



To enhance mission performance, TSA is committed to promoting a culture founded on its values of Integrity, Innovation and Team Spirit.

NOTE: Pursuant to Section 101 of the Aviation and Transportation Security Act (49 U.S.C. 114(n)), this directive and all related Handbooks, Attachments, and Appendices, establish Transportation Security Administration (TSA) policy and must be applied accordingly.

REVISION: This revised directive supersedes TSA MD 1100.35-1, *Guidance on Acceptable Academic Credentials*, dated January 11, 2007.

SUMMARY OF CHANGES: Section 1, Purpose, and Section 3, Authorities, were revised. Section 4, Definitions, was revised to update the definitions of Diploma Mills and Accreditation; Section 5, Responsibilities, was revised to clarify the responsibilities of supervisors, management officials, and training coordinators; and Section 7, Procedures, was revised to include a link for a list of accredited colleges, universities, and career and trade schools; and the new debarment period of three years. Administrative changes throughout the directive.

1. **PURPOSE:** This directive provides TSA policy and procedures regarding acceptable and non-acceptable credit, degrees, certifications, and/or credentials to ensure legitimate qualifications, experience, and education.
2. **SCOPE:** This directive applies to all TSA organizational elements and all TSA employees.
3. **AUTHORITIES:**
 - A. The Aviation and Transportation Security Act, Pub. L. 107-71 (ATSA)
4. **DEFINITIONS:**
 - A. Accreditation: A process that helps ensure that education provided by institutions meets acceptable levels of quality. Institutions 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 (ED) does not accredit educational institutions and/or programs, but it does publish a list of nationally recognized accrediting agencies.
 - C. Diploma Mills: Entities that for a fee, offer degrees, diplomas, or certificates, that may be used to represent to the general public that individuals have completed a program of postsecondary education or training; require the individuals to complete little or no education or coursework to obtain the degrees, diplomas, or certificates; and lack accreditation by a recognized accrediting agency or association.

D. Higher Education Categories:

- (1) Conventional/Accredited: Degree-granting schools that are accredited by accrediting agencies recognized by the ED.
- (2) Non-Accredited/Pending Accreditation: Schools that are not accredited by an accrediting agency recognized by ED. These schools offer a curriculum for advanced learning similar to conventional/accredited institutions and are in the process of seeking accreditation from an organization recognized by ED. 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 ED fall in this group. These institutions may be accredited by appropriate organizations in their home country, but not by agencies recognized by ED.
- (4) Non-Qualifying: Non-traditional schools that are not accredited by accrediting agencies recognized by the ED and 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, Management Officials, and Training Coordinators are responsible for:

- (1) Ensuring they do not send employees to diploma mills for degrees or any other form of education/training; and
- (2) Ensuring they do not endorse employee reimbursement for educational expenses from non-accredited schools or the repayment of student loans 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 6.E. of this directive), Non-Accredited/Other, and Non-Qualifying education, training, degrees and credentials are not used by an employee or potential employee in qualifying for positions at TSA, to include initial appointment, promotion or reassignment, or in-position salary increases.

**TSA MANAGEMENT DIRECTIVE No. 1100.35-1
GUIDANCE ON ACCEPTABLE ACADEMIC CREDENTIALS**

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.

- 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 and supervisors shall evaluate training to determine how well it meets short and long range program needs by occupations, organizations, or other appropriate groups. Managers and supervisors 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/or 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 the course work is equivalent to conventional higher education programs of U.S. institutions.

7. PROCEDURES:

- A. The ED 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:
<https://ope.ed.gov/accreditation/>.
- B. Determinations concerning the use of fraudulent academic degrees, certifications, or credentials:

**TSA MANAGEMENT DIRECTIVE No. 1100.35-1
GUIDANCE ON ACCEPTABLE ACADEMIC CREDENTIALS**

- (1) If an applicant or TSA employee engages in dishonest conduct, commits fraud, falsifies credentials or dishonestly represents credentials and educational experience, TSA can:
 - (a) Debar the individual from obtaining Federal employment with TSA for a period of three years;
 - (b) Take administrative or corrective, disciplinary or adverse action, including demotion, reassignment or termination/removal; and/or
 - (c) Cancel a pending application or eligibility determination.

- (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 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) In accordance with [TSA MD 1100.73-5, *Employee Responsibilities and Code of Conduct*](#), and the accompanying [Handbook](#), employees are expected to conduct themselves in a manner that does not cause the agency to question employees' judgment or trustworthiness. Therefore, 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.

- 8. APPROVAL AND EFFECTIVE DATE:** This policy is approved and effective the date of signature unless otherwise specified.

APPROVAL

Signed

August 29, 2017

Karen Shelton Waters
Assistant Administrator for Human Capital

Date

EFFECTIVE

September 8, 2017

Date

Distribution: Administrator, Deputy Administrator, Chief Counsel, Assistant Administrators, Regional Directors, Federal Security Directors, Supervisory Air Marshals in Charge, Business Management Division Directors, Administrative Officers, and Human Resources Specialists

Point-of-Contact: OHCAccess Helpdesk: helpdesk@mailserver-hraccess.tsa.dhs.gov