



February 8, 2023

To: Chief Executive Officers

From: Andrew Vanzee, Kevin Stella and Scott Taebel
Hall, Render, Killian, Heath & Lyman, P.C.
IHA Counsel

Re: **OIG Announces Major Crackdown on Nursing Diploma Scheme –
Thousands Received Fraudulent Nursing Diplomas and Transcripts**

Executive Summary

The U.S. Department of Health and Human Services Office of Inspector General ("OIG") recently announced that it coordinated with law enforcement partners in launching a multi-state enforcement action dedicated to uncovering a massive fraudulent nursing diploma scheme. Referred to as [Operation Nightingale](#), it has exposed an alleged scheme involving the sale of fake and fraudulent nursing degree diplomas and transcripts from three then accredited Florida-based nursing schools to 7,600 aspiring nurses.

Fraudulent Scheme

On January 25, 2023, the [U.S. Department of Justice \("DOJ"\)](#) charged over two dozen individuals with wire fraud and conspiracy to commit wire fraud in connection with leading the alleged fraudulent scheme – each defendant faces up to 20 years in prison. The DOJ alleges the sale of the fake transcripts and diplomas enabled the nurse candidates to sit for the national nursing board exam. For those nurse candidates who passed the exam, the Government alleges that they were eligible to apply for their nursing license without having the requisite education and clinical training experience.

The scheme used fake and fraudulent diplomas and transcripts from the following Florida-based accredited nursing schools: Siena College in Broward County, Sacred Heart International Institute in Broward County, and Palm Beach School of Nursing in Palm Beach County.

While all three schools are now closed, the OIG and law enforcement agencies are identifying individuals who purchased the fraudulent documents and became licensed. Currently, Operation Nightingale has identified health care facilities in Delaware, Florida, New Jersey, New York, and Texas employing such individuals. State boards of nursing

have also begun investigating nursing licenses issued as part of this fraudulent scheme. The Texas Board of Nursing issued [this statement](#) in late January, indicating an intent to take action against affected individuals and seek revocation of any fraudulently obtained nursing licenses.

Practical Takeaways

Health care employers should prepare for the possible repercussions resulting from Operation Nightingale, including the obvious potential for patient health and safety concerns or follow-up from federal or state enforcement officials regarding any affected nursing staff. In addition, health care employers should consider reviewing educational records in its possession of employed and contracted nurses to identify whether any individuals attended the three Florida-based schools associated with this scheme. If a health care employer identifies a nurse with credentials from one of these schools, it should contact legal counsel to determine possible next steps.

For questions or more information, please contact:

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Routing Suggestions: Human Resources, Nursing, Compliance