark employment rate for the ICE program is “absolutely viable.” The school also provided statements from industry experts stating that the service experience is important in conjunction with the education.

With the response, ICC-Campbell described plans to introduce students to the Career Services department during the admissions process; address career assistance opportunities offered post-graduation (including while in Italy) during new student orientation; require students to meet with career services staff while in classes located in California; engage students while in Italy through emails from the Career Services staff; and a required exit interview to finalize resume and offer networking assistance with every graduate.

While the Commission recognizes ICC-Campbell’s efforts to improve the employment rates for the 7-month ICE program, the Commission determined that additional monitoring is warranted in order to provide the school with an opportunity to demonstrate the accuracy of its claims and the effectiveness of its efforts.

Based on the foregoing, the Commission directs ICC-Campbell to submit the following:

- a. A Graduation and Employment Chart for the 7-month Italian Culinary Experience program using an **August 2017 Report Date**. Please use the most recent Graduation and Employment Chart, which can be found at the Commission’s website at www.accsc.org.
- b. Summary information for the Graduation and Employment Chart organized according to the corresponding **cohort start date** reported on the chart (line #1) as follows:
 - i. For each student start, provide the following information:

Student Name	Program	Start Date	Graduation Date	Withdrawal/Termination Date

- ii. For each student classified as “Unavailable for Graduation” (line #6), provide the following information:

Student Name	Program	Start Date	Reason Unavailable

- iii. Supporting and verifiable documentation for each student in (ii.) above to include minimally, external documentation such as military orders, letter from physician/doctor, death notice/obituary, public record of incarceration.
 - iv. For each graduate classified as employed in the field¹ (line #14), provide the following information:

Graduate Name	Program	Start Date	Employer Name, Address, & Ph. #	Employer Point of Contact	Date of Initial Employment	Descriptive Job Title and Responsibilities	Source of Verification ² (i.e., graduate or employer)

- v. Supporting and verifiable documentation or a narrative justification for each graduate in (iv.) above whose descriptive job title or place of employment does not appear directly related to the graduate’s program of study.

¹ See Appendix VIII – Guidelines for Employment Classification, Standards of Accreditation.

² Appendix VIII (4)(a) Guidelines for Employment Classification requires the school to verify the employment classification.

- vi. From the list in (iv.) above, for each graduate classified as employed in a training related field, that is “self-employed,” provide the following:

Graduate Name	Program	Start Date	Description of the Documentation on File

- vii. Supporting and verifiable documentation for each graduate in (vi.) above to include a signed statement from the graduate acknowledging that the self-employment is aligned with the individual’s employment goals, is vocational, is based on the education and training received, and that the graduate is earning training related income along with some form of verifiable documentation to demonstrate that the self-employment is valid.

- viii. For each graduate classified as “Graduates-Further Education” (line #11) or “Graduates-Unavailable for Employment” (line #12), provide the following information:

Graduate Name	Program	Start Date	Classification on the G&E Chart	Reason

- ix. Supporting and verifiable documentation for any student classified as “Unavailable for Graduation” (line #6), “Graduates-Further Education” (line #11), “Graduates-Unavailable for Employment” (line #12), or “Non-Graduated Students Who Obtained Training Related Employment” (line #19). This should include, minimally, external documentation such as transcripts/enrollment agreements for “Graduates-Further Education” and military orders, letter from physician/doctor, death notice/obituary, public record of incarceration, etc. for “Graduates-Unavailable for Employment.”

- c. Any additional information, to include contemporaneous retention, graduation, or employment data, that the school believes will be useful to the Commission in making a determination regarding the school’s compliance with ACCSC’s student achievement outcomes requirements.

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*, 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 nine months, the maximum timeframe allowed for ICC-Campbell to achieve and demonstrate compliance with the *Standards of Accreditation* is twelve months. Thus, the timeframe to achieve compliance begins as of the date of this letter and ends on **July 10, 2018**. 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 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-Campbell 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.³ 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-Campbell 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.

As stated in the [July 1, 2016 Accreditation Alert](#), at the Commission's discretion a \$1,000 processing fee is assessed when a school is placed on Probation. Given ACCSC's concerns regarding ICC-Campbell's financial soundness, the Commission has decided to reduce the fee to \$500 fee. 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 September 8, 2017**.

³ 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.

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 September 8, 2017**, 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]

Sincerely,



Michale S. McComis, Ed.D.
Executive Director

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