

LAYERS OF DEFENSE – HOW TO COMBAT THE TIDAL WAVE OF FRAUD IN INTERNATIONAL EDUCATION

NAFSA 2013

DISCLAIMER

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AGENDA

Housekeeping

A Conceptual Framework of Fraud in Education

The Logic of Fraud in International Education: Economic Imperatives

Examples of Test, Document, and Identity Fraud

Layers of Defense Against International Education Fraud

Discussion

HOUSEKEEPING

- The presentation is geared for about 45 minutes.
- About 30 minutes are allocated for questions and discussion.
- The presentation will be posted on the ICG website (www.icg.ac).

A QUICK POLL OF ATTENDEES

Your Views

- **Do you believe fraud in international education is a small issue, or do you believe fraud is a significant issue?**
- **Do you think your country is becoming more of a target of international education fraud?**
- **If so, in which way?**
- **Do you think your institution has proper quality assurance / anti-fraud mechanisms and policies in place?**
- **Have you personally observed fraudulent behavior / documents?**
- **What do you estimate is the dollar figure attached to fraudulent activities globally?**

A QUICK POLL OF ATTENDEES

Perspectives

- **Fraud has become a notable and sustained problem, stretching around the world and affecting all aspects of international education, ranging from admissions to immigration rules violations.**
- **It is safe to say that most but all of us have been exposed to fraudulent behavior / documents even though one might think otherwise. The very nature of “high quality” fraud is that it remains undetected.**
- **ICG is estimating the amount of money spend on fraudulent activities at USD 2.0 to 2.5 billion annually. It is impossible to generate a concise estimate.**

By definition, “high quality” fraud tends to stay undetected

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FRAUD: A CONCEPTUAL FRAMEWORK

Purposes of Fraud

Purposes	Description
Immigration and Employment	The pursuit of entrance to a country, either through study permits or falsified qualifications to obtain a work or residence visa, or to work in a country based on a (violated) study permit.
Admission to a (Preferred) Institution	The pursuit of admission to an education institution in general, or to a western/selective institution in specific.
Improved Academic Credentials	The attainment of (basic/advanced/elite) academic credentials (real/fake), in order to meet admission requirements to further degree programs or to increase employability prospects.

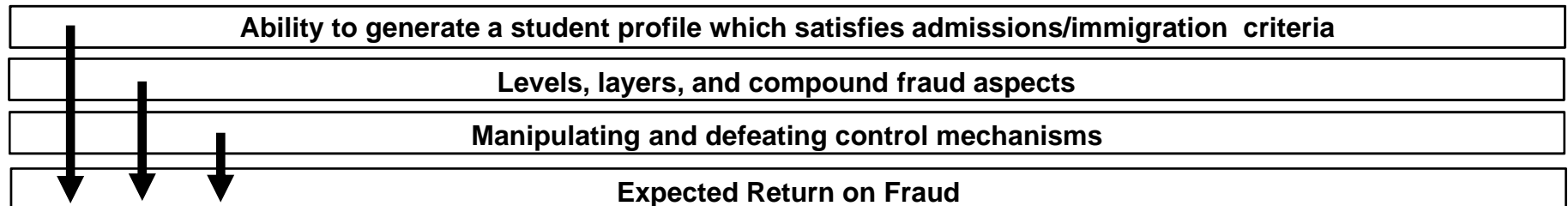
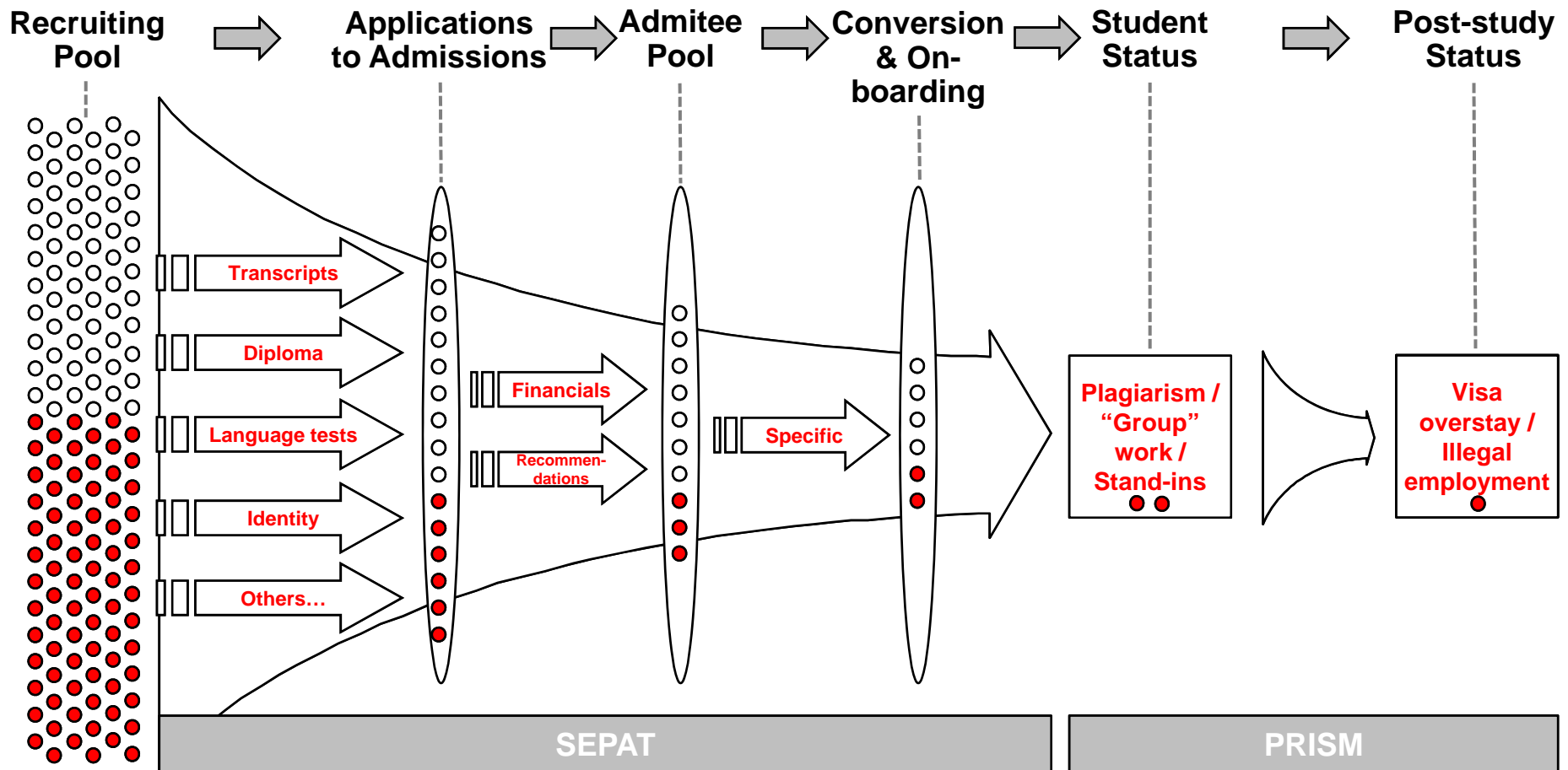
Fraudulent behavior can be singular or multi-tiered

FRAUD: A CONCEPTUAL FRAMEWORK

Modes of Fraud

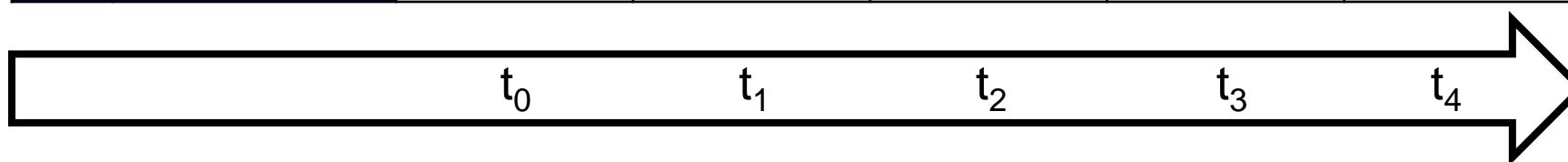
Mode	Description
Transcripts / Degrees	Students, alone or through third parties, submit and/or are awarded fake degrees or academic transcripts. The main purpose is securing admission to a given institution.
Standardized Tests	Students, alone or through third parties, cheat on standardized tests (attitudinal and language ability) and/or produce false scores to secure admission at a given institution or to receive a student visa.
Immigration Documents	Students, alone or through third parties, submit untruthful documentation to immigration authorities. The main purpose is securing entrance to a destination country.
Immigration Rule Violations	Students, alone or with the assistance of third parties, either violate visa rules or overstay their visas.
Plagiarism	Students, alone or through third parties, resort to cheating or contravene academic ethics standards to improve their chances of admission to a given institution, or their academic performance if already enrolled.
Corruption	Students, alone or through third parties, offer financial compensation to a third party to secure the receipt of a given document (e.g. test score) or the successful conclusion of a process (e.g. visa granting process). This cross-sectional category is geared towards those cases in which official government or corporate representatives are engaged in the fraud.

FRAUD: MEASURING THE FLOW AND VOLUME OF FRAUD ALONG THE ACADEMIC STUDENT LIFE CYCLE



FRAUD: FRAUD TYPES BY STAGE IN THE OVERALL STUDENT LIFECYCLE

		Overall International Student Lifecycle (Stages)				
		Application to Education Institution	Visa Granting Process	Border Entry	Studies	Further Studies / Labor Market
Fraud and Deception Modes	Transcripts / Degrees	✓	✓			✓
	Standardized Tests	✓	✓		✓	✓
	Visa Documents/ Compliance		✓	✓	✓	✓
	Plagiarism	✓			✓	
	Corruption	✓	✓	✓	✓	✓



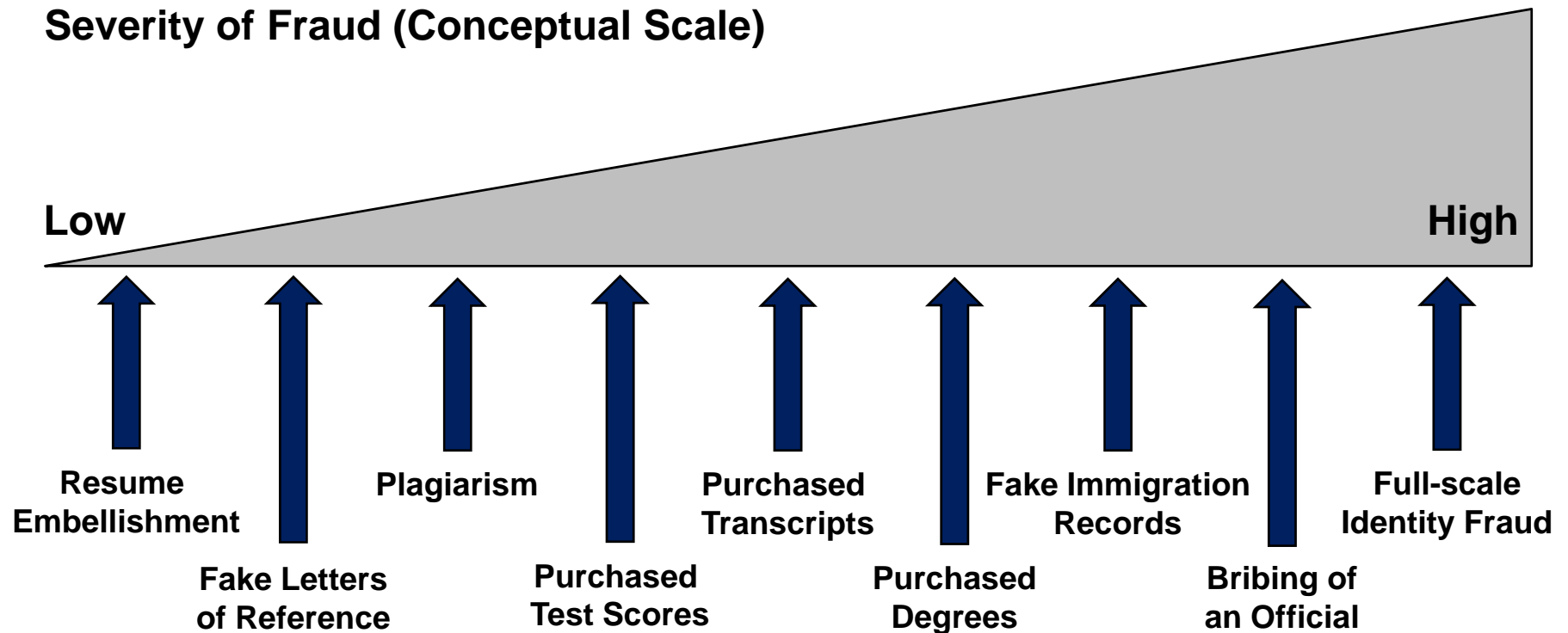
Economic incentives make fraud a persistent, multi-faceted issue

Source: ICG. Notes: Standardized Tests refer to both language and attitudinal tests.

THE SCALE OF FRAUD

Concept, Examples, and Manifestation

Severity of Fraud (Conceptual Scale)



Manifestation

- Fraud can occur as a small, stand-alone issue or be part of a multi-instance, concerted, multi-entity effort.

FRAUD: ON MEASUREMENTS

Using Proxies to Gauge the Reach of Fraud

- **An indirect measurement of fraud activities can be undertaken through proxies (volumes, trends):**
 - **Study permit refusal rates relative to total visa applications (good).**
 - **The surge in language tests relative to reported problems (circumstantial).**
 - **Admissions fraud discoveries (circumstantial).**
 - **Student attrition and failure rates (circumstantial).**
 - **Student visas abuse and overstay rates (moderate).**
 - **Unethical agents count (approximations might be possible).**
 - **Footprint and revenues of the plagiarism-enabling industry (circumstantial to approximation).**
 - **Student misconduct proceedings (approximation).**
 - **Known instances of diploma mills (approximation).**

Combining proxy measures will yield an incomplete but telling picture

FRAUD: ON MEASUREMENTS

How to Measure and Quantify Fraud?

- **The direct measurement of fraudulent activities is effectively impossible:**
 - **Many instances will never be known or measurable.**
 - **Some instances will not be detected and thus misclassified.**
 - **Some instances will never be captured in a reportable format.**
 - **Many instances are detected and terminated but not properly classified.**
 - **Commercial providers hold fraud data they refuse to share on account of commercial confidence.**
 - **Most governmental agencies hold fraud data they refuse to publicly share on account of public diplomacy, national security, or fraud counter-measures.**
 - **Most but all educational institutions refuse to publish fraud data.**
- **The economic and policy incentives for stakeholders are powerfully aligned against a public discussion (investigation) of fraud.**

To date, the only way to quantify fraud is through proxy measures

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THE DRIVER FOR FRAUD: ECONOMIC BENEFIT

- **Fraud is invariably underpinned by certain key rationales. These may overtly be connected to education, but essentially all rationales share one key driver – the economic benefit (perceived/expected/attained).**
- **In many early-stage situations, nearly all stakeholders benefit directly or indirectly (and willingly or unwittingly) from fraud:**
 - **Students (and their families)**
 - **The student eco-system (high school principals, etc.)**
 - **Providers of “fraud services”**
 - **Test providers**
 - **Educational institutions**
 - **Governments**
- **Eventually, fraud will manifest itself and/or will be found out. At that time, the “benefit equation” starts to change.**
- **Some of the above will stop benefitting – and some stakeholders will pay a steep penalty (brand/reputation).**

FRAUD AND DECEPTION: A CONCEPTUAL FRAMEWORK

Economic Rationale and Incentives to Commit Fraud: Students

International Student Lifecycle



Economic Incentives and Rationale to Commit Fraud: Students

- Access to "Western" credential (per se).
- Securing "Western" credential to obtain access to advanced degrees (Master's or PhD) in home or third country.
- Illegal direct access to "Western" labor market through study permit ("underground economy").
- Legal access to "Western" labor market upon completion of studies.
- High(er) earnings prospects upon return to country of origin with "Western" credential.
- Prospect of permanent residence in destination country.
- Prospect of citizenship in destination country.

Fraudulent students have multiple powerful economic incentives to cheat

FRAUD AND DECEPTION: A CONCEPTUAL FRAMEWORK

Economic Rationale and Incentives to Commit/Support Fraud: Agents

International Student Lifecycle



Economic Incentives and Rationale to Commit/Support Fraud: Agents

- High profit margins and volume-driven business model.
- High (and rising) demand from education institutions.
- High (and rising) demand from prospective students.
- Lack of institutional oversight by the education institution of destination.
- Regulatory gaps. At the international level, agents largely act in a regulatory vacuum and quality assurance (and enforcement) measures generally stop at the national border.
- Purely fraudulent agents.

Volume-driven model and regulatory gaps provide a fertile ground

FRAUD AND DECEPTION: A CONCEPTUAL FRAMEWORK

Economic Rationale and Incentives to Tolerate Fraud: Testing Agencies

International Student Lifecycle



Economic Incentives and Rationale to Deal with Fraud: Testing Agencies

- Language proficiency (in particular) is a key bottleneck for any student planning to study abroad.
- Standardized tests are “a necessary evil”, and alternatives emerge only at a slow pace (e.g. today’s language testing market is effectively a duopoly).
- Volume-driven business model.
- To date, despite fraud instances having been widely reported, no regulatory backlash by a popular destination country (Canada, USA, UK, Australia, etc.) has occurred. A credible threat to lose a large destination market has yet to emerge.
- Law enforcement and quality assurance measures in key sending countries may be patchy, or effectively absent.

Testing agencies are aware of their key gatekeeper function

FRAUD AND DECEPTION: A CONCEPTUAL FRAMEWORK

Economic Rationale and Incentives to Tolerate Fraud: Education Institutions

International Student Lifecycle



Economic Incentives and Rationale to Tolerate Fraud: Education Institutions

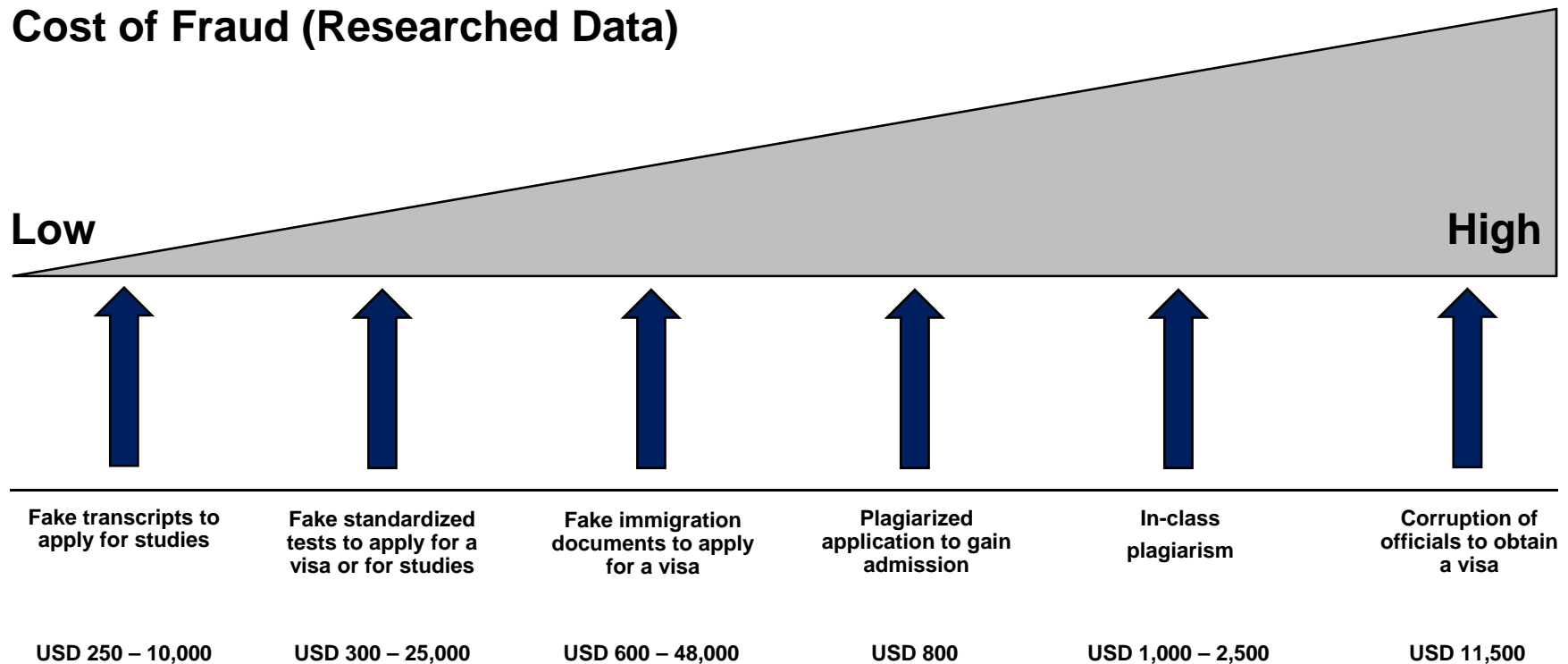
- Tuition fees and associated revenues are an important revenue stream.
- Enrollment targets drive decision-making.
- Costs of fraud prevention at the institutional level is increasing (e.g. screening of thousands of applications for fraud).
- Per student recruitment costs have substantially increased.
- Detection and fraud prevention is not high on administrators' agenda (e.g. as opposed to ensure the overall functioning of the educational institution).
- Marketing potential of a highly internationalized student body.

The prospect of increased revenues can overrule quality considerations

THE ECONOMICS OF FRAUD AND DECEPTION

Fraud Types by Transaction Costs (USD estimates)

Cost of Fraud (Researched Data)



Given their bottleneck function, language testing & visa fraud runs at a "premium"

Notes: Standardized Tests refer to both language and attitudinal tests.

Source: ICG.

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SAMPLE CASES OF FRAUD: APPLICATIONS

Fake Applications to Newcastle University

theguardian


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News > Education > Newcastle University

Newcastle expels overseas students with fake grades

Mainly Chinese students may have been victims of bogus agents who forged applications, says university

Anthea Lipsett
guardian.co.uk, Wednesday 12 November 2008 10.15 GMT



All the forgeries were of "high quality", says Newcastle University. Photograph: Carlos Dominguez/Corbis

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THE CHRONICLE

of Higher Education

Wednesday, September 12, 2012

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November 12, 2008

British University Kicks Out Chinese Students Admitted With Fake Applications

Dozens of Chinese students who submitted fraudulent applications have been expelled from Britain's Newcastle University, according to the BBC and *The Guardian*.

The students — 49 from China and one from Taiwan, all of whom recently began their studies — had been admitted to the university based on what an investigation later revealed to be forged or altered application documents. The students "appeared to be victims of bogus 'agents,' based either in China or the U.K., who were paid to submit applications, including supporting documents, on their behalf," *The Guardian* said. The BBC reported that Newcastle would change various admissions procedures, "including publishing a list of approved agents on the university's Web site."

University officials grew suspicious when some of the students flunked English-language tests, which are required for foreign students whose first language is not English, even though they had documents attesting to their proficiency in English, *The Guardian* reported.

The incident comes as Britain begins phasing in sweeping new student-visa restrictions, intended to ensure that only bona fide students who demonstrate their educational track records can travel

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1. That's Dr. So-and-So to You
2. Who Does Your College Think Its Peers Are?
3. In Selecting Peers for Comparison's Sake, Colleges Look Upward
4. Who Does Your College Think Its Peers Are?

Some kind of application fraud is typical for certain countries

Sources: The Guardian, the Chronicle of Higher Education.

SAMPLE CASES OF FRAUD: APPLICATIONS

Top 5 Fraudulent Applications Practices by Chinese Applicants

Cheating Method	Percentage of Undergraduate Applicants Who Use This Method
Recommendation letters written by someone rather than the teacher, and simply signed and posted by the teacher	~ 90%
Essays written by someone other than the applicant	~ 70 %
High school transcripts (grades and ranking) that are falsified	~ 50 %
Financial aid applications that contain information	~ 30 %
Awards and achievements that are fake	~ 10 %

Notes: Results from interviews with around 250 high school leavers in China (2010).

Source: Zinch.

SAMPLE CASES OF FRAUD: TEST TAKING

The Flourishing Impersonation Industry

THE TIMES OF INDIA | Chandigarh

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Man who cleared IELTS for others in lieu of money, held

TNN Jun 25, 2010, 01:25am IST

Tags: [canada](#)

NEW DELHI: A 30-year-old man, who used to clear IELTS (International English Language Testing System) tests, required for immigration, by impersonating candidates in return of money, was arrested here on Thursday.

Clearing the test is necessary for higher education and employment abroad as well as for immigration.

0 0 0

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More than half of test scores from certain countries are not reliable

Source: The Times of India.

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SAMPLE CASES OF FRAUD: TEST TAKING

Another Variation: Defrauding Fraudulent Students



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5 held for TOEFL fraud

Amira Agarib / 19 September 2012

The Dubai Police have arrested four men and a European woman for allegedly defrauding more than 33 GCC nationals by offering them TOEFL certificates.

Brigadier Khalil Ibrahim Al Mansouri, Director of the General Department of Criminal Investigation, said that the suspects claimed that they owned an institute in Dubai and they would issue TOEFL certificates against Dh24,000 for each certificate.

The case came to light after one of the victims, who was living outside the country, told the police through the Twitter page of Lieutenant-General Dhahi Khalfan Tamim, Commander-in-Chief of the Dubai Police, that he was cheated by a fake institute in Dubai. Lt.-Gen. Dhahi Khalfan instructed the police to investigate the matter.



Legal View
Gratuity calculated on basic salary last drawn



On Campus
Visitors swell at Sharjah Education Fair



In Focus
Park breeds Arabian Tahr



Youth Spot
No child's play

Test taking involves a range of fraud – USD 6,500 paid for nothing

Source: Khaleej Times.

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SAMPLE CASES OF FRAUD: PLAGIARISM

The Harvard Cheating Scandal (I)

The Harvard Crimson

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Typo at Root of Cheating Scandal, Letter Reveals 16

By MERCER R. COOK and REBECCA D. ROBBINS 10 hours ago

Professor of Government 1310 noted suspicious similarities between exams in his official letter to the Athletic Board.

Students React to Kyle Casey's Withdrawal 4

By PETER G. CORNICK 8 hours ago

Students react with surprise and disappointment as Kyle D. Casey '13 withdraws from the College in light of the Government 1310 cheating scandal.

Science Center Plaza Common Space Construction Underway 2

By AKUA F. ABU 8 hours ago

Construction is underway to transform the Science Center Plaza into a dynamic social gathering site that will accommodate more seating, events, and local engagement for the Harvard community.

Men's Basketball Co-Captain Kyle Casey To Withdraw, Miss 2012-13 Season; Curry Also Implicated 31

By ROBERT S. SAMUELS and SCOTT A. SHERMAN Yesterday

Men's basketball co-captain Kyle D. Casey '13 has chosen to withdraw from Harvard because of potential disciplinary action relating to the investigation of the Government 1310 cheating scandal, Sports Illustrated reported early Tuesday morning. The Boston Herald later reported that fellow co-captain Brandyn T. Curry '13 is also implicated in the scandal and likely to take a leave of absence as well.

OPINION

flyby blog

Quincy Swing Housing 3 hours ago

Scaffolding Near the Kennedy School, Kind Of Yesterday

Holy Smokes! 2 days ago

Sundays by the River 2 days ago

The Official Sports Blog of The Harvard Crimson

THE BACK PAGE

MONOTONOUS VS MOMENTOUS

Source: Harvard Crimson.
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SAMPLE CASES OF FRAUD: PLAGIARISM


The Harvard Cheating Scandal (II)



- **In August 2012, Harvard announced publicly that about 125 students from Harvard College would be investigated for cheating:**
 - **While grading an exam for the Government 1310 “Introduction to Congress” course, Professor Matthew B. Platt noticed similarities among 13 exams.**
 - **The Ad Board, which reviewed all exams, announced that 45% of the 279 submitted exams would be reviewed for plagiarism.**
- **Platt’s suspicion was based on, among others:**
 - **On a bonus question, “all the answers use the same (incorrect) reading of the course material in arguments that are identically structured.”**
 - **On two exams, “22, 500” was written with an unnecessary space.**
- **In February 2013, Harvard announced the following outcome:**
 - **Approximately 70 students were asked to temporarily withdraw.**
 - **An additional quarter of investigated students were put on probation.**

Fraud is universal – elite status does not isolate any institution

SAMPLE CASES OF FRAUD: PLAGIARISM

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SAMPLE CASES OF FRAUD: DOCUMENT FALSIFICATION

Diploma Mills



The screenshot displays the DiplomaXpress website interface. At the top, the logo 'DiplomaXpress' is prominently featured. Below it, a navigation menu includes links for 'Diplomas', 'Transcripts', 'Verification Services', 'Samples', 'Prices', 'FAQ', 'Contact Us', and 'ORDER NOW!'. A large promotional banner for a 'SPRING BREAK SALE!!!' is visible, stating that all fake diplomas and degree packages are now at a massive 20%-28% discount until March 31st. Below the banner, there is a section titled 'Samples' with a note advising users to click on thumbnail images to view actual diplomas and transcripts. A section titled 'Sample Diplomas & Degrees' follows, displaying a grid of various sample diplomas from different institutions.

From Photoshop to Diploma Mills: And diploma or transcript can be falsified

Source: www.college-paper.org/order.

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SAMPLE CASES OF FRAUD: DOCUMENT FALSIFICATION

Identity Fraud

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Fake identity documents can be bought for less than USD 100

Source: www.youfinishit.com/shopfactory, others..

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SAMPLE CASES OF FRAUD: IMMIGRATION

Toronto Online Immigration Scam

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3,100 citizenships ordered revoked for immigration fraud

19 individuals stripped so far as Jason Kenney's department investigates some 11,000 cases

CBC News Posted: Sep 10, 2012 8:57 AM ET | Last Updated: Sep 10, 2012 8:04 PM ET 403



Immigration Minister Jason Kenney updated the Harper government's progress on cracking down on immigration fraud Monday. (Sean Kilpatrick/Canadian Press)

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Source: CBCnews.

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SAMPLE CASES OF FRAUD: EMPLOYMENT

Visa / internship fraud

Visa fraud

- The applicant untruthfully claimed to hold a work authorization for the US.
- The applicant proclaimed to have Optional Practical Training (OPT) status with another company. Research strongly suggests that the claimed OPT internship might be a sham.
- Hiring this candidate would have exposed an employer to the (rapid) need to adverse employment action.

Resume screenshot

RESEARCH EXPERIENCE:

██████████ Laboratories ██████████	
Marketing Intern	03/2012 – present
<ul style="list-style-type: none">▪ Identifying fiber optics lasers market strengths and opportunities through data and analysis▪ Collecting information on competitors and its products, application trends and forecasts	
Physics of Semiconductors Group, ██████████	
Research Assistant	09/2007 – 05/2010
<ul style="list-style-type: none">▪ Market research of sensitive terahertz detectors and systems▪ Analysis and acquisition of patent information▪ Researched temperature dependent conductivity of novel semiconductor materials	
Division of Polymers and Crystal Physics, ██████████	
Research Assistant	10/2006 – 05/2007
<ul style="list-style-type: none">▪ Investigated mechanical properties, synthesis and manufacturing methods of high-temperature membranes for fuel cells	

Notes: Details sanitized to maintain privacy.

Source: ICG.

SAMPLE CASES OF FRAUD: TEST TO PLAGIARISM TO EMPLOYMENT

Cultural and Language Non-Capability

The Illuminating Consulting Group

Mobile No. : [REDACTED]

Dear Sir/Madam,

I am writing to apply to the Policy Analyst Position with Illuminating Consulting Group. I am confident the skills that I have developed at Yale and the London School of Economics in addition to my working experiences would prove valuable to any of your areas of project.

Five-year solid academic training in UK enabled me built strong networks with more 800 alumni and 55 professors. To prepare me well for functional analysis, I elected “Econometrics” and “International Economics” at Yale. I leaned through these courses tools of policy evaluation, statistical analysis as well as the international strategy, predictive forecasting and trend modeling. I also strengthened the qualitative benchmarking and equity valuation skills through twelve business case studies in emerging markets finance. In addition, my written and literature surveys skills are improved after completing master’s thesis “the impact of financial development on economic growth”. I look forward to bringing these evaluative and quantitative skills in addition to my deep understanding of British education system and institutional roles to Illuminating Consulting Group.

Financial work experience at Lehman Brothers and Industrial and Commercial Bank of China (ICBC) honed my problem-solving and structuring skills. As an analyst intern at ICBC, I conducted research into the real estate industry and prepared investment strategy presentation slides for potential investors. I also raised \$15 million in capital with five team members. Moreover, through working at Lehman Brothers on the US\$ 250 million Alliance & Leicester bond issue project, I significantly boosted my proficiency in conducting financial models and providing financial strategic advice. Meanwhile, my entrepreneurial experience starting MMY International Social House has honed my abilities in creative business strategy planning and detail-oriented marketing.

Four years of elite education (LSE, Yale) – a cover letter with dozens of mistakes, multiple untruth, and supporting materials which evidence a fundamental lack of English capability

Notes: Details sanitized to maintain privacy.

Source: ICG.

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Discussion

COMBATING FRAUD EFFECTIVELY IS BASED ON MULTIPLE, INTER-CONNECTED, FLEXIBLE LAYERS OF DEFENSE

- **Much of current anti-fraud measures are belated and reactive.**
- **The later fraud is discovered, the more an institution will have suffered negative impact across multiple functions (eventually without recourse).**
- **Moving fraud detection up early into the application-admissions-onboarding process chain is essential – this is what the layers of defense model is about.**
- **Layers of defense entail multiple approaches – from established credential verification to advanced statistical modeling of the probability for fraud.**
- **Layers need to be connected to be effective (a key deficiency typically is the disjointed anti-fraud measures)**
- **Flexibility is key – fraudulent activities can be innovative, ingenious, and relentless. Static measures will thus fail over time.**

COMBATING FRAUD EFFECTIVELY IS BASED ON MULTIPLE, INTER-CONNECTED, FLEXIBLE LAYERS OF DEFENSE

Layer One: Marketing/ Recruiting

- Clearly articulate that fraud is not tolerated.
- Drive negative self-selection of fraudulent students.
- Focus recruiting on legitimate student pools.



Layer Two: Admissions

- Use holistic, information rich application materials.
- Employ state-of-the-art verification processes.
- Utilize data mining across Norway.



Layer Three: Immigration

- Set up clear policies and enforce these publicly.
- Apply appropriate/high levels of scrutiny.
- Collaborate with other student destination countries.



Layer Four: In-Classroom

- Add training on expected academic conduct.
- Use proper tools to validate academic performance.
- Enforce quality by expelling fraudulent students.

INTERNATIONAL EDUCATION FRAUD

How To Respond – Higher Education Institutions?

- **Convene all stakeholders and assess state of awareness as well as educate on actual state of fraud (potentially/actually) impacting the institution (EDUCATE).**
- **Assess institutional processes, procedures, and protocols to detect and respond to fraud relative to best practices (GAP ANALYSIS).**
- **Run post-fact analysis and gather deep contextual information across the organization (EVIDENCE COLLECTION).**
- **Draw up improved processes, procedures, and protocols which are embedded in a QA-driven organizational design (CHANGE MANAGEMENT).**
- **Repeat...**

INTERNATIONAL EDUCATION FRAUD

How To Respond – Governmental Institutions?

- **Develop comprehensive information and evidence collection mechanisms, ideally in a scalable, codified, digital, and database-centric manner (GATHER).**
- **Assess (supra-) national processes, procedures, and protocols to detect and respond to fraud relative to best practices (ASSESS).**
- **Change cooperation, sharing, policy-making/shaping, and enforcement models (CHANGE MANAGEMENT).**
- **Devise dedicated and specific layered communication policies and share intelligence and implications (COMMUNICATE).**
- **Repeat...**

AGENDA

Housekeeping

A Conceptual Framework of Fraud in Education

The Logic of Fraud in International Education: Economic Imperatives

Examples of Test, Document, and Identity Fraud

Layers of Defense Against International Education Fraud

Discussion

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