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18 August 2011

DISPOSITION MEMORANDUM

SUBJECT: (U) Unaccredited Degree: Project Manager

CASE: 2011-10161-IG

ISSUES UNDER INVESTIGATION:

1. (U//~~FOUO~~) Based on a 2008 United States Secret Service investigation that identified an Agency contractor as possessing a degree from a known diploma mill, the Office of Inspector General (OIG) initiated a proactive investigation on 5 August 2008 into Agency staff claiming degrees from non-accredited institutions. (b)(3) CIAAct
(b)(6)
(b)(7)(c) OIG matched a list of unaccredited institutions against Agency BIO information to identify any individuals who had provided degree evidence to Human Resources.^{1,2} One of the individuals identified, claimed a degree from an unaccredited institution, on his Agency BIO. (b)(6)
(b)(7)(c)

(b)(6)
(b)(7)(c)

2. (U//~~FOUO~~) OIG reviewed the claims made by regarding his degree and the associated education to determine if there were false statements or improper use of an unaccredited degree, and if there was an improper reimbursement for the degree by the Agency. (b)(3) CIAAct
(b)(6)
(b)(7)(c)

¹ (U//~~FOUO~~) The term unaccredited refers to the recognition and acceptability of a degree for use in federal employment as recognized by the Office of Personnel Management. Unaccredited degrees cannot be used to meet the qualifications for federal positions that require a degree. The complete definitions of accreditation are included in the Appendix.

² (U//~~FOUO~~) The Agency biographical profile (Agency BIO) is the mechanism for tracking information on individuals who officially declare their education to the Agency by providing proof of attendance. The Agency BIO is made available to hiring managers and used directly in staffing decisions. Only staff employees and former employees were covered by this review because there is no central database on contractor educational records.

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(b)(3) CIAAct
(b)(6)
(b)(7)(c)

INVESTIGATIVE EFFORTS:

3. (U//~~FOUO~~) OIG reviewed [] security file for any degree claims.

4. (U//~~FOUO~~) OIG reviewed [] Official Personnel Folder (OPF) and online Agency BIO.

(b)(3) CIAAct
(b)(6)
(b)(7)(c)

5. (U//~~FOUO~~) OIG interviewed [] on 5 September 2008, regarding his unaccredited degree.

6. (U//~~FOUO~~) OIG obtained and reviewed [] internal job applications and resumes for positions that he held at the Agency as well as his Performance Appraisal Reports.

7. (U//~~FOUO~~) OIG reviewed Agency regulations and relevant laws related to the allegations.

RESULTS:

(b)(3) CIAAct
(b)(6) (b)(3) CIAAct
(b)(7)(c) (b)(6)
(b)(7)(c)

8. (U//~~FOUO~~) [] is a [] officer serving as a [] [] has been an Agency employee since [] and has prior experience as a contractor to the Agency. []

(b)(3) CIAAct
(b)(6)
(b)(7)(c)

9. (U//~~FOUO~~) [] holds an associate's degree [] and a bachelor's [] [] received his associate's degree in [] and his bachelor's degree in []

(b)(3) CIAAct
(b)(6)
(b)(7)(c)

(b)(3) CIAAct
(b)(6)
(b)(7)(c)

10. (U//~~FOUO~~) [] holds two additional "degrees" from [] master's and a doctorate [] SF-86 fails to include his master's "degree," but his personnel records cite that the master's "degree" was conferred in [] and the doctorate in [] [] In a 5 September 2008 interview with investigators, [] stated that he paid a lump sum for his bachelor's and master's "degrees," and estimated that they cost \$2,000 to \$3,000 each. [] stated that there were []

(b)(3) CIAAct
(b)(6)
(b)(7)(c)

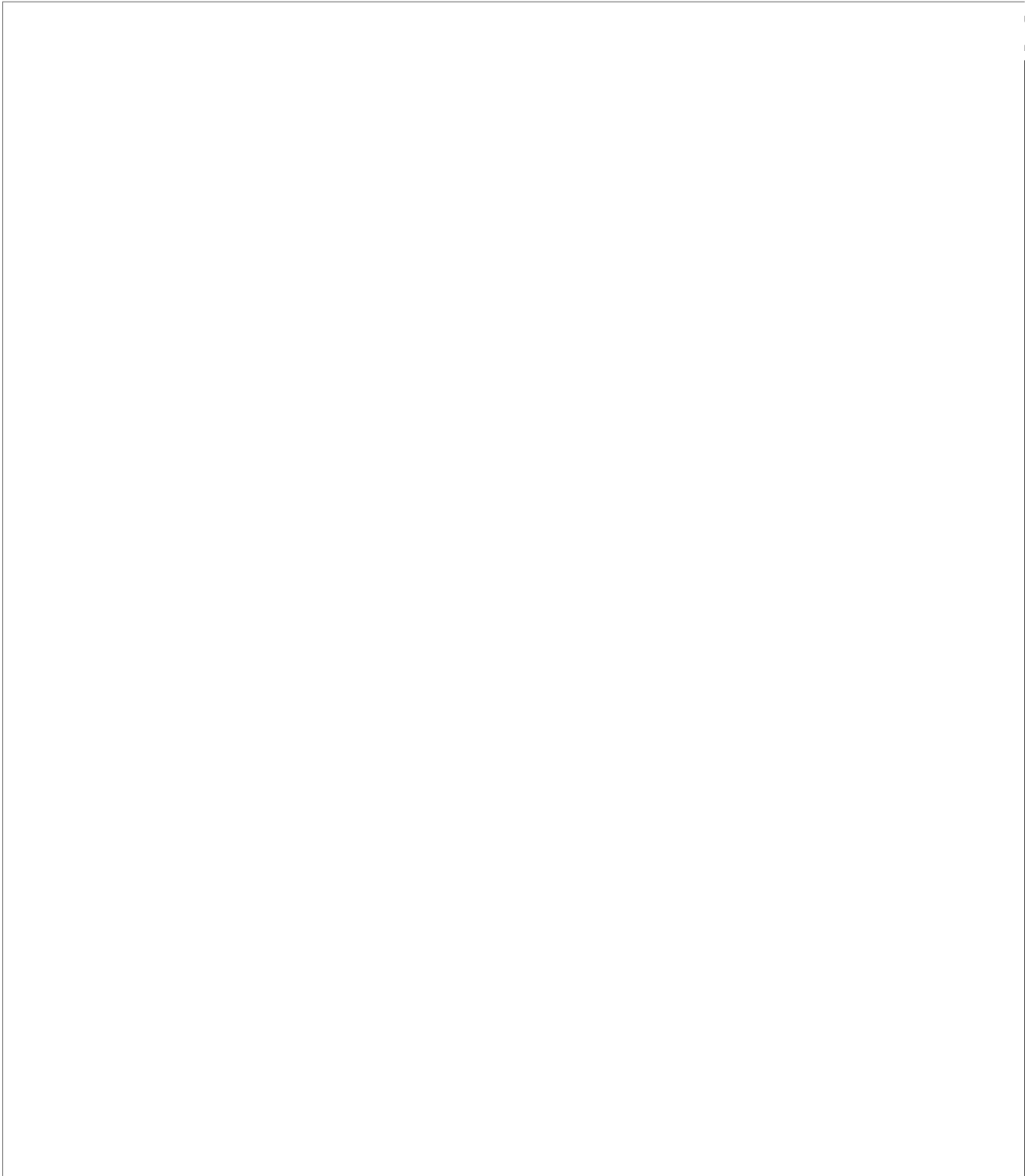
(b)(6)
(b)(7)(c)

(b)(6) (b)(3) CIAAct
(b)(7)(c) (b)(6)
2 (b)(7)(c)

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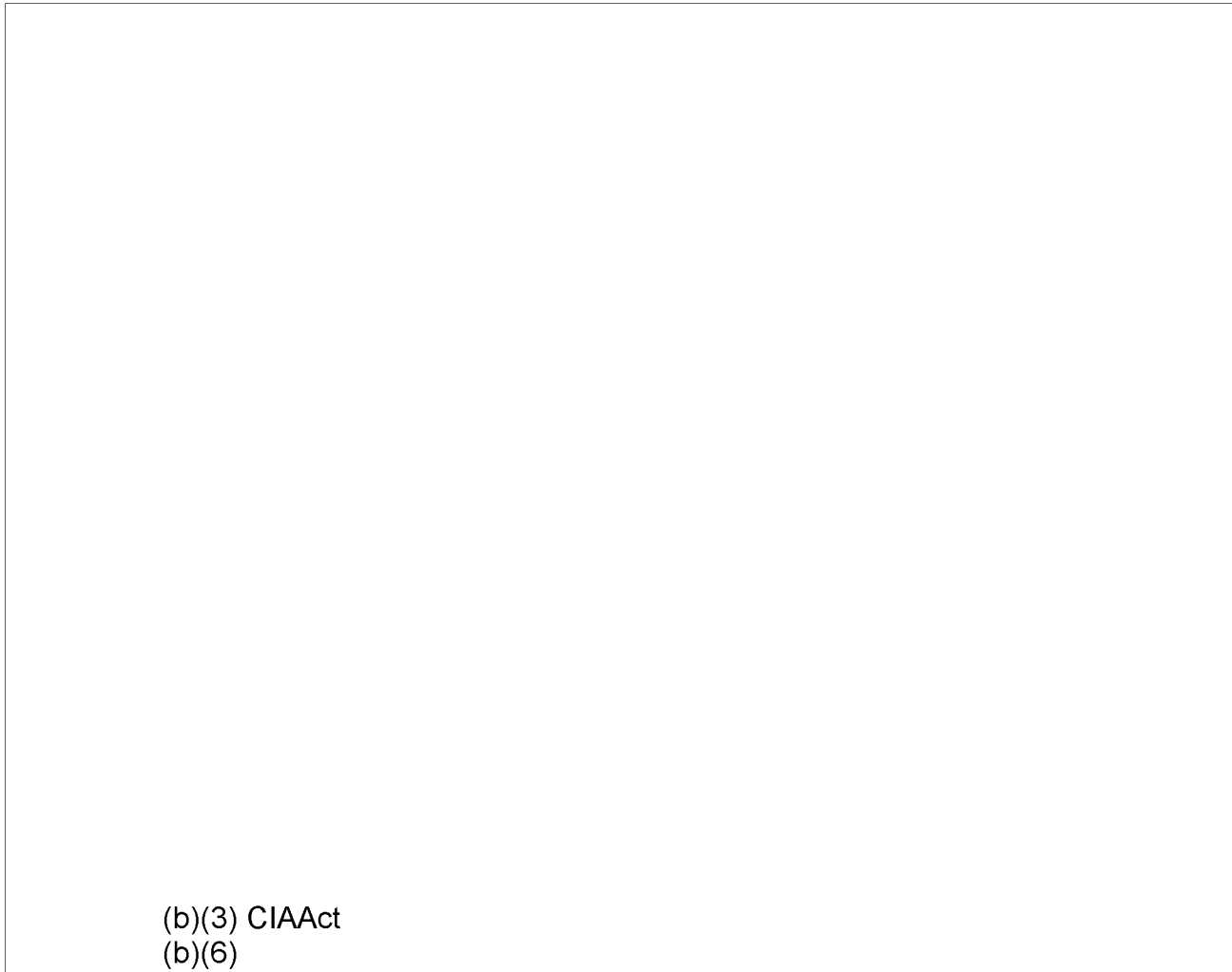
no grading fees, review fees, exam fees, or other associated costs to the best of his recollection.



(b)(6)
(b)(7)(c)

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(b)(6)
(b)(7)(c)

(b)(3) CIAAct
(b)(6)

(b)(7)(c)

18. (U) [redacted] presented his credentials to the Agency as part of his initial application on his SF-86 [redacted] [redacted] additionally provided transcripts from [redacted] for his master's and doctorate degrees to HR, which added the degrees to his Agency BIO. [redacted] Agency BIO indicates that he was selected for [redacted] positions within the Agency since adding his degree to his record.

(b)(6)
(b)(7)(c)

(b)(3) CIAAct
(b)(6)
(b)(7)(c)

(b)(6)
(b)(7)(c)

(b)(3) CIAAct
(b)(6)
(b)(7)(c)

19. (U//~~FOUO~~) In an interview with investigators on 5 September 2008, [redacted] stated that [redacted] was licensed to do business in [redacted] and

(b)(3) CIAAct
(b)(6)
(b)(7)(c)

(b)(6)
(b)(7)(c)

(b)(6)
(b)(7)(c)

³ (U//~~FOUO~~) According to Title 20 U.S.C. § 1099b (*Recognition of accrediting agency or association*), the Secretary of Education is responsible for recognizing accrediting bodies, which in turn recognize institutions.

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(b)(3) CIAAct (b)(6) (b)(7)(c) (b)(3) CIAAct (b)(6) (b)(7)(c)
 (b)(6) that it encountered problems [redacted] because it "became a diploma (b)(7)(c)
 (b)(7)(c) mill." [redacted] stated that he knew [redacted] was not accredited, and that there (b)(6)
 was no accreditation body at the time for that type of school.⁴ [redacted] stated (b)(7)(c)
 that he never visited [redacted] (b)(6) (b)(6) (b)(6)
 (b)(3) CIAAct (b)(7)(c) (b)(7)(c) (b)(7)(c)

(b)(6) 20. (U//~~FOUO~~) [redacted] contended that his degrees from [redacted] were (b)(6)
 (b)(7)(c) *bona fide*. [redacted] stated the institution was licensed in [redacted] and he (b)(7)(c)
 (b)(3) CIAAct believed that degrees offered before [redacted] were valid. [redacted] (b)(3) CIAAct
 (b)(6) stated that he would present them as valid if he sought to teach at a college (b)(6)
 (b)(7)(c) [redacted] asserted that he went through a rigorous process, and that [redacted] (b)(7)(c)
 (b)(6) must have changed in [redacted] [redacted] stated that [redacted] was a (b)(6)
 (b)(7)(c) non-traditional institution that catered to a need that was not filled (b)(7)(c)
 (b)(3) CIAAct elsewhere at the time, but is at the present. [redacted] recommended that the (b)(3) CIAAct
 (b)(6) Agency determine where [redacted] "fell out," but that he too [redacted] (b)(6)
 (b)(7)(c) licensing of the institution as validating his degree. (b)(6), (b)(6) (b)(7)(c)
 (b)(6) (b)(7)(c) (b)(3) CIAAct
 (b)(7)(c) (b)(6)

(b)(3) CIAAct 21. (U//~~FOUO~~) [redacted] explained that he did not take written exams (b)(3) CIAAct
 (b)(6) or write papers for his [redacted] courses and that all of the grades were (b)(7)(c)
 (b)(7)(c) exclusively based on his discussions of books he had read and questions he (b)(3) CIAAct
 answered verbally with his advisor. [redacted] later clarified that he (b)(6)
 considered the discussions to be equivalent to oral exams. (b)(3) CIAAct (b)(7)(c)
 [redacted] (b)(6)
 [redacted] (b)(7)(c)

(b)(3) CIAAct 22. (U//~~FOUO~~) [redacted] stated that he defended both his thesis and (b)(3) CIAAct
 (b)(6) dissertation. When asked further about this, [redacted] confirmed there was (b)(3) CIAAct
 (b)(7)(c) no committee to which he presented and defended either in person, but (b)(6)
 stated that he recalled submitting both to his advisor and answering a few (b)(7)(c)
 questions in writing and in a discussion with her.⁵

⁴ (U//~~FOUO~~) Despite [redacted] assertion, the Distance Education and Training Council has offered (b)(3) CIAAct
 Department of Education approved accreditation specifically for distance learning since 1955. (b)(6)

⁵ (U) An actual defense generally requires a dissertation committee be formed and a public notice posted (b)(7)(c)
 in advance of an oral presentation where questions from the committee (and public) are addressed.

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(b)(3) CIAAct
(b)(6)
(b)(7)(c)

23. (U//~~FOUO~~) [redacted] acknowledged his degree was not accredited, but did not acknowledge it was not a valid degree, despite being presented evidence to the contrary. [redacted] initially removed the degree from his Agency BIO after his interview with OIG. He subsequently reinstated it and stated his desire that a:

(b)(3) CIAAct
(b)(6)
(b)(7)(c)

... request be made in writing, on letterhead, include references, if not actual copies, of the Agency regulations and/or policies you believe my non-compliance would put me in conflict with, and whatever provisions have been made for appeal, if appropriate.

DISPOSITION:

(b)(6)
(b)(7)(c)

24. (U//~~FOUO~~) [redacted] was never an accredited institution and never claimed any accreditation, but it was "approved" by [redacted] to operate as a business. The academic rigor was not consistent with a typical Ph.D. program, as found by [redacted]. There was work required for a degree; however, the work was not consistent with typical Ph.D. programs (see Appendix B) and was never accepted as accredited by the US Department of Education as required for use in job placement or compensation within the US Government. [redacted] "degree" from [redacted] was present on his Agency BIO for his selection to [redacted] different positions within the CIA. [redacted] did not acknowledge his "degree" was not legitimate when confronted by OIG investigators, and he continues to present his "degree" on the Agency BIO system. OIG Deputy Counsel determined there was no criminal or regulatory violation on the part of [redacted]. Based on the currently available information, no disciplinary action or further investigation is recommended. OIG will notify HR and request [redacted] [redacted] degree information be removed from his Agency BIO.

(b)(6)
(b)(7)(c)

(b)(6)
(b)(7)(c)

(b)(3) CIAAct
(b)(6)
(b)(7)(c)

(b)(3) CIAAct
(b)(6)
(b)(7)(c)

(b)(6)
(b)(7)(c)
(b)(6)
(b)(7)(c)

(b)(6)
(b)(7)(c)

(b)(3) CIAAct
(b)(6)
(b)(7)(c)
(b)(3) CIAAct
(b)(6)
(b)(7)(c)

[redacted]

Special Agent

(b)(3) CIAAct
(b)(6)
(b)(7)(c)

[redacted]

Supervisory Special Agent

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