



# TACRAO Best Practices

High School, Home School  
or Diploma Mills



# Suggested Committee Members

- Student Services
  - Accreditation Specialist
  - Enrollment Services
  - Financial Aid
  - Registrar
  - Admissions
  - High School Programs/Dual Credit
  - Legal Counsel as needed
  - Others.....
- 



# Defining the issues

- What qualifies a student as a high school graduate? Graduation from of a public/private high school, recipient of a GED, completer of a home-school program....
- What evidence is acceptable to document high school completion?
- What is a “diploma mill”? According to the Department of Education, it is a high school credential that can be obtained for a fee that requires little or no academic work.



# Factors that may trigger review of a student's high school completion status

- Lack of specific regulatory guidance
- However, there is general guidance on diploma mills from the U.S. Department of Education, Coordinating Board, Texas Attorney General, organizations such as the Better Business Bureau, other institutions of higher education, and non-profit education organizations



# Examples

- ▶ *State of Texas v. Lincoln Academy* – Lincoln claimed to be a home-school provider. It offered an on-line test and advertised that it was accredited. The Attorney General alleged that there was a relationship between the owners of Lincoln and the accrediting group. In August 2014, a judge signed a permanent injunction closing down Lincoln Academy.  
[www.texasattorneygeneral.gov/oagNews/release.php?id=4820](http://www.texasattorneygeneral.gov/oagNews/release.php?id=4820)
- ▶ *Galiano Career Academy* (U.S. Dep't of Education financial aid ruling, Dec. 6, 2012) – A hearing officer found that a college improperly awarded financial aid to graduates of a high school diploma mill. The high school program cost \$199, could be completed in less than a month, and consisted of study materials and an exam but no formal academic instruction.



# Does the entity have a CEEB code?

- If CEEB code exists and there are no other suspicious circumstances, you may stop here.
- Occasionally, unrelated schools will claim to share a CEEB code. Informal guidance from ETS indicates that this is not permissible. Make sure each school name matches the name on the CEEB list.
- Some CEEB codes from out of state indicate “home school” in the title. These might need to be reviewed to require a signed affidavit by parent/legal guardian.




# Legitimate Home School?

- ➔ Under the *Leeper* case, “school-age children” are exempt from the truancy laws when they receive instruction “under the direction of a parent or parents or one standing in parental authority in or through the child’s home,” with a “curriculum” that is taught in a “bona fide” manner, which means in “good faith, not a sham or subterfuge.”



# Home School?

- ▶ Education directed by parent or guardian
  - ▶ Was a curriculum provided/used
  - ▶ Transcript describes the specific courses taken in a home-school setting?
  - ▶ Does the transcript contain information inconsistent with a home-school setting?
  - ▶ Was the home-school transcript prepared by an entity that appears to be a diploma mill?
- 





# Transcript Appearance

- Anomalies, inconsistencies, errors, misspellings
- Missing information (e.g., does it list when the courses were taken?)
- Inconsistent information or dates; inconsistent transcripts from the same student
- Transfer work clearly identified and not just a photocopy of public school transcript




# Campus Address

- Physical Address – not just PO Box or if address is occupied by a different business
- Phone number (just not an email)
- Building with classrooms?



# Time of attendance/How long was the student enrolled?

- Look for attendance dates, dates of course completion, terms of enrollment on the transcript
- Graduation date (how soon after enrollment?)



## **Are there alerts from a government agency or court about the school?**

- Check legal databases (ERIC or JSTOR) for court cases.
- Search using names of school owners.
- Check state attorney general websites.
- Search name of school restricted to “.gov” domains.

## Do other institutions have this school on their “not approved” list?

- Check state department of education web sites for public statements or warnings
- Search name of school restricted to “.edu” domains.
- Pearson publishes a list of home schools they have recognized as fraudulent.

[http://www.gedtestingservice.com/testers/fraudulent-websites//](http://www.gedtestingservice.com/testers/fraudulent-websites/)



# Is there information from a consumer protection group regarding institution?

- If the business is not BBB accredited, examine reason. See if BBB has issued advisory warnings regarding business. Check letter grade assigned by BBB.
- If complaints have been filled in the last three years, see if details are available. See if business entity has responded and note resolutions.



# Accrediting Agency

- Growing concern about “accreditation mills” – Coordinating Board has stated that bogus accreditation is a major warning sign of a diploma mill.
- Who is the accrediting agency?
- Affiliated with School or Owners?
- Published performance criteria or voluntary self-review?



# Faculty identified

- ➔ Names or credentials of educators?
- ➔ Faculty credentials listed?
- ➔ Cross reference faculty with owners. If school claims certified teachers, check state department of education web site to see if certification verification is possible.



# Description of Services

- ▶ Do they simply recommend a curriculum provider or does the school provide the curriculum?
- ▶ Is the only requirement passage of exam or completion of a workbook or packet? Is the exam open-book or are the answers provided in advance? May the exam be retaken until passed? Are exams proctored?
- ▶ Does the school claim that students who failed state-mandated exit exams may graduate automatically upon paying a credit transfer fee?
- ▶ Does the school award credit based on "life experience"?



# Web Site Reviewed?

- Does the school still exist?
- Is the website generic and vague, or does it describe in detail the content of the programs?
- Use the “Wayback Machine” to see how it has changed.
- Internet Archive: <https://archive.org/>

# Office Visit?

- Visit the school if possible.
- Call schools to get additional information.
- Google Earth is visited to see where the building is located.
- Review brochures and letters from the school when provided or available.



## Other reasonable basis for concern?

- Owners indicted in past for crimes related to fraud?
- Owner operates multiple schools or universities in conjunction with school.
- Advertises “online GED” or get GED at home.

# Information regarding legality of school on website?

- Check website for references to state or federal law. Does the school say “colleges have to take our home school transcript because it’s the law”?
- Check format of references. Is reference a valid legal reference and points to the correct law.
- Relevant compilation of valid legal citations:  
<http://www.law.cornell.edu/citation/2-300.htm>



# Are the tuition and fees charged by the degree/diploma?

- Flat fee for diploma rather than charging by the course or by the semester? Flat fees are a “red flag” according to the Department of Education and Coordinating Board.
- Check news articles or legal briefs for references to price of diploma if not available on website.

# Other Research Sites

- ▶ Texas Private School Accrediting Commission (TEPSAC) <http://www.tepsac.org>
- ▶ Library of Congress legal databases.  
<http://www.loc.gov/law/find/databases.php>
- ▶ LexisNexis database for legal research if your institution has access:  
<https://www.lexisnexis.com/hottopics/Inpubliclibraryexpress/>