

CHAPTER 2

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 USA⁹. 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 website¹⁰ 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

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.shtml>).

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. Kings 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

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>

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

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.aqf.edu.au>

¹⁹ The document was drafted in Strasbourg 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 Strasbourg on 1st and 2nd December 1986.

²⁰ The second bulletin was published on 20th 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,

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.def.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

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

²⁶ <http://www.ib-groep.nl>

²⁷ The abstract of the publication can be downloaded at: <http://www.hsv.se/aboutus/publications/reports/reports/2005/fakeuniversitiesandbogusdegreeswedenandtheworld.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 through 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*

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.

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

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;
2. 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.

1. 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.

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 anti-riot 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 and through 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.