



NOTE: Pursuant to Section 101 of the Aviation and Transportation Security Act (49 U.S.C. 114(n)), this directive establishes Transportation Security Administration (TSA) policy and supersedes Federal Aviation Administration (FAA) orders, policies, guidance, bulletins regarding Guidance on Diploma Mills (academic credentials) issued under the FAA personnel management system. This directive is TSA policy and must be applied accordingly.

1. **PURPOSE:** This directive supersedes HRM Letter 735-1, *Interim Guidance on Diploma Mills*, dated April 19, 2005, and provides TSA policy and procedures regarding acceptable and non-acceptable credit, degrees, certifications or credentials to ensure necessary, legitimate qualifications, experience and education.
2. **SCOPE:** This directive applies to all TSA organizational elements and all TSA employees.
3. **AUTHORITIES:** Sections 101 and 111(d) of the Aviation and Transportation Security Act, Pub. L. 107-71 (ATSA), November 19, 2001 (49 U.S.C. §§ 114(n), 40122, 44935, and 44935 note)
4. **DEFINITIONS:**
 - A. Accreditation: Accreditation helps ensure that education provided by institutions meets acceptable levels of quality. Institutions and/or programs that request an accrediting agency's evaluation and meet their criteria are then "accredited" by that agency.
 - B. Accrediting Agency: Private educational associations that develop evaluation criteria and conduct peer evaluations to assess whether or not those criteria are met. The United States Department of Education (DoED) does not accredit educational institutions and/or programs but it does publish a list of nationally recognized accrediting agencies.
 - C. Diploma Mills: Non-traditional schools that are not accredited by accrediting institutions recognized by the DoED, commonly award degrees with little or no coursework, or sell counterfeit degrees and/or transcripts that appear to be from recognized and legitimate educational institutions.
 - D. Higher Education Categories:
 - (1) Conventional/Accredited: Degree-granting schools that are accredited by accrediting agencies recognized by the DoED.
 - (2) Non-Accredited/Pending Accreditation: Schools that are not accredited by an accrediting agency recognized by DoED. These schools offer a curriculum for advanced learning similar to conventional/accredited institution and are in the process of seeking accreditation from an organization recognized by DoED. These schools have received "pre-accreditation" or "candidate for accreditation" status.
 - (3) Non-Accredited/Other: Schools that generally have a traditional curriculum but have chosen not to seek accreditation and thus do not qualify under Sections 4D(1) or (2). In addition, foreign institutions that offer courses of study comparable to institutions

accredited by organizations recognized by DoED fall in this group. These institutions may be accredited by appropriate organizations in their home country, but not by agencies recognized by DoED.

- (4) Non-Qualifying: Non-traditional schools that are not accredited by accrediting agencies recognized by the DoED and that may award degrees or certificates with little or no course work completed by the student. Education is considered Non-Qualifying if it is determined that it is not equivalent in content to Conventional/Accredited higher education programs. This group includes diploma mills and organizations that sell counterfeit degrees.

E. Material Statement: A statement that is capable of influencing, or has a natural tendency to affect, an official decision.

5. RESPONSIBILITIES:

A. Supervisors, Managing Officials and Training Coordinators are responsible for:

- (1) Ensuring that employees are not sent to diploma mills for degrees or any other form of education/training; and
- (2) Ensuring that employees are not reimbursed for the educational expenses from non-accredited schools or repaying student loans (if/when student loan repayment policies are issued) if the degrees are granted by non-accredited institutions or diploma mills.

B. Office of Human Capital and/or Human Resources Specialists are responsible for ensuring that Non-Accredited/Pending Accreditation education (unless covered by Section 6E of this policy), Non-Accredited/Other, and Non-Qualifying education, training, degrees and credentials are not used by an employee or potential employee in qualifying for Federal jobs, to include initial appointment, promotion or reassignment, or in-position salary increases.

C. Employees are responsible for:

- (1) Not using degrees and/or credentials from non-accredited institutions or diploma mills to qualify for Federal jobs (including initial appointment, promotion, or reassignment); and
- (2) Not claiming credit, degrees and/or credentials from diploma mills on employment applications and/or government forms (such as the Standard Form 86, Questionnaire for National Security Positions). Doing so may constitute a fraudulent claim and is considered dishonest behavior or conduct.

- 6. POLICY:** Identifying and eliminating the use of fraudulent academic degrees, certifications or credentials is in the best interest of every Federal employee and is critical to ensuring that TSA employees have legitimate qualifications.¹
- A. TSA will not fund or accept degrees, certifications or credentials that are counterfeit or are obtained from non-accredited institutions, including diploma mills.
 - B. TSA will only accept credits, degrees, certifications or credentials earned from conventional or accredited higher education institutions as legitimate qualification, experience or education in consideration for salary determinations and position qualification requirements.
 - C. TSA will not condone fraudulent claims or intentional falsification of educational experience.
 - D. Employee training is not specifically limited to Conventional/Accredited schools. Managers shall evaluate training to determine how well it meets short and long range program needs by occupations, organizations, or other appropriate groups. Managers may conduct the evaluation in the manner and frequency he or she considers appropriate. Consequently, training may be obtained from Non-Accredited/Pending Accreditation and Non-Accredited/Other schools if the training content meets the agency program needs.
 - E. Degrees obtained from Non-Accredited/Pending Accreditation institutions may suffice if certain provisions are met. The school must fully meet the definition of Non-Accredited/Pending Accreditation. Employees or applicants can be required to provide written documentation of a school's status before the agency makes a judgment as to whether education is qualifying. This ensures that the course work is equivalent to conventional higher education programs of U.S. institutions.

7. PROCEDURES:

A. Dishonest Conduct:

- (1) If a Federal employee engages in dishonest conduct, commits fraud, falsifies credentials or dishonestly represents credentials and educational experience, the Government can:
 - (a) Debar (prohibit the person from obtaining Federal employment) for a period of up to one year;
 - (b) Take administrative or disciplinary action, including demotion, reassignment or removal; and/or
 - (c) Cancel pending applications or eligibilities.

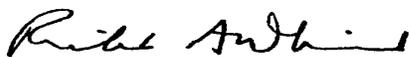
¹ Note: This directive only covers educational requirements and does not cover issues related to the other credentialing programs. For questions about training requests/approvals, contact your local Training Coordinator. For questions concerning employment, contact your servicing Human Resources Specialist.

- (2) Fraud occurs when an individual makes a material statement or intentional false statement in an attempt to obtain employment, promotion, training, special assignment, or other employment-related benefit. This includes claiming education from a diploma mill or claiming education the individual did not obtain.
- (3) The appropriate action depends on whether the individual intentionally falsified a form and whether the person qualifies for the position without the fraudulent or diploma mill credential/degree. Other considerations include:
 - (a) Whether the individual received an unfair advantage over others by claiming the credential/degree;
 - (b) Whether the person holds a security clearance; and
 - (c) Whether the person should continue to remain employed even if the claim was not material to the initial employment decision.
- (4) Regardless of whether or not the fraudulent degree or education claimed was required to qualify for a position, the dishonest conduct displayed will put the person's continued employment in jeopardy if the position occupied requires a security clearance. Dishonest conduct has a direct impact on clearance eligibility, and if a person is determined ineligible for a security clearance, they are ineligible to occupy the sensitive position.

B. DoED has created the following web site that provides a master list of accredited colleges, universities and career and trade schools to use as an initial source of information:
<http://www.ope.ed.gov/accreditation>.

8. EFFECTIVE DATE AND IMPLEMENTATION: This policy is effective immediately upon signature.

APPROVAL



1/11/2007

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Date

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