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CENTRAL INTELLIGENCE AGENCY  
OFFICE OF INSPECTOR GENERAL

MEMORANDUM TO FILE  
(CASE CLOSING MEMORANDUM)

(U//~~AIUO~~) I. ADMINISTRATIVE DATA

Case No: 2011-10145

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Case Title: Misrepresentation of Academic Credentials and False Statements by a Procurement Officer

Investigator:

Supervisor:

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Date Received: 8/5/2008

Date Opened: 8/5/2008

Date Assigned: 8/5/2008

Case Type: FI

(U//~~AIUO~~) II. SUMMARY OF INVESTIGATIVE ACTIONS

(U//~~AIUO~~) BACKGROUND

1. (U//~~AIUO~~) Based on a separate 2008 United States Secret Service investigation that identified an Agency contractor as possessing a degree from a known unaccredited higher education institution, the Office of Inspector General (OIG) initiated a proactive investigation on 5 August 2008 into Agency staff claiming degrees from non-accredited institutions. OIG matched a list of unaccredited institutions against Agency BIO information to identify any individuals who had provided degree evidence to Human Resources. One of the individuals identified,  claimed a bachelor's degree from  an unaccredited institution, on her Agency BIO.

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Revision Date: 8 February 2013

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2. (U//~~ATUO~~) On 9 September 2008, OIG reviewed [redacted] personnel and security files, conducted open source research on [redacted] obtained records of [redacted] reimbursements. OIG interviewed [redacted] regarding the allegations.

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3. (U//~~ATUO~~) On 12 March 2009, OIG referred the allegations and investigative findings regarding [redacted] to the U.S. Attorney's Office, Eastern District of Virginia (EDVA) possible violation of Titles 18 U.S.C. § 287 (False, fictitious or fraudulent claims) and/or Title 18 U.S.C. § 1001 (Fraud and False Statements, Statements or entries generally). EDVA declined prosecution on 22 December 2009 in favor of administrative action.

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(U//~~ATUO~~) III. FINDINGS (b)(6)  
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4. (U//~~ATUO~~) [redacted] is an unaccredited institution [redacted]

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[redacted] web site states that it does not accept federal funding. [redacted] provides bachelor's, master's, and doctoral degrees through distance learning, and has neither a physical campus nor faculty. [redacted] is a pay-per-degree program that requires its students to pay approximately \$5,000 for a bachelor's degree. [redacted] students enroll in classes as directed by the school and must purchase a textbook from [redacted] for each class. [redacted] formerly claimed accreditation by the World Association of Universities and Colleges, an accreditation mill. [redacted] no longer claims accreditation, but rather claims a membership in the United States Distance Learning Association, a non-profit organization open to anyone able to pay the required fee.

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5. (U//~~ATUO~~) According to Agency records, [redacted] was reimbursed by the Agency for her education at [redacted] on three separate occasions:

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- 9 January 2006 - \$512.02
- 3 February 2006 - \$519.32
- 18 May 2006 - \$520

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6. (U//~~AIUO~~) On or about August 2006, [redacted] presented Human Resources (HR) with a copy of her diploma from [redacted] to be placed on her Agency BIO. [redacted] did not submit a copy of her transcripts to HR, but provided a copy to OIG investigators when requested. [redacted]

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[redacted] transcript indicates [redacted] is not regionally accredited and does not accept federal funding."

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7. (U//~~AIUO~~) [redacted] the date of [redacted] first reimbursement, indicated "The World Association of Universities and Colleges is a private accrediting body not listed with any government agency or the U.S. Department of Education and is not designed to meet the needs of students intending to use Federal Funds."

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8. (U//~~AIUO~~) During her 9 September 2008 OIG interview, [redacted] stated that she profited from her degree by moving from a procurement officer position to a [redacted] position that had more responsibilities, more challenging work, and a higher pay grade. [redacted] stated that she applied to a master's program at [redacted]

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According to [redacted] informed her that she was not eligible to apply because her [redacted] degree was unaccredited. [redacted] stated that she did not inform her management when she learned her degree was not accredited.

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9. (U//~~AIUO~~) From 12 June 2005 to 29 October 2006, [redacted] served as a procurement officer, which does not require a degree. [redacted] employee BIO listed her as having a bachelor's degree in Business Administration from [redacted] On 29 October 2006, [redacted] was promoted to the position of [redacted] which requires a degree.

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10. (U//~~AIUO~~) On 12 April 2009, [redacted] was removed by her component from the position of [redacted] and returned to the role of a procurement officer, which does not require a degree, after OIG briefed the component as to her degree status. [redacted] component ensured [redacted] that were entered into by [redacted] under false pretenses were subsequently ratified.

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11. (U//~~AIUO~~) OIG has not developed any evidence to confirm that [redacted] in fact knew that [redacted] was an unaccredited institution at the time she submitted her reimbursement claims or when she provided her [redacted] diploma to HR for inclusion in her Agency BIO information.

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12. (U//~~AIUO~~) Between 9 January and 18 May 2006, [redacted] received reimbursement from the Agency for academic degree training from an unaccredited institution in the amount of \$1,551.34. The Agency approved her funding in violation of AR 18-1 (CIA University - General), which is dated 21 April 2004 and was therefore in effect at the time the Agency reimbursed [redacted]. AR 18-1 requires that any academic training that is reimbursed by the Agency must meet certain criteria, including be accredited and provided by a nationally recognized accrediting body, as identified by the Department of Education. As such, [redacted] was improperly reimbursed for the costs of academic degree training that did not satisfy the necessary requirement under AR 18-1.

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13. (U//~~AIUO~~) OIG has prepared a separate memorandum recommending the Director for Support establish a debt for [redacted] in the amount of \$1,551.34. Because disciplinary action has already been taken by [redacted] component by removing her from a [redacted] position, this matter is being closed.

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**(U//~~AIUO~~) IV. REVIEW AND APPROVAL**

Case Investigator: [redacted] 2/28/13  
Sign and Date

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Approved by Supervisor: [redacted] 3/13/2003  
Sign and Date

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