GUIDE ON DIPLOMA MILLS

AND OTHER DUBIOUS INSTITUTIONS

FRAUDOC

Guidelines on Diploma Mills and Document Fraud for Credential Evaluators

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Introduction

Over the past several years, a majority of countries have put in place policies targeting the implementation of quality assurance procedures in higher education. Recognition and accreditation systems have been implemented, referencing, in those countries, which institutions are accredited and authorised to award qualifications that are accepted for academic and professional purposes. Through recognition and accreditation, higher education institutions and programmes are evaluated against defined standards, guaranteeing the quality of the education provided.

Accreditation of higher education institutions and programmes is a reality in most of the countries, being conducted by a government organisation or an institution recognised by the government. Furthermore, the establishment of a legal value for the qualifications awarded in those countries also contributes to the quality of education. In the USA and Anglo-Saxon higher education systems, which are generally not strongly regulated by national legislation, as a consequence of the significant independence of the academic community, the quality of institutions, programmes and qualifications is managed through a decentralised system of accreditation[1].

Nonetheless, in some countries it is possible to set up private unaccredited institutions which provide higher education services. Generally speaking, unrecognised higher education institutions are generally those that operate without a formal accreditation/authorisation/recognition status given by an official authority of a certain country. Qualifications issued by an unrecognised institution in a particular country are generally not entitled to recognition in other countries. Importantly, this does not mean that all such institutions pursue fraudulent ends[2].

There is a distinct group of organisations that operate as diploma mills. Such organisations that claim fraudulently to be recognised awarding bodies, offer short duration programmes leading to qualifications without examination or assessment, and charge considerable sums of money for access and/or issuing the award.

Two important achievements in higher education, that have contributed to quality improvements in the sector, can, unfortunately, also act as a barrier to quality assurance and monitoring procedures[3]:

- *Transnational education, i.e. education provided in a location that does not coincide with the location of the head office of the institution which issues the qualification. By establishing their headquarters abroad, qualifications granted by irregular institutions can keep away from the rules that promote the quality assurance in the country where the education is provided.*

- *Open and distance education, namely education provided on-line. Through this model, fraudulent institutions can offer low quality programmes and qualifications, which are not accredited or do not undergo quality assurance procedures.*

The presence of fraudulent qualification providers in higher education has reached a frightening dimension, but the situation is slowly changing. Governments, international organisations, higher education institutions, employers and credential evaluators are coordinating their efforts and adopting strong measures to fight this phenomenon, namely through the implementation of systems for the accreditation and recognition of higher education institutions and programmes. This measure allows legitimate institutions to be distinguished from fraudulent ones, which in turn guarantees the quality of education.

This guide is intended to provide an overview of the diploma mills phenomenon and practical ways to identify fraudulent institutions, with the main objective of contributing to fight this serious problem.

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1 Lantero, L. et al (2010).
2 ENIC-NARIC website, section "Unrecognised HEI" and European Area of Recognition - EAR Manual, chapter 16 "Non-recognised but legitimate institutions". http://ear.enic-naric.net/emanual/Chapter16/default.aspx#
3 Lantero, L. et al (2010).

2 Description of the phenomenon

2.1 Definition of diploma mill

A diploma mill is a private institution, posing as an educational institution, which is neither recognised by national competent authorities nor duly accredited, and that awards fraudulent qualifications with no academic value.

The Webster's Third New International Dictionary defines a diploma mill as "an institution of higher education operating without supervision of a state or a professional agency and granting diplomas which are either fraudulent or, because of the lack of proper standards, worthless".

Despite the lack of a shared international definition, it is generally accepted that we are likely to be dealing with a diploma mill when some or all of the following descriptors are observed[4]:

- lack of legal authority to operate as higher education institutions and to award official degrees;
- degrees are offered based solely on experience or resume review;
- degrees can be purchased and there is a strong emphasis on fees and payment options;
- courses may be very short in duration (e.g. a bachelor degree in 5 days); little or no attendance required;
- false or exaggerated claims of external quality review: a long list of accreditation agencies and affiliated bodies may be mentioned on the website;
- academic staff whose degrees were issued by degree mills or failure to provide verifiable lists of academic staff and their qualifications;
- no campus or business address is provided, e.g. relying, only on a post office box number;
- qualifications offered have unlikely titles;
- the name of the diploma mill is similar to a well-known reputable higher education institution.

[4] Council for Higher Education Accreditation and UNESCO (2009).

2.2 Definition of accreditation mill

According to the European Area of Recognition - EAR Manual, "accreditation mill" refers to a non-recognised, usually non-existent accreditation organization that claims to provide accreditation without having any authorisation to do so. In many cases accreditation mills are closely associated with diploma mills.
Diploma mills often claim to be accredited by bogus accreditation agencies and in many cases the diploma and accreditation mills are owned by the same people[5].

2.3 Historical overview

Diploma mills are probably as old as universities. In Europe, diploma mills probably already existed in France and Italy in the Middle Ages[6]. Yet, in the modern era this phenomenon is predominantly associated with US or quasi-US "institutions". The Colonial Academy, Milton University of Maryland and Richmond College were probably the first fake universities in North America. In the 1870s the then US Commissioner on Education, John Eaton, referred to the proliferation of diploma mills in the US as a "scandal and disgrace"[7].

Besides being the main exporter of credentials from diploma mills, the US has had the most experience in trying to do something about the problem. In 1959, The American Council on Education Report by Robert Reid pointed out that the major problems lie in the absence of minimal educational standards and lack of uniformity in state laws[8]. In the 1980s FBI's successful "Operation DipScam" closed forty diploma mills and put many fraudsters behind bars.[9]

Then came the internet in the early 1990s and the social media service Facebook ten years later. At last, the diploma mill business had the vehicle to unchain its activities from geographical constraints and go global. Instead of physical addresses (that the police could raid!) and expensive advertisements in newspapers or airline magazines, they could now use inexpensive websites or social media to sell fake degrees on a global scale. This "cornucopia of possibilities" has turned the diploma mill business into a billion-dollar industry.

Some US states have tried to curb the diploma mill problem by introducing strict educational laws and banning the use of credentials from diploma mills (e.g. Oregon).
Although these attempts have been successful locally, they do not solve the problem since diploma mills simply move their operations to jurisdictions with lax educational laws (e.g. California).

Europe has witnessed different efforts to combat the problem. In the late 1980s and early 1990s the Council of Europe printed a black lists of diploma mills. The lists accidentally contained some recognised institutions and the project was abandoned.[10] In 2010 the Italian organization CIMEA (Italian ENIC-NARIC) published the report ***"Cimea against the mills: How to spot and counter diploma mills."***[11] At about at the same time UNESCO published a list of effective practices to counter diploma mills.[12] One of the recommendations was to protect the word University. Although some countries follow these recommendations (e.g. Denmark), most countries do not. Although very powerful tools exist to counter diploma mills, the interest in these issues has always been cyclic, haphazard and inconsistent.

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5 European Area of Recognition - EAR Manual.
6 Lantero, L. et al (2010).
7 Ezell, A. & Bear, J. (2012).
8 Reid, Robert H. (1959).
9 Ezell, A. & Bear, J. (2012).
10 Council of Europe (1986) and Council of Europe (1992).
11 Lantero, L. et al (2010).
12 Council for Higher Education Accreditation and UNESCO (2009).

2.4 Target groups of diploma mills

The endemic dimension of the diploma mills phenomenon is a consequence of the high demand for fraudulent qualifications.

Some specific social groups are more likely to be attracted by the phenomenon[13]:

- Mid-career adult professionals, for whom a new academic qualification can represent the access to a higher level position in their workplace. Some of these professionals may look for education programmes tailored to the pace of their careers and to the needs of their families, thus, the flexible manner in which fraudulent institutions award their qualifications can become an irresistible temptation for this social category;
- Young people with low-level academic qualifications or not qualified at all, that, for professional purposes, need to obtain an academic qualification in a very short period of time;
- People holding technical qualifications, for whom the achievement of an academic qualification can lead to financial benefits and improvements in their external image. Some irregular institutions exclusively target this social category, advertising non-traditional methods to obtain advanced professional qualifications at academic level;
- Craftsmen, tradesmen and small entrepreneurs. For many of these professionals, the achievement of an academic qualification is relevant to improve their image, both within their company (e.g., other team members and employees) and at an external level (e.g., suppliers, customers and public administration). This group is particularly sensitive to programmes which do not require physical attendance and that recognise prior learning;
- Students who have failed entrance examinations for programmes with numerus clausus (e.g., medicine, dentistry and nursing) or candidates who have failed to obtain the licence for a regulated profession. Some fraudulent institutions offer transnational programmes, which grant access to such professions, which can be a temptation for this social category;
- People who practice emerging professions, which are normally neither recognised nor regulated (e.g., non-conventional medicine). Professionals from this group tend to have their qualification recognised in another country, and some fraudulent institutions offer transnational programmes with this objective;
- "Qualification hunters", i.e. people who, out of personal ambition, collect academic qualifications from different institutions.

[13] Lantero, L. et al (2010).

2.5 Ethical dimension of the phenomenon

"A degree is a degree! Whether fake or genuine, it's a degree! It makes no difference!"[14]

For most people this assumption does not hold true. In fact, society values degrees for what they represent. In the modern knowledge-based society, an academic degree works as a guarantee that an individual has knowledge at an advanced level in order to carry out a certain task. For example, an engineer is expected to build safe bridges and a physician is expected to give patients adequate treatment. The same goes for teachers educating future generations. Society rests to a certain extent on the trust that citizens attribute to these and other professions.

This said, it is essential to understand that the sale and purchase of fraudulent credentials does not constitute victimless crime. It is a form of corruption. The long-term effect of fraudulent credentials on society is devastating. The purchase of fake degrees fund criminal organisations that are frequently involved in other crimes as well, e.g. money laundering, tax evasion and even terrorism. The proliferation of fraudulent credentials damages the citizens' trust in society and state institutions. Fake degrees dilute the value of real education and accomplishment; undermine meritocracy and reward deceit and unfairness. Both the individual and the society as a whole suffer the consequences of fraudulent credentials.

The qualifications awarded by irregular institutions, which are neither officially authorised nor approved, impact on several stakeholders:

- Students, who are misled to invest their time and money in fraudulent and useless qualifications;
- Employers, who might select employees based on fraudulent qualifications, running the risk of hiring nonqualified people;
- Recognised and/or accredited higher education institutions, which are exposed to unfair competition in the education market;
- The general public, because fraudulent qualifications can be obtained in fields where they could present, among others, a threat to health, safety or well-being;
- National education systems where fraudulent institutions thrive, which suffer as a result of a loss of credibility at an international level.

[14] The chief minister of Balochistan Province, Nawab Aslam Raisani, when asked about the issue of Pakistani politicians with fake credentials: https://www.theguardian.com/world/2010/jul/02/pakistan-fake-degrees-scandal
[15] Council for Higher Education Accreditation and UNESCO (2009).

2.6 General methodology on how to tackle the phenomenon

Diploma mills have been operating internationally for many years. Nonetheless, they have received limited attention from higher education institutions, national governments, accreditation and quality assurance organisations and international bodies. To tackle the diploma mills phenomenon, the following general actions are suggested[15]:

- create tools for the identification of diploma mills;
- use evidence of quality provided by acknowledged competent authorities such as recognised accreditation and quality assurance bodies;
- encourage providers of public and private funding for higher education to avoid funding diploma mills and their students;
- inform the public, employers and higher education institutions about diploma mills;
- pursue legal action against diploma mills and the use of fraudulent credentials;
- pay attention to cross-border diploma mills' operations.

More tools and recommendations can be found in **Chapter 8 of this Guide**.

5 Case studies

3.1 Case studies on diploma mills

Three case studies are outlined for diploma mills: the most recent case of Axact, and the two representative cases of University Degree Program and Saint Regis.

3.1.1 Axact

In May 2015, The International New York Times published "Fake diplomas, Real Cash: Pakistani Company Axact Reaps Millions".[16] The subject of this article was Axact, a Pakistani IT-company that allegedly ran a network of internet based degree mills. The New York Times uncovered at least 370 fictitious educational websites that could be connected to Axact. Most of these are listed in another article: "Tracking Axact's Websites"[17].

Axact was founded during the dot-com boom in 1997 and claims to have started from a one room office. Before the release of the article, the company was preparing to launch a high-profile media network involving several prominent journalists. Axact mentions on its website[18] that it has "a global presence across 6 continents, 120 countries and 13.000 cities with more than 25.000 employees and associates".

Days after the publication of the articles in The New York Times, Axact CEO Shoaib Sheikh was arrested and Axact's offices were raided by authorities. In April 2016, fourteen employees were awaiting trial on charges of fraud, extortion and money laundering. However, the case was delayed several times and several prosecutors and judges have quit without explanation[19].

[16] C Walsh, D. (2015).
[17] Palmer, G. (2015).
[18] axact.com, (2017).
[19] Walsh, D. (2016).

In the end, the court case was dismissed in November 2016 on account of a lack of sufficient evidence. In December 2016, the United States Attorney for the Southern District of New York announced charges against Umair Hamid, an Axact executive. This prompted Pakistani authorities to open a new case against Axact in January 2017[20]. At the end of August 2017 Umair Hamid was sentenced to 21 months in prison and ordered to forfeit $5,303,020[21].

Over the past decade, Axact obtained hundreds of millions of dollars from at least 215.000 people in 197 countries. Police found over one million blank educational certificates and evidence of 300 fictitious educational websites[22]. These websites include websites for diploma mills, accreditation mills and search portals. A lot of websites used distinct Anglophone- or Persian-Gulf-styled naming[23].

The company was aggressively positioning its websites to appear prominently in online searches to lure in as many potential customers as possible. Telephone sales agents were used to close the deal. Customers who were not aware of the nature of the websites were manipulated into enrolling for non-existing coursework or were convinced that their life experience was sufficient to earn a degree[24]. Taped phone conversations found on Axact servers are said to show sales agents impersonating American lawyers or State Department Officials in order to scare customers into buying authentication documents and certifications[25].

In parallel, Axact operated a web of shell companies in the United States, British Virgin Islands, Cyprus, Dubai and Panama and controls bank accounts in the United States, Ireland, Dubai, St. Vincent and the Grenadines, Belize and Singapore[26].

3.1.2 University Degree Program (UDP)

The University Degree Program (UDP) was an unaccredited consortium of diploma mills[27] that began operating in 1998 and had at least 22 colleges and universities throughout Europe[28]. These included:

- **The Ashford University London (not to be confused with Iowa State's Ashford School),**
- **Brentwick University,**
- **Harrington University,**
- **Hartford University (not to be confused with the University of Hartford in Connecticut),**
- **Hartley University,**
- **Kingsfield University,**
- **Landford University,**
- **Northfield University,**
- **Oaklands University,**
- **Parkhurst University,**
- **Parkwood University,**

[20] Khan, A. (2017).
[21] https://www.justice.gov/usao-sdny/pr/pakistani-man-sentenced-21-months-prison-axact-diploma-mill-scam [Accessed 27 December 2017]
[22] Walsh, D. (2016).
[23] Palmer, G. (2015).
[24] Walsh, D. (2015).
[25] Walsh, D. (2016).
[26] Walsh, D. (2016).
[27] Sabir, S. (2015).
[28] Ezell, A. (2009).

The UDP established websites for each of its colleges and universities as well as for its own accrediting agencies and was estimated to have sold more than 30,000 fake online degrees equating to received proceeds totalling $50 million to $100 million or even more[30]. All of this was overseen by several Americans from New York doing business as "University Systems", "Wheelie International Limited", and "Mountain View Systems" through telemarketing offices located in Jerusalem, Israel, and Bucharest, Romania[31].

UDP operated almost exclusively via the internet[32]. They would begin by sending out millions of spam e-mails daily leaving a telephone number for interested buyers who could then call various telephone message drops located throughout the United States[33]. While the wording varies slightly, the messages nearly all begin: "Obtain a prosperous future, money-earning power, and the admiration of all"[34].
Recipients were invited to call a US telephone number which acted as an answering service[35] and were asked to leave their name, day and night telephone number, and type of degree desired[36]. The message would subsequently be retrieved by one of the UDP registrars, who is the person working at one of the telemarketing offices who would try to lure in interested buyers by delivering a well-orchestrated sales pitch[37].
While the registrar would suggest or say that he is calling from England (or wherever the school currently featured is supposed to be), the calls are in fact made from the telemarketing offices in Bucharest or Jerusalem, typically either by natives of those countries or by South African immigrants living there[38].
The registrar would then explain that the UDP is a fully recognized member of Distance Learning Organizations in Europe and admitted that while their degrees are not accredited and cannot be used to transfer credits to other institutions of higher learning, they may be used for business and employment purposes[39]. Approximately one person in three ends up buying a degree during the phone call[40].

- **Shaftesbury University,**
- **Shelbourne University,**
- **Shepperton University,**
- **Stafford University,**
- **Summerset University,**
- **Thornewood University,**
- **University of Bedford,**
- **University of Devonshire,**
- **University of Dorchester,**
- **University of Dunham,**
- **University of Hampshire,**
- **University of Palmers Green,**
- **University of San Moritz,**
- **University of Wexford,**
- **Westbourne University,**
- **Westhampton University[29].**

[29] Sabir, S. (2015).
[30] Sabir, S. (2015).
[31] Ezell, A. (2009).
[32] Ezell, A., Bear, J. (2012).
[33] Ezell, A. (2009).
[34] Ezell, A., Bear, J. (2012).
[35] Ezell, A., Bear, J. (2012).
[36] Ezell, A. (2009).
[37] Ezell, A. (2009).
[38] Ezell, A., Bear, J. (2012).
[39] United States District Court for the district of Columbia, 2003.
[40] Ezell, A., Bear, J. (2012).

UDP offered degrees in any field requested by the prospective student and would take into account his or her life experience[41]. The degree package typically included the diploma (date of one's choice), the transcript (courses and grades of one's choice), information on a degree verification service employers can call, and two extremely favourable letters of recommendation[42].

In 2003 the Federal Trade Commission (FTC) announced that it had settled charges against three companies and three individuals who appeared to be associated with the UDP[43]. The owners of the UDP were forced to shut down many of its call centres and were prompted to return over $100,000 in profits[44].

3.1.3 Saint Regis University

Saint Regis University was one of more than 120 fictitious universities operated by a group who sold diplomas from 1999 until 2005[45], before it was shut down by the authorities[46]. The government investigation concluded that during this period, their business sold 10,815 fake credentials to 9,612 people in 131 countries for a total of $7,369,907. The products included counterfeit high school diplomas, college and graduate-level degrees (e.g., Bachelor of Arts, Bachelor of Sciences, Master of Arts, Master of Sciences, and Doctor of Philosophy) and fabricated academic transcripts. According to the investigation, fraudulent rubber stamps and seals were manufactured to make the degrees look official and employers and potential employers received a false confirmation via telephone that the degrees purchased were valid[47]. Documents further indicate that by accessing websites and paying fees, consumers could be evaluated for a degree[48], after which the degrees and related documents would then be printed and shipped to consumers throughout the world[49]. Degrees were awarded in recognition of a customer's prior learning. Based on the evaluation of a peer advisory connected to Saint Regis University the candidates' life experience was matched with traditional college curriculums at all levels in subjects such as engineering and education[50]. Documents were created with Microsoft Word and information was cut and pasted from different internet searches[51].

The fake schools created during the scheme included:

- Saint Regis University
- James Monroe University
- Robertstown University
- Holy Acclaim University
- Ameritech University
- Fort Young University
- Pan America University
- All Saints American University
- American Capital University
- Blackstone University
- Capital America University
- Hampton Bay University
- Hartland University
- Intech University
- Nation State University
- New Manhattan University and Graduate Institute
- North United University
- Port Rhode University
- St. Lourdes University
- Saint Renoir University
- Stanley State Graduate University
- Van Ives University
- West American University
- International MBA Institute
- Apollo Certification Institute
- James Monroe High School
- Liberty Academy Preparatory High School
- Trinity Christian High School
- Mission College Preparatory High School
- Bradford Academy College Preparatory High School

However, the conspirators also sold counterfeit diplomas and academic products purporting to be from legitimate academic institutions, such as the University of Maryland, George Washington University, Missouri University, and Texas A&M University[52].

Supposedly, Saint Regis University was headquartered on the Caribbean island of Dominica and it was being advertised as an accredited postsecondary institution and a member of the unrecognized "National Academy of Higher Education"[53]. The outfit also attempted to solve its lack of US accreditation by creating its own body, the "Academic Credential Assessment Corporation" and by claiming accreditation from the Ministry of Education of the African state of Liberia[54]. They went so far as to bribe Liberian government officials to obtain accreditation for their phony institutions[55] and admitted to paying more than $43,000 in bribes to several Liberian government officials in order to obtain accreditation from Liberia for Saint Regis University, Robertstown University, and James Monroe University, and to induce Liberian officials to issue letters and other documents to third parties falsely representing that Saint Regis University was properly accredited by Liberia[56].

The government investigation—called "Operation Gold Seal"— led to a successful prosecution of all participants in this diploma mill and each of them pleaded guilty to one count of conspiracy to commit wire and mail fraud[57]. This case led to new legislation, included in the 2008 "Higher Education Opportunity Act" that writes into a law a federal definition of the term "diploma mill"[58].

3.2 Visa mills: the Swedish experience

It happened out of the blue. In the autumn of 2011 the following four previously unknown British colleges turned to Swedish authorities requesting information on how to establish branch campuses in Stockholm: Bridge College, Hammersmith Management College, Queensway College and School of Business and Commerce. None of the colleges had degree granting rights in the United Kingdom, yet they presented themselves as institutions of academic excellence that wanted to bring quality higher education to Sweden.

On their websites, they referred to physical addresses in the Stockholm area with students and thriving campuses. Additionally, at least one of them was claiming Swedish accreditation. At the same time, the Swedish Migration Board was signalling problems with individuals in Bangladesh and Pakistan. Apparently, the Swedish embassies in Dhaka and Islamabad were being swamped with applicants for Swedish student visas for studying at the named colleges.

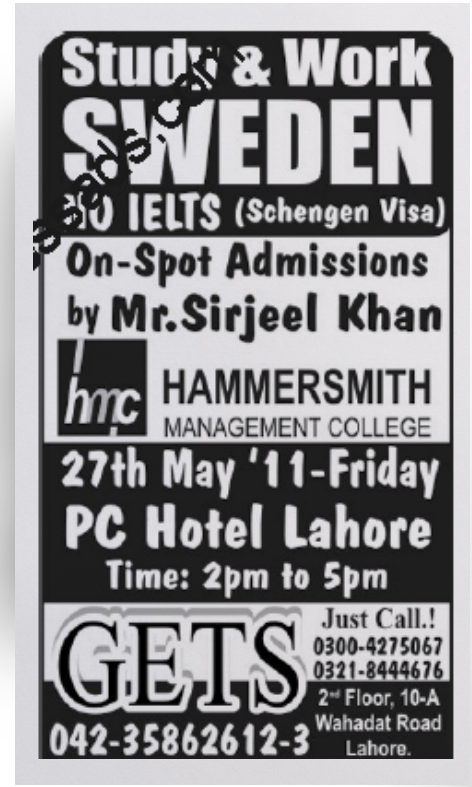
Interestingly enough, the physical addresses in Stockholm that the colleges were referring to were either fake or belonged to office parks. For example, Bridge College claimed to be located in the city centre: "Our campus is situated at the heart of City of Stockholm [sic] (...). Due to its vicinity to the central Stockholm [sic], students could easily pop into major central public and university libraries."

41 Sabir, S. (2015).
42 Ezell, A., Bear, J. (2012).
43 United States District Court for the district of Columbia, 2003.
44 Sabir, S. (2015).
45 Barrett, S. (n.d.).
46 Schemo, D. J. (2008).
47 U. S. Department of Justice, (n.d.).
48 Barrett, S. (n.d.).
49 U. S. Department of Justice, (n.d.).
50 Ezell, A., Bear, J. (2012).
51 Ezell, A., Bear, J. (2012).
52 Barrett, S. (n.d.).
53 Ezell, A., Bear, J. (2012).
54 Times Higher Education (2005).
55 Schemo, D. J. (2008)
56 Barrett, S. (n.d.).
57 Barrett, S. (n.d.).
58 Ezell, A., Bear, J. (2012).

In reality, the address belonged to an automobile repair shop in an industrial zone 15 km north of Stockholm. As to quality education, this was certainly not stressed in the colleges' advertisement in South Asia. Focus was instead on how easy it would be to obtain a Swedish Student Visa and access to the Schengen Area.

This sudden interest by these UK colleges in a remote kingdom in northern Europe was no coincidence. Following a crackdown on bogus colleges and students in the United Kingdom in 2010, hundreds of colleges were closed due to visa law violations. Furthermore, in June 2011 the UK Government introduced stricter student visa laws banning non-EU students the right to work and bringing dependents into the country. Illegal immigration and the threat of terrorism have prompted the authorities in Australia, Canada and the US as well to take action against this kind of fake colleges.

Advertisements in Bangladeshi and Pakistani press.



These "visa mills" belong to a subcategory of diploma mills. By fronting as colleges and universities visa mills circumvent visa laws and for money offer foreign nationals student visas that allow them stay and work in a country. Visa mills commonly use temporary addresses and office park facilities unfit for instruction. In the United States, the Department of Homeland Security has raided several visa mills in California, New Jersey and Virginia. The case of the unaccredited Tri-Valley University in Pleasanton, California, illustrates the visa mill problem. In 2011 the true nature of this operation was exposed in a federal investigation: most of the Tri-Valley's 1,500 students were not studying in Pleasanton. Instead, they were working in full-time menial jobs in New Jersey, Texas and other states. The university's many Indian students had paid thousands of US dollars to come to the US on student visas at the same time as the university's owner was making millions. The student visa represented a ticket to a job in the US. Furthermore, in 2016 hundreds of Indian students were denied entry to the United States due to suspected visa fraud at the unaccredited Northwestern Polytechnic University and Silicon Valley University in the San Francisco Bay Area.

3.3 Accreditation mills: Axact case study

When the New York Times published the article about Axact running one of the biggest degree mill empires ever discovered, they also published a list of websites that are connected to Axact. This list can be found in the article "Tracking Axact's Websites"[59].

While the majority of attention goes to the websites representing fictitious high schools and universities, a smaller number of websites representing fictitious accreditation organizations is also listed. These were used to accredit the fictitious high schools and universities in order to make them seem more credible to customers[60]. When looking at the websites, several red flags indicate the possibility of an accreditation mill.

One of the fictitious accreditation organizations mentioned in the article is called "International Accreditation Board for Engineering and Technology Education"[61]. This is not worlds away from "Accreditation Board For Engineering and Technology, Inc" (more commonly known as "ABET"), a programmatic accreditation agency, recognized by the Council for Higher Education Accreditation in the United States. It is a common tactic for accreditation mills to use names similar to recognized accrediting organizations.

Another indication is the fact that several of the fictitious accreditation organizations are doing international or global accreditation, like the "International Accreditation Organization"[62], who mention on their website that "IAO's accreditation process is very simple and can be achieved within 30 days". The "European Accreditation Board for Online Education"[63] provides accreditation for institutions in the Gulf States. There is a list of accredited institutions, all with Anglophone names. All seem to have been accredited on the same day and none of the "certificates of accreditation" mention the duration of the accreditation.

In general, these websites show very little information about the actual accreditation process, but emphasize the advantages institutions would receive when accredited. It is also remarkable that several of the websites also offer "equivalence" or "equalization" procedures, making them seem like both accreditation mills and credential evaluation mills at the same time.

[59] E Palmer, G. (2015).
[60] Palmer, G. (2015).
[61] iabete.org, (2017).
[62] iao.org, (2017).
[63] eaboe.org, (2017).

4 | Grey Area

4.1 The grey spectrum between recognised higher education institutions and diploma mills

"Among the schools without recognized accreditation, there exists a continuum, from those that are undeniably fake to those that have various levels of acceptance (...). Each person, organization, each agency, each decision maker, and each gatekeeper must decide where to draw a line on a continuum saying in effect, that "those on one side meet my needs, and those on the other side do not."[64]

The "continuum" identified by Bear & Ezell constitutes a nebulous grey area for the evaluation community. Although most diploma mills are easy to identify it can occasionally be difficult to make a clear distinction between a diploma mill and a recognised institution.[65] So how can we safely navigate in these many shades of grey?

The guiding principle of the Lisbon Recognition Convention (LRC) is that if an institution is recognised in one country qualifications from that institution shall be assessed in another country. Recognition refers to "the official status granted to a higher education institution by national legislation".[66]
The Ministry of Education or other competent authority usually publishes lists of recognised institutions. For LRC signatory countries, quality is implicit in the national recognition granted to an institution/programme. Many non-signatory states, however, do not have a fully developed quality assurance/accreditation system. In other words, the quality assurance (QA) process may vary from country to country and in some cases the quality assurance system is inadequate or even non-existent. In such a context recognition does not constitute more than a license to operate an institution.

Notwithstanding the lack of a QA system, the *European Area of Recognition (EAR) Manual* argues that - quality assurance or not - a degree from a recognised institution should be assessed.
The *EAR Manual* also states that it is "imperative that credential evaluators refuse to recognise qualifications or credits from diploma mills." So what if the recognised institution has ties to a diploma mill? Does the latter taint the institution's legitimacy and is this something that we should take into consideration in the evaluation process?

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[64] Ezell, A. & Bear, J. (2012).
[65] According to Bear & Ezell (2005) there can apparently even be disagreements within countries: "A school whose degree can qualify you to take th e bar or state licensing exam in California can get you arrested on a criminal charge in Oregon."
[66] European Area of Recognition - EAR Manual.

In other words, the challenge to the evaluation community is posed by institutions that are recognised but dubious due to past or existing ties to diploma mills. These institutions show the following typology and characteristics:

Typology:

- the institution has a history as a diploma mill in country A, but is now recognised in country B under the same name or a new name;
- the institution is a branch of/or has close ties to an existing diploma mill based in country A, yet has gained recognition in country B under the same name or new name;
- the institution has legitimate programmatic accreditation in country A, yet issues non-accredited degrees for a diploma mill in country B;
- the institution is a diploma mill that has gained membership in a legitimate regional, national or international academic or professional organisation that does not pre-screen members[67];
- the institution is a diploma mill that claims recognition by a territory that formally belongs to a state, yet is internally self-governing with lax laws on education.[68]

Characteristics:

- the institution is private;
- the institution is US, quasi US or has past or current ties to a US diploma mill;
- the institution uses a US credit and grade system and issues degrees and transcripts in a US format with American English spelling;
- the institution is located in a country or part of a country with a weak or non-existent central government;
- the institution is located in a country wrought by civil war;
- the institution is located in country with a high/very high level of corruption;
- the institution is located in a country with a weak or non-existent system of quality assurance of institutions and programmes;
- the institution is located in a country that does not provide adequate and clear information on its education system;
- the institution is located in a country that has not signed the Lisbon Recognition Convention;
- the institution is rated as "highly deficient" according to the country's own quality assurance organisation.[69]

[67] EAIE, ENQA etc.
[68] For example: British Virgin Islands, Jersey, Montserrat, Turks and Caicos Islands and Wallis and Futuna.
[69] Pakistan etc.

4.2 The grey area between academic and professional recognition

In the European context the application of EU Directive 2005/36/EC, recentely amended by Directive 2013/55/EC enables the free movement of professionals among EU member countries.

The Directive 2005/36/EC sets the rules, among others, for the systems of recognition of qualifications, with automatic recognition for professions with harmonised minimum training conditions (i.e. nurses, midwifes, doctors (general practitioners and specialists), dental practitioners, pharmacists, architects and veterinary surgeons).[70]

A new challenge related to this EU Directive concerns the discrepancies among academic and professional recognition.

Access to academic programmes and professional rights of academic credentials may vary among the different EU countries:

- In some countries access to specific academic programmes (where the degree gives direct professional rights) requires an entrance examination, and admission is subject to *numerus clausus*.
- In some countries the holder of a qualification needs to pass a state examination in order to get the professional licence, when in other countries the academic qualifications entitles the holder to practice the same profession.

Some institutions/agencies are using these differences in higher education systems offering alternative routes for gaining a professional licence.

3 example cases:

To make the grey zone between academic and professional recognition more understandable, the following three example cases are described. Given the delicacy of the situation, the diploma mills, official universities and countries are in these examples replaced by characters and places from the Pinocchio fairy tale[71].

The institutions and places are named as follows:

Places (let's presume they are all located in the EU):

- Collodi (Village in Tuscany) = Country A
- Pleasure Island = Country B
- Hollywood = Country C

Institutions:

- Pinocchio University (non accredited institution based in Pleasure Island)
- Blue Fairy University (official University accredited in Hollywood)

✔ Case 1

Final official qualification obtained following a course (distant learning or face-to-face) in Collodi offered by the teaching institution Pinocchio University from Pleasure Island (where it is not accredited). The official Blue Fairy University, which is based and accredited in Hollywood, awards the final 'official' qualification giving professional rights.

- Academic recognition result in your country or in Collodi: **negative**.
  The teaching institution (not accredited) is different from the awarding institution. Lack of quality assurance.
- Professional recognition result in your country or in Collodi: positive. Irrespectively of the academic programme, if the final qualification gives professional rights to practice a profession in Hollywood, the holder will get the certificate of conformity to the EU directive and will have his/her licence recognised in Collodi and/or Pleasure Island.

[70] European Commission web-page.

[71] Novel for children by author Carlo Collodi first published in 1883. The characters and places for this chapter are taken from the animated musical fantasy film procuded by Walt Disney Productions in 1940.

✔ Case 2

Final official qualification obtained following a course in Pleasure Island within Pinocchio University (non-accredited teaching institution) and final 'official' qualification giving professional rights awarded by Blue Fairy University based and accredited in Hollywood.

- Academic recognition result in your country or in Collodi: **negative**.
  The teaching institution (not accredited) is different from the awarding institution. Lack of quality assurance.
- Professional recognition result in your country or in Collodi: **positive**. Irrespectively of the academic programme, if the final qualification gives professional rights to practice a profession in Hollywood, the holder will get the certificate of conformity to the EU directive and will have his/her licence recognised in Collodi and/or Pleasure Island.

✔ Case 3

Final official qualification obtained following part of the course in Hollywood within Blue Fairy University (accredited institution), with the other part of the course and/or apprenticeship taken in Pleasure Island within Pinocchio University (non-accredited institution) and final 'official' qualification giving professional rights awarded by the official Blue Fairy University which is based and accredited in Hollywood.

- Academic recognition result in your country or in Collodi: **varies according to national legislation**.

- Professional recognition result in your country or in Collodi: **positive**.

Irrespectively of the academic programme and of academic recognition, if the final qualification gives the professional rights to practice the profession in Hollywood, the holder will get the certificate of conformity to the EU directive and will have his/her licence recognised in Collodi and/or Pleasure Island.

Analysis of cases

Academic recognition: during the procedures of academic recognition, a credential evaluator analyses all the elements of a qualification: length of the programme, credits, status of the awarding institution and, if different, of the teaching institution, accreditation agency, etc. The legal value of the qualification is one of the elements, and not the only one, that credential evaluators analyse. Even if the degree is accredited, the final recognition result could be negative.

Quality assurance is one of the key elements in evaluation procedures: both the teaching and the awarding institution should undergo a process of quality assurance by a competent and legitimate authority. Not all quality assurance agencies use to check the quality of a Higher Education Institutions (HEI) operating abroad or of a study programme organised in another country.
The lack of quality assurance verification is considered a substantial difference according to the Lisbon Recognition Convention and leads to the denial of recognition.

For this reason in the Diploma Supplement there are two different points related to the HEIs:

- 2.3 – Awarding institution
- 2.4 – Teaching institution.

Professional recognition: during the procedure for professional recognition, only the final qualification is considered, and the (legal) value of a qualification is the only element considered during professional recognition procedures according

to the EU Directives: the competent national authority of the country where the qualification is issued certifies the license and the qualification is going to be able to be recognised in another EU country, even if the holder studied in a system different to the issuing institution's country, in a different language and within a non-accredited institution. In this case the legal value of the qualification, that should guarantee quality and academic value, turns out to be with the protection of dubious/unclear Transnational Education (TNE) study programmes and lack of quality assurance.

In this case the Alert Mechanism[72] in the framework of EU Directive 2005/36/EC and Directive 2013/55/EC is not relevant, because the qualification is an "official" one.

[72] Article 56 a of Directive 2013/55/EU http://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex%3A32013L0055

5 Sources of information

When determining the legal status of the education institution **use only credible sources of information**, such as official or "white" lists of recognised institutions provided by national authorities or trustworthy international organisations. National and international "black" lists can be used with caution as additional sources but the presence or absence of the institution in such a list cannot be considered crucial for the recognition decision because the "black" lists are never complete and exhaustive. Diploma mills may disappear and reappear with a different name once they learn that they are on a blacklist. Furthermore a non-accredited but legitimate institution can be inserted in a blacklist by mistake. In addition, diploma mills that are not on a blacklist may claim that they are legitimate and accredited due to their absence from the list.

Do not underestimate an institution's own website as a source of information about the institution itself.
No need to say that every stated fact should be checked by the competent authority, but the website itself can give you a better picture of the institution. Offers of purchasing or ordering the degree, degree-granting based solely on previous life or professional experience, diplomas issued in a very short period of time, little or no attendance of studies and assignments requirements, absence of the list of faculties and teaching staff, contact details limited to the e-mail address, phone number and post office box – all are possible signs of a diploma mill.

Special attention is required to the **accreditation section of the institution's website**. Illegitimate degree providers often claim to be recognised by the long lists of accreditation agencies and organisations, including UNESCO, Council of Europe and/or other international organisations, which do not accredit or recognise any education institutions or programmes. The institution´s website may also claim accreditations by accreditation mills with imposing names and also legitimate accrediting organisations that actually have never recognised this institution. It is necessary to check the status of the accreditation agency as well as the presence of the education institution in the list of institutions accredited by the legitimate agency.

Other authoritative sources of information on the accreditation status of an institution other than the websites of the national ministry of education are:

- **Diploma Supplement:** this document usually includes information about the status of the institution as well as the accreditation and quality assurance system in a given country; furthermore it gives indications about the awarding institution and the teaching institution (if different), and it is important to verify that both are accredited in the higher education system they belong to;
    - the websites of national accreditation and quality assurance bodies;

- **official national publications** regarding the education system;

- **international official sources** such as:
    - the website of the UNESCO (http://en.unesco.org/);
    - websites of credential evaluator networks, such as the ENIC and NARIC networks (www.enic-naric.net);

- websites of **associations of accreditation/quality assurance agencies**, e.g. the website of the Council for Higher Education Accreditation of United States of America (www.chea.org);

- **publications containing information about the national education systems, accreditation and recognition**, such as:
    - the International Association of Universities (http://www.iau-aiu.net/);
    - Eurydice (http://eacea.ec.europa.eu/education/eurydice/index_en.php);

- websites of **international organisations and information tools regarding quality assurance and accreditation**, such as:
    - the European Association for Quality Assurance in Higher Education (ENQA) (http://www.enqa.eu/);
    - the European Quality Assurance Register for Higher Education (EQAR) (http://www.eqar.eu/register.html);

The Council for Higher Education Accreditation of the United States of America offers extensive information about degree mills and accreditation mills at their website, http://www.chea.org/.

The Higher Education Degree Datacheck managed by Prospects (HEDD) is the United Kingdom's official higher education verification service. HEDD by Prospects has developed toolkits for employers and higher education institutions with advice and guidance on degree fraud and how to avoid it in admission to higher education and in recruitment for employment. The toolkits can be downloaded here:

- Advice and Guidance on Degree Fraud – A Toolkit for Higher Education Providers: http://cdn.prospects.ac.uk/pdf/hedd%20degree%20fraud.pdf

- Advice and Guidance on Degree Fraud – A Toolkit for Employers: https://cdn.prospects.ac.uk/pdf/Advice%20and%20Guidance%20on%20Degree%20Fraud%20for%20HE%20Providers.pdf

On the ENIC-NARIC website there is a specific section on unaccredited institutions and diploma mills: http://www.enic-naric.net/unrecognised-heis.aspx

6 Legislation: the example of Denmark and Estonia

Legislation can be a powerful tool to make the establishment of diploma mills difficult. This aspect is here demonstrated by the example of Denmark and Estonia.

6.1 Denmark

In Denmark higher education institutions are government-funded, independent institutions within the public administration under the Minister for Higher Education and Science. Universities may offer study programmes or parts thereof at a foreign university. The universities must ensure that such study programmes are accredited in Denmark according to the Accreditation Act or by a foreign quality assurance agency. It is, however, demanded that the foreign quality assurance agency is listed on the European Quality Assurance Register for Higher Education (EQAR) or otherwise internationally recognised. If the study programme is quality-assured by a foreign quality assurance agency, the Danish Minister for Higher Education and Science must approve the programme.

The title of *universitet*, the equivalent term in other languages and their abbreviations may be used only by universities under the Universities Act and by institutions authorised to use the title under other Danish legislation. This provision entered into force on 1 July 2010. However, institutions that were using the term "University", on 1 July 2010 and that are covered by the ban had to cease using the term by 1 July 2015.

Some educational and research institutions that are recognised by foreign law or international law, are not covered by the ban. The ban applies only where the term university is part of an institution's title or name, and the institution is engaged in activities that are likely to be confused with education and university activities. For example, the ban will not affect a café with the name "University Café".

A few private companies operating on the Internet and located in Denmark present or have presented themselves as higher education institutions even though they are not publicly recognised as educational institutions and the degrees or other titles they offer do not correspond to any qualification within the Danish education system. This applies to "Knightsbridge University", "Green Hills University", "The Arab Academy in Denmark", "The Arab Open Academy in Denmark" / "Arab Open University", "Northwestern International University, Ltd.", and "Aalborg Academy of Science", and it may also apply to other companies.

6.2 Estonia

In Estonia, the title of *ülikool* (university) and the title in other languages are permitted to be used only by universities under the Universities Act and by higher education institutions that offer several accredited groups of study at all cycles of higher education, including doctoral studies, and where research and development activities are evaluated.

The establishment of a university shall be initiated by the Government of Estonia on the proposal of the Minister of Education and Research. According to this requirement, no other legal bodies or individuals can establish a higher education institution or a degree-granting institution.

In Estonia the higher education institutions are public, state or private. The establishment of a private higher education institution is regulated by the Private School Act. The establishment of a private higher education institution can be also nominated by the initiative of the Government of Estonia only.

According to the national legislation, the establishment of a higher education institution is highly protected, quality assessed and regulated. The foreign higher education institutions (except institutions from the European Union member states) or their cross-border activities (branches, etc.) are permitted to establish in Estonia only by mutual agreement by the Government of Estonia and the Government of the home country to the higher education institution. After they are established according to the mutual agreements by the Governments, the foreign institutions will be registered at the Estonian Ministry of Education and Research. In case the higher education institution belongs to the higher education system of a European Union member state, there is no need for a mutual agreement of governments but it can be established by the same procedure as Estonian higher education institutions.

Concerning the establishment of a cross-border provider in Estonia, the Estonian Ministry of Education and Research is working closely together with the Estonian ENIC/NARIC asking the recognition status of a foreign institution in the home country. The foreign institution wishing to operate in Estonia should be quality assured and officially recognised by competent authorities of the home country.

Another protected area in the Estonian higher education section is the system of state standard education documents (diplomas and diploma supplements). In Estonia, there is a right to issue state standard education documents only, and the right to issue state standard education documents is only for institutions accredited by the competent accreditation agency. Therefore, an unaccredited institution cannot issue diplomas.

Also, academic degrees and other titles of qualifications are protected by the Government Regulation "Standard of Higher Education" (SHE). The SHE lists the full names of academic degrees and other qualifications, and it is not permitted to use other names of qualifications.

Checklists to spot diploma mills and accreditation mills

Where to start if you receive a credential from an unknown education institution?

1

First of all **read the presented education documents carefully focusing on the name, logo and location of the institution, level of study, programme and awarded degree**. Sometimes non-recognised or illegitimate institutions use names similar to the fully legitimate and accredited universities, for example Standford University (non-recognised in the USA) vs Stanford University in California (legitimate and accredited by a recognised accreditation body in the USA) or Cambridge State University (non-recognised in the USA) vs University of Cambridge (legitimate and officially recognised in United Kingdom). Designation of qualifications, word spelling or expressions uncommon for the education system, where educational institution claims to belong to, should also raise your suspicion.

2

The next step is to **check the accreditation or recognition status of the institution in the country of origin from official sources of national authorities** (e.g. Ministry of Education).

White list first. The most straightforward way to **check the status of an institution is to browse through the official lists of accredited institutions** in the country where the institution claims to be based. Without doubt, one of the

major information sources is the **ENIC-NARIC website (www.enic-naric.net)**. The website offers **information on 55 different countries**; there is a dedicated 'country profile' page for each country, which is updated by the ENIC-NARIC centre of the country of reference. The majority of country profiles provide the link to the official list of recognised higher education institutions. The ENIC-NARIC centres are the main source of information about bogus institutions used by credential evaluators, since the lists uploaded on the website are very useful to identify both accredited and non-accredited institutions[73]. On the ENIC-NARIC website in the section "UNESCO Regions" there is a list of countries that are not part of the ENIC-NARIC network, with links to the competent authorities for recognition of each country.

3

Determine the legitimacy of the provider. If the institution does not appear in any official list of the country of reference or if the country only published lists referring to certain types of higher education institutions, try to determine the legitimacy of the provider. It is also possible to check the IAU database or other lists provided by other international organisations that contribute to spread information about Higher Education. The World Higher Education Database (http://whed.net/home.php) is a database about the Higher Education systems powered by the International Association of Universities (IAU)[74], an organisation created by UNESCO with the main purpose of dealing with Higher Education issues. The database contains the description of Higher Education systems in 186 countries, all drafted by the official institutions of each country, and lists 18.500 Higher Education Institutions.

4

Black lists. Another possibility is to **look at existing lists of unaccredited institutions and Diploma Mills**. This is not the recommended way: **the best way remains to check the "white lists", i.e. list of accredited institutions**. In the past there were several problems related to the so-called "black lists", such as institutions changing name after being inserted in these lists, or a legitimate institution inserted by mistake in such lists. Furthermore such lists are never complete, because new diploma mills mushroom and old ones can change their names as said above. But as a matter of fact "black lists" exist, and often are published by the national competent authority in matter of accreditation and recognition.

5

Checklist to identify Diploma Mills. A further step is to **identify the most common features of a suspect institution**. To this purpose, the Council for Higher Education Accreditation (CHEA – www.chea.org) published a checklist to understand and evaluate risk factors. In the present work, the list has been expanded and reshuffled. In the following section, twenty questions are listed in order to facilitate the identification of the accreditation status of institutions. If the answer to one or more of the following questions is "yes", the institution under consideration might be an irregular one. Nonetheless, it is necessary to point out that non-accredited institutions pursue different goals and not all of them go under the label of "diploma mills".

[73] Lantero, L. et al (2010)
[74] International Association of Universities, http://www.iau-aiu.net/.

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Checklist to identify a diploma mill

1. Could the qualification be bought or ordered?
2. Does the institution emphasise its accreditation?
3. Are you unable to find accreditation in any national system?
4. Can the qualification be attained without students completing any tasks or fulfilling any duties?
5. Does the final qualification refer to several education systems?
6. Are the learning outcomes of the students not tested for the accumulation of credits?
7. Is the time to achieve the qualification shorter than the time that is normally needed to complete comparable studies?
8. Does the institution declare to be recognised on international level and quotes international organisations?
9. Does the institution define itself “global”, “worldwide” or “international”?
10. Is the qualification awarded for the evaluation of CVs that students send? Or is it a qualification for “life experience”?
11. Does the institution issue honorary degrees?
12. Are the student fees too low or too high compared to the standard?
13. Does the institution not mention the location where the courses take place and is there only a Post box address?
14. Are there no lists of faculties, departments or professors of the institution?
15. Does the institution have a similar name to a very well known one?
16. Does the institution name its qualifications with official names of a different HE system?
17. Does the institution declare that it is not directly responsible for awarding the final qualifications but that they are awarded by another foreign institution?
18. Does the institution justify the authenticity of their qualifications only because it issues qualifications with the Apostille?
19. Does the institution underline that the accreditation it is not necessary as a practice in some systems?
20. Does the institution propose discount or payments with credit cards on their website?

Apart from the ones mentioned above, there are also other indicators that could warn potential clients of an irregular institution:

- the accrediting agencies are not regularly accredited;
- one of the requirements to obtain a qualification is the possession of a valid credit card;
- no previous qualifications or minimum entrance marks are required;
- the only requirements are the submission of a CV and a form of self-certification;
- the qualification is issued in a very short time;
- all administrative operations are on-line.

An irregular institution is very interested in keeping its clients satisfied and in "issuing" qualifications in the shortest possible time, without even checking the personal data provided by the client. These kinds of institutions claims to grant qualifications exclusively on the basis of previously acquired work experience. As a matter of fact, in no education system in the world is previously acquired work experience considered as a sufficient indicator to grant an academic qualification. There is no accredited institution, where administrative operations are carried out exclusively on-line: in this case it could not be accredited or recognised.

Finally, **institutions claiming to be recognised or accredited by international organisations**, such as UNESCO or the Council of Europe, **are to be looked at with suspicion**. Both the UNESCO[75] and the Council of Europe[76] published an alert on Bogus institutions on their respective websites.

Sometimes it is not enough to take into account the recognition status of the institution in question in order to understand if a qualification is "genuine", and therefore recognisable. It is also necessary to double-check if the course and the type of qualification are official or accredited in the education system of the country of reference.

In this respect, a good example, is represented by the case of France, where the *écoles supérieures* issue both qualifications recognised at national level (*diplôme visé*), and qualifications that can be defined as purely institutional awards. This does not mean that they are irregular but simply that they are not official qualifications of the French education system. They can still be used in the private job market.

[75] UNESCO alert: https://en.unesco.org/themes/higher-education/recognition-qualifications/guidelines/
[76] Council of Europe alert: http://www.coe.int/t/dg4/highereducation/Recognition/Recognition%20disclaimer_EN.asp#TopOfPage

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Checklist to identify an accreditation mill

The US Council for Higher Education Accreditation (CHEA) has also published 10 questions to identify bogus accreditation agencies:

1. Does the organisation allow accredited status to be purchased?
2. Does the organisation publish lists of institutions or programs they claim to have accredited without those institutions and programs knowing that they are listed or have been accredited?
3. Are the accreditation fees different from the current ones?
4. Does the operation claim that it is recognised (by e.g. USDE or CHEA) when it is not?
5. Are few if any standards for quality published by the organisation?
6. Is a very short period of time required to achieve accredited status?
7. Are accreditation reviews routinely confined to submitting documents and do not include site visits or interviews of key personnel by the accrediting organisation?
8. Is "permanent" accreditation granted without any requirement for subsequent periodic review, either by an external body or by the organisation itself?
9. Does the operation use organisational names similar to recognised accrediting organisations?
10. Are "special offers" or accreditation discounts advertised?

Tools and recommendations

- Request that the applicant provides further information about the institution. **Conduct research into the history of the institution**, its legitimacy and the legitimacy of the qualification.

- Take particular note of the QA system in the country where the institution is located, document features and the institution's possible ties to a diploma mill at the time of graduation. **Use the Lisbon Recognition Convention (LRC) and its subsidiary texts** (including the Code of good practice in the provision of transnational education) and **the EAR Manual** for guidance.

- Consider denying applicant recognition of his/her qualifications if the awarding institution had ties to a diploma mill at the time of graduation. Consider referring to A) substantial differences (lack of quality assurance); alternatively B) the institution is a branch of a non-recognised institution in the country to which the institution appears to belong (usually the United States.)

- It is suggested to higher education providers to send a **cease and desist letter** both to individuals presenting fake degrees and to a copycat website, which uses its visual or intellectual property (see points 8.1 and 8.2).

- **National legislation can also be a powerful tool to tackle the phenomenon of diploma mills** if it protects names of education institutions (e.g. University, Academy, College, etc.), names of academic degrees and also regulates a responsibility for using bogus degrees and certificates. References to the national legislation as well as legal consequences of using bogus degrees should be easily accessible for the applicants.

General recommendations always include the following steps:

- check the accreditation or recognition status of the institution;
- check the legal status of accreditation agency;
- check the features indicative for the bogus universities;
- check the institution in "white" lists and "black" lists;
- in the case of detected diploma mill credentials do not grant any form of recognition;
- collect diploma mill samples for the future work.

When working with a questionable credential, you can use **already existing checklists or recommendations** from relevant publications, such as:

- Recommendations from the **European Recognition Manual - EAR manual** (2012): http://ear.enic-naric.net/emanual/

- Recommendations for Higher Education Institutions from the **EAR-HEI manual** (2016): http://www.enic-naric.net/ear-manual-standards-and-guidelines-on-recognition.aspx

- **ENIC-NARIC webpage on unrecognised institutions and Diploma Mills:** http://www.enic-naric.net/unrecognised-heis.aspx

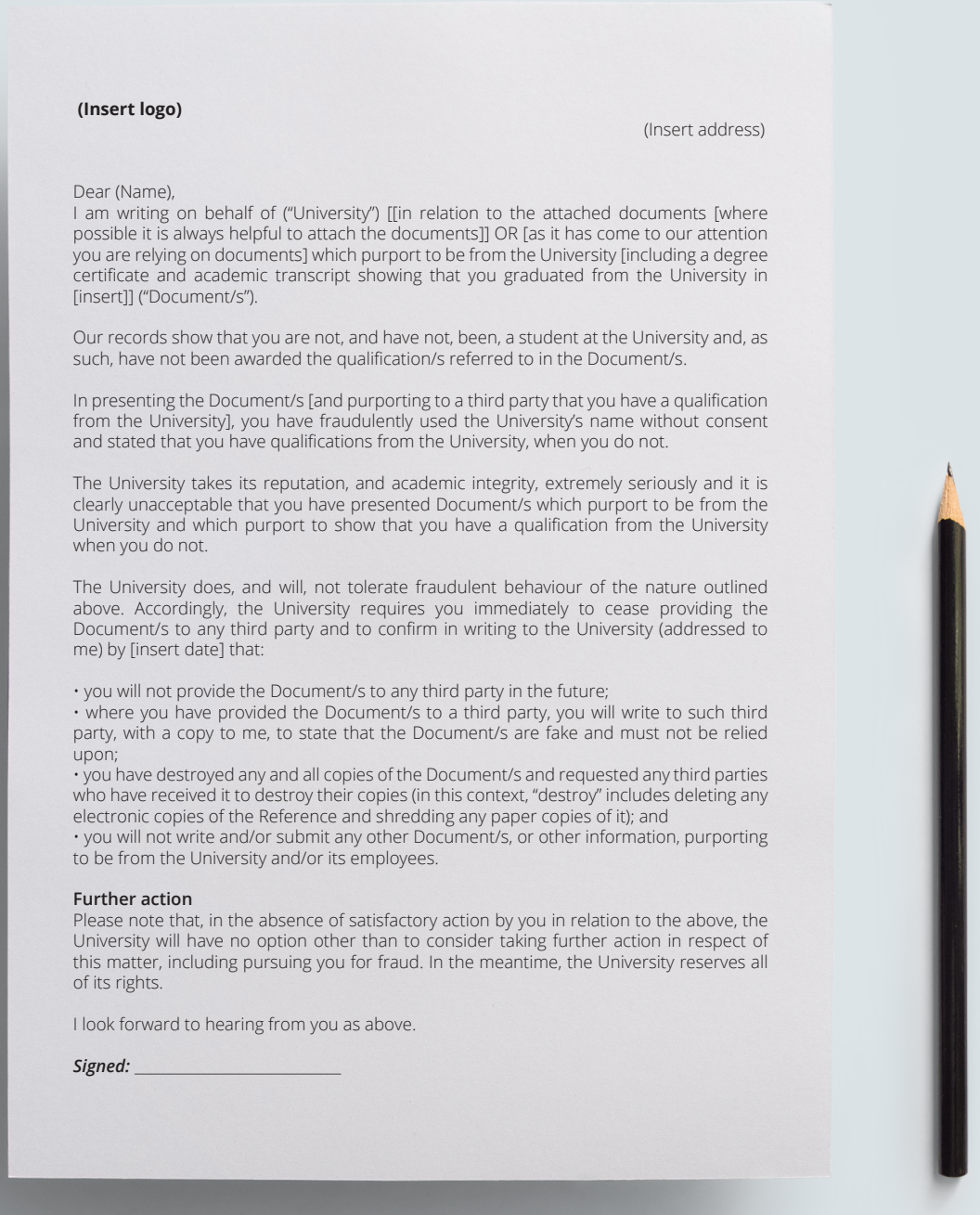
- **Council for Higher Education Accreditation (CHEA) checklist** and the CHEA page "Important Questions About Accreditation, Degree Mills And Accreditation Mills" (2015): http://www.chea.org/4DCGI/cms/review.html?Action=CMS_Document&DocID=45&MenuKey=main

- Higher Education Degree Datacheck (**HEDD**): **Advice and guidance on degree fraud. A toolkit for higher education providers** (2017): http://cdn.prospects.ac.uk/pdf/Advice%20and%20Guidance%20on%20Degree%20Fraud%20for%20HE%20Providers.pdf

- Higher Education Degree Datacheck (**HEDD**): **Advice and guidance on degree fraud. A toolkit for employers** (2017): http://cdn.prospects.ac.uk/pdf/HEDD%20degree%20fraud.pdf

- **WES, Best Practices: Strategies and Processes to Obtain Authentic International Educational Credentials**, May 2012: http://knowledge.wes.org/WES-Training-Best-Practices.html

8.1 Example template for a cease and desist letter to an individual



(Insert logo)

(Insert address)

Dear (Name),
I am writing on behalf of ("University") [[in relation to the attached documents [where possible it is always helpful to attach the documents]] OR [as it has come to our attention you are relying on documents] which purport to be from the University [including a degree certificate and academic transcript showing that you graduated from the University in [insert]] ("Document/s").

Our records show that you are not, and have not, been, a student at the University and, as such, have not been awarded the qualification/s referred to in the Document/s.

In presenting the Document/s [and purporting to a third party that you have a qualification from the University], you have fraudulently used the University's name without consent and stated that you have qualifications from the University, when you do not.

The University takes its reputation, and academic integrity, extremely seriously and it is clearly unacceptable that you have presented Document/s which purport to be from the University and which purport to show that you have a qualification from the University when you do not.

The University does, and will, not tolerate fraudulent behaviour of the nature outlined above. Accordingly, the University requires you immediately to cease providing the Document/s to any third party and to confirm in writing to the University (addressed to me) by [insert date] that:

• you will not provide the Document/s to any third party in the future;
• where you have provided the Document/s to a third party, you will write to such third party, with a copy to me, to state that the Document/s are fake and must not be relied upon;
• you have destroyed any and all copies of the Document/s and requested any third parties who have received it to destroy their copies (in this context, "destroy" includes deleting any electronic copies of the Reference and shredding any paper copies of it); and
• you will not write and/or submit any other Document/s, or other information, purporting to be from the University and/or its employees.

Further action
Please note that, in the absence of satisfactory action by you in relation to the above, the University will have no option other than to consider taking further action in respect of this matter, including pursuing you for fraud. In the meantime, the University reserves all of its rights.

I look forward to hearing from you as above.

Signed: _____

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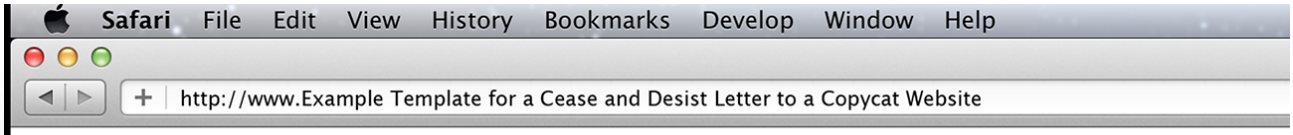
8.2 Example template for a cease and desist letter to a copycat website



To: XXX (+ email address)

From: [Name, address, telephone number and email address of complainant].

Reference: [Title and unique identifier to which complaint refers] [subject of complaint].

1. Infringement of copyright/author's rights/related rights
a) The following material is protected by intellectual property and copyright law [insert reference to national legislation].
i) Describe the protected material in as much detail as possible so that the specific content, edition and format may be readily identified and indicate the category for protection under copyright law (e.g. original literary, dramatic or musical work, software). Specify exactly the extent of use, e.g. by quoting text that has been reproduced (The Protected Material).
b) I/we own or am/are authorised to represent the owner of intellectual property rights in the protected material.
c) I/we hereby give notice of unauthorised use by reason of reproduction and/or making available the protected material.

2. Infringement of Trade Marks
a) Describe the trade marks held by the complainant (e.g University Name, device registered as "Trade Mark") and indicate the category/ies under which the marks are registered (e.g. class 41 teaching services provided by a university; undergraduate and postgraduate courses; professional training; educational services and paid educational services).
b) Using [Trade Mark] in domain names; posing as [Trade Mark]; using [Trade Mark owner]'s device marks or words in documentation such as certificates is contrary to section 10(1) of the Trade Marks Act 1994 and Article 9(1)(a) of the Community Trade Mark Regulation (207/2009/EC) [insert reference to the relevant legislation].
c) As a result of using those names or devices, there is likelihood of consumer confusion and of association with the Trade Marks. This is an infringement of section 10(2) of the Trade Marks Act 1994 and Article 9(1)(b) of the Community Trade Mark Regulation [insert reference to the relevant legislation].

3. I/we hereby request, with reference to the subject of this complaint, you/your organisation:
a) Remove it from the website; and
b) Cease further use of the material; and
c) Withdraw from circulation any materials that include it.
4. I/we request that you notify me/us when you have complied with my/our request in section 3 above.
5. I/we attach/direct you to the following additional information which supports the complaint: [proof of ownership, etc]
6. In relation to my/our complaint, I/we also inform you [any other relevant information including other steps taken to protect my/our rights].
7. The information contained in this notice is accurate and I/we believe, with good faith, that the publication, distribution and reproduction of the material described in section 1 and 2 is not authorised by the rightsholder, the rightsholder's agent or the law and/or infringes the law as described in section 1/2 above.
8. This notice is given to you without prejudice to any other communication or correspondence relating to the protected rights or any other right.

Contact information:
Name, address, telephone number, email address:

To: XXX (+ email address)

From: [Name, address, telephone number and email address of complainant]

Reference: [Title and unique identifier to which complaint refers] [subject of complaint].

1. Infringement of copyright/author's rights/related rights
a) The following material is protected by intellectual property and copyright law [insert reference to national legislation].
i) Describe the protected material in as much detail as possible so that the specific content, edition and format may be readily identified and indicate the category for protection under copyright law (e.g. original literary, dramatic or musical work, software). Specify exactly the extent of use, e.g. by quoting text that has been reproduced (The Protected Material).
b) I/we own or am/are authorised to represent the owner of intellectual property rights in the protected material.
c) I/we hereby give notice of unauthorised use by reason of reproduction and/or making available the protected material.

2. Infringement of Trade Marks
a) Describe the trade marks held by the complainant (e.g University Name, device registered as "Trade Mark") and indicate the category/ies under which the marks are registered (e.g. class 41 teaching services provided by a university; undergraduate and postgraduate courses; professional training; educational services and paid educational services).
b) Using [Trade Mark] in domain names; posing as [Trade Mark]; using [Trade Mark owner]'s device marks or words in documentation such as certificates is contrary to section 10(1) of the Trade Marks Act 1994 and Article 9(1)(a) of the Community Trade Mark Regulation (207/2009/EC) [insert reference to the relevant legislation].
c) As a result of using those names or devices, there is likelihood of consumer confusion and of association with the Trade Marks. This is an infringement of section 10(2) of the Trade Marks Act 1994 and Article 9(1)(b) of the Community Trade Mark Regulation [insert reference to the relevant legislation].

3. I/we hereby request, with reference to the subject of this complaint, you/your organisation:
a) Remove it from the website; and
b) Cease further use of the material; and
c) Withdraw from circulation any materials that include
4. I/we request that you notify me/us when you have complied with my/our request in section 3 above.
5. I/we attach/direct you to the following additional information which supports the complaint: [proof of ownership, etc]
6. In relation to my/our complaint, I also inform you [any other relevant information including other steps taken to protect my/our rights].
7. The information contained in this notice is accurate and I/we believe, with good faith, that the publication, distribution and reproduction of the material described in section 1 and 2 is not authorised by the rightsholder, the rightsholder's agent or the law and/or infringes the law as described in section 1/2 above.
8. This notice is given to you without prejudice to any other communication or correspondence relating to the protected rights or any other right.

Contact information:
Name, address, telephone number, email address:

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