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3 May 2011

### DISPOSITION MEMORANDUM

**SUBJECT:** (U) Unaccredited Degree: Telecommunications Information Systems Officer

**CASE:** 2011-10157-IG

#### ISSUES UNDER INVESTIGATION:

1. (E) 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. OIG matched a list of known, unaccredited institutions against Agency BIO information to identify any individuals who had provided degree evidence to Human Resources (HR).<sup>1,2</sup> One of the individuals identified, [redacted] claimed a bachelors degree from [redacted] on his Agen (b)(1) BIO. [redacted], a known, unaccredited institution is not affiliated with the (b)(3) CIAAct accredited [redacted] (b)(3) NatSecAct

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

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

<sup>1</sup> (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.

<sup>2</sup> (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.

(b)(3) NatSecAct  
 [redacted]

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(b)(1)  
(b)(3) CIAAct  
(b)(3) NatSecAct  
(b)(6)  
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2. ~~(E)~~ OIG reviewed the claims made by [redacted] 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.

**INVESTIGATIVE EFFORTS:**

(b)(1) 3. ~~(E)~~ OIG reviewed [redacted] security file for any degree claims.

(b)(3) CIAAct

(b)(3) NatSecAct 4. ~~(E)~~ OIG reviewed [redacted] Official Personnel Folder (OPF) and  
(b)(6) online Agency BIO.  
(b)(7)(c)

5. ~~(E)~~ OIG interviewed [redacted] on 18 November 2008, regarding his unaccredited degree.

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(b)(7)(c) 6. ~~(E)~~ OIG reviewed Department of Justice (DOJ) records related to [redacted] for evidence of reimbursement to [redacted].

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

(b)(1)

(b)(3) CIAAct

(b)(3) NatSecAct

**RESULTS:**

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(b)(7)(c)

(b)(3) CIAAct

(b)(6)

(b)(7)(c)

(b)(1)

(b)(3) CIAAct

(b)(3) NatSecAct

8. ~~(E)~~ [redacted] is a [redacted]

According to the [redacted] (b)(6)

(b)(6)

(b)(7)(c)

Agency BIO system [redacted] holds a bachelors degree in [redacted] (b)(7)(c)

[redacted] from [redacted] additionally holds a bachelor of (b)(1)

science (BS) degree in [redacted] from [redacted] (b)(3) CIAAct

[redacted] an accredited institution, [redacted] (b)(6) (b)(3) NatSecAct

[redacted] (b)(7)(c) (b)(6)

[redacted] (b)(7)(c) (b)(6) (b)(7)(c)

[redacted] (b)(6) (b)(7)(c)

[redacted] (b)(6) (b)(7)(c)

[redacted] (b)(6) (b)(7)(c)

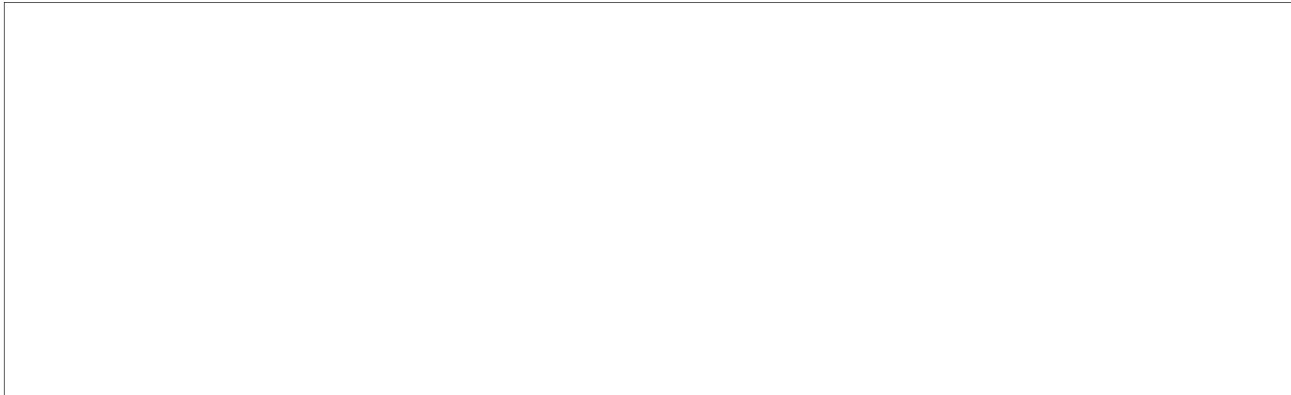
[redacted] (b)(6) (b)(7)(c)

[redacted] (b)(6) (b)(7)(c)

[redacted] (b)(6) (b)(7)(c)

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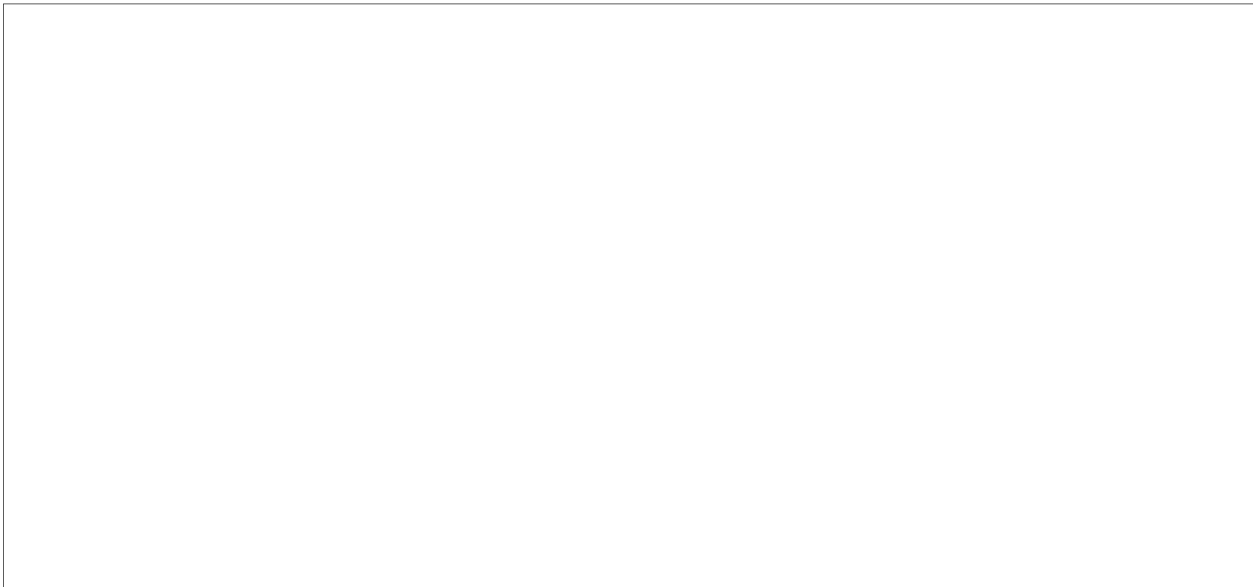
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(b)(6)  
(b)(7)(c)

11. (U) Former students identified by [redacted] were informed by DOJ that they had been defrauded and that their [redacted] degrees were not valid. The students were informed in a letter [redacted] that stated in part:

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



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

12. (U) [redacted] advertised its degrees in mainstream publications. Students would receive extensive credit for transferred courses as well as extensive "life experience" credit. Students would register for a small number of classes and were asked to purchase and read textbooks for the classes. Students would then submit a paper based on the class topic for grading. For classes taken at the university, students would pay an enrollment fee for each class, and then a separate grading fee for each paper submitted. Since there were no faculty behind the classes, student submissions varied greatly in quality. There was no valid check of the academic work performed.

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

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[Redacted]

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

(b)(1)  
(b)(3) CIAAct  
(b)(3) NatSecAct

14. (e) During an 18 November 2008 interview, [redacted] told O [redacted] that he forwarded his [redacted] completion information to his Agency training officer in 1997 [redacted] [redacted] degree is listed on his Agency BIO. [redacted] explained that he had listed his [redacted] degree on his past resumes. [redacted] also said that the completion of his [redacted] degree was likely cited in his Performance Appraisal Report (PAR).

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

(b)(1)  
(b)(3) CIAAct  
(b)(3) NatSecAct

15. (e) During an Office of Security interview on 28 November 2000 for an Agency re-investigation for continued employment, [redacted] advised the background investigator that he had received a BS degree in [redacted] [redacted]. He added that his coursework was completed off-site and that he graduated Magna Cum Laude. A copy of the degree in [redacted] OPF indicated he had graduated Magna Cum Laude as well.

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

(b)(1)  
(b)(3) CIAAct  
(b)(3) NatSecAct

16. (e) In a PAR covering the period [redacted] through [redacted] [redacted] rating official [redacted] noted that [redacted] earned his BS degree [redacted] during the prior year and should be "congratulated."

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

17. (e) On his most recent Supplemental Personal History Statement (SPHS)/Form 444, which covered the period from [redacted] [redacted] listed his attendance at [redacted] noting he took [redacted]

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

(b)(1)  
(b)(3) CIAAct  
(b)(3) NatSecAct

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

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

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(b)(1)  
(b)(3) CIAAct  
(b)(3) NatSecAct  
(b)(6)  
(b)(7)(c)

18. (C) On an SPHS covering five years beginning on [redacted]

[redacted] listed his BS degree [redacted] (b)(6)

[redacted] attended from [redacted] (b)(7)(c)

[redacted] degree received on [redacted]

19. (C) When interviewed by OIG, [redacted] stated that, sometime [redacted]

[redacted] he received a letter from [redacted] which reported that the University was (b)(6)  
having accreditation problems. He said he completed his degree after (b)(7)(c)

receiving the letter. [redacted] said he did not inform the Agency of the letter (b)(6)  
because he was not sure of the exact status of the accreditation. [redacted] (b)(7)(c)

commented that when an opportunity came about to earn a bachelor's (b)(3) CIAAct  
degree from the [redacted] (b)(6)

[redacted] he enrolled due to concerns arising over [redacted] (b)(6)  
accreditation issues. (b)(7)(c)

20. (C) [redacted] stated that the Agency provided tuition [redacted] (b)(6)  
reimbursement for his [redacted] degree. He said that he took approximately (b)(7)(c)

10 courses through [redacted] Based on (b)(6)  
the estimated per-course cost and the number of courses, [redacted] (b)(7)(c)

estimated reimbursement from the Agency was [redacted] The Agency did (b)(1)  
not retain the vouchers for the reimbursement. (b)(3) CIAAct (b)(3) NatSecAct

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

21. (C) [redacted] stated that he did not recall receiving money or (b)(3) CIAAct

seeing a refund check from DOJ [redacted] (b)(6)  
[redacted] (b)(7)(c)

22. (C) [redacted] stated that he was not sure about the status of [redacted] (b)(6)

accreditation, which is what caused him to seek a bachelor's degree from (b)(7)(c)  
an accredited university. He acknowledged that his [redacted] degree is (b)(6)

probably not worth anything now, although he claimed to have put in a (b)(7)(c)  
good deal of effort to complete the degree. He explained that he would  
pay back any refund received from DOJ, if he had been issued a check.  
However, he stated he did not recall ever cashing a check.

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**DISPOSITION:** (b)(6)  
(b)(7)(c)

23. (U) [redacted] was widely recognized as a fraudulent institution. Though it had "classes" and "coursework," the efforts of students were not evaluated by actual faculty. [redacted]

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

24. (C) Due to [redacted] did not receive reimbursement from DOJ nor the associated letter requiring he notify employer. Additionally, [redacted] was reimbursed for his education from [redacted] prior to the change in legislation (and Agency regulation) requiring reimbursement be only for accredited degrees. DOJ declined prosecution of [redacted] on 6 November 2008.

(b)(1)  
(b)(3) CIAAct  
(b)(3) NatSecAct  
(b)(6)  
(b)(7)(c)

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

25. (C) Upon finding out that his [redacted] degree was not legitimate, [redacted] earned a degree from the [redacted] prior to the OIG investigation. The inclusion of his degree completion in [redacted] PAR indicates that it was, at a minimum, a consideration in his rating decision. [redacted] accepted full responsibility for his actions and appears to have made reasonable attempts to correct his invalid degree by obtaining a legitimate degree subsequently.

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

26. (C) There is no evidence of 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] degree information be removed from his Agency BIO.

(b)(1)  
(b)(3) CIAAct  
(b)(3) NatSecAct  
(b)(6)  
(b)(7)(c)

(b)(1)  
(b)(3) CIAAct  
(b)(3) NatSecAct  
(b)(6)  
(b)(7)(c)

[redacted]

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

Special Agent

[redacted]

Supervisory Special Agent

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