INTRODUCTION

The phenomenon of bogus providers in higher education is nothing new, as the authors of this timely study demonstrate in their section on the historical overview of diploma mills and boaus accrediting bodies. But the problem actually goes far beyond the 19th century. In the appendices to volume II of Rashdall's masterful work The Universities of Europe in the Middle Ages (Powicke and Emden, Oxford, rev. ed. 1936), there are listed some 23 establishments which various contemporary and later authorities claimed to be universities, but for which no adequate evidence existed.¹ Indeed, Pope Alexander IV issued a Bull against the chanter of the Cathedral of Reims in 1258 for falsely claiming exemption from residential requirements for attending the non-existent studium generale in that city when he was actually living in another country and claiming benefices there: The dean of the Reims cathedral chapter was forbidden to allow him to enjoy this subterfuge. And in another cited case, the Bishop of Albi excommunicated the entire town because of their false claim to have established a university - a decision which was reversed on appeal to the ecclesiastical court of the Archbishop of Bourges,² Thus already by the end of the 13th Century we have evidence that false claims of university privileges were extant, and also that the competent authorities were no more consistent in their approaches to the problem in that time than are their modern counterparts.

Given the sorry history of bogus providers and dubious (at best) claims on their behalf, the efforts of the late Twentieth and the Twenty-First Centuries need now to accomplish what has not succeeded for over 800 years - a concerted effort to combat fraudulent academic providers and their supporters, including the so-called quality assurance agencies that supposedly give them legitimacy.

It is a pleasure to be invited by my colleagues at CIMEA to write the introduction to this important volume, which as previously been published in Italian but is now available in an English version. The importance of this publication lies in its success, in less than 100 pages, in providing both an overview of the issue and practical ways to identify bogus providers and accrediting agencies. Many monographs and websites have provided practical information, but few if any have communicated to lay readers the reasons why these entities are threats, much less provided the fruits of research on them. The authors go further, by not only providing links and references to additional sources of information, but by selecting 50 important examples and providing well-researched and thoughtful snapshots of each case. Even a casual reader can discover from reading these snapshots how diploma mills

¹ Hastings Rashdall, Vol. II, Appendix II; Alleged Universities at Lyons, Reims, Alais, Parma, etc., pp. 325-341.

² Rashdall, ibid., pp. 332 and 335.

6 INTRODUCTION

and accreditation mills mimic the mission of legitimate entities, going just far enough to deceive with their borrowed names and fake web-based information while remaining outside the reach of prosecutors and aggrieved victims in all but a few instances

The authors have drawn upon cases and evidence from around the world, and their careful presentation clearly shows that the phenomenon is not confined to any country or education system. Indeed, the evidence presented here shows that diploma and accreditation mills lie and deceive about their locations and ownership as much as they do about everything else. And if they are kicked out of one jurisdiction, or required to stop using one website or name or degree programme, they simply chose another. Diploma and accreditation mills are in some cases not only multinational corporations. but also "multi-campus systems". Legal efforts to combat this scourge are often handicapped by the very factors that are the strengths of democratic societies: respect for privacy, limitations on free speech and activity; restrictions on how the state may interfere with private citizens' affairs; the tradition of the judiciary staying away from academic matters; and strong evidentiary requirements before a case can be made against a person or organization. In many situations, fraud has been hard to prove in a legal proceeding, and bogus entities have often become the price paid for allowing freedom, much as hate speech and intolerance have often been the price that societies pay for laws promoting free expression. As the authors point out, the situation is slowly changing, and both individual countries and international organizations are beginning to coordinate their efforts and adopt stronger measures. But the process will take time, and must ensure that legitimate providers and quality assurance agencies can be successfully distinguished from bogus operations.

The European Network of Information Centres (ENIC Network), of which I am privileged to be the president in 2009-2011, has been concerned with bogus operations since its inception in the late 1980s. Following the ratification of the Lisbon Recognition Convention (LRC) in 1997, the ENICs (joined now by the National Academic Recognition Information Centre Network (NARIC Network) related to the European Union and European Economic Area) have developed and approved several subsidiary texts to the LRC that address the problems of diploma mills and accreditation mills, either specifically or in connection with other issues such as transnational education. These documents are publicly available on the ENIC-NARIC website at http://www.enic-naric.net/. The 56 Member States of the Networks are united in their strenuous opposition to diploma mills and accreditation mills. At the same time, we are all equally concerned to get good information into public hands so that no one need be victimized by these entities. The European Union, the Council of Europe, and UNESCO are equally concerned about this issue.

For all these reasons, I and my colleagues in the ENIC and NARIC Networks, and the Secretariats of the sponsoring organizations, applaud the translation of this useful monograph into a language that will enable it to reach a global audience. Our Italian colleagues are to be congratulated for their good work. This writer would only hope that more translations might be made available in future, and that students, faculty, educational advisors, school personnel, government officials, political leaders and employers - as well as the general public - will give its contents the attention it deserves.

Dr. E. Stephen Hunt USNEI President, ENIC Network, 2009-2011

THE PHENOMENON AND EVOLUTION OF DIPLOMA MILLS

1.1 INTRODUCTION

The internationalisation of Higher Education, increased cooperation amongst universities, the growth of international mobility of students, researchers and teachers and the increasing alignment of national Higher Education systems at a European level have all contributed to the development of policies which are focused on the implementation of high quality organisational processes in European higher education systems, as well as to increase the level of implementation of a learning outcomes approach to higher education.

Achieving high quality education and research capabilities in higher education implies putting in place considerable quality assurance and quality improvement activities, both internally within universities and at an external level. In addition, accreditation procedures have to be implemented, both at programme and institution level, which allow the programmes and institutions to be measured against defined and accepted standards and indicators.

At international level, two main legislative principles need to be considered:

a. The concept of Higher Education as a common good brings into existence a context in which State universities operate side-by-side with private institutions, which are officially recognised in the country of reference. This is a common model of higher education provision in continental European countries. The quality of the education provided is guaranteed to citizens via the quality assurance procedures in place at accredited institutions and by the legal value of the qualifications awarded in the national Higher Education system in question.

b. Higher Education systems which are focused on the independence of the academic community and where the outcomes of Higher Education are conceived as the free expression of the civil society. The countries which conform to this model - for instance, the USA and Anglo-Saxon countries - are generally not strongly regulated by national legislative frameworks. In such systems, national programme outlines do not exist nor are is there a State examination system to verify the knowledge and skills of prospective professionals. In such systems, the quality of institutions and academic qualifications is managed by different forms of accreditation within the country.

Both of the systems highlighted above present potential 'grey areas' that can be exploited by institutions that claim to be higher education institutions but which in practice evade all methods of control, including accreditation and quality assurance procedures. Often, such institutions are auto-referential institutions, which exploit the great freedom that modern countries grant to science, research and education. Such institutions often define themselves as "non-traditional institutions" in order to avoid peer review. They represent borderline provision in the Higher Education system and often operate in the area of life long and distance learning.

Upon closer examination, it is possible to identify three different sets of bad practices, which characterise irregular and low-quality higher education available in today's market:

- The falsification of the academic content of the qualification and the consequent alteration of the final titles.
- The uncertainty regarding the identity of transnational institutions and their tendency to avoid regular monitoring, accreditation and evaluation visits, as well as the consequent punishment.
- The forgery of academic curricula and qualifications.

Lack of minimal quality standards

The "diplomas" awarded by non-accredited and irregular universities have not been officially authorised or approved, nor have they been double-checked after being issued, therefore they pollute the education market through forgery. The qualification awarded, which is often a close copy of the official national qualifications, conceals fully auto-referential issuing procedures. The formal layout of the underlying curriculum hides obscure processes of discipline replacement, insertion of low-quality educational content or, in some cases, even the absolute absence of content. In the international academic jargon, the institutions producing diplomas without any quality are defined "degree mills" and they award "bogus diplomas".

Steward and Spille defined a "degree mill" as "a person or organisation selling or awarding academic qualifications, which are not supported by an adequate scientific knowledge base or which are not bounded to demonstrate the achievement of a certain level of knowledge."³

³ In 1988, the American researchers, David W. Stewart and Henry A. Spille, studied on behalf of the American Council of Education the extension of the phenomenon of 'non-traditional education'. Their book (Diploma Mills: Degree of fraud, Macmillan Publishing Company, 866 Third Avenue, New York, NY 10022, 1988) became quickly popular and was considered as a sort of Bible in the field. Some American States consulted it in order to draft control regulations on private and non-accredited colleges.

Escaping control

Nowadays, two major phenomena exist, which invalidate the traditional quality assurance and monitoring procedures applied in the Higher Education sector:

- "De-localised education": the location where education is provided does not coincide with the actual, geographical seat of the institution which issues the qualification. The internationalisation of Higher Education has increased the practice of institutions forming affiliations including offshore provision, as well as franchised institutions. These are new types of institutional models, which, in associated literature, go under the name of "transnational education". The phenomenon of transnational education is not an utterly negative one, since, in principle, it does represent an actual enrichment of the degree programmes offered, providing a meaningful opportunity for institutions to collaborate and work together, to engage with other institutions, as well as to increase their competitiveness. On the other hand however, the model can be exploited to provide low or zero quality degree programmes and qualifications in foreign markets, which are awarded by institutions with their headquarters and archives located abroad, far from the risk of undergoing quality assurance investigation, or the scrutiny of fiscal inquiries or police investigations.
- The second phenomenon is open and distance education. In this case, the programmes are normally provided on-line or via information technology and they exploit the numerous possibilities offered by advanced IT solutions. Elearning plays a leading role in re-modelling the field of Higher Education. As discussed earlier, also in this scenario, programmes and qualifications flourish which have low or no quality and they do not undergo regular accreditation or quality evaluation. These are frequently awarded by institutions whose seats are difficult to trace. Students enrol on-line, on websites which are impossible to locate and which evade quality assurance.

Qualification forgery

A third area to be taken into account is the production and commercialisation of utterly fake or partially counterfeit qualifications. In the former case, thanks to digital technologies, fake credentials are identical to genuine ones; in the latter, qualifications usually are characterised by altered institutional logo and signatures, counterfeit exam transcripts and curricular details and are accompanied by a fraudulent legalisation of the submitted documents.

Recently, this phenomenon has grown to assume frightening dimensions in Russia, where hundreds of agencies sell fake qualifications on the Internet, which mainly belong to the old Soviet education system. The innovation process that Russian institutions have undergone over the last few years has fostered the diffusion of this phenomenon. Its most evident consequence was the elimination or the conversion of traditional Higher Education institutions. This brought about the dispersion of the old archives and the circulation of official higher education documents in the underground market. The migration waves towards Western European countries have probably been deeply affected by this trend, since a considerable number of qualified Russian technicians have entered Western Europe over recent years. In this

context, the task of evaluating such qualifications appears to be a very delicate one, given the little knowledge and information that is available regarding the Russian education system, due to the long-lasting isolation between the two blocks.

South American credentials represent a further source of concern for Western European qualification evaluators. Over the last few years, qualifications originating from South American have become more widespread in Europe because of the sharp increase in people emigrating from there to Europe. Also in this case, the evaluation is particularly delicate because, on the one hand, the existence of a South American counterfeiting industry has long been known and demonstrated; on the other, many South American qualifications also award the licence to practice a regulated profession.

1.2 DIPLOMA & ACCREDITATION MILLS: SOME DEFINITIONS

Degree or diploma mills are independent/private institutions, which are not officially recognised in the national Higher Education system of reference. They award academic qualifications with a very short turnaround (usually from seven days to a few months) upon payment of very high sums of money, sometimes without even requiring candidates to sit examinations or attend structured courses. The Webster's Third New International Dictionary gives the following definition of a diploma mill4: "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".

There is a wide range of institutions operating in this sector: from actual fake institutions or agencies, which reproduce or counterfeit genuine qualifications, to non-accredited institutions, which carry out training activities but are not recognised by any Higher Education system. In addition, there are loophole institutions set up to look as if they have the legal right to award degrees without breaking the law (See \S 5.3).

Apart from a few exceptions, the majority of countries have put in place a set of rules for accreditation of Higher Education institutions, as well as for the recognition of the qualifications awarded, which generally indicate the features and the minimal quality requirements that official institutions must meet. Generally speaking, qualifications awarded by institutions, which do not belong to the official Higher Education system of a country, are not eligible for recognition in any other country. Nonetheless, this assumption does not necessarily imply that all institutions that are not officially recognised actually pursue fraudulent goals.

It is worth noting that:

- a. In many countries it is possible to set up private institutions which provide teaching and learning services in Higher Education which are not accredited. In some cases the education provided by such institutions is of a high quality;
- b. Higher Education systems are not homogeneous and
- c. From country to country, the rules for recognition and accreditation of institutions are based on different legislative frameworks.

⁴State of Oregon Office for Degree Authorization: http://www.osac.state.or.us/oda/diploma_mill.html

Therefore, it is quite easy to understand how fake and non-accredited institutions can easily position themselves in a market which is everything but clear and regulated.

The majority of irregular institutions in the education market thrive in those national Education systems where the legal value of the academic qualification does not exist and where institutions are accredited by private agencies recognised by the Government and not by actual legislation⁵.

Finally, "accreditation mills" are also in operation in the education market. Accreditation mills are non-accredited agencies, which grant accreditation to bogus Higher Education institutions in order to help them look legitimate. This type of accreditation does not confer any valid status on bogus qualifications, it is only used by the degree mills as a decoy to attract potential customers (See § 3.2.).

1.3 A HISTORICAL OVERVIEW

The history of medieval university education in Europe is not exempt from a few bewildering episodes of academic dishonesty and trickery with regard to the prestige of universities and institutions and of the quality of programmes. A malicious reading of those incidents could bring to mind daring similarities with recent events with regard to bogus institutions.

The historian Leo Moulin writes that in the XV century, the number of European universities doubled. The number of institutions became so high that it caused difficulties for incumbent universities, such as the University of Paris. The increased competition in the higher education market was causing a reduction of student numbers at the established universities. So much so that a missive addressed to the Pope was sent out from the Sorbonne, with the request to him to stop granting papal privileges for the foundation of universities. Meanwhile, also some poorer students, belonging to the lower social classes, started attending university and sometimes they struggled to pay enrolment costs. The quest to enrol new students (and to obtain their associated fees) caused a considerable decrease in the quality of the selection procedures, alongside the suspension of admission examinations and the practice of selling qualifications to the highest bidder. The progressive decline in the quality of academic qualifications caused widespread dissatisfaction, which became a general feature of the XVII century.

Thriving in a system of free competition, medieval universities devised advertisement and marketing techniques to increase their popularity. They used all available means, in particular financial ones, to attract students and professors or to persuade them to leave the university they currently belonged to. At the same time, the academic authorities took steps to prevent students and professors from moving or abandoning their studies; which would have caused disastrous migration and jeopardised the studium. So, for example, they obliged newly graduated dottori to swear that they would not abandon immediately their institution of origin (Alma

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⁵Let us just consider the United States, where the problem of the degree mills is endemic because of the characteristics of the accreditation system and of the job market. It is therefore not surprising that the highest number of publication and the most significant governmental measures have been taken in this country.

⁶L. Moulin, La vita degli studenti nel medioevo, Milano, 1992, pag.187.

Mater). In 1217, the University of Bologna ruled that anybody who would be caught "plotting" a transfer of their studium to a city other than Bologna, would be condemned to perpetual exile and all their possessions would be confiscated (bona publicentur). Nonetheless, in 1321, the above-mentioned threat was not enough to prevent students and masters from leaving Bologna. Many details of the demanding and subtle negotiations, which were undergone at that time to facilitate the movement from one institution to another, are known. For instance, in Padua all the desirable privileges were granted, such as: the accreditation of all exams passed at the university of origin; the achieved diploma was considered valid, the rector could carry weapons, and so on.

In 1444, the Senate of Venice declared void the academic qualifications obtained in Padua, which at the time was regarded as the Oxford of the Venetian aristocracy. In the XV century, the University of Avignon lost two thirds, if not even three fourths, of law students because of the devastating epidemics and of the wars, but also and mostly - as the chronicler says - because of the unfair competition of a number of "degree mills", where a group of smart "graduates" (dottori) distributed or sold aualifications, without even running programmes. In the same way, in 1491, the University of Padua accused the universities of Ferrara, Parma and Piacenza to have signed an agreement (fedus) against Padua and to be selling (venalia) the degree of master (magistralia insigna) at a very low price (obolo). If a rival institution was in crisis, universities never hesitated to attract students by means of advertisement. Below, an extract from a "leaflet" distributed by the University of Toulouse is reported: "Our country is a promised land, where milk and honey flow and the fields are always fertile and lush. It is a country rich in fruit trees Ubi Bacchus regant in vineis. ubi Ceres imperat in arvis. The air is healthier than in any other region, everything is low-priced, tranquillity and safety reign in the city and the full freedom of teaching is granted".

Students usually received from their Alma Mater some credentials (litteraes credentiales) – the precursor of the present Diploma Supplement – which certified that they had completed a regular academic curriculum and listed the exams they had passed. It was the awarding university, which made the difference. Two years in any university corresponded to nothing more than one year in Paris. The teaching licence (licentia docendi) awarded in Paris, Bologna and Salerno had universal value: it allowed its holders to teach (in all places of the globe) (ubique locorum ac per universum terrarum orbem), which did not happen with licences issued by other universities. However, in 1255, Pope Alexander IV, upon request of the King of Castile y León, granted the graduates of the University of Salamanca the licence to teach in any university (in quolibet generali studio), except in those of Paris and Bologna.

In the Middle Ages, academic qualifications were organised on three levels: the baccalaureate, the licence and the doctorate. While the fees for the final exams to achieve the first two qualifications were quite reasonable, fees for the third one, called *convetus* - the public ceremony held to award the title of *doctor* – were very high. On the occasion of the ceremony, parades were organised, the university was decorated, rich banquets were offered and it was expected to reward almost all participants with presents and donations, particularly professors. It was estimated,

that the cost of a degree ceremony was equal to the expenses that a student had to cover for four or five years at university. This was the reason why, at the time, the greatest majority of students preferred not to get a doctorate, but to obtain just a *licentia*, which granted access to the highest social classes, both in the public sector and in the private professions. Nonetheless, such qualification did not entitle them to become professors; therefore they could not teach or become members of the doctoral colleges (collegia doctorali).

There are also cases of students, who upon obtaining their licence at a prestigious university, such as Bologna, then decided to obtain the doctoral qualification in minor and cheaper universities, such as Siena or Perugia and, in later years, also Ferrara (founded in 1391), if not even in Cesena (founded in 1570). The latter was well known for awarding degrees very easily and for its low prices: it was mockingly defined "the university of the two hams".

Finally, there was a further shortcut to obtain the title of doctor, i.e. to bypass regular examinations, through a papal edict, called *bulla* or breve, which could be obtained by submitting a plea. This system dated back to the XIV century and was firstly adopted by the Pope, but it was later imitated by the Empire, even if only to a limited extend.

It was introduced in order to help poor students (scholares pauperes) to cover the expenses for the final examination. As a matter of fact, such aid measure turned into "degree mills" of sorts; issuing titles that enjoyed little recognition in the academic world of the time, since the expression doctor bullatus was used to define an almost idiot graduate⁸.

Crossing the Atlantic Ocean, we find that the renowned American Higher Education system is not exempt from occasional episodes of dishonesty and also in this part of the world, the degree mills are everything but a recent phenomenon. At the end of XIX century, the growing demand for Higher Education caused an increase in the foundation of new universities and colleges, which was accompanied by a parallel growth in the number of fraudulent institutions.

The first record of a degree mill dates back to 1876. In the last century, regulations were put in place which granted the possibility of obtaining academic qualifications to the veterans of the Second World War and of the War in Korea. This enhanced the diffusion of boqus degrees.

At a certain point, they became so widespread that the Government passed a bill which obliged universities to comply with quality requirements defined by the recognised accreditation agencies. In fact the legal ruling that an institution must have access to federal funds to support students is still a prerequisite of official accreditation.

In summary, the objective of compulsory accreditation was, on the one hand, to contribute to the reduction in fraud in higher education qualifications; on the other, to contribute to the development of a new phenomenon, i.e. the creation of fake accreditation agencies or "accreditation mills".

⁷ A. I. Pini, "Scolari ricchi e scolari poveri tra Medioevo ed età moderna", in Gian Paolo Brizzi – Jaques Verger, Le Università dell'Europa – Gli uomini e i luoghi – Secoli XII – XVIII, Milano, 1993, pag.167. ⁸ Ibidem, p. 183.

After the fall of the Berlin Wall and of the iron curtain in 1989, the fake degrees market flourished in Eastern Europe as never before. In some cases, the rapid liberalisation of social structures had dramatic consequences on universities: traditional State funding was cut and they were forced to undergo privatisation. Some universities in Eastern Europe, driven by the need to survive, put in place programmes specifically targeting western students. These programmes often had very "loose" procedures to assess learning outcomes and the quality of final titles awarded was questionable. For a few years, the names of universities with seat in Rijeka, Niš, Odessa, Bucharest, and Krakow were advertised in Italy by agencies promising academic qualification issued by foreign state universities at very high cost but with low educational content.

1.4 DEMAND ANALYSIS

The phenomenon of bogus degrees would not be of endemic dimensions if it were not supported by a high demand for these types of titles and a high expenditure capacity.

Researchers have identified some specific social categories, which are more likely to be attracted by the phenomenon, since they might be the potential customers targeted by the advertisement of counterfeit diplomas.

The first ones are the so-called "mid-career adult professionals", i.e. executive and managerial staff working both in public administration and in private companies. For many of them, the achievement of an academic qualification is a prerequisite to access top-level positions in their field.

The option of returning to the traditional education system is often not appealing to the professionals. In some cases, the people in question interrupted or abandoned their studies in a traumatic way and they may be looking for forms of education tailored to the needs of their families and to the pace of their careers. Factors such as flexibility, independent management of learning time, little but intensive attendance, possibility to choose courses, application of acquired knowledge, recognition of prior learning and of the professional skills they have gained though the years may be important to them in obtaining their qualification. For this category of professionals, the manner in which non-accredited institutions award academic qualifications can become an irresistible temptation.

A second social group includes young people who have achieved only low-level school qualifications or who are not qualified at all. In order to be admitted in the public sector or to start a job with career prospects, they need to obtain school and professional qualifications, often in a very short time.

These people are attracted by the underground market of diploma mills because they offer both legal and illegal shortcuts to the achievement of the qualifications they need. In Italy, the falsification of school diplomas – punished by the Italian law as a crime – is only a phenomenon of limited dimensions and it concentrates, most of all, on the production of final High School diplomas, often in connection with private remedial schools for the recovery of lost school years.

A third social group is represented by people holding technical qualifications, which often work as freelancers, consultants or offer technical services. Some institutes and

agencies of transnational education, which exclusively target this segment of society, offer non-traditional methods to obtain advanced professional qualifications at academic level to these technicians. For instance, surveyors can become engineers, accountants can achieve a degree in economics and business management; dental technicians can become dental hygienist or dentists. The achievement of academic qualifications implies financial benefits and improves the external image of these professionals.

The fourth social group includes craftsmen, tradesmen and small entrepreneurs. These independent professionals - sometimes also defined "self-made men" - very often reach considerable professional success, both as far as their company and the profit they make are concerned. Many of them aspire to improving their image: both within their company, in the relationship with the other team members and with employees - who sometimes have higher level qualifications than their boss; and to the external world, i.e. suppliers, customers and public administration. They are particularly sensitive to the academic qualifications issued in non-traditional ways, to the honoris causa titles - as a form of formal recognition of their professional achievements. In addition they are generally attracted to programmes which do not comprise formal traditional attendance and recognise their prior learning.

A fifth group is made up of students, who failed entrance examinations for degree programmes with *numerus clausus* (dentistry, medicine and surgery, technical health professions, nursing and rehabilitation) or candidates who failed the State exam to obtain the licence for a regulated profession, in particular, trainee lawyers. The offer of "alternative routes", often transnational programmes, which grant access to such professions are very popular among the representatives of this group, since they exploit the combination of emotions felt by this group, such as frustration and ambition.

A sixth group is represented by people who practice new, emerging professions, which are normally not yet recognised nor regulated. Professions in this category include *Heilpraktiker*, osteopath, art-therapist, financial consultant, optometrist and all professions related to natural medicine. The loopholes or absence of legislation and regulations in these professions foster a potential market for the achievement of transnational or foreign qualification, with a view to having the qualification recognised in another country.

The last category comprises so-called "qualification hunters", i.e. people that for personal ambition or to promote their external image, enjoy collecting academic and honorific qualifications coming from different sources.

1.5 THE SOCIAL DAMAGE

The level of social emergency caused by low or zero quality Higher Education is rising and it is fostered by the growing internationalisation of universities and by the increasing popularity of transnational education.

Bogus qualifications issued by non-accredited institutions are a source of considerable problems and they are detrimental to numerous social groups and to the institutions themselves.

The following are the stakeholders that can be adversely affected:

a. Students, who unconsciously invest their time and their money to achieve qualifications that only look valid, but that are actually bogus and cannot be recognised or used in any meaningful way;

- b. Employers who might select employees on the basis of bogus academic and professional qualifications. As a consequence, they run the risk of hiring non-qualified people in key positions within their companies and potentially damaging their business. In addition, human resources and career plans might suffer under inefficient management which may have an adverse effect on the company image:
- c. Non-recognised institutions expose "genuine" universities to unfair competition on the market and their presence could damage high-quality institutions. In addition, each national Higher Education system suffers as a result of a loss of credibility at international level, caused by the over-diffusion of non-qualified institutions and of academic corruption.

The strategies put in place to fight illegality or targeted at containing the phenomenon of bogus qualification and their potential damage attract wide social and academic interest.

BOGUS INSTITUTIONS: A CENSUS OF SOURCES

At international level, two strategies have emerged which have been adopted in different countries in order to identify and expose non-recognised institutions:

- 1. The publication of lists of recognised or accredited institutions existing and operating in a specific country. In principle, almost all countries have published official lists of recognised institutions and the programmes they offer;
- 2. Lists of institutions or qualifications, which are not recognised in the national system. In some countries, lists of diploma mills also exist and are published.

The first option is the most common route utilised, even though at national level different classification methods are adopted to draft the above-mentioned lists. At the moment, the number of countries that have actually published a list of degree mills are very much in the minority.

Let us consider two examples:

- Italy: from 1988 to 1994, the Ministry of Education published three official documents, which listed Italian and foreign institutions that awarded qualifications that could not be recognised in Italy. From 1994 onwards, the Ministry ceased publishing these lists. It continued updating the list of recognised/official institutions.
- United States: there are different regulations for university accreditation and to counter the phenomenon of bogus institutions in each federal State. Not all American States publish lists of non-accredited or non-recognised institutions.

International organisations have also sought to deal with the issue of diploma mills, although considerable differences have emerged in the approaches adopted. In some cases, institutions were uncovered which declared to enjoy some kind of accreditation or partnership with such organisations. In other cases, actual lists of non-accredited institutions were produced and measures against the most blatant cases were taken.

The lists of official institutions available in each country are the most widely exploited source of information on recognised institutions. However, not all such lists are exhaustive; they sometimes are limited to gathering only a selection of institutions operating in the Higher Education sector and they fail to give a comprehensive picture. For instance, in Italy, there are various national lists of State and recognised Higher Education institutions, including universities, AFAM institutions (i.e. conservatories, fine arts academies, Higher Education institutions for the artistic industry, etc.) and Schools for Interpreters and Translators. Nonetheless, it is also necessary to bear in mind that some institutions for education and training operating in the field of Higher Education are accredited by the Italian regions. So, even if they are not to be compared to universities and they do actually operate only in some Italian regions, they award qualifications that can be recognised abroad. Therefore, it would be desirable to have a homogeneous set of information about the Higher Education sector in each country.

Further sources of information used to identify irregular institutions are the archives of the interventions of the Italian Authority on Fair Competition (Autorità Garante del Mercato e della Concorrenza in Italia) and of the different anti-trust organisations abroad – such as the Federal Trade Commission in the USA°. Such documents offer a comprehensive selection of rulings about institutions that declare to issue valid qualifications, but which actually are neither recognised, nor accredited.

2.1 THE ENIC-NARIC NETWORKS

Two international networks connect a number of national information centres for the recognition of qualifications:

- The NARIC (National Academic Recognition Information Centres) network was created in 1984 by the European Commission, to implement a decision of the European Council Ministries of Education. The main purpose of the network is to connect information centres designated by national authorities in each European Union member State and of other European countries;
- The ENIC (European Network of National Information Centres on academic recognition and mobility) network connects national information centres of the States party to the European Cultural Convention or belonging to the UNESCO Europe Region.

The two networks manage a joint website ¹⁰ where, selecting the country of choice, the contact details of each national centre become available. Alongside the information about the centres, the website provides general information about each national Higher Education system. Lists of accredited institutions are also published on a country-by-country basis, as well as the procedures in place for the recognition of academic and professional qualifications. In view of the goals pursued by the present research, it is worth pointing out that the ENIC-NARIC centres are the main source of information about bogus institutions used by credential

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⁹ Part of the website of the Federal Trade Commission is dedicated to the phenomenon of degree mills (http://www.ftc.gov/bcp/edu/pubs/consumer/alerts/alt149.shtm).

¹⁰ http://www.enic-naric.net

evaluators, since the lists uploaded on the website are very useful to identify both accredited and non-accredited institutions.

2.2 THE WORLD HIGHER EDUCATION DATABASE (WHED) OF THE INTERNATIONAL ASSOCIATION OF UNIVERSITIES (IAU) AND UNESCO RECOMMENDATIONS

A very useful tool for a preliminary check on the accreditation status of institutions belonging to a Higher Education system is the World Higher Education Database, a database about the Higher Education systems powered by the International Association of Universities (IAU)¹¹, 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 183 countries, all drafted by the official institutions of each country.

Furthermore, the website offers the possibility to browse through another on-line database, a sub-section of the main one, focusing on Higher Education institutions of academic level and organised by country¹², containing about 10.000 institutions in total.

All this information is available both on-line and on a CD-Rom, which is updated and published annually by IAU.

If an institution does not appear on the list, it does not mean that it definitely is a non-recognised one, as a matter of fact, there are 17.000 institutions listed in the full version of the database.

Recently, given the increase in the number of institutions and organisations claiming to be accredited by UNESCO, the intergovernmental body published a disclaimer on its website, where it is made clear that UNESCO is not involved in granting accreditation to Higher Education institutions or to accreditation agencies. As a consequence, any institution or agency claiming to be accredited by UNESCO must be looked upon with suspicion. On the website, also some examples are reported of how institutions claim to have obtained such accreditation by UNESCO:

- a. The qualification is "sold" with the UNESCO logo, as it happens for those awarded by the World Technological University (http://www.wtu.ru);
- b. UNESCO is mentioned in the sections of the web site dedicated to accreditation, ex. Al Qasim University¹³:
- c. The institution claims to be on the UNESCO Higher Education Institutions Registry, which does not actually exist ex. Kinas University¹⁴;
- d. The web address of the institution contains the word "UNESCO", to convey the impression that it is somehow connected with the organisation;
- e. Institutions claim to host a UNESCO officer, to give the impression of accreditation;
- f. The institution declares to be pursuing "the Educational creed of UNESCO";
- g. Dubious professors belonging to dubious institutions declare to hold qualifications or to have experiences that are somehow related to UNESCO ex. Intercultural Open University¹⁵;
- h. Inaccurate and vague declarations are made about NGOs, which claim a

14 http://www.kingsinternationaluniversity-edu.com/home.html

¹¹ http://portal.unesco.org/education/en/ev.php-URL_ID=48787&URL_DO=DO_TOPIC&URL_SECTION=201. html

¹² http://www.iau-aiu.net/onlinedatabases/list.html

¹³ http://www.aqu.edu.pk/accreditation.htm

¹⁵ http://www.ioufoundation.org/index.php?option=com_content&task=view&id=292&Itemid=74

connection with UNESCO, but which among their members have non-recognised institutions with the status of "membership paying entities". The latter are neither recognised nor accredited by UNESCO - ex. West Coast Institute, Golden State University and Clayton University.

UNESCO also published a bulletin, entitled "Bogus Institutions", in order to warn students that are about to choose a degree course at university. The document encouraged the prospective students to consider only universities and programmes officially recognised in the country of reference. The publication included the details of the IAU database, of the United States Council of Higher Education¹⁶, of the list of accredited institutions in the United Kingdom¹⁷ and of the recognised Australian Universities¹⁸.

2.3 CONFIDENTIAL DOCUMENTS AND STATEMENTS OF THE COUNCIL OF EUROPE

In 1986, the Council of Europe published a list of institutions awarding qualifications, which were not officially recognised in Europe. This document was drafted in view of the expert meeting scheduled for the month of December of the same year. It was requested to keep the existence of such document strictly confidential, because it was targeted at experts only¹⁹. The document contained more than 700 non-recognised institutions operating in the Higher Education sector, organised by country.

Table. 1: Countries with the highest number of irregular institutions

Position	Number of institutions	Country
1	330	United States
2	150	United Kingdom
3	36	Italy
4	30	Switzerland

(Source: CoE)

In 1996, ten years afterwards, the Council of Europe published a second bulletin, still for internal use only²⁰. In the new version, the total number of institutions doubled:

¹⁶ http://www.chea.org/search/search.asp

¹⁷ http://www.dcsf.gov.uk/recognisedukdegrees

¹⁸ http://www.aaf.edu.au

¹⁹ The document was drafted in Strasburg on 10th October 1986 by the Secretariat of the Direction of Education, Culture and Sport, Documentation Section of the Council of Europe. The publication was entitled: "Provisional list of institutions of higher education the diplomas and degrees of which are not in general officially recognised in Europe"; it was discussed during the meeting of national experts coming from the national centres for information on academic recognition, which was held in Strasburg on 1st and 2nd December 1986.

 $^{^{20}}$ The second bulletin was published on 20^{th} March 1996 with the title "List of institutions of higher education the diplomas and degrees of which are not in general officially recognised in Europe". The new version was the 1986 list amended and updated by the national experts.

from 700 to almost 1.300. The countries with the highest number of irregular institutions remained unchanged: USA (more than 400 institutions), United Kingdom (195 institutions), Italy (143 institutions) and Switzerland (97 institutions).

Unfortunately, the 1996 list came into existence just prior to the signing of the Lisbon Recognition Convention and the creation of the ENIC and NARIC Networks. Canadian, United States and UK national authorities had not been consulted in drawing up the list. After considerable discussion among ENIC and NARIC authorities, the 1996 list was formally withdrawn in 1997 due to nearly 60 legitimate and recognised institutions having been placed on it in error. This episode helped lead to the policies of publishing so-called "white lists" of recognized institutions and quality assurance agencies rather than "black lists" of bogus providers, and to greater coordination among national authorities.

In more recent times, on the website of the Council of Europe, an official statement appeared, which is very similar to the one published by UNESCO. The Council of Europe stresses the fact that it "does not recognise or in any other way bestow legitimacy on any higher education institution, programme or provision", since institutional recognition normally falls within the competence of national authorities²¹.

Such initiatives give evidence of the increasing threat that diploma mills represent to Higher Education internationally and that also the most prominent international institutions and organisations are taking steps to counter them.

2.4 THE PHENOMENON OF DIPLOMA MILLS WORLDWIDE

The results obtained by the field survey highlighted that many countries have assessed the number of irregular institutions operating in their territory, a selection of the most relevant cases follows:

- India: on the website of the University Grants Commission²², it is possible to browse
 a list of 21 "fake universities";
- Australia: the New South Wales Department of Education published a list of non-recognised institutions, mentioning among others, the Chancery International University, the CNBC University, the eBay University, the University of Action Learning and Warnborough University. On the same website, also some additional material is available about "genuine" qualifications, in order to provide users (i.e. students, teachers and employers) with information about official institutions and the procedures they must comply with in order to grant valid academic qualifications²³.
- The Netherlands: in the month of July 2005, the Dutch Ministry of Education published a press release to announce the creation of a new website entirely dedicated to diploma mills: The Centre for Information on Diploma Mills (CIDM)²⁴,

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²¹ http://www.coe.int/t/dg4/highereducation/Recognition/Recognition%20disclaimer_EN.asp#TopOfPage ²² http://www.ugc.ac.in/inside/fakealerts.html

²³ The brochure: "Is that degree genuine?" can be downloaded on the website: https://www.det.nsw.edu. au/aboutus/higheredu/fakedegrees.htm

²⁴ http://www.diplomamills.nl

in collaboration with the Dutch Ministry of Education, the Nuffic²⁵- the Dutch ENIC-NARIC centre - and the IB Goep²⁶, a governmental organisation, in charge of the implementation of the regulation related to the Higher Education sector. The website was at first only in Dutch, then it was translated into English and it provides general information about irregular institutions and qualifications. Furthermore, the website offers the possibility to get in touch with the experts, to ask about the status of institutions and the recognition status of the titles awarded

- Sweden: the Högskoleverket, i.e. the national agency for Higher Education, published a 48 page report entitled: "Fake universities and bogus degrees Sweden and the world", analysing the case of 17 institutions which are not officially recognised in Sweden. The full report is in Swedish, but also a summary in English is available²⁷.
- United Kingdom: the Department of Business Innovation & Skills BIS²⁸, published a "Bogus degree warning" and describes in detail the UK accreditation system. In the FAQ section, there is also a comprehensive description of the bogus degree phenomenon.

In the following paragraphs, we are going to take a closer look to the measures that were taken in three different countries to tackle the phenomenon of diploma mills.

2.5 ITALY

In Italy, three initiatives against degree mills have been undertaken as follows:

- 1. The work of the Italian Authority on Fair Competition;
- 2. The official documents published by the Italian Ministry of Education and
- 3. The work of the Italian NARIC Centre, CIMEA.
- 1. Also known as Antitrust, the Italian Authority on Fair competition is an "independent authority" established under law n. 287 of 10th October 1990 (Regulations on competition and market protection). The Authority is competent on matters of misleading and comparative advertisement as provided by Title III, Chapter II of Law decree n. 206 of 6th September 2005 as well as, on issues related to conflict of interest as provided by Law n. 215 of 20th July 2004. The decree establishes that consumers, competitors, professional associations and public administrations can issue a complaint and thereafter enjoy protection. The Authority is not entitled to proceed on its own initiative, but only after a specific claim has been made and it is only competent to consider the subject matter specified on the claim.

It is very interesting to point out that many claims for misleading advertising have already been made against non-recognised Higher Education institutions, which were then sanctioned for different reasons: for instance, because the words "university" or "polytechnic" appeared in their names, or because they claimed to award qualifications recognised in Italy or, finally, because they described the

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²⁵ Afdeling Diplomawaardering & Certificering - Den Haag - http://www.nuffic.nl

²⁶ http://www.ib-groep.nl

²⁷The abstract of the publication can be downloaded at: http://www.hsv.se/aboutus/publications/reports/reports/2005/fakeuniversitiesandbogusdegreesswedenandtheworld.5.539a949110f3d5914ec800074186.html ²⁸ http://www.dcsf.gov.uk/recognisedukdegrees

qualifications they issued as "Laurea" or "Master universitario", names protected by law, which did not apply.

The Authority started more than 150 proceedings against institutions operating in the field of Higher Education and charged them for different types of misleading advertising, working both on-line and though more traditional means²⁹.

2. In 1988, what at the time was called the Ministry of Public Education circulated an official document³⁰ with the purpose of "clarifying the activity of some private institutions awarding certificates or academic qualifications, which were not eligible for recognition in the Italian Higher Education system". The document listed 19 Italian and foreign institutions, which were - and still are - non-recognised neither in Italy, nor in their country of origin. They awarded academic qualifications - most of them honoris causa degrees - which claimed international validity and recognition. During the years, many of these institutions have ceased activity because of the intervention of the judicial authority, while others have simply changed their name and continue operating.

In 1993, the Ministry of University and of Scientific and Technological Research published a second document concerning the recognition of academic qualifications³¹. Such document pointed out that there were "numerous private institutions with seats in Italy and abroad operating in the Higher Education sector, which awarded titles guaranteed to be recognised and recognisable in Italy, in compliance with articles 170 and 332 of Royal Decree n. 1592 of 31st of August 1933 or with specific bilateral agreements".

Italian universities were recommended to request the relevant documentation about foreign qualifications from the Italian diplomatic authorities abroad, in particular for the following countries: Mexico, Ecuador, and Ex-Yugoslavia, because "in these countries some institutions operate which are not authorised to award valid academic qualifications". The document contained the names of 46 institutions, some of which were already mentioned in the previous one, which granted titles that were not eligible for recognition in Italy. The number of institutions still active in Italy is higher than in 1988.

The last circular letter was published a year after the second one, i.e. in 1994: it added further 17 irregular institutions to the ones that were already known to be operating in Italy. The majority of them are still active.

3. The activities carried out by the Italian NARIC centre are also supported by the Italian Ministry of Education, University and Research. As far as diploma mills are concerned, CIMEA dedicated a page of its website, which collects the major sources of information at international level, as well as a .pdf document of the book Degree mills: non-accredited and irregular higher education institutions

30 Italian Ministry of Public Education - General Directorate for University, Department X - Ministerial Circular Letter n. 1633 of 5th July 1988.

²⁹ It is possible to view the proceedings started by the Italian Authority on Fair Competition on the website: http://www.agcm.it. The search engine on the website allows to select the proceedings of interest.

³¹ Italian Ministry of University and of Scientific and Technological Research - Department for University and Foreign Students, Ministerial circular letter n. 1115 of 16th June 1993.

published in 2008³². The book was published with the purpose to set the phenomenon of diploma mills in context and to report the most 'famous' cases of diploma mills in Italy and worldwide. It is worth pointing out that in the Italian scenario, the work of CIMEA is highly innovative.

2.6 THE UNITED STATES

As we have already mentioned earlier, the phenomenon of non-recognised institutions is very widespread in the whole territory of the United States and, in many cases, the laws in force are not enough to counter its proliferation. Some U.S. states publish lists of degree mills, which are constantly updated with new institutions³³. In the present chapter, the most relevant ones will be considered.

- The State of Oregon was the first one to draft a list of degree mills, which is published on the website of the Office of degree authorisation³⁴. The list contains 514 institutions and for each one, information is supplied about its location, the possible proceedings started against it and connections with other irregular institutions. Furthermore, the website contains a comprehensive description of the phenomenon of diploma mills, with plenty of information about the databases published in other countries, about the current legislation and the protection policies of academic qualifications put in place in different areas of the United States.
- On the website of the Department of Education, the State of Maine highlights 418 irregular institutions in alphabetic order, to facilitate the search³⁵. Also in this case, the State provides general information about diploma mills, presenting useful tips to spot them, with reference to the existing legislation put in place to counter the phenomenon³⁶.
- In Texas, the Higher Education Coordinating Board website³⁷ presents a shorter list of about 379 institutions, where the ones granting non-recognised qualifications are highlighted.
- The State of Michigan published a list drafted by the Department of Civil Service³⁸, where more than 800 institutions are mentioned, which are not recognised by the Council on Higher Education Accreditation. Furthermore, a list of 103 accreditation mills that are not recognised by the US Department of Education has been published.
- In the State of Mississippi, the Commission on College Accreditation³⁹ published a note about non-recognised institutions. The list comprises 18 institutions in total: 10 are still operating in Mississippi, while 8 are not active anymore. It is made clear that, in compliance with current legislation, the sole registration with the Secretary of State does not constitute approval, accreditation or licensure to grant valid academic qualifications.
- In Hawaii, it is possible to gather information about irregular institutions browsing

³² The book is in Italian and it is downloadable at: http://www.cimea.it/default.aspx?IDC=243

³³ The data indicated refer to August 2010.

³⁴ http://www.osac.state.or.us/oda/unaccredited.html

³⁵ http://www.maine.gov/education/highered/Non-Accredited/alphalist.htm

³⁶ http://www.maine.gov/education/highered/Mills/Mills.htm

³⁷ http://www.thecb.state.tx.us/AAR/PrivateInstitutions/NoTX.cfm

³⁸ http://www.michigan.gov/documents/Non-accreditedSchools_78090_7.pdf

 $^{^{39}\,}http://www.mississippi.edu/oasa/downloads/MCCANonApprovedEntitiesList.pdf$

through the recommendations of the Department of Commerce & Consumer Affairs⁴⁰, which sometimes sanctioned, also very strictly, all irregular institutions that operated or operate in the Hawaiian territory.

These state "blacklists" are possible only because each jurisdiction has passed laws protecting the civil servants from lawsuits by the highly litigious owners of diploma mills. Unfortunately, the laws have power only within the territory of the states which possess such laws, not nationally.

The U.S. federal Congress has finally established a definition of a diploma mill in the 2009 revision of the federal Higher Education Act (HEA), and it is hoped that further federal legislation may follow.

A further source of information for the diploma mills operating in the United States, are the reports of the General Accountability Office (GAO) Special Investigations department on diploma mills. The GAO is the investigation and auditing agency of the US congress and its work focuses on how the phenomenon of diploma mills affects both the US citizens and the federal government⁴¹.

2.7 NIGERIA

In the last ten years, diploma mills in Nigeria have formed and been dissolved, since they have been clamped down by a series of harsh measures implemented by the National Universities Commission (NUC) together with the National Youth Corp and the local police.

Four main types of degree mills are found in Nigeria:

- 1. Unapproved satellite campuses of local and foreign universities, the majority of them based in the US, Canada and in the United Kingdom;
- Unapproved private institutions founded by rich individuals and religious organisations, conducting their own admission procedures outside those organised by the Joint Matriculation Board;
- 3. Unapproved programmes run at universities:
- 4. On-line courses offered by bogus foreign providers.

There are two main reasons for the flourishing of these bogus institutions in Nigeria. On the one hand, the official Higher Education system does not have the capacity to absorb the number of new matriculations every year. On the other, a high percentage of students fail the University Matriculation examination at the beginning of each year.

In order to counter this phenomenon, the NUC put in place a series of policies. In the following paragraph the main ones will be summarised.

 In 1999, the National Council on Education ordered the closure of all African and foreign satellite campuses operating in Nigeria, since it was proved that no offshore campus had been authorised to operate in the Nigerian territory up until then.

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⁴⁰ http://hawaii.gov/dcca/areas/ocp/udgi/lawsuits (The webpage is protected by a password).

⁴¹ http://www.gao.gov/products/GAO-04-1096T

2. In 2001, the NUC, backed by the antiriot wing of the Nigerian police, enforced a policy on closure of all non-recognised universities. The manoeuvre was successful in most cases, despite the fact some of the universities, which were closed down, resumed clandestine activity.

- 3. In order to prevent official institutions from over-enrolling students through degree mills, the NUC set the maximum admission capacity of each approved programme, on the basis of the available resources. This measure also foresaw that institutions practicing over-enrolment would be decertified by NUC.
- 4. The NUC started collaborating with the Department of State Services, i.e. the Nigerian secret service, in order to spot and prosecute unapproved universities and satellite campuses.
- 5. The NUC also drafted a list of the officially recognised institutions in Nigeria and disclosed to the public the names of the illegal universities both on-line a though print media.

The list of illegal universities is now updated and published every week in the last pages of the weekly bulletin, which is available for download on the website of the NUC (http://www.nuc.edu.ng/pages/news_detail.asp?id=148): in June 2010 the NUC identified 35 irregular institutions; while 7 had already been closed and 1 was undergoing on-going investigation.

HOW TO SPOT BOGUS INSTITUTIONS

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 ENICNARIC 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 powered and updated by the centres of the country of reference. The majority of country profiles contain a list of recognised higher education institutions.

In cases where the institution which is being researched 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, it is also possible to check the IAU database or the other lists compiled by the other international organisations that contribute to spread information about Higher Education (See Chapter 2 Bogus institutions: a census of sources).

The third possibility 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 the risk factors. In the present work, the list has been expanded and reshuffled. In the following section, twenty questions will be 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 irregular institutions pursue different goals and not all of them go under the label of "diploma mills".

3.1 CHECKLIST TO SPOT DIPLOMA MILLS

- 1. Can degrees be purchased or ordered?
- 2. Is there a claim of accreditation when there is no evidence of this status?
- 3. Is accreditation/recognition information over-emphasised?
- 4. Is little, if any, attendance required to students, either online or in class?
- 5. Does the awarded qualification belong to the Education Systems of different countries?
- 6. Are only a few assignments required for students to earn credits?
- 7. Is a very short period of time required to earn a degree or, in any case, the time required is short in comparison with the prescribed duration of the course?
- 8. Does the organisation declare to be recognised worldwide?
- 9. Does the organisation define its status as "global", "worldwide" or "international"?
- 10. Are the degrees granted based solely on previous experience or resume review?
- 11. Does the institution grant honoris causa qualifications?
- 12. Are there few and easy requirements for graduation?
- 13. Are tuition fees too high or too low in comparison with current standards?
- 14. Does the organisation fail to provide any information about a campus or business location or address and rely, e.g., only on a post office box?
- 15. Does the organisation fail to provide a list of its faculties and/or of its professors?
- 16. Does the organisation have a name similar to other well-known colleges and universities?
- 17. Does the organisation use qualification names that are used in a country different from the country where it operates?
- 18. Does the organisation claim not to grant any qualifications but to represent foreign recognised universities?
- 19. Is the Apostille indicated as a proof of institutional accreditation or of the validity of the qualification granted?
- 20. Does the organisation stress the fact that there is no need for accreditation?

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

- a. The accrediting agencies are not regularly accredited;
- b. Among the requirements to obtain a qualification is the possession of a valid credit card:
- c. No previous qualifications or minimum entrance marks are required;
- d. The only requirements are the submission of a CV and a form of self-certification;
- e. The qualification is issued in very short time;
- f. All admin 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. This kind 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 admin operations are carried out exclusively

There is no accredited institution, where admin operations are carried out exclusively on-line: if this was the case they could not be accredited or recognised.

Finally, institutions claiming to be recognised or accredited by international organisations, such as UNESCO, are to be looked at with suspicion.

In order to understand if a qualification is "genuine" and therefore recognisable, sometimes it is not enough to take into account the recognition status of the institution in question. 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 which could be defined typical of that kind of institution: 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 on the private job market.

3.2 CHECKLIST TO IDENTIFY ACCREDITATION MILLS

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?

FIFTY EXAMPLES OF BOGUS INSTITUTIONS AND ACCREDITATION AGENCIES

On the basis of the information sources and on the identification criteria described in the previous chapters, a group of 50 institutions has been selected, which for different reasons were judged irregular and which grant non-recognised titles in almost all national Higher Education systems.

It was decided to draft the list in alphabetic order, to facilitate browsing. Obviously such organisation is detrimental to the categorisation by "type of institution", which, due to the subject matter, is always quite complicated.

The list includes two types of institutions:

- 1. Institutions set up to the purpose of "selling" titles;
- 2. Institutions that, for different reasons, have not obtained recognition or accreditation, even though they are apparently providing programmes and applying the same methods as accredited institutions.

Firstly, forty irregular institutions will be listed, followed by ten accreditation mills.

Please note, that some of the institutions in the list have now ceased operating in the education market or their websites have been taken down from the internet. They are going to be described nonetheless, as it is important to spread information about bogus institutions which existed and issued qualifications over recent years and whose qualifications are still circulating in the market. Furthermore, it is necessary to point out that the list below is not comprehensive and does not cover all cases of irregular institutions operating in the higher education market worldwide.

1. Accademia di Belle Arti di Mendicino

Location: Italy

Website: not available

This institution underwent a proceeding for misleading advertising initiated by the Italian Authority for Fair Advertising. The proceeding was started after the publication of an advertisement in Cosenza, which mentioned the Italian Ministry of Education, University and Research. The poster led potential customers to think that the programme was accredited by the Italian Ministry, when it was not. Furthermore, the message contained also terms such as "Accademia" and "academic year", and it made reference to a Ministerial decree.

The Accademia di Mendicino declared "not to have any legal recognition to offer programmes at academic level, but to work together with different institutions". For example, the officially recognised Accademia di Belle Arti Fidia: for this institution the Accademia di Mendicino "functioned as multi-campus student office and looked after public relations" ⁴².

2. Adam Smith University (ASU)

Location: USA, Liberia, France

Website: http://www.adamsmith.edu

This institution appears on the list of American diploma mills and grants qualifications at Associate, Bachelor, Masters and Doctorate levels in various disciplines. The ASU was founded in 1991 by Donald Grunewald, who is still the President of the institution. The Italian Authority on Fair Competition dealt with ASU in the context of proceedings started against other organisations operating in Italy, which claimed to award titles granted by this irregular institution⁴³. On its website, further clues of connections between the Adam Smith University and Italy can be found: as a point of contact for Italy and the Republic of San Marino, the European Institute of Technology is indicated, another non-recognised institution. The ASU claims to be officially recognised in the Republic of Liberia since 2001 and that its qualifications are also recognised in France, where the institution operates through the École Superiéure Universitaire Adam Smith. The authorities of the two countries refute such declarations. On the website, another thirty branches of the Adam Smith University appear in thirty different countries: none of them are authorised affiliations.

3. American College of Metaphysical Theology

Location: Italy, Belgium

Website: http://www.americancollege.com (website under renovation)

With a few hundred US dollars, this institution grants qualifications in Biblical studies. The American College of Metaphysical Theology is one of the diploma mills listed by the State of Michigan and Maine and it operated for a few years also in Austria, Germany and in the Scandinavian countries, where it was authorised to award academic qualifications in Theology. At the end of the Nineties, in order to warn the Austrian official institutions, the Austrian NARIC Centre⁴⁴ published a report, which analysed the case of qualifications issued by the American College of Metaphysical Theology, also known as The American College of Theology.

⁴² Proceeding n. 17516 published on the Bulletin n. 39/2007, issue date 18/10/2007.

 $^{^{43}}$ See also the CETUS case and Proceeding n. 14.785, published on the Bulletin n. 41/2005, issue date $^{12/10/2005}$.

⁴⁴ Bundesministerium für Wissenschaft und Forschung: http://www.bmwf.gv.at/naric

4. American University of London

Location: UK, USA

Website: http://www.americanuniversity.org.uk/

This is a for-profit distance learning institution offering courses in Business & IT, Law, Humanities, Education and Liberal Arts and English. The contact details indicated on the website report a mailing address based in London and another one in Huston, Texas. The American University of London claims to be accredited by the World Association of Universities and Colleges (WAUC), which is a well-known US accreditation mill not recognised by the US Department of Education.

The institution is listed in the databases of diploma mills published by the State of Maine and Oregon.

5. Ateneo di Studi Superiori pro Pace

Location: Italy, Belgium Website: not available

This institution operated in Italy from 1978 to 1988 and, allegedly, issued between 500 and 1000 irregular degrees and post-graduate diplomas. More than 200 people were summoned at court on charges of trading in fake qualifications⁴⁵. The institution is mentioned in the circular letter of the Ministry of Public Education of 16th June 1988 and in that of the Ministry of University, Research and Technology of 16th June 1993⁴⁶. The Ateneo di Studi Superiori pro Pace was founded by Pierino Gennaro, ex Franciscan friar, who was then expelled from the order of minor friars. He already had criminal records for fraud and he proclaimed himself Bishop of the Syrian-Antiochian Church, of Danzig and of the whole of Byelorussia. In addition to academic qualifications, the organisation also sold professional licences, knight crosses, aristocratic titles and it certified religious marriages with civil effects⁴⁷.

The Pro Pace institution does not exist anymore but, considering the great number of qualifications it awarded, some of them may still be found circulating in the market.

6. Belford University

Location: USA

Website: http://www.belforduniversity.org

This Texan institution claims to grant academic qualifications based exclusively on the recognition of previously acquired professional experience, demonstrated through self-certification by filling out a CV. The "prospective students" can fulfil all operations on their own and they can order their credential by phone or on-line. Clients purchasing complete "academic curricula", such as a BA, a MA and a PhD, are entitled to obtain a price reduction. Belford University is not accredited by any official American agency: on the website, it looks as if it is accredited by the Universal Council for Online Education Accreditation (UCOEA) and the International Accreditation Agency for Online Universities (IAAOU), which are actually two

 45 La Stampa, 6^{th} August 1988 and 10^{th} January 1990.

⁴⁶ In this circular letter also other institutions connected to the Ateneo di Studi Superiori pro Pace are named: Unione Internazionale della Pace, Accademia Universale "Giosuè Carducci", Istituto Superiore di Ricerche sociologiche di Sosti, Chambre Européenne des Arbitres.

⁴⁷ In 1984, a couple married by "father" Gennaro with religious rite discovered that their wedding was not valid and was also more uxorio cohabitation.

accreditation mills.

Allegedly, the people in charge of Belford University have also opened two other diploma mills: Rochville University and Ashwood University⁴⁸. Qualifications obtained at Belford University come with a cover letter, a transcript and certificates demonstrating the accreditation of the institution. The whole package is sold at 400 US dollars and it is delivered within 7 days. It is worthwhile to quote the Belford's motto: "No studies, no admissions, no attendance" 49.

7. Bernelli University

Location: USA, Italy

Website: http://www.bernelli.edu

This institution was born from the ashes of the previous Berne University and it offers mainly courses at Master and PhD level, as well as a few undergraduate courses; it also issues various types of certificates. It is mentioned in the degree mills lists published by the State of Oregon, Maine and Michigan, both as Bernelli and in the relation to the Berne University. On the website, it is stated that the institution also operates in Italy, more precisely in the region of Trentino, in the town of Canale di Trenno, where the Bernelli Education Centre is located. The Centre offers weekend programmes in Riva del Garda, which also include the graduation ceremony, set in the fabulous castle of Drena. The Bernelli University invites groups and associations to take part in its weekend programmes.

8. Cambridge International University

Location: South Africa, Arizona (USA)

Website: http://www.cambridaeinternationaluniv.co.za

Cambridge International University is a distance learning institution, which offers exclusively on-line degrees. On its website, the institution claims to be located in South Africa, but it actually has no campus or premises there. Despite the South African country domain .za, the institution operates in Arizona, USA.

The University claims accreditation by the Global Accreditation Organization for Life Experience and Education (GAOLEE)⁵⁰, a well-known accreditation mill. Moreover, it is not registered as accredited in the List of Registered Private Higher Education Institutions of South Africa⁵¹ nor is it mentioned in the database of South African Qualifications⁵².

On its homepage, it is possible to find the typical features of a diploma mill, promising flexible course attendance, recognition of prior learning and work experience, absence of any admission requirements:

"Cambridge International University makes it possible for people to earn a university education regardless of where they live or work, or their commitments to careers or

⁴⁸ All three institutions appear on the website: http://www.speedydegrees.com, where the same template to order the diploma is used, no matter which institution the customer wants to apply for.

⁴⁹ http://www.belforduniversity.org/university/InsideBelford.html

⁵⁰ For further reference, see the report by Erik Johansson, Swedish National Agency for Higher Education: "Diploma mills, fake universities, and bogus credentials", 17th Annual EAIE Conference 2005, Krakow, Poland, available and downloadable at www.eaie.org/pdf/krakow/203.pdf

⁵¹ http://www.saga.org.za/docs/misc/phei/lphei.pdf

⁵² http://allqs.saqa.org.za

families. The University strives to remove the barriers of time, space, past educational experience, and to a great degree, level of income. (...) In life, you learned at your own pace, now you should get credit for that experience. This flexible evaluation process frees you from the demands of specified class times and rigid institutional schedules. For ultimate flexibility, individualized evaluation applications are accepted year round. Any person 18 years of age or older, of any race, gender, or nationality, is eligible for admission to Cambridge International University".

Nonetheless, the website opens with a suspect disclaimer: "Welcome to Cambridge International University and its "new" way of learning. Cambridge International University is dedicated to the evolving methods of education available in today's ever-changing technological society. But, at the same time, although our acceptance is rapidly growing worldwide in this age of cyberspace, please realize that "not all" employers, educational institutions or accreditation organizations have accepted our educational programs".⁵³

9. Centro di Tecnologia Universitaria Straniera – CE.T.U.S.

Location: Italy

Website: http://www.universitacetus.it (not available anymore)

This institution was defined as "an association for the academic culture" and offered "degree and post-graduate courses of American universities, which have full validity in their country of origin", as well as "American Masters in alternative medicine". It underwent a proceeding by the Italian Authority on Fair Competition for misleading advertising. On the basis of a memorandum of understanding signed with the European Institute of Technology (EIT), CETUS "took on the responsibility to promote, organise and manage the teaching support of courses" for the qualifications awarded by the American partner universities of EIT: for instance, Honolulu University and Clayton University" The latter institutions appear in all lists of diploma mills.

As a consequence, as CETUS representatives have also admitted, the qualifications granted by the above-mentioned American institutions do not have any legal value in Italy. As a matter of fact, on the website, it is said that "the term *laurea* always refers to an American qualification".

10. Clayton University

Location: Hong Kong, China, Republic of San Marino, Nigeria, India

Website: http://www.culhk.com (not available anymore)

This institution operated for many years, issuing titles of Bachelor, Master and PhD. In 1993, it was mentioned in a circular letter published by the Italian Ministry of Education and it now appears on a few lists of irregular institutions. Even though it was founded in the State of Missouri, the headquarters of the Clayton University were in Hong Kong; the other three branches operated in the Republic of San Marino, in Nigeria and in India. This institution declared not to be accredited in the USA but to be a member of UNESCO: it is one of the three institutions, which exploited the name of UNESCO for fraudulent purposes.

⁵³ On the website of the Cambridge International University, under the menu item 'Licensure', the initial disclaimer is further specified and the institution declines all responsibility for the recognition of the title it grants: http://www.cambridgeinternationaluniv.co.za/html/licensure.html

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⁵⁴ Proceeding n. 14.785, published on the Bulletin n. 41/2005, issue date; 12/10/2005.

In numerous proceedings of the Italian Authority on Fair Competition, the Clayton University is mentioned as an organisation issuing qualifications of irregular institutions. At Clayton, students could obtain their final title with a 25 page dissertation for each examination, which had to be sent via e-mail: the students did not have to attend any lesson and the exams were not set by the institutions but chosen by the students themselves.

11. Concordia College and University

Location: Dominican Republic, USA

Website: http://www.concordia-college.net

This degree mill offers qualifications at Associate, Bachelor, Master and Doctorate level, with a 12-hour turnaround.

The headquarters are in the Dominican Republic, the website domain is registered in Pakistan and the mail-box is in the USA. It claims to be accredited by organisations without any authority in Liberia, Indonesia, in the Dominican Republic and in the United States. On the website, there is a copy of a certificate coming from Italy and referred to a qualification issued by the College and University institution. There are counterfeit stamps of the Prefecture of Rome and of the Embassy of Liberia. Obviously, the above-mentioned "clues" are only referred to the legalisation of the document and they have got nothing to do with the recognition of such credential. The Concordia College and University grants qualifications, which are already certified with the Apostille of the Hague⁵⁵, which guarantees that the qualification is recognisable. This is a blatantly misleading strategy, since the purpose of the Apostille is not to certify that a qualification is issued by a legally recognised institution, but it only states that the document is original and bears an authentic signature.

12. Earlscroft University

Location: UK, Ireland, Seychelles

Website: www.earlscroft.com (not available anymore)

Unfortunately the website of this operation only shows the homepage and it cannot be accessed anymore, but its story is absolutely worth telling.

At the end of April 2009 Earlscroft University was struck off by Seychelles Authorities because its activities were found to be, or likely to be, contrary to Seychelles law⁵⁶. The institution declared to have administrative offices in Dulwich, London; affiliated divisions in Ireland and to be registered as a Limited Company in the Seychelles. According to Royal Mail, the address indicated on the website of the Earlscroft University corresponds to the headquarters of the company 'February Automation', which manages a mail forwarding service. This operation was also banned from operating in Texas, and it appears in the list, "Institutions Whose Degrees are Illegal to Use in Texas", published by the Texas Higher Education Coordinating Board⁵⁷.

⁵⁵ The Apostille de la Haye (Apostille of the Hague in English) is a means of authenticating and legalising a signature on a qualifications. It was introduced in 1961 with The Hague Convention, in order to facilitate international legal relationships. The Apostille has the shape of a square (8 x 8 cm) and it is attached to the original documents in order to validate their authenticity.

⁵⁶ Accredibase Newsletter: Seychelles International Business Authority takes action against 'Universities' http://www.accredibase.com/index.php?section=904

⁵⁷ http://www.thecb.state.tx.us/apps/consumerinfo/notx.cfm

Finally, Earlscroft claimed to be accredited by the "United Congress of Colleges (UCC)", which has no significant presence on the web and does not even seem to exist⁵⁸.

13. École Supérieure Robert de Sorbon

Location: France

Website: http://www.sorbon.fr

This institution is active in France also with the name Université Francophone Robert de Sorbon; it claims to issue qualifications at Associate, Bachelor, Master, Magistère, MBA and PhD level. It openly declared that the above-mentioned titles are equivalent to the Italian qualifications of Laurea and Dottorato, to the German Vordiplom and to the Russian Kandidat Nauk e di Doktor Nauk, which would be recognised on the basis of agreements with American institutions. The École Supérieure Robert de Sorbon is not recognised by the French authorities. It is listed among the degree mills published by the State of Maine and Oregon. The institution cannot issue qualifications in Sweden, where it was prevented to operate. Its name blatantly recalls the Sorbonne, the most well known university in Paris.

14. European Institute of Technology

Location: Italy, Republic of San Marino

Website: http://www.eit-ateneo.org, http://www.eit-univ.net

This organisation must not be confused with the school of excellence with the same name founded by the European Commission and created in order to attract the best students and to compete with giants such as the Massachusetts Institute of Technology (MIT).

The EIT originates from the *Istituto Superiore Statale di Cibernetica Sammarinese*; the Italian Authority on Fair Competition started against it several proceedings for misleading advertising and it was also charged to pay a first fine of \in 11,600 and a second one of \in 6,000, because its qualifications result from the partnership with foreign universities and they are not recognised in foreign countries, in Italy or in the Republic of San Marino⁵⁹. As a matter of fact, EIT partner institutions appear in numerous lists of degree mills⁶⁰.

15. Freie und Private Universität Herisau

Location: Switzerland

Website: http://www.unihe.ch

This institution is mentioned in the circular letter n. 155 issued on 16th June 1993 by MURST⁶¹. It has been operating since 1980 and it targets the Italian market through print advertising. In a few newspaper ads, the institution declares that anyone can "graduate", regardless of their mother tongue or of their professional status. Today, it functions mainly through a website, where it is made clear that individuals, who

⁵⁸ CHEA: List Information about some degree-granting institutions not accredited by CHEA-recognized organizations: Earlscroft University http://web.archive.org/web/20060627232714/http://www.osac.state.or.us/oda/index_OR.html

⁵⁹ Proceeding n. 15.441, published on the Bulletin n. 18/2006, issue date 03/05/2006. See also Proceeding n. 15.629, published on Bulletin n.25/2006, issue date 21/06/2006.

⁶⁰ The list of EIT partner institutions can be downloaded at: http://www.eit-ateneo.org/doccollaborazioni.htm ⁶¹ Ministero dell'Università, della Ricerca Scientifica e Tecnologica, now MIUR, Ministero dell'Istruzione, dell'Università e della Ricerca.

have acquired high-level professional experience have the possibility to obtain a prestigious academic qualification. Furthermore, they state that "the study programs and means of evaluation are closely linked to the quality and professional experience of each individual candidate" 62. On the same website, there is also a note on the recognition of the diplomas awarded at this institution: "The University cannot be held responsible regarding the use of degrees and the right to professional practice in individual countries. A degree from our University does not ensure membership of professional associations, nor is any equivalence with other academic titles guaranteed" 63.

16. Golden State University

Location: Lebanon, USA

Website: http://www.goldenstateuniversity.edu

This institution appeared on the Internet in 2002 and it claimed to operate on the Virgin Islands. According to the information contained in the Oregon State database, the Golden State University is located in Hawaii and is called Honolulu University of the Arts Sciences & Humanities. Allegedly, it also operated in Australia, but after an article appeared on *The Australian*, which brought the case to public attention, the contact details of the Australian branches were removed from the website. The Golden State University awards qualifications of any level and in any subject area; it is also closely connected with other on-line bogus institutions.

17. Greenleaf University

Location: USA

Website: http://www.greenleaf.edu

This institution delivers Master and PhD qualifications through distance learning. On the website, it is explained that the Greenleaf University is inspired to "the preindustrial model found in China, India, ancient Islam and in the European older universities like Oxford and Cambridge" ⁶⁴. This institution appears among the degree mills of the State of Oregon database, where it is also highlighted that it is prevented from operating in Sweden.

18. Hamilton University

Location: USA

Website: http://www.hamilton-university.edu (not available anymore)

First established in Hawaii as American State University, it relocated in Wyoming, where it could exploit the local regulations in favour of religious institutions and granted titles, which were declared to be valid. When the State of Wyoming amended such regulations, Hamilton University relocated once again to the Bahamas and it changed its name to Richardson University. On the website, a notice appeared informing the students, who had already purchased a qualification and wanted to receive a transcript of exams, that the institution had moved: the previous headquarters were located in a motel room. The Hamilton University was also accredited by a fake agency: The American Council of Private Colleges and Universities (ACPCU), created especially for this purpose.

⁶² http://www.unihe.ch/eng/university.htm

⁶³ http://www.unihe.ch/eng/info.htm. Please notice that in the text there are also numerous typos and grammar mistakes.

⁶⁴ http://www.greenleaf.edu/about.htm

19. Lacrosse University

Location: USA

Website: http://www.lacrosseuniversity.com (not available anymore)

This institution granted Associate, Bachelor and Master degrees, as well as qualifications at PhD level. After the headquarters in Louisiana were closed upon decision of the judicial authorities, it relocated in Mississippi, where it was immediately added in the list of non-recognised institutions. The organisation operated following the same pattern of many other degree mills: it promised easy qualifications and offered recognition of professional experience. Furthermore, Lacrosse University claimed to be accredited by the Association of Distance Learning Programmes (ADLP), a non-recognised accreditation agency, which grants accreditation to irregular institutions and diploma mills.

20. Leibniz Campus – Libera Università Internazionale G. W. Leibniz

Location: Italy

Website: http://www.lunil.it (not available anymore)

This institution operated through branches located in Milan, Bergamo, Rome, Velletri and Lamezia Terme. The name of its website changed many times: at first, it was called Libera Università Internazionale G.W. Leibniz, then a new institution appeared under the name of Leibniz Campus. The latter specified that the Leibniz Campus did not offer final qualifications equivalent to the Italian ones. Nonetheless, it decided not to apply for any kind of academic recognition by the Italian authorities, because it wanted to remain independent in choosing programme content and teaching methods, as provided by art. 33 of the Italian Constitution. On the website, the institution declared to grant qualifications such as the Master universitario di primo e di secondo livello, which can only be awarded by universities. Furthermore, it used the name of "university" to describe the status of its institution and it claimed to have the typical governing structure of a university, with a rector and academic senate.

For the above-mentioned reasons, the Italian Authority on Fair Competition sanctioned the *Leibniz Campus* with a monetary fine of $\leq 25.000^{65}$. The authority ruled that through the production of unfair advertising, the institution gave misleading messages about its status and the status of the qualifications it granted, using different Internet domains; in so doing, the institution failed to comply with a previous proceeding for misleading advertising⁶⁶.

21. Libera Università degli Studi di Formello

Location: Italy

Website: http://www.uniformello.it (not available anymore)

This institution claimed to have applied for recognition at the Italian Ministry of Education, University and Research and, in the meantime, it claimed to award qualifications recognised by the Region of Latium. After a proceeding started by the Italian Authority on Fair Competition⁶⁷, the University ceased activity and its website domain was cancelled on 29th April 2004. The *Università di Formello* was

⁶⁵ Proceeding n. 15.203, published on the Bulletin n. 7/2006, issue date 15/02/2006.

⁶⁶ Proceeding n. 12.630, published on the Bulletin n. 47/2003, issue date 20/11/2003.

⁶⁷ Proceeding n. 13.429, published on the Bulletin n. 30/2004, issue date 22/07/2004.

founded by a consortium between the Municipality of Formello – now claiming to be the offended party - and the Banca di Credito Cooperativo di Formello. The only course offered at this institution was at the faculty for theatre and cinema, and it was advertised as a unique opportunity in Italy for technical and specialised training in this field, of European standard. During the investigation carried out before the proceeding, the Italian Authority on Fair Competition discovered that all claimed accreditation, as well as all references to European funds were made up. Furthermore, the Italian Ministry of Education confirmed that there was no accreditation procedure in progress for this institution. The people in charge of the operation have never answered to the requests of clarification submitted by the Authority on Fair Competition and they have not even issued a defence brief.

22. Libera Universitas Multidisciplinare Umanitaria per la Cultura Internazionale – LUMUCI

Location: Italy

Website: http://www.lumuci.org (not available anymore)

The LUMUCI University operated though nine branches and offered Bachelor and Master programmes, as well as post-araduate training courses. It declared not to be officially recognised by the Italian Ministry of Education, University and Research and, as a consequence, that the qualifications it granted did not have any legal value in Italy. Nonetheless, "academic qualifications with international validity were issued in partnership with foreign universities, which had signed an agreement with the LUMUCI". The term "international validity" is not correct, since foreign aualifications are never automatically recognised in education systems of other countries. The Italian Authority for Fair Advertising started numerous proceedings against this organisation on charges of misleading advertising, with reference to the information published on the website. In the defence documents, the LUMUCI claimed to be registered in the Anagrafe Nazionale Ricerche (National Register of Research) since 2004 and to be entitled to apply for funding at the Ministry of Education⁶⁸. The Ministry stressed that: "Such registration only means that an institution is actually involved in research activities but does not entitle it to offer courses at academic level or to grant qualifications with legal validity in Italy". The fact that LUMUCI worked in partnership with foreign universities is irrelevant for recognition purposes, because "the latter do not seem to be officially recognised in Italy"69.

23. Non Traditional University of USA – University of USA

Location: Italy

Website: http://www.univerusa.com (not available anymore)

This institution was promoted in Italy by Net Italy snc, a company operating in the field of education, in partnership with some 'Non Traditional Universities of the USA' and constantly looking out for innovations, for the purpose of offering high-quality training. The company declared to work with US programmes and with numerous Italian and American professors. It is impossible to find information about the name of the partner institutions that worked with this company. The institution awarded Bachelor, Master, as well as honoris causa qualifications. Each page of the website

⁶⁸ Registration number 56316DDS (13th July 2004).

⁶⁹ Proceeding n. 15.533, published on the Bulletin n. 21/2006, issue date 24/05/2006.

specified that the Degrees (Lauree) granted in the US were not equivalent to those awarded in Italy, as a matter of fact, they could not even be called Lauree, since this name identifies exclusively Italian aualifications and not US ones, which have a completely different status. The Italian Authority on Fair Competition examined a piece of advertising published by Net Italy snc on national newspapers, where the disclaimer, which appeared on the Internet, was omitted. The Authority judged it as a case of misleading advertising and forbade its further diffusion⁷⁰. Net Italy snc tried to dismiss the charges of misleading advertising, claiming that the omission of the disclaimer was a print mistake. From the investigation, it emerged that the Italian Ministry of Education, University and Research had made clear that: "The University of USA is not officially recognised in the Italian Higher Education system and the term "università" must not be used to describe it. Furthermore, the qualifications it grants cannot be defined "Lauree", because the only valid academic qualifications are those legally recognised in Italy, in compliance with current legislation, which cannot be awarded by private people or institutions, regardless of their name". Finally, the Italian Ministry of Education stressed that: "As far as affiliations with foreign universities are concerned, the University of USA is not authorised to carry out any educational activity as affiliation to a foreign university".

24. Pebble Hills University

Location: Italy (Seborga⁷¹)

Website: http://www.pebblehills.edu

The Pebble Hills University appears among the non-accredited institutions listed in the document of the Office of Degree Authorization of the State of Oregon⁷² and in the one drafted by the Department of Civil Service of the State of Michigan. It is interesting to note that the headquarters of the Pebble University in Seborga is also the headquarters of ten other institutions, all included in the online databases of diploma mills:

- Saint Bernard University (via Miranda 3, Suite 103)
- Eurasia Community College (via Miranda 3, Suite 105)
- Instituto Latinoamericano de Psicobiofisica I.L.A.P. (via Miranda 3, Suite 101)
- St. Paul Ottawa College & University (via Miranda 3, Suite 304)
- Phoenix International University Europe (via Miranda 3, Suite 404)
- West Coast University WCU (via Miranda 3, Suite 504)
- The International University (via Miranda 3, Suite 505)
- Miranda International University (via Miranda 3, Suite 507)
- Marguis Open University (via Miranda 3, Suite 508)
- James Monroe International University (via Miranda 3, Suite 509)

⁷⁰ Proceeding n. 12.057, published on the Bulletin n. 22/2003, issue date 29/05/2003.

⁷¹ Seborga is a little Municipality in the province of Imperia, which counts less than 400 inhabitants. According to unspecified historical documents, this little town claims to be independent from Italy, boasting to be the first constitutional monarchy in the world, which was self-proclaimed "Antico Principato di Seborga" (Ancient Principality of Seborga). During the years, media have often covered the case of Seborga, since they were attracted by the folk phenomenon which animated the small village. The town founders elect a Prince, which rules together with a council of 15 ministers, who do not have any legislative power. As a matter of fact, the Municipality of Seborga belongs to the Italian Republic and its inhabitants do vote for the Major and for the Municipal Council. Nonetheless, the "Principality" mints its own worthless coin, called "Luigino d'oro".

 $^{^{72}}$ In this document the Pebble Hill University is described as follows: "Degree mill. Not a genuine postsecondary institution, has no meaningful authority to issue degrees".

An article appeared on *La Gazzetta di Seborga* (Seborga's Gazette), the on-line magazine of the Principality of Seborga, revealed that after being accused of fraud, the police started investigation on the case of Pebble Hills University and on all other partner institutions. The article also revealed that the headquarters of the institutions are in a room used as a cellar.

The institution claims to offer Bachelor, Master and PhD qualifications accredited by partner accreditation mills, located in various countries, and recognised by the Department of Education of Seborga: an utterly imaginary Ministry, since the Municipality is not autonomous and it does not even host secondary schools.

25. St. Christopher Iba Mar Diop - College of Medicine

Location: United Kingdom, USA Website: http://www.stchris.edu

The British authorities made known that this institution is not eligible for recognition in the UK because it does not satisfy the minimal quality requirements in order to obtain accreditation.

The St. Christopher College operated for many years also in Senegal, where the official authorities have confirmed that it is a non-recognised institution. In Belize, it works under the name of The Medical University of the Americas, another non-accredited institution.

On the website, it is possible to find information about the courses offered but no mention is made of accreditation.

It is claimed that the programmes offered at this institution will prepare students for the United States Medical Licensing Examination (USMLE). The institution is reported in the list of degree mills published by the State of Oregon and Maine; the State of New York and of California rejected its application for accreditation.

26. Saint Regis University

Location: Liberia, USA

Website: http://www.sru.multiservers.com (not available anymore)

This institution was closed down after a decision of the US Federal Court in June 2005 and many of the people employed there were judged guilty. The St. Regis claimed to be accredited in Liberia and in India.

After this information became public, the Liberian Embassy in Washington D.C. circulated a message, which denied any involvement of the Republic of Liberia in the recognition of this institution. St. Regis operators were also involved in spreading information about recognition in India, which was untrue.

This institution operated in a network of at least thirty irregular institutions and it claimed to be accredited by the Distance Education Council, which was also an accreditation mill. In the last few years, other employees were arrested by the US Secret Service on charges of working for the biggest organisation producing fake qualifications⁷³.

After the institution was shut down, it emerged that former students at St. Regis were holding prominent positions at international companies such as Boeing Australia or even at the White House. The institution seems to have reached Australia also:

⁷³S. Phillips, "A stress-free PhD? A snip at \$250", in «The Higher Education Supplement », 25th November 2005

according to the *Sydney Morning Herald*, more than 50 Australians were linked to St. Regis. The majority of them were professionals with degrees in "electrical and mechanical engineering, law, IT, marketing, business management and theology"⁷⁴.

27. Standford University – International Open University

Location: USA

Website: http://www.standford-university.org/about.html (not available anymore), http://www.iou.edu.tf/

Sometimes, spelling can be tricky, as it is in this case: We are not actually referring to the world-class Stanford University in California, but to a fully-fledged diploma mill based in Texas.

Recently, the institution was re-named International Open University and opened a new branch in California. It is accredited by the Council of Distance Education Culture and Faith of the Ancient Principality of Seborga in Italy and it appears on all lists of diploma mills. It is interesting to point out that, in the Internet domain of the new website (http://www.iou.edu.tf/), the termination '.tf' refers to the Territory of the French Southern and Antarctic Lands (TAAF), i.e. to the volcanic Antarctic isles in the Southern Indian Ocean, which are part of the French Overseas Territory (Territoire d'outre-mer or TOM).

28. The Yorker International University

Location: Italy

Website: http://www.nyuniversity.net

This institution grants honorary degrees, as well as PhD qualifications in a number of disciplines. With proceeding n. 11.296⁷⁵, the Italian Authority for Fair Advertising found that an ad published by the Yorker International University was an example of misleading advertising. The institution claimed that the qualifications awarded were eligible for recognition in Italy, where it was neither recognised, nor accredited as an affiliation of a foreign institution. On the Italian version of the website, under the menu item 'Agenzie' (Branches), it is possible to find out that the institution has got branches in the USA, in South America, in China, in the United Arab Emirates and in Africa. Furthermore, it claims to be accredited by the Government Accreditation Association of Delaware: according to the Italian Authority this claim is not supported by any evidence. The Delaware Department of Education denied that the institution ever received authorisation to operate on its territory.

The Yorker International University is also a member of the International University Accrediting Association (IUAA), a well-known accreditation mill based in California and included in the list of non-recognised accreditation agencies of Michigan. This association appears among those that claimed to be accredited by UNESCO. After the ruling of the Italian Authority on Fair Advertising, The Yorker International University stressed that "the American qualifications are not equivalent to the Italian 'Laurea'" and that "The Yorker International University and its partner institution, Université Intercontinentale Le Bon Samaritain, are not affiliated nor recognised in any way by the Italian Ministry of Education or by the other Italian institutions".

⁷⁴ Sydney Morning Herald, "Fakes on to know one: the best degree money can buy" by Anna Patty, 15th February 2010: http://www.smh.com.au/national/education/fakes-one-to-know-one-the-best-degree-money-can-buy-20100214-nzn3.html

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⁷⁵ Proceeding n. 11.296, published on the Bulletin n. 41/2002, issue date 10/10/2002.

29. Trident University of Technology

Location: USA

Website: http://trident-university.com (not available anymore)

This institution specialised in economics and finance and granted qualifications at Bachelor and Masters level. It was based in the USA and it claimed to be accredited by the State of New Jersey; as a matter of fact, the institution never obtained official recognition in this State and the State of Wisconsin also rejected its application for recognition. On the website, the institution claimed to operate privately and that its qualifications were accepted by some official Higher Education institutions. It is registered in all US lists of degree mills.

30. Università Mons Calpe

Location: Gibraltar

Website: http://www.umc-puc.edu/umc_it/default.htm (not available anymore) The Università Mons Calpe is a member of the Private University Consortium LTD, together with the American Business School LLC in Colorado and the University Europanamense in Panama. The three institutions claim to grant qualifications belonging to three different Education Systems: American degrees, European degrees, American Masters, European Masters and honoris causa qualifications. These institutions are not officially recognised. The main objective of the Mons Calpe is to "recognise experience, skills and talents" and to grant honoris causa qualifications "to a selected and exclusive group of entrepreneurs, managers and professionals which distinguished themselves in their jobs". The Università Mons Calpe was mentioned in the circular letter published by the Italian Ministry of Education (MURST) in 1994, among the institutions that are not entitled to obtain recognition in Italy.

31. Università Popolare San Tommaso D'Aquino

Location: Italy

Website: http://www.unitommaso.it (not available anymore)

This institution was connected to the Associazione Internazionale Universitaria San Tommaso d'Aquino (International University Association St. Thomas Aquinas), and it specialised in adult education, organised research and teaching activities, as well as professional training courses. Sometimes, these types of institutions – also called università popolari (people's universities) – enjoy regional recognition and they are managed either by associations and by private institutions – as it was in this case – or by public institutions. Adult education institutions are not authorised to grant qualifications with legal value in Italy, as officially recognised universities do.

The website of the institution advertised a wide-ranging offer of Italian degree programmes, foreign degree courses and different kinds of professional training courses; in some cases, even the corresponding degree class number was specified. The institution made clear that qualifications were not issued directly by the UPST, because it is was not authorised to do so; as a matter of fact, it only carried out administrative, logistic, legal and technical activities in order to support students in the path towards the achievement of an academic qualification at officially recognised institutions. Unfortunately, on the website it was not possible to find the list of the Italian universities which awarded the credential.

In the category 'Foreign degrees' a course in Dentistry was advertised, which was organised in partnership with a Romanian institutions: unluckily, Romanian credentials are not called "Laurea" and they do not have any legal value in the Italian Higher Education system.

The Italian Authority for Fair Advertising also dealt with this institution and started a proceeding on charges of misleading advertising against the *Università Popolare San Tommaso D'Aquino – Campus Sicilia*, on the basis of the information displayed on the extinct website www.unisicilia.net, where it was claimed that the licence for "Rehabilitation therapist" was actually equivalent to the licence for "Physiotherapist".

The UPST only made known that the proceeding of the Italian Authority was not referring directly to the activities it promoted. The Italian Authority ruled that the UPST should pay a monetary fine of $\leq 12.100^{76}$.

32. Universitas Internationalis Studiorum Superiorum "Pro Deo"

Location: USA

Website: not available

This institution worked for many years and granting void *honoris causa* qualifications. It appeared in the circular letter of the Ministry of Public Education of 16th June 1988 and in the one published by the Ministry of University, Scientific and Technological Research of 16th June 1993.

The institution sent letters via mail, fax or e-mail targeted at "selected emerging personalities in different fields: policy, art, industry, etc" (177).

Despite working mainly in partnership with American institutions and operating mostly in the USA, the New York Department of Education declared not to have any information about this institution⁷⁸. For at least 10 years, from 1983 to 1993, it worked with the *Istituto Promozioni Internazionali* (Institute for International Promotion), a PR agency, which – as it was claimed in their documents – mainly worked with two other organisations in the USA: the Constantinian University and the Universitas Internationalis Studiorum "Pro Deo". The Istituto Promozioni Internazionali defines itself as a "member and official sponsor of the United Nations".

It is very interesting to note that at the same address where the premises of the *Istituto* were located, there are now the headquarters of a new agency called *Servizi Mediazioni Internazionali* Srl, which surprisingly enough also advertised via email qualifications such as "Degrees, Professorial credentials and *honoris* causa qualifications" granted by the *Constantinian University*.

On the Internet there is no trace of this university apart from a few mentions on some CVs.

Please note that the *Universitas Internationalis Studiorum "Pro Deo"* must not be confused with the *Università Pro Deo*, a Higher Education institution officially recognised in Italy, which operated in Rome until the Sixties.

⁷⁷ These words are extracted from one of the letters which were sent by the institution in order to advertise the possibility to get a *honoris causa* qualification, with included trip to the USA for the graduating ceremony.
⁷⁸ Source: Il Sole 24 Ore, A. Plateroti: "USA: un ateneo sconosciuto" (USA: An unknown university), 6th March 1995.

⁷⁶ Proceeding n. 17.989, published on the Bulletin n. 5/2008, issue date 07/02/2008.

33. Universitas Sancti Cyrilli

Location: Malta

Website: http://www.unicyril.org

Browsing through the website of this institution, in the Historical profile sections, some 'Schools' are mentioned, which "organise courses leading to European and American academic qualifications (Diploma, Bachelor, Master, Laurea, Ph.D.)", as well as Bachelor of Arts - Bachelor of Science [B.S.]; Master of Arts - Master of Science, Master in Business Administration awarded directly by the affiliated American Universities; [while] the Doctorate in Political Science in Economics and Commerce [is] awarded directly by State Universities⁷⁹". On this profile page, the institution claims to issue qualifications belonging to different Higher Education systems. For the purposes of the present study, it is interesting to have a closer look at the history of the institution and of its accreditation.

"Genesis: The Universitas Sancti Cyrilli was founded in 1669 as "Imperial Academy of St Cyril" by the Grand Ducal House of Moscow, Rjurik Dynasty. It owes its prestigious name to St. Cyril (827 – 869), Apostle of the Slavs, who is credited with the introduction of the Cyrillic Alphabet.

Characteristics: The Universitas is an International University which retains the following historical - juridical characteristics: it is dynastic as the founding Family is a Sovereign Dynasty, formerly reigning over Moscow, which has never renounced to its prerogatives nor suffered the debellatio; it is patrimonial as it has an endowment of honorary and academic titles, forming part of the fons honorum; it is a moral Entity in view of its non-profit making character.

Recognitions: The Universitas has been recognised: in 1669 by Decree of Sultan Mohammed IV Osman; in 1788 by H.S.H. Duke Ercole III of Modena; in 1890 by the Imperial Royal Austro - Hungarian Government; in 1944 by Royal Decree of the Royal Government of Yugoslavia, in exile in London, which recognised its juridical personality and decreed it a moral Entity.

Recent Developments: The Universitas has traditionally been protected and administered by the Head of the Name and Arms of the Grand Ducal House of Moscow, Rjurik Dynasty.

On 12 October 1989 the Grand Duke, in the absence of male heirs and wishing to ensure the dynastic succession, proclaimed Prof. Alfred Josef Baldacchino, Prince of Gagry, His adopted Son and dynastic Successor, in virtue of an irrevocable Testamentary Act of Dynastic Adoption.

By the same Act the Grand Duke bestowed irrevocably on the Prince as dowry with immediate effect the Universitas, with authority to carry out suitable modifications to, and adequate updating of, the existing Statutes and Regulations. On 6 August 2000 the Grand Duke transferred to the Prince in absolute perpetuity the Sovereignty and the fons honorum of the Universitas".

On the website of the *Ordo Byzantinus Sancti Sepulchri*, connected to the Universitas, it is declared that: "The Universitas confers *Honoris Causa Doctorates* in various Faculties on exceptionally meritorious persons who have distinguished themselves in the arts, sciences, industry, commerce, labour, finance, politics, communications and other spheres"80.

⁷⁹ http://www.unicyril.org/en_profile.htm

⁸⁰ http://www.obss.org/infoa.htm

34. Université Européenne Jean Monnet a.i.s.b.l.

Location: Belgium

Website: http://www.jeanmonnet.com

The main purpose of this institution is "[to offer] post-secondary-education training courses of high professional quality and equivalent qualifications in all those fields which are not considered at all, or only partially, by the conventional training system, mainly with reference to new professions. [For this reason it offers] courses through its associate Institutes all over Europe. Such Institutes work completely independently, according to the rules of Jean Monnet statute, but also accepting the control and supervision by Jean Monnet". The presentation of the University ends with the following disclaimer: "UEJM is not a state university. It is not one of those universities which can decide about the academic qualifications, which are protected about the use of such qualifications or about the practicing of a profession". The association has been operating in the market for many years and in the sole territory of Italy, it has 25 branches. The Italian Authority on Fair Competition examined the case of the UEJM. Its advice was requested for the evaluation of the alleged connection with the Libera Università di Cultura Europea (LUCE) incorrectly indicated as an institution authorised to arant recognised degrees and qualifications in Italy. The Authority ruled that the ad appeared on the website was misleading. Afterwards, with the proceeding n. 15.346 of 11th of April 2006, the Italian Authority sanctioned the non-observance of the first measure and ruled the corresponding monetary fine. The Italian Ministry of University Scientific and Technical Research clarified that the qualifications awarded by this institution cannot be recognised in Italy for three main reasons: first of all, because the Italian branches are not affiliations of foreign accredited universities; secondly, because they are not accredited by the Italian Ministry; finally, because the UEJM is not recognised in the Belgian Higher Education system⁸¹.

It is important not to confuse the UEJM with the Libera Università Mediterranea 'Jean Monnet', located in Casamassima (Bari), which is an officially recognised institution in Italy⁸².

35. University of Berkley

Location: USA

Website: http://www.berkley-u.edu; http://www.uofb.com

This institution must not be confused with the prestigious Berkeley University in California. Its name contains, in fact, one 'e' less. This case is another example of spelling-based fraud. At first, it was founded in the State of Pennsylvania; then it was sanctioned and prevented from doing business with the citizens of that State, as it was also reported on the website of the institution⁸³. Furthermore, the Berkeley campus of the University of California requested and obtained an agreement that the Berkley diploma mill would declare itself, in public statements, to be a different institution from the University of California Berkeley Campus.

⁸¹ This information has been confirmed by the Belgian NARIC centre: NARIC de la Communauté française de Belgique; Direction générale de l'enseignement non obligatoire et de la recherche scientifique - Rue A. Lavallée, 1 B-1080 Bruxelles.

⁸² Proceeding n. 14.099, published on the Bulletin n. 8/2005, issue date 23/02/2005.

⁸³ From the website: http://www.berkley-u.edu: "All potential applicants please be advised, 'The University of Berkley is not permitted to do business with any citizens of the Commonwealth of Pennsylvania'".

The Italian Authority on Fair Competition dealt with the case of this institution in connection with a piece of advertising published on the national newspaper *Il Corriere della Sera*, where the possibility to achieve degrees, PhDs, as well as honoris causa qualifications with no need to make the slightest effort was advertised⁸⁴. The Italian Authority got in touch with the Berkley Department of Career Development – Office of Postsecondary Services, which declared that the University of Berkley had not been authorised and that it was not accredited by any accrediting body, legally recognized by the U.S. Department of Education. Any degree issued by the institution would be of dubious value given the conditions described above⁸⁵".

36. University of Bums on Seats

Location: Unknown

Website: http://www.cynicalbastards.com/ubs

This funny institution works exclusively on-line and grants free-of-charge qualifications. It offers degrees in a wide range of disciplines: from Navel Philosophy, to a Master in Issues and a PhD in Hairdressing and Ecology. All credentials are signed by Prof. Alan Dubious, the vice-chancellor of the institution, with an unmistakable signature 'X' and the motto: "The antithesis of academic excellence". This website is a mockery of irregular institutions, since it is possible to print all degree certificates from any computer, without any efforts. The qualifications are at different levels: from Bachelor to the title of Big Indian Chief. The final result is hilarious.

37. University of Ecoforum for Peace

Location: Switzerland

Website: http://www.uep.ch/universita.htm

This institution has got branches in different countries: Belgium, Hawaii, some Eastern European countries and in Switzerland, where the domain of the website is registered. The University Ecoforum for Peace is neither accredited nor recognised in any Higher Education system of the countries mentioned above and it is mentioned in all lists of diploma mills. The institution claims to grant UK and European qualifications. It offers the possibility to organise the academic curriculum at leisure, to attend lessons, seminars, workshops and research groups at universities affiliated to UEP; nonetheless, there is no mention of any partner institution on the website.

In line with the creed of the organisation, potential students are warned that the UEP does not use "impressive premises to administer courses in order to reduce to a minimum the waste of resources and to make the most of the existing ones".

38. University of the Holy Land

Location: Israel

Website: http://www.uhl.ac

This institution offers Master of Arts and Master of Theological Studies, as well as PhD programmes; it appears in the list of diploma mills published by the State of Oregon. On the website, it claims to enjoy recognition from a few Israeli ministries but, as a matter of fact, it does not have any. Furthermore, it is claimed that the qualifications

⁸⁴ The ad appeared on the Corriere della Sera of 23rd June 2002 declared: "It is not necessary to sit exams or to move abroad".

⁸⁵ Proceeding n. 11.519 published on the Bulletin n. 50/2002, issue date 12/12/2002.

granted are accepted in numerous universities worldwide and that they grant access to the further level of studies. In the website there is also plenty of information about the Holy Land, about tourist sites and the possibility to make donations to support this institution which operates in a difficult context. Nonetheless, it is not possible to find any accurate description of the study programmes, nor of its accreditation status.

39. Warnborough University

Location: Ireland, United Kingdom

Website: http://www.warnborough.edu; http://www.warnborough.ie;

http://www.warnborough.ac.uk

The Warnborough University offers Bachelor, Master and PhD courses and issues certificates of different kind. It operates through a network of branches located mainly in Asia, with two main headquarters in Ireland and in the United Kingdom. The institution is also known as the Warnborough College and grants qualifications, which are not recognised neither by the National Qualifications Authority of Ireland (http://www.nqai.ie), nor by the UK NARIC centre (http://www.naric.org.uk/). On the website of the Warnborough University Ireland, it is claimed that the institution has applied for accreditation at the Irish authorities and its qualifications are about to be added to the National Qualification Framework; furthermore, it claims to be accredited by other centres, such as the British one. Unluckily, such information has not been confirmed by any of the centres mentioned. The institution appears in the US lists of bogus universities.

40. Washington International University

Location: USA

Website: http://www.washint.edu/en/

The Pennsylvania Department of Education declared that, this institution is illegal and is not authorised to grant academic qualifications. Furthermore, the WIU must not operate in Australia or sell and advertise the qualifications it grants. The Hawaii Department of Commerce & Consumer Affairs sanctioned the WIU with a monetary fine, because it operated on the Hawaiian territory; the institution has left the State of Hawaii since 2000. It is mentioned in all lists of bogus institutions. It mainly offers distance learning courses, as well as, the possibility to have a tutor in one-to-one courses: Bachelor and Master qualifications are all signed and certified not only by academic institutions, but also by a notary public, which has got nothing to do with the recognition of the qualification.

41. Accreditation Governing Commission of the United States of America

Location: unknown

Website: http://www.agc-usa.org

Despite the tricky name, this agency is not recognised in the USA and it appears in all lists of accreditation mills. It is affiliated to seven institutions that sell qualifications without any legal value.

As we can read from the website, the agency relies on the self-government of the institutions it accredits and on the evaluation given by the students enrolled. In this way the agency denies any responsibility about the quality of the accredited institutions.

42. Association of Christian Colleges and Theological Schools

Location: USA

Website: http://www.accts.cc (not available anymore)

This institution specialises in the accreditation of institutes offering programmes in theology and it works without the authorisation of the US Department of Education. It must not be confused with the Association of Theological Schools in the United States and Canada, the first North American accreditation agency for seminaries. The Association of Christian Colleges accredits five irregular institutions, among others the Tyndale Theological Seminary, sanctioned by the Texas Supreme Court with a fine of \$173.000, because it was not authorised to use the noun "seminary" in its description.

It is possible to become an "Accredited member" upon payment of a fee of \$300. Organisations have also got the possibility to appear among the "accredited" institutions by paying only a few hundred dollars per year. This association is mentioned in the list of accreditation mills published by the State of Oregon and Michigan.

43. Centre of Academic Excellence UK

Location: United Kingdom

Website: http://www.academic-excellence.org.uk (not available anymore)

This institution is accredited neither by the United Kingdom Ministry of Education, nor by any other official authority in other countries.

It is affiliated with the following irregular institutions: University of Benin (Nigeria), School of English Studies, Dalian University of Foreign Languages (China), Department of English, Yunnan University (China), Sri Ramchandra Medical College and Research Institute (India), University of St. Gallen (Switzerland).

The accreditation fee varies according to the course offered by the institutions and to their level: from £800 to £1.500 + VAT for departments; while for the whole institution from £1.500 to £2.500 + VAT.

44. Distance Education & Training Council (DETC)

Location: UK, Cyprus

Website: http://www.detc.org.uk/aboutus.php

This accreditation mill appeared in April 2010 and it bears the same name as does an officially recognised Washington-based accrediting body "The Distance Education and Training Council" (DETC), whose genuine website is http://www.detc.org/. This bogus DETC" appeared with a British web domain and a Cyprus address.

The officials of the recognised American accrediting body, tried to get in touch with the DETC via e-mail and on the phone, but their queries were not answered and their calls were not returned. From further research emerged that there is no registered company in the United Kingdom with this name.

Moreover, the "Standards%" section of the DETC website is a word-for-word copy of the section "Standards & Policies®" of another recognised US accrediting body, the New England Association of Schools and Colleges.

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⁸⁶ http://www.detc.org.uk/accreditation_standards.php

⁸⁷ http://cihe.neasc.org/standards_policies/

45. International Commission for Higher Education

Location: United Kingdom Website: http://www.icfhe.org

This accreditation agency appears in the list of accreditation mills of the State of Michigan; it is affiliated to four institutions: the Breyer State University, the Pebble Hills University, the Worldwide Campus and the North America College

University, the Worldwide Campus and the North America College.

With a fee of \$1.000 to be paid every four years, this agency promises institutional accreditation, on the basis of "certified" parameters and makes available some services, such as the Apostille, to be applied on the issued documents.

Furthermore, it offers a networking service with the other accredited institutions to facilitate the exchange of good practices and suggestions.

Finally, it also promises some reductions for already accredited institutions, in case they want to obtain further accreditation at different accreditation mills.

46. International Council for Accrediting Alternate and Theological Studies - ICAATS

Location: India

Website: www.icaats.org.in

This institution declares to be a Government-approved NGO, but neither the Indian Ministry of Human Resource Development, nor the University Grants Commission of India recognises it and none of the institutions accredited by the ICAATS appear in the lists of official Indian institutions. The Indian Department of Education declares that non-accredited or institutions accredited by non-recognised agencies do not have any right to use the name of "university" or Vishwvidyalaya in the Indian territory.

The affiliated institutions, the Scotfield Graduate School (Modesto, California), the Calvin School of Apologetics and Theology (Kerala, India) and the Trinity School of Apologetics & Theology (Kerala, India), are all lead by Johnson C. Philip, who works as both the Headmaster and the Chancellor of the International Council.

47. Universal Council for On-line Education Accreditation - UCOEA

Location: Unknown

Website: http://www.ucoea.org

The number of institution accredited by UCOEA so far is unknown, also because the "Members' Area" of the website is not accessible. This fake accreditation agency is included in the list of accreditation mills of the State of Michigan and it is also affiliated to the most famous accreditation mill, i.e. the Higher Education Accreditation Commission (HEAC) – which includes four on-line accreditation mills. The websites of the three agencies have been conceived following the same standards: they have the same layout, and they share contents and texts⁸⁸.

48. University Degree Programme - UDP

Location: Israel, Romania

Website: http://www.connect.co.il/degree (not available anymore)

This organisation used to be a diploma mill consortium made up of four affiliated non-accredited agencies: the Distance Learning Council of Europe (DLCE), the European Council for Distance & Open Learning (ECDOL), the European Committee

⁸⁸ http://www.heac.org/heac/onlineuniversities.htm

for Home and on-line Education (ECHOE) and the Higher Education Services Association (HESA). The US Federal Trade Commission repeatedly investigated the case of the UDP. The agency includes 27 fake institutions, which appear in all lists of degree mills. Nine out of the 27 websites were shut down by US authorities. Among the founders of this institution there is the mother of a child who achieved a PhD in Maths at the age of four.

49. World Association of Universities and Colleges - WAUC

Location: Israel, Romania

Website: http://www.waucglobalaccreditation.org (not available anymore)
The WAUC is an accreditation agency, which is not recognised by the US
Department of Education. It was funded by Maxine Asher, who also created the
American World University, another non-recognised institution. Mrs. Asher despite
complaining that "laws in the U.S.A. prohibit the recognition of global accreditation
associations" decided to create a global accreditation agency anyway. This
agency accredited 21 institutions, which were all diploma mills. In January 2006,
WAUC offered accreditation to university at the special price of 100 US dollars.

50. World Information Distributed University - WIDU

Location: Belgium, Russia

Website: http://www.widu.us; http://www.aeiedu.be (not available anymore) Also called, Academie Européenne d'Informatisation – AEI, this irregular institution worked mainly in Belgium, Switzerland and Russia; it offered qualifications belonging to the US Higher Education system (Bachelor, Master and PhD), as well as to the French one (Licence, Mater, Doctorat) in various disciplines. The competent Belgian authorities declared that neither the institution nor the qualifications it granted were valid to access any regulated profession⁸⁹. On the website, in the section dedicated to recognition, it was claimed that the qualifications issued by the WIDU/AEI were recognised in thirty countries worldwide, but the institutions mentioned are all irregular.

⁸⁹ A copy of the letter sent by the Belgian NARIC Centre to the American Association of College Registrars and Administration Officers is available at: http://www.osac.state.or.us/oda/doc/Widu_belgian_response.pdf

COUNTERFEIT QUALIFICATIONS

The present paragraph will be devoted to the three main aspects of counterfeit qualifications:

- a. The case of institutions, agencies and other types of entities, which openly declare to grant forged qualifications;
- b. The case of corruption in the award of PhD degrees, as a practice fostering the circulation of qualifications with no market value;
- c. The case of the so-called 'loophole institutions'.

New, easily-available IT technologies and the latest print devices allow institutions/agencies to forge, completely or partially, qualifications with a very high degree of resemblance to the original ones. The qualifications are indeed advertised as "identical" to them.

Since the phenomenon is particularly common in those countries where, in the past, a considerable number of recognised institutions ceased to operate, changed their name or discarded their archives, because they were lost, modified or even destroyed; in order to give the most comprehensive possible picture we have identified two parallel case studies: the ex Soviet Union and the People's Republic of China, which show some striking similarities.

Altered or modified qualifications are different from the ones that have been discussed in the previous chapter. In this case, the information contained in the credentials issued by official institutions is altered; for instance, the name of the student is changed or the issue date or the final mark obtained. Also, the transcript of exam results can be modified, the marks corresponding to each exam or the collected credits, as well as official covering letters issued by the awarding institutions, where it is usually declared that they are responsible for the award of the qualification in question can be altered.

In order to reduce risks to a minimum, it is possible to identify a few points, which could help to spot forged qualifications⁹⁰:

- always request qualifications in their original language with the corresponding translation, if necessary⁹¹: translated documents alone are not enough, even if they have been drafted by an official institution:
- it is advisable not to accept copies of the qualifications only, which are more likely to be altered, but to always request the originals;
- always check carefully that the credentials do not contain typographical errors, grammar mistakes or rather "unnatural expressions";
- always check the letter headed paper of the institution and the name of the people who signed the credential;
- if possible, compare the credentials to be examined to other ones issued by the same institution or in the same country;
- get in touch with the awarding institution, in order to double-check the name of the qualification holder.

5.1 THE FORMER USSR

As was mentioned earlier, credential evaluation can become particularly difficult when the usual sources of information become unavailable, due to heavy social changes or hefty political upheavals. The best example of this phenomenon, are the institutions which operated in the former USSR⁹² and that, for different reasons, were shut down, changed their name or their status and destroyed their archives. On the ashes of the previously official institutions, agencies were founded with the purpose of selling forged qualifications, which cannot be double-checked with the issuing institutions. They offer dissertations; counterfeit certificates, Kandidat⁹³ and Doktor Nauk⁹⁴ qualifications upon request of the clients. For those who have already achieved an academic qualification, they offer to alter their transcript with higher marks than the original ones. In some cases, the websites of these agencies advertise qualifications directly printed on Goznak⁹⁵ templates, including all elements of aenuine aualifications. At the time of writing, some of the websites listed below have been shut down. Nonetheless, it is always necessary to bear in mind that these forged qualification will continue to circulate in the market for years to come.

On this topic, it might also be useful to browse the instructions on how to obtain academic credential for evaluation purposes on the World Education Services website: http://www.wes.org/ewenr/documentation.htm ⁹¹ In the following countries qualifications are usually issued in English: in Asia Hong Kong, Japan, Korea, Malaysia, the Philippines, Taiwan and Thailand. In the Middle East: Egypt, Israel, Jordan, Kuwait, Oman, Palestinian National Authority, Qatar, Saudi Arabia, Arab Emirates, Yemen. In Africa: Eritrea, Ethiopia and Sudan. In Europe, the Diploma Supplement is becoming common in a good number of countries, it is issued in English but it always comes with the qualification in original language.

⁹² K. Warren, Russian Diplomas for Sale, in «NAFSA newsletter - Admission wrap up», Special issue 1, June 2005 ⁹³ The qualification Kandidat Nauk (кандидат наук) had been granted – in some cases it still is – in ex Soviet states, since 1934. In the US and UK Higher Education systems, it corresponds to a Doctor of Philosophy (PhD) qualification. Nonetheless, its evaluation varies from country to country, mainly due to the fact that the USSR high school leaving qualifications were achieved after 10 years of school. In some other ex USSR countries, this name was attributed to lower level qualifications.

⁹⁴ The qualification *Doktor Nauk* (доктор наук) is an academic credential, achieved by prospective university professors or by students who would like to pursue a career in the field of academic research. It is achieved after the qualification of *Kandidat Nauk*, but abroad it is not always recognised at this level.

 $^{^{95}}$ Goznak (Государственный знак) is the Unitary Enterprise that is responsible for the production of coins and banknotes.

The ENIC-NARIC network identified 29 agencies that sell Russian forged qualifications on-line; the majority of their website is in Russian language only, therefore they are targeted exclusively at Russian speaking users.

Table 2: Website of agencies selling forged academic qualifications in Russia

http://www.diploms-maker.ru *	http://www.prodam-diplom.ru
http://www.vuzdiplom.ru	http://www.diplomshop.ru
http://www.a-diplom.ru *	http://www.needdiplom.ru
http://www.diplomov.net *	http://www.mosdiplom.ru
http://www.docka.ru *	http://yandiplom.ru *
http://www.vip-diplom.ru *	http://www.vipdisser.ru
http://www.dissertation.ru	http://pero.pp.ru
http://www.kupit-diplom.ru	

^{* =} Not available anymore.

(Source: NAFSA)

Doctoral qualifications are not only forged in Russia, but they are also sold. Despite not being directly related with the topic of 'diploma mills', this is a phenomenon of great interest: first of all because it derives from the considerable difficulties that the Russian Higher Education Systems has been facing in the last few years; secondly, because its final outcome is still the circulation of worthless high-level academic degrees. Given the increased competition in the market, a number of companies offer to sell doctoral dissertation at competitive prices⁹⁶. The falsification of doctoral qualifications concerns three different aspects of their achievement:

a. The dissertation: a Candidate Nauk or Doktor Nauk dissertation is supposed to be an original and substantial contribution to the existing body of knowledge in a specific subject field. Usually the "dissertations for sale" do not fulfil this feature, since they are blatantly copied from previous academic works, therefore cannot be defined original in any way.

[%] Osipian, Ararat L.: Dissertations for sale: Corruption in Russia's Doctoral Education, Vanderblit University, Department of Leadership, Policy and Organizations, Nashville, 2009 at: www.aeaweb.org/aea/conference/program/retrieve.php?pdfid=88

b. The holder of the doctorate: not all dissertations circulating on the market have been written by the actual holders of the credential. Usually professional ghost writers, who are paid to do the job, draft the dissertations sold on the market.

c. The diploma: diplomas and doctorates may be forged.

In recent times, Russian and international media have often brought the issue to public attention and, according to some estimates, about 23% of all defended doctoral dissertations are written for money by professionals operating illegally on the market.

It seems that the fashion of holding doctoral degrees is particularly widespread among politicians and bureaucrats, who want to distinguish themselves from the masses. As a matter of fact, in 2006, the Times and the Sunday Times accused the dissertation of the Russian President, Vladimir Putin, of plagiarism⁹⁷. Allegedly, Putin obtained a Kandidat Nauk at the St. Petersburg Mining Institute, but US researchers at the Brookings Institution, based in Washington D.C., discovered that the President's piece of research was based on another work published in 1978 by two professors of the University of Pittsburgh, which was translated almost literally by KGB officials. Furthermore, the two US researchers established that the discussion of that doctoral thesis would not have entitled the Russian President to achieve a full doctorate.

Ospian (p.12) states in his article: "The culture of plagiarism, cheating and forgeries is widespread in Russia. Master theses and term papers can be bought on-line or custom-prepared for the clients and so can doctoral dissertations. Academic corruption is not an exception". Nonetheless, plagiarism and forgery also have their roots in the cultural habits of the Russian people: "One has to know about the importance of kitsch and showing off in the society: "It is like the French term faire montrer. It is better to look like than to be. It is very oriental".

In Russia about 169 firms working in this sector have been identified: the majority of them offers dissertations for sale drafted by ghost-writers in Russian. Some of them also offer the choice to have them in English.

The professional writers are usually recruited among researchers already employed in universities department or faculties. Sometimes, the package also includes accompanying documents for VAK. Most of the agencies are legally registered companies and pay taxes. The starting prices for a *Kandidat Nauk* range from \$900 to \$16.000; while those to obtain a Doktor Nauk qualification vary from \$4.000 to \$25.000.

The Russian academic world is calling for urgent action to be taken in order to

⁹⁷ The Sunday Times: "Putin accused of plagiarising his PhD Thesis", 26th March, 2006:

http://www.timesonline.co.uk/tol/news/world/article695235.ece

⁹⁸ In Russian: Высшая аттестационная комиссия, the VAK is the national government agency in Russia, Ukraine and some other States of the Russian Federation. Its duty is to monitor the award of advanced academic degrees and applications for the ranks of Associate Professor and of Professor. During the Soviet Regime, the VAK was a very efficient institution and was very accurate in controlling the quality of the dissertations and of doctoral documents. After the fall of the Regime, the saw its staff strongly reduced and it struggles to manage the applications coming only from the Russia.

safeguard the quality of doctoral degrees and to tackle the problem of forged qualifications. In this respect, the VAK, the Higher Attestation Commission⁹⁸, recently launched an on-line system called "Antiplagiat-VAK", with the purpose of uncovering plagiarism in doctoral dissertations. The system has the capacity to use more than eight million on-line sources to track possible cases of plagiarism.

5.2 THE PEOPLE'S REPUBLIC OF CHINA

After Russia, China is another country where the falsification of academic documents flourishes at different levels.

Quite surprisingly, students themselves are the first ones to 'alter' their academic qualifications, when they have to translate them to apply for admission at foreign universities worldwide. Nowadays, only a few higher education institutions offer an internal translation service of transcripts and diplomas or issue official English translation of credentials. As a consequence, in the great majority of cases, students translate their qualifications themselves and the documents they produce are not checked by any official institutions. Therefore translations often contain mistakes or their content doesn't actually match the original documents.

Some minor translation errors are not difficult to spot: 计算机基础 (computer basics) often becomes "computer base", when translated into English. Sometimes, the English document may be the result of an "interpretive translation" or even be custom-made for the benefit of the student.

For instance, those courses considered to be irrelevant for further study at a Western institution are omitted, such as Marxist Theory (马克思主义理论) and History of the Communist Party of China (中共党史). In a certificate of graduation, the mention to the adult higher education sector (成人高等教育) might disappear in favour of the regular higher education sector (普通高等院校).

In some other cases, the English qualification may contain extra information that may not be true. For example, a certified English copy of a bachelor's degree in engineering may indicate the holder is also awarded the professional title of engineer. In fact, higher education institutions in China are not allowed to award professional titles. After graduation with a bachelor's degree in engineering (for which a more accurate translation is bachelor's degree in technology), a student usually has to gain a minimum of five year work experience, as an "assistant engineer" (助理工程师) before achieving the professional title "engineer" (工程师). By their very nature, translations are approximations rather than equivalents of the original text. Furthermore, the use of the "related" terminology may be quite different in China and in the rest of the world. Translations, therefore, should not be taken at face value?"

As it has been observed earlier in the case of Russia, also the Chinese Higher Education System in the last few years has known the widespread phenomenon of corruption in the award of PhD qualifications¹⁰⁰. In the People's Republic of China, this occurrence was fostered by the rapid expansion of the PhD programme offered

 ⁹⁹ International Qualifications Assessment Service (IQAS), International Education Guide for the assessment of education from China, 2nd Edition, Alberta, 2009 at: http://employment.alberta.ca/lmmigration/6432.html
 ¹⁰⁰ Asian Times: "In China, an easy route to academic glory", by Stephen Wong, 25th November 2009: http://www.atimes.com/atimes/China/KK25Ad01.html

over the last ten years, as a result of the government's attempt to adapt the offer of academic courses to the need of the expanding Chinese industry. Experts fear that such an increase in the doctoral programmes is not going to be matched with the necessary quality enhancement. In particular, there has been a considerable increase in the number of doctoral qualifications awarded to businessmen and government officials, which are sometimes obtained through a non-traditional route.

While for most ordinary Chinese citizens the path towards the award of a doctoral degree remains demanding, allegedly, powerful Chinese officials are now offered a "green route" from entrance examination to graduation. Universities usually organise admission exams and in order to attract students with some political influence, they even offer exam-free admission.

Once enrolled, these students "with benefits" are exempt from attending courses; in many cases, they even send their PAs to take the classes and to write examinations.

One of the most prominent examples, is the former chairman of China's Securities Regulatory Commission, whose name will be kept confidential, who was arrested in February 2009 on charges of corruption.

According to his CV, he was a doctor of economics, but his master degree was in history; nonetheless the most surprising thing was that it took him only two years to obtain his PhD. This case attracted public attention, since the above-mentioned official must have been "not only a quick learner, but also a capable multi-tasker to complete [a PhD] course, pass exams, finish a dissertation and pass his oral defence within only two years, [...] while at the same time being also engaged in his no doubt hectic official business". A professor of the Fudan University in Shanghai called for an investigation into the acquisition of the above-mentioned doctoral degree, but his demand was not met.

In the Chinese Higher Education system, the majority of universities are public; this means that the Government assigns both the head of the governing body, as the funds allocated to the institution. To some extent, university officials themselves are government officials - they are often transferred from or to a government department, and so are linked with government officials from other branches. In Chinese universities, the status of an employee is not decided by the academic title they hold but solely by their administrative ranking: the higher the ranking, the more power the person has. So university employees often target higher administrative rankings than decent academic titles.

Ironically, this has led to a situation where government officials are queuing up for higher academic degrees while university officials and professors are competing for higher administrative rankings.

5.3 HOW TO GET A "GENUINE" DEGREE IN 5 DAYS: INSTANTDEGREES.COM

Instantdegrees.com is surely a website that must be considered when dealing with counterfeit qualifications: exploiting the "legal loopholes" of the system, here it is possible to obtain a fully "genuine" academic qualification.

Clients are not allowed to choose the awarding institution nor the country of origin, but they can specify the type of qualification, the subject area and the academic

year of issue.

In order to strengthen the value of the credential, it is stressed that the qualification will not be a distance learning one, but it will look like as if it was issued after attending a regular course in the country of origin. The relationship between the agency and the clients is regulated by a contract which is available on-line for consultation (http://www.instantdegrees.com/tos.html). Also the transcript of the whole programme can be purchased on-line.

Clients, who are interested in buying a qualification, must enter on-line the corresponding professional profile: on the website it is made clear that neither a "CV nor documentary evidence is required to back up [their] declaration".

This website was signalled by G. Evans in his book "How to get a genuine College Degree in 5 days".

5.4 ON-LINE SALE OF COUNTERFEIT QUALIFICATIONS

In their book, "Degree Mills: The billion dollar Industry that has sold over a million fake diplomas" ¹⁰¹, Allen Enzell and John Bear published a list of websites managed by organisations operating mainly in the US, which sell fake or forged academic qualifications on-line.

List of websites selling counterfeit qualifications

http://www.bogusphd.com

http://www.diplomareplacementservice.com

http://www.boxfreeconcepts.com/aaardvark.html

http://www.diplomamakers.com

http://www.backalleypress.com

http://www.diplomasandmore.com

http://www.blackmarket-press.net *

http://www.closeduniversity.com/ecommerce *

http://www.boxfreeconcepts.com/fake/diplomas.html

http://www.documentsandsuch.com *

http://www.closedcollege.com

http://www.espionage-store.com/cert.html

http://www.cooldegree.com *

http://www.fake-diplomas.com *

http://www.counterfeitlibrary.com *

http://fakedegrees.com *

http://www.degree-now.com

http://www.fakediplomas.com *

http://www.fantasydiplomas.com *

http://www.graduatenow.com

http://www.diplomacollection.com *

http://www.peterleonguinn.com *

http://www.diplomamasters.com *

http://www.premier-degrees.com *

^{* =} Not available anymore.

¹⁰¹ Prometheus Books, New York, 2004