

**KEEPING IT
HONEST**

Academic credential fraud is big business both colleges and universities, and even some govern



A

UNIVERSITY'S ACADEMIC GOOD NAME

is a priceless asset not easily acquired. But, as Reverend Michael J. Sheeran, president of Denver-based Jesuit institution Regis University discovered, in a world of ever-expanding possibilities for enrollment fraud, it is an asset that can be easily compromised.

From roughly 1999 through 2005, a seller of bogus degrees, or diploma mill, used a similar name, St. Regis University, that tarnished Regis University's reputation. At first, Sheeran says that he and others at the university largely treated St. Regis as a nuisance unworthy of serious attention.

Then things changed.

"Eventually, we found out that the impact was fairly significant," Sheeran says. "We'd get responses from potential students where the person would say, 'I've checked various programs online and the one you offer is the one I want. But I've decided not to apply to you because I don't want to spend the rest of my career explaining to every boss I have that I have a legitimate degree from you.' That was three years into the process of our trying to nail these people."

Unlike many other schools confronting such incidents, Sheeran took action and brought a lawsuit that led to a court order preventing the perpetrators from using the Regis name in their online presence. In addition, a variety of federal agencies, including federal prosecutors, succeeded in building a case against the perpetrators and securing convictions resulting in significant jail terms.

domestically and internationally, but evaluators, ments, are taking clear steps to stop it in its tracks.

B Y D A V I D T O B E N K I N

The St. Regis prosecution is an example of success in pursuing and rooting out enrollment fraud, a long-time Achilles heel in enrollment efforts, both international and domestic. Educators say that while many challenges remain, there are some positive developments in combating such fraud:

- More states in the United States, are passing statutes that will facilitate prosecution of fraudulent credential sellers and users.
- Federal legislation has been introduced that could facilitate a greater federal role in combating fraud.
- Many regions of the world with poor record keeping of enrollment documents have improved their efforts, resulting in databases that can be used by admissions officers to ensure the validity of submitted documents.
- The United Nations is creating an international database that will provide a common international higher education portal to help ease determination of valid educational programs.
- Some countries are increasing enforcement efforts.

One is Australia. On July 12, 2010, the Australian Department of Immigration and Citizenship (DIAC) reported the first criminal conviction in Australia arising from an investigation into a large-scale fraud allegedly involving a college and large numbers of students using false qualifications to obtain permanent residence.

Shao Wen Yin, a former student at the now-defunct Sydney International College of Business (SICB), was found guilty on two counts of supplying false documents for two educational qualifications, including one in hospitality (commercial cookery), from the college with intent to fraudulently obtain an Australian permanent resident visa. He was sentenced to 200 hours of community service. Four additional arrest warrants related to the fraud also have been issued.

“This conviction sends a clear warning that the department will pursue the prosecution of people at all levels of organized scams, whether they operate educational institutions, people who provide migration advice without being registered, or people gaining advantage from these practices,” a DIAC spokesman said in a statement.

There are several primary types of international enrollment fraud. First is doctoring or fabrication of documents from legitimate institutions. Another is of the diploma mill variety, passing off diplomas or transcripts purchased from bogus institutions. A close cousin is representing as educationally significant summer or semester programs that are little more than vacations.

“That is encouraging,” says George Brown, group academic director for Sydney-based Australian private college owner Think: Education Group and author of a doctoral dissertation on the topic of credential fraud. “Government and educators must go out there and say we won’t tolerate this.”

The Nature of the Problem

There are several primary types of international enrollment fraud. First is doctoring or fabrication of documents from legitimate institutions. Another is of the diploma mill variety, passing off diplomas or transcripts purchased from bogus institutions. A close cousin is representing as educationally significant summer or semester programs that are little more than vacations.

“Fraud comes in various forms, such as commission or omission,” says Robert Watkins, an assistant director of the Graduate and International Admissions Center at the University of Texas at Austin who has been scrutinizing admissions materials for fraud for the past 33 years. “We see it in different ways. Someone leaves off college experience from their postsecondary record. You aren’t supposed to self-select what you report. That can happen from those who consciously try to omit records or also by those not trying to commit fraud. When you look at actual fraudulent documents, that’s an area that’s more worrisome.”

At the other end of matters are sophisticated operations like St. Regis that involve diploma mills, forgers who create phony documents for a multiplicity of students, and, sometimes, government officials themselves.

“The biggest thing that comes to mind in enrollment fraud that we have dealt with is a ring in Nigeria—this was a nationwide thing,” says Ted R. McKown II, associate director of the Office of International Affairs at Kent State University in Kent, Ohio. “We were seeing weird things where individuals were applying, would submit application fees with credit cards, and the credit card would have a British or German name but the application name was clearly Nigerian. We would process it. Then the credit card would bounce on it and university would get charged for it. We quickly shut that down. For a while, we



HIGH-TECH FRAUD SOLUTIONS

wouldn't process Nigerian applications coming in. What we assumed was happening was someone in Nigeria was serving as a recruitment agent for the students. They were saying, 'give me the application and \$60 and I'll process your application using my credit card.' They'd send it to us and the guy was using a stolen credit card. We'd reply to student and they'd say 'this guy processed my application for me.'"

Even worse is any admissions officer's true nightmare: the inside job. "If people in the university itself are selling the official transcript paper and you have an inside job, then you are out of luck," says Mariam Assefa, executive director and chief executive officer of New York, NY-based World Education Services, a credential evaluation service. "Every so often there is a declaration by an institution that someone has been found to be doing that stuff. That person is sitting there until caught and you have no idea."

One recent example is a Philippines nursing college, says Josef Silny, founder and president of Josef Silny and Associates, a Miami, Florida-based credential evaluation service. "In October 2009, upon receiving an application from an applicant in Los Angeles who said she was studying in the Philippines, Audra Flanders, one of my foreign credential evaluators, asked how a person living in Los Angeles could be studying in the Philippines in a letter to the institution." Audra received confirmation from the university but had a gut feeling that it was not right. She contacted the commissioner of education in the Philippines and said she suspected that something was amiss. As it turns out there was fraud. The registrar who had left the nursing college, took official transcript stationery. He was marketing the ability to get an official transcript on the official paper. He also had an accomplice, still at the university, who responded to any questions about the transcripts. Audra contacted the president of the college and couldn't get a response. Only when she went to the education commissioner was action taken. Before that, her contacts went on for four to six months." Silny says that as far as he knows, no legal action was taken against the former registrar.

The United States as a Nexus of Fraudulent Activity

Significantly, the United States, which to date has lacked strong federal laws to combat the problem, has emerged as a delivery mechanism for global fraud, with by all accounts the most diploma mills located, or professing to be located, within its borders. Some states in particular, notably Hawaii and California, appear to be the largest fraud havens because they either lack regulatory regimes to prevent fraud or are not sufficiently aggressive in enforcing the laws and regulations that they have, says Alan Contreras, administrator of the Oregon Office of Degree Authorization, perhaps the most robust state antifraud agency in the United States.

Some registrars are working toward high-tech solutions to establish the authenticity of electronic documents.

Stanford University Registrar Thomas Black in his current position and previously as registrar of the University of Chicago has aggressively pursued self-authenticating transcripts that incorporate PDF digital signature technology. With digitally signed records, the authentication with the document remains within that document, wherever the document is. Processing the document requires only Internet access and Adobe Acrobat Reader.

The process is already well-established at the University of Chicago, with digital transcripts accounting for 25 percent of transcripts, or more than 10,000 transcripts, processed by the university annually, when he left for Stanford University in 2007, Black says.

Some schools and educational services are offering additional related services, such as expedited delivery. "Now [National] Student Clearinghouse is entering this business and they think they can reduce the costs to a dollar a transcript," Black says.

Black says Stanford will soon offer a new service:

"I'm working with a company, CollegeNET, on a fee-for-service program that would involve people posting transcripts while they apply in a way that ensures authenticity. When they submit their application, if a school has digitally signed up, we would have them post it right in. We are developing an admissions application with them. That will come next year."

Some countries are moving toward continuous verification and archiving of student records from primary through tertiary education, such as the Netherlands.

In the Netherlands, Dienst Uitvoering Onderwijs (DUO), the executive agency of the Netherlands ministry of Education, Culture and Science, has archived students' data from primary education through tertiary education and has data on file for most students in the Dutch educational system, says Herman de Leeuw, an adviser on authenticity issues and falsifications for the Agency for International Educational Credential Recognition and Legalization, which is part of DUO. These archives have been digital since the late 1990s, with some exceptions, such as private schools, which do not have to provide their students' data to DUO, he says.

De Leeuw says that by 2012, DUO will provide a "DiplomaRegister" that can be consulted by students using their Digital ID (a national ID system). Students will be able to check their data in the DiplomaRegister and also can have the DiplomaRegister forward that student's data to third parties, such as higher education institutions and employers.

Another tool, DiplomaBank, is a DUO database that verifies foreign original credentials against reference records of high-quality scanned images of foreign diplomas, with shots of typical characteristics plus technical descriptions of the document.

—DT

In a globalized education market, that becomes a problem for foreign institutions.

“In Sweden, we have seen roughly 195 cases of degrees from problematic universities from 1999 to the present and more than half of the cases we have seen are diploma mills from U.S. institutions or that claim to be from a U.S. university,” says Erik Johansson, a credential evaluator of foreign credentials for the Swedish labor market and an adviser on credentialing to the Swedish higher education community. “The message I would give is that we would welcome some U.S. federal interest in these matters. This does concern the U.S. as well.”

In perhaps its most serious form, fraud is used to gain admittance to professions such as nursing and medicine or to provide bogus degrees apparently from legitimate professional instruction programs.

The prevalence of fraud remains unclear. Few statistics are kept, including by national associations, and many numbers floated tend to be guesstimates.

In June 2009, for example, a Dearborn, Michigan, resident, Nazeer Hamadneh, was sentenced to two years in U.S. federal prison for submitting phony college transcripts to universities in order to get bogus transfer credits for students to gain admission to graduate and medical school programs in the Caribbean and Belize, and for helping foreign students obtain U.S. student visas based on false documents.

“Fraud undermines the credibility of legitimate institutions,” says Judith Eaton, president of the Washington, D.C.-based Council for Higher Education Accreditation. “The worst thing is when they offer fraudulent degrees in the helping professions [such as medicine]. They are getting hired because they claim to have skills that they don’t have and the public is endangered. Also, international students are being used. They are spending perfectly good money for degrees that turn out to be fraudulent. It undermines the legitimate educational establishment, endangers the public, and harms students trying to get an education.”

Few Reliable Statistics

The prevalence of fraud remains unclear. Few statistics are kept, including by national associations, and many numbers floated tend to be guesstimates. In part, that reflects the fact that designating conduct as fraud involves an often subjective determination of intent to deceive. Most institutions take action before making that determination by simply barring admission to students with questionable documents. Rarely is legal action taken.

“We don’t know how many altered documents are presented to colleges and universities,” says Dale Gough, director

of international education services at the Washington, D.C.-based American Association of Collegiate Registrars and Admissions Officers (AACRAO). “We hear estimates of five to 10 percent but no one does verifications. Therefore, when we talk about how many international students present fraudulent credentials, I don’t know if it is any greater than in the past or if there are more international fraudulent credentials than domestic ones.”

George Gollin, a University of Illinois physics professor who has investigated diploma mill frauds such as that of St. Regis, says that based on his research, he estimates that 200,000 academic degrees are sold by illegal degree providers in the United States each year. Contreras says that there was an initial increase in the amount of illegal credential activity in the 1990s and in the subsequent past decade as online education and Internet-based enrollment became more prevalent, but it is not clear now whether that trend is continuing.

“The main patterns I tend to see are geographic,” says Contreras. “There are certain regions of the world that tend to be havens for bad actors. In Africa, most of the problems are in Western and Central Africa. There are more problems in Pakistan than any other country in that region. Also in the United Arab Emirates. There are also more problems in the Caribbean than anywhere else in that hemisphere. In the United States, there are more cases in California and Hawaii.”

The growth of online and branch campuses contribute to the problem, says Contreras: “Branch campuses of universities 3,000 miles away are generally less well managed than home institutions. Most of the problems that I see happen are with overseas campuses of U.S. providers, not with people inside the United States.” Contreras says a problem in such circumstances is that foreign governments generally ignore credentialing requirements for such foreign operations.

While diplomas and transcripts are primary targets for perpetrators of fraud, another area of fraud is falsified financial documents, most often bank statements.

Stung by such frauds in financial documentation, some schools are increasing tuition deposits to several thousand dollars, while others are increasing application fees to a few hundred dollars to filter out students who are not likely to qualify for a student visa, says Cheryl Darrup-Boychuck, chief international education officer for USJournal.com, LLC, which assists colleges, universities, and language programs to generate inquiries and promotional materials for foreign students to attend U.S. institutions. Most of the world’s top host countries require that prospective international students prove they have sufficient funds to cover tuition and living expenses so they do not become a burden to domestic resources. Darrup-Boychuck notes, for example, that Australia in January 2010 increased its minimum level for evidence of funds from 12,000 Australian dollars to 18,000 Australian dollars.

Solutions in Sight

Divergent approaches taken by similar governmental institutions within North America, within different U.S. states, and within Scandinavia provide apt examples of how attention to combating fraud can make all the difference in fighting international enrollment fraud.

Lack of a central authority can provide a ripe opportunity for forum shopping by fraud perpetrators. The United States bears the dubious honor of being the diploma mill fraud capital of the world. In part, this is because it is a federal system where states have primary jurisdiction over education. Like water seeking its lowest level, fraud flows to the states with weakest regulatory structures or enforcement efforts.

Observers say that Oregon is the high-water mark for state enforcement efforts. Under Oregon law, falsifying educational documents in the state is a criminal violation and a form of civil fraud and Contreras has a mandate to enforce those laws. That differs from many other states that have state fraud code provisions under which diploma mills and the like theoretically could be charged, but that lack key definitions that would greatly ease enforcement efforts.

Lack of a central authority can provide a ripe opportunity for forum shopping by fraud perpetrators. The United States bears the dubious honor of being the diploma mill fraud capital of the world.

Enforcement is also more aggressive in Oregon than in most states, Contreras says. “In any of those other states, if a degree is false, they are enforced occasionally,” Contreras says. “In Oregon, we send cease and desist letters giving them 30 days to agree to never again use this degree in the state again. They almost always agree. In my office, I get a dozen serious cases a year that get a serious cease and desist letter. In the St. Regis case, we had 24 Oregon residents who bought St. Regis degrees. We sent cease and desist letters to all of them.”

Some states are improving their efforts to fight fraud, Contreras says. “When I took this job 11 years ago, there were only two states where there were laws on the books making it illegal to use unaccredited credentials and now there are 12 states,” he says. “It’s a big difference when big states like Illinois, Texas, Missouri, and, as of last year, Virginia, say it’s illegal to use these bogus credentials, which was not true six years ago. I think the state efforts underway to deal with the use of fake degrees are improving.”

The challenges at the federal level remain greater. The U.S. Department of Education and the Federal Trade Commission, the federal agencies most proximate to educational fraud issues, have not been major factors in combating fraud in recent years.

The Department of Education has no regulatory authority over schools that do not participate in its programs, according to

a spokesperson, though it does educate the public about different schools, ways to know if they are legitimate, and attributes to check like default rates, accreditation, and job placement rates. The DOE also maintains a Web site that lists accredited institutions so students and parents can check the list (available at www.ope.ed.gov/accreditation) as one way to make sure the schools they are considering are valid institutions.

In June 2010 the Department of Education proposed new rules that would require institutions receiving federal money to develop and follow procedures to determine the validity of students’ high school diplomas if there is reason to believe that a diploma is not valid or was not obtained from an entity that provides secondary school education.

The Federal Trade Commission smashed diploma mills in the 1950s and 1960s, but has become less active in recent years, in part because its leadership has questioned whether the companies involved are committing actual fraud, as many students know the degrees they are purchasing are bogus. In addition, as with many states, no law at the federal level clearly defines key terms necessary to determine that diploma mill fraud has been committed and thereby facilitates enforcement.

That could change. In January 2010 legislators in the U.S. House of Representatives, including Timothy Bishop (D-N.Y.), Michael Castle (R-Del.), and Betty McCollum (D-Minn.), introduced a bipartisan bill, HR 4535, that includes a definition of an accreditation mill and directions to the FTC to address the problem.

As of October, the bill had been referred to a House committee but had not seen further action, says Kate Dickens, communications director for Castle. Eaton says that the Council for Higher Education Accreditation (CHEA) distributed a draft of the bill to state regulators encouraging them to use similar language in state laws.

In addition, in October 2010 Castle sent a letter to the House Education and Labor Committee Chairman, George Miller (D-Calif.) and the Education and Labor Committee Ranking Member, John Kline (R-Minn.), requesting a House Education and Labor Committee hearing to explore claims that a number of postsecondary institutions are recruiting homeless and other unqualified students to attend their schools to gain access to financial aid and grant money.

A Study in Contrasts

While the description above may suggest that the U.S. federal government may render it particularly susceptible to fraud, others would point to the United States’ neighbor to the north for the counterargument that states in a federation can effectively fight fraud.

Canadian provinces and territories have incorporated within their postsecondary education laws measures that allow for rapid and effective enforcement against diploma mills, says Yves Beaudin, national coordinator at the Canadian Information Centre

for International Credentials (CICIC) at the Council of Ministers of Education, Canada (CMEC), a corporation of the ministers of education of the 10 Canadian provinces and three territories.

“We have a good system where legislation in each province protects the words ‘university,’ ‘bachelor’s,’ ‘master’s’ and ‘PhD’ degrees,” Beaudin says. “As soon as an institution uses such terms inappropriately, the province closes it down. We have very few diploma mills operating within Canada, compared to other countries, especially the United States.”

A similar story of contrasts has played out in Scandinavia, says Swedish credential evaluator Johansson.

Johansson notes that Sweden and Norway are Scandinavian neighbors with many cultural, social, and economic commonalities. There is, however, a significant legislative difference that he says results in divergent records in preventing fraud. In Norway, there are strong laws that prohibit the use of terms like ‘university’ and ‘college’ by any but institutions authorized by the ministry of education. That has kept fraudulent operators away. In contrast, in Sweden, the government has yet to pass any such laws. Recently, Sweden suffered from the presence of two diploma mills operating out of its territory for the first time, he notes.

Some institutions are turning to higher technology computer-based techniques to combat fraud by ensuring the integrity of documents submitted to institutions.

Efforts to Combat the Problem

In the United States, in addition to state and federal legislative efforts described above, a number of efforts to combat diploma mill fraud are underway. Many are centered around the creation of “positive” databases of reputable institutions to trust or blacklists of problematic ones to scrutinize more carefully or avoid altogether.

In addition to the positive list of institutions maintained by the Department of Education described above, CHEA maintains a positive list of reputable accrediting bodies in the United States. The CHEA Database of Institutions and Programs Accredited by Recognized U.S. Accrediting Organizations (available at www.chea.org/search/default.asp) contains contact information for more than 7,600 accredited degree-granting and nondegree-granting institutions and more than 18,700 programs accredited by U.S. accrediting organizations that have been recognized either by CHEA or the Department of Education, or both.

UNESCO is developing a Web site with collections of information that countries provide about their higher education capacity and a positive list of legitimate institutions. This UNESCO Portal on Higher Education Institutions allows schools, students, and others to know if they are dealing with legitimate entities.

Contreras notes that his Oregon regulatory office maintains a list of unaccredited degree suppliers that may be problematic.¹

Efforts to improve enrollment document verification are improving in a number of locations, including in critical countries such as China and India, where a large proportion of students bound for institutions in developed countries originate from, says Contreras. China has already instituted a national registry that is praised by various university administrators as greatly increasing the reliability of educational records and the ease of obtaining them.

India, which has a decentralized, federal system of government similar to the United States, is also taking steps to develop a national registry. In May 2010, the federal Ministry of Human Resource Development appointed a task force to establish a national online database of academic qualifications that would allow eased verification of students in graduate, postgraduate, and professional programs. This task force drafted legislation to create a National Academic Depository to facilitate the digitization of academic records to fight fraud, which was included in a bill that was introduced in the winter 2010 session (spanning from November–December 2010) of Indian Parliament.

While determining the authenticity of credentials in less-developed regions can be problematic, some registrars note that just because an institution is located in a developing country does not mean that it or its national government is incapable or unwilling to fight fraud. Even relatively less-developed educational systems can come up with effective antifraud systems, says Aimee Thostenson, assistant director of international admissions at St. Catherine University in St. Paul, Minnesota.

A good example, Thostenson says, is the Nigerian and Ghanaian West African Examination Council (WAEC) scratch card systems. Under those online systems, students and institutions can purchase a scratch card. With the scratch card, they can go on the respective WAEC Web site, enter the student information, the scratch card number and PIN, and find out their exam results.

“By comparing the exam results on file with what is in the online WAEC system, you can see if the information matches. We have caught several fraudulent documents that way,” says Thostenson. “Maybe they thought we wouldn’t check. The only drawback is that it only goes back to 1990, and there aren’t similar programs elsewhere. The system was created because West African educators had problems with fraud. So they took an active step to counteract it.”


Some institutions are turning to higher technology computer-based techniques to combat fraud by ensuring the integrity of documents submitted to institutions.

Stanford University Registrar Thomas Black, in his current position and previously as registrar at the University of Chicago, has aggressively pursued self-authenticating transcripts that incorporate PDF digital signature technology. “What’s different with digitally signed records is that the authentication

stays with the document wherever you are,” Black says. “This is the same technology as runs e-commerce, with the little padlock on the bottom of the browser. What that means for me, as registrar, is that there is no one that touches that record. And all you need to process it is Adobe reader and access to the Internet.” [See sidebar “High-Tech Fraud Solutions.”]

Others say that sophisticated technology can also help to combat financial documentation fraud.

“Fraud in financial documentation is an issue that needs to be addressed on a worldwide basis,” Darrup-Boychuck says. “The process right now involves admissions counselors and host government officials ‘eyeballing’ the students’ or sponsors’ bank statements on paper; if they look good, they accept them. We need to establish global standards, where perhaps the prospective student [and/or] sponsor authorize the designated financial institution of the host government [and/or] campus to access their bank account balances in a limited and secure way. That would significantly improve the efficiency and integrity of the current process—especially in developing countries, where qualified students are eager to prove their financial capacity.”



NAFSA E-Pub *Evaluating Foreign Educational Credentials: An Introductory Guide* is available online at www.nafsa.org/foreigncredentials.

The Challenges for Universities

Higher education institutions are in a quandary over how much to do to fight fraud and are pulled by opposing forces, including balancing the need for speed in processing applications with the time and financial costs for rigorous evaluations of applications, says AACRAO’s Gough.

Asked of the organization’s efforts to fight enrollment fraud, he notes: “We have to rely on member institutions and that is the weak link there. Most institutions accept transcripts if they think it comes from issuing institutions. Very few institutions verify that the documents they receive are authentic. Many will accept transcripts if they come in a sealed envelope and not necessarily through the mail. That in and of itself leads to vulnerability to phony transcripts.”

Beyond the daunting logistical challenges of fighting fraud is the question of willpower, Gough says, noting that many institutions struggle with concerns that overaggressiveness in scrutinizing applications will frighten away an increasingly vital international component of student applicants.

Some educators indeed contend that fears regarding fraudulent activity are overstated and can lead to negative consequences for applicants and institutions. Some Irish educators fear a tight student visa policy by the Irish government based upon concerns of visa fraud has contributed

to a dramatic decline in foreign student enrollment at Irish institutions of higher education.

“I’ve heard it said by senior people in the [Irish] Department of Justice that they would consider the student visa route as easy access for illegal economic migrants—but there is actually no evidence to show that at all,” says Nicola Carroll, who heads the International Office at the National College of Ireland based in Dublin. “There are a few bad cases highlighted in the media that represent a small percentage of international applicants.”

Crime and Punishment

Hampered by legal concerns, administrative resource limitations, and fears of bad publicity, many universities decline to pursue legal action against even egregious fraudsters. At many universities, enforcement efforts are also hampered because the institutions delegate action against students suspected of fraud to honor code organizations that are often student-run and that tend toward leniency.

While fraudulent applications caught before enrollment are often simply ejected from the system, what to do when such fraud is discovered after matriculation presents a more difficult problem.

“The toughest category is those you admit and who enroll and then you find out later committed fraud,” Watkins says. “Then we [at the University of Texas at Austin] work with the dean of students, who is an enforcement officer with a legal degree.”

Watkins says that in one case six years ago, the university had an administrative hearing for 7 of a group of 11 Pakistani students alleged to have participated in enrollment fraud:

“The individual in the dean’s office reviewed the case and determined that there was evidence indicating fraud. He contacted one student who accused another student. The student who doctored the documents confessed and was expelled from campus. Those that used the documents [the expelled student had] created professed ignorance as to what he was doing. To settle that, we had a hearing where the school’s law faculty served as administrative judge, the dean of students served as the prosecutor, and I served as expert witness. The individual being examined at hearing could bring family or legal counsel but couldn’t speak at the hearing.”

“All the students were found guilty with exception of one. The punishment varied. They first received no credits for the academic work that had been fraudulent and many of the students received enforced withdrawal for set periods of semesters.” **IE**

DAVID TOBENKIN is a freelance writer in Bethesda, Maryland. His last article for *IE* was “Feeding Mouths and Minds” about the international education community’s efforts to fight world hunger in the March/April 2010 issue.

ENDNOTE

¹ This list is available online at www.osac.state.or.us/oda/unaccredited.aspx.