



Pennsylvania's Professional Development (PD) Registry Policy on Fraud

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Fraud

Fraud is defined as an intentional misrepresentation of information to gain an unfair advantage over an individual or system. Examples of fraud with Pennsylvania’s Professional Development Registry (The PD Registry) include, but are not limited to:

- Pennsylvania Quality Assurance System (PQAS)/Training Certificate Manipulation
- Transcript distortion
- Diploma distortion
- Eligibility deception
- Training distortion by instructor or participant

Participants may unknowingly, and therefore unintentionally, misrepresent degrees earned when submitting transcripts or grades reports from colleges that are not accredited and considered “diploma mills”. Pennsylvania’s Professional Development Registry considers transcripts and degrees from these organizations to be fraudulent information from the company providing the degree. Participants will be notified by email that the transcripts and/or degree submitted does not meet the criteria for an approved degree from an accredited college or university.

Detecting Fraud

The PD Registry staff has been trained to detect fraudulent high school diplomas, college transcripts, college degrees, training certificates, and credentials.

College transcripts and any degrees earned may be unofficial transcripts with the name, college/university name, degree, courses with grades, and confer date. There may not be any handwritten information on the transcript. A photo of the transcript or degree may be taken on a smart phone and uploaded to the education tab of the Pennsylvania’s Professional Development Registry of an individual’s account.

- The PD Registry staff are regularly updated on the format of education, certificate, and credential documents. They are also updated on timelines for issue/expiration dates of credentials, fonts used, and sponsors of training certificates and/or credentials submitted by participants.
- PQAS-approved training organizations and/or PQAS approved Instructors will record a participant’s attendance and completion of a training event directly into our system which lists the training and completion date onto the participant’s Professional Development Learning Record.
- Participants enter place of employment, position held, wage, and amount of time worked in a licensed facility into Pennsylvania’s Professional Development Registry. This information is verified by either Department of Human Services, OCDEL, The Pennsylvania Key, Early Learning Resource Center Quality Coach, or a Director of the program in which that employee is employed.
- The PD Registry staff maintains a working relationship with Department of Human Services Certification Representatives, approved PQAS training sponsors, credentialing organizations, and Higher Education as a source of verification.

Reporting Fraud

Pennsylvania's Professional Development Registry staff are obligated to report any suspicion of fraudulent practices within the system. The suspicion of fraud should be documented and kept in the participant's online profile with a private staff note and immediately brought to the attention of the Professional Development Manager and Professional Development Registry Manager.

Pennsylvania's Professional Development Registry staff researches the suspected fraudulent information with PQAS approved training sponsors, credentialing organizations, Higher Education, or Certification Representatives to determine if the information/document is indeed fraudulent.

1. If fraud is still suspected and no verification from other sources can verify the document, staff makes detailed notes of the findings in the participant's online profile under the private note section of the account.
2. The participant is issued a letter requesting either the original document of the photocopied one submitted, verification of attendance or compliance from the sponsoring organization/instructor or an explanation as to how they obtained the document they submitted.
3. The participant has 2 weeks from the date of the letter to submit any of the requested information.
4. If the requested information is submitted and found that fraud was not committed, the PD Registry staff may continue with the processing the application and no action is taken.
5. If the requested information is submitted and the PD Registry staff cannot confirm or deny that fraud was committed, further investigation will occur with the assistance from the Professional Development Registry Steering Committee and OCDEL.

Corrective Action

If the requested information is submitted and the PD Registry staff cannot confirm or deny that fraud was committed, further investigation will occur with the assistance from Pennsylvania's Professional Development Registry Steering Committee and OCDEL.

If the participant does not submit the requested documentation/information within the allowed timeline or documents other than any originals of the photocopied documents previously submitted are not received, the participant will be notified by mail of suspension from Pennsylvania's Professional Development Registry for a total of ninety (90) days from the suspension date (letter signed and issued by the Professional Development Manager or Professional Development Registry Manager).

Participants that have been suspended from Pennsylvania's Professional Development Registry may also be subject to more disciplinary actions depending on the severity of the case. The case will be brought to the Professional Development Registry Steering Committee for further review and decisions on disciplinary actions.

Documentation - Notification

Participants suspended from Pennsylvania's Professional Development Registry will show a status of "Suspended" within the staff notes section of the participants profile along with detailed notes as to timelines, requested documentation and any correspondence with the participant. Documentation will also be housed at the Pennsylvania Key with the Professional Development Manager and Professional Development Registry Manager.

The Professional Development Registry Manager and Professional Development Manager will contact Director of Workforce, Executive Director at The Pennsylvania Key, the Quality Coach for the program that the participant is employed, and OCDEL. If the participant is employed at a Training Organization, the Training Organization will be contacted.

The email will include:

- The participant's full name,
- Place of employment, including the MPI number of the facility and the position held at the facility if the person works for a child care program.
- The participant's suspensions dates
- A copy of the suspension letter that was sent to the participant

Suspension Due to Fraud

Suspended participants are entitled to appeal the decision made by Pennsylvania's Professional Development Registry administrators up to two times.

Appeal #1

- Appeals must be received within thirty (30) days from the date of the suspension.
- Appeals must be submitted in writing and addressed to the Professional Development Manager or Professional Development Registry Manager at The Pennsylvania Key.
- Within ten (10) days of the receipt of Appeal #1, the participant can expect a reply, in writing, from the Professional Development Manager or Professional Development Registry Manager reflecting the decision Appeal #1

Appeal #2

- Appeal #2 should be received within fourteen (14) days from the date of Appeal #1's decision
- Appeal #2 must be submitted in writing and addressed to the Director of Workforce
- Within ten (10) days of the receipt of Appeal #2, the participant can expect a reply, in writing, from Director of Workforce reflecting a decision.

Decision from Director of Workforce and OCDEL on Appeal #2 is final.