

## POSITION STATEMENT

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# Toward a Fraud-Free Environment

### ● TruMerit's position

Public safety depends on rigorous screenings of foreign-educated health professionals seeking to work in the United States, where they now account for 16 percent of the healthcare workforce. Accordingly, the authenticity of their evidential records—upon which all subsequent eligibility decisions are made—must be at the very top of the credential evaluation agenda. With this in mind, ensuring a fraud-free environment requires evaluation organizations to adopt a dynamic combination of approaches, including primary source verification, smart deployment of the latest security technologies, robust application of data checkpoints, and an abiding commitment to upgrading and evolving anti-fraud techniques in response to emerging threats.

### ● Background and analysis

Operation Nightingale, a multi-state law enforcement action in 2023, brought to public attention that 7,600 fake nursing school diplomas and transcripts were sold to allow individuals without the requisite education and training to take and pass NCLEX®, the U.S. nursing licensure exam. This incident pointed to vulnerabilities in credential evaluation, and particularly the need to strengthen anti-fraud standards and protections in the interest of patient safety. This challenge is further compounded when foreign credentials are presented, due to their vulnerability to tampering in light of differences in educational and regulatory systems from country to country.

In this environment, credentialing organizations can strengthen their efforts against fraud by adopting a robust constellation of anti-fraud tools and processes. The ongoing transition from paper to digital records presents a unique opportunity for them to revisit their fraud policies and strengthen their implementation in the following critical areas:

**Steadfast reliance on primary source verification**—Primary source documentation is the core of fraud prevention and, along with a short chain of custody and robust efforts to limit opportunities for human intervention, is key to preventing record-tampering throughout the document transmittal process.

**Smart deployment of technology**—Existing and emerging technologies offer enormous promise for reducing exposure to fraud in the credential verification process, as well as for optimizing operational efficiency. For example, TruMerit operates a state-of-the-art Credential Transfer Portal (CTP), hardened with Advanced Endpoint Protection and other web security tools, enabling issuing authorities to submit school and licensure records directly, electronically, and securely. We use network security technology, including secure web gateways to filter traffic and enforce policy compliance. Only recognized educational institutions, licensing boards, and professional associations that issue or validate credentials are able to share records with us via the CTP. Designated portal users must also



regularly undergo a multifactorial approval process, ensuring that they have official institutional email addresses as well as the ability and authority to authenticate credentials.

**Robust application of data checkpoints**—Multiple data checkpoints across global databases equip TruMerit with unique capabilities to verify and synchronize information from multiple sources to confirm accuracy. Our systems cross-reference credentials against applicant biodata and the country's educational and regulatory systems, and verify details such as graduation dates, licensure numbers, and other relevant information. We ensure that information on documents is consistent with the individual's application, and we look for any discrepancies in job titles, dates of employment, and other details. Multiple checkpoints at each stage of the review process strengthen our protocol.

**Effective use of corporate expertise and proprietary data**—Credentials information representing decades of expertise is a critical asset to identify errors, inconsistencies, and irregularities of all kinds. TruMerit's proprietary databases of educational and regulatory system operations across the health professions worldwide equip us with this unique capability.

## ● Conclusion

Fraud is a dynamic international problem and a longstanding threat to assessment systems worldwide. As a credential evaluation organization dedicated to the adjudication of qualifications that helps define access to opportunities, TruMerit remains vigilant and committed to creating a fraud-free environment to ensure fair, accurate, and equitable evaluation. We seek to collaborate with like-minded organizations to continue to innovate and to guard against fraud in this vital public service.