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Federal Trade Commission
Office of the Secretary
Room H-135 (Annex V)
600 Pennsylvania Avenue NW
Washington DC 20580

To the Commission:

I am writing regarding “Vocational School Guides Review, Matter No. P097701” in response to the Commission’s request for public comments.

I am a professor of physics at the University of Illinois, Urbana-Champaign and serve on the Board of Directors of the Council for Higher Education Accreditation (CHEA). CHEA, along with the U.S. Department of Education, recognizes and monitors the regional, national and specialized accreditors that provide external quality assurance for the colleges and universities that comprise the U.S system of higher education.

My professorial activities include teaching, and research in elementary particle physics, but I also devote significant attention to higher education policy issues, primarily relating to characterization of legitimate postsecondary programs and identification and suppression of fraudulent and/or illegal degree providers. I publish regularly in higher education journals on these matters. I worked extensively with Congresswoman Betty McCollum’s office when she was drafting anti-diploma mill legislation that was incorporated into the House version of H.R. 4137, passed by the House of Representatives during the 110th Congress. Some of the text survived the conference process to become law in the Higher Education Opportunity Act of 2008, P.L. 110-315 122 STAT. 3078 (HEOA).

HEOA contains a somewhat muddled definition of the term “diploma mill.” The Act does not speak to the problem of deceptive practices in the use by degree providers of unrecognized accreditation, and does not discuss the use by diploma mill customers of their purchased degrees.

To my mind, the Commission’s *Guides for Private Vocational and Distance Education Schools* provides the most lucid, coherent, and extensive description of unfair and deceptive practices to be found in the federal literature concerning bogus academic credentials and certifications. I refer to the document whenever I present on the subject of diploma mills at a policy forum, or in a talk for the interested public. Alan Contreras,

Emily Lawrence, and I refer to it in our article “Complexities in Legislative Suppression of Diploma Mills” to appear in the next issue of the *Stanford Law and Policy Review*. In the article we wrote

The Commission’s 1998 Guides for Private Vocational and Distance Education Schools presents a clear, well-conceived set of definitions and descriptions of the deceptive commercial practices of diploma and accreditation mills. The document illustrates the FTC’s depth and clarity of thinking about the matter.

I describe *Guides* (and include the full text of it as an appendix) in my briefing paper “Thoughts on further legislation concerning diploma mills” that I use in discussions with Congressional higher education staffers. I have used *Guides* as part of my lessons in higher education graduate seminar classes at the University of Illinois and the University of Wisconsin. And I described the content of *Guides* to federal investigators in Operation Gold Seal, the eight-agency investigation and prosecution of the St. Regis University diploma mill gang: I was an expert consultant with the Washington State Office of the Attorney General during the case.

The House Education and Labor Committee is currently considering another round of legislation intended to suppress diploma and accreditation mills. I expect that the material of *Guides* will likely inform and sharpen their thoughts about language for a new law.

I encourage the Commission to retain *Guides* in its set of active guideline documents, with some elaboration of controls on problems that arise in our increasingly global postsecondary landscape. There is a substantial, and largely unregulated industry of foreign academic credential evaluators. An alarming number of them are willing partners of diploma mills, helping the mills’ customers who acquire degrees from illegitimate, purportedly foreign degree providers to use them for purposes ranging from application for immigration visas to misrepresentation of qualifications to prospective customers, patients, and clients.

The call for public comments published by the Commission lists eighteen separate subjects to be addressed by correspondents. Proper attention to each of those topics would be the stuff of an interesting PhD thesis on challenges in higher education regulatory policy. Alas, I don’t have the time to do the topic justice! But if I can be helpful to the Commission in its deliberations about *Guides*, please call on me as you see fit.

Sincerely,

George D. Gollin
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University of Illinois at Urbana-Champaign