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# The Use of Agents in International Student Recruitment: International Education Professional's Opinions

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Running header: THE USE OF AGENTS IN INTERNATIONAL STUDENT  
RECRUITMENT

THE USE OF AGENTS IN INTERNATIONAL STUDENT RECRUITMENT:  
INTERNATIONAL EDUCATION PROFESSIONAL'S OPINIONS

Emily Kirsch  
PIM 71

A Capstone Paper submitted in partial fulfillment of the requirements for a Master of  
International Education at SIT Graduate Institute in Brattleboro, Vermont, USA.

Capstone Seminar February 2014

Advisor: David Shallenberger

## THE USE OF AGENTS IN INTERNATIONAL STUDENT RECRUITMENT

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# THE USE OF AGENTS IN INTERNATIONAL STUDENT RECRUITMENT

## ABSTRACT

The use of recruitment agents in international student recruitment is a controversial topic with divisive and differing opinions among international education and higher education professionals. This paper researches international educator's opinions on the use of recruitment agents in international education and explores the idea of a framework to regulate their use. A survey was sent out to international educators across the United States. 119 respondents gave their opinions on the use of agents and provided a valuable snapshot of the current outlook on the ethics and necessity of the use of agents.

## **Introduction**

The use of recruitment agents in international student recruitment is a controversial topic with divisive opinions among international education and higher education professionals. Is the use of commission-based recruitment agents inherently bad? Are recruitment agents really essential in certain markets? If the use of agents was more regulated, would more professionals be willing to use them? The researcher wanted to research the use of recruitment agents in international student recruitment, and was interested in learning what a broader swath of professionals in the field of international education think about their use. The researcher wanted to find out how many universities and colleges already utilize them, what methods they use to regulate agents and ensure student satisfaction and quality, and how they feel about a broader framework for working with agents.

In my current position, my primary responsibility is working with recruitment agents. Our operational framework came from a recruitment consultant working for Humboldt State University. The consultant was a past director of marketing and promotion at an Australian university and worked in the Australian international education market for many years. In Australia, the ESOS (Education Services for Overseas Students) Act defines how universities market, offer, and provide courses of study to international students that study in Australia (Flinders, 2013). This act includes regulation of the use of recruitment agents, and aims to protect the interest of

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students coming to Australia on student visas (Australian Government, 2013).

Universities in the United Kingdom and Australia that work with agents post names of the agents they work with on their websites – there is no secrecy surrounding their use of agents. However, in the United States, the use of recruitment agents has been surrounded by controversy. According to some, commission-based recruitment agents prove a “combustible mix, to the detriment of the student,” when agents make profit by directing students to specific universities (Miller, 2011, para. 16).

There are conflicting opinions from different higher education and international education players. NACAC (National Association of Schools and Colleges) has traditionally taken an approach that does not recommend working with agents, but the organization has recently become slightly more lenient, stemming from a barrage of comments received from members when the organization attempted to clarify their position on the use of commission-based recruitment agents (NACAC, 2011). AIRC (American International Recruitment Council) has been proactive in forming a consortium of member universities in the United States that support the use of recruitment agents in a regulated way. They also comprehensively review and certify recruitment agents. NAFSA’s website mentions the robust and passionate discussion surrounding agents, and supplies information for best practices from various organizations (Darrup-Boychuck, 2009). NACAC and AIRC, as well as a select few vocal proponents, have made their opinions on the use of recruitment agents well

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known. I wanted to give a broader selection of international educators a chance to voice their opinions on recruitment agents, find out if they were equally divided into the pro- and against agent camps, and to see if common themes ran through their reasoning for choosing to work with agents or not. As Australia and the United Kingdom have well-developed mechanisms for working with agents and I am primarily interested in international educators in the same type of working environment as my own, the context of inquiry for my research was therefore international educators working in the field of international student recruitment in higher education in the United States. My research question asks, what are some of international educators' commonly held opinions of the use of recruitment agents in international student recruitment?

### **Literature Review**

#### Existing research

Debates on a variety of forums have taken place over the topic of recruitment agents. Some research has been done on surveying students to learn about their satisfaction with the use of agents (Choudaha, 2012; Intead, 2013; International Student Barometer, 2013), and research has been done surveying recruitment agents themselves (Archer, 2012). Little research has been done on the attitudes of international education professionals on the use of agents; most information is presented in opinion pieces.



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### Use of agents in other countries

Historically, Australia and the United Kingdom have relied heavily on foreign representatives to recruit students, a practice that helps to entice students in a global marketplace where opportunities to study abroad are plentiful (Fischer & Hoover, 2011). AIRC, for example, looks to the United Kingdom and Australia's demonstration that "the creation of recognized and ethical standards in the recruitment agent industry is a highly effective means of ensuring an enduring match between students and institutions and that students are treated honestly and with respect, thereby improving both student mobility and the productivity of the educational process" (AIRC, 2013, para. 6).

The Australian Universities International Directors' Forum benchmarking exercise in 2010 showed that "57.6% of all new international student enrollments to Australian universities came through agents" (Raimo, 2012, para. 12). In a document put out by the Australian Government Department of Education, Employment and Workplace Relations, "Using Education Agents," agents are described as "critical aspects" of an institution's business (2009, p. 2). The document states, "an honest, professional education agent can enhance the reputation of your institution. Alternatively, an inappropriate choice of agent can have an adverse impact" (Australian Government, 2009, p. 2).

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Australia's regulatory framework, the ESOS Act, came about in the 1990s as a response to "ethical lapses that occurred in the recruitment of foreign students in Australia" (Leventhal, 2013, p. 5). Australia's National Code, a legislative instrument under the ESOS act, requires that "education and training providers only use agents who provide international students with accurate information about study in Australia and who act honestly in their dealings with students" (Australian Government, 2009, p. 2). Further, the code requires that institutions use agents with understanding of the Australian educational industry, enter into a written agreement with agents, ensure that agents have up-to-date marketing information, do not accept students from agents that may be engaging in dishonest practices, and terminate agreements if agencies are acting unethically (Australian Government, 2009). "Using Education Agents" goes on to outline how to work with education agents, and even mentions a training that was developed specifically for education agents to work with Australian institutions of higher education (Australian Government, 2009).

In 2003, the British Council put out a background paper titled "Recruitment Agents: A Legal Overview." The document states that "a growing number of institutions use agents as part of their marketing strategy for the recruitment of overseas students," and as it was a "relatively new activity" in 2003, sought to provide guidance in working with agents (Chang, 2003, p. 3). The document is similar to the Australian document, outlining best practices such as developing a written agreement,

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delineating responsibilities, and maintaining an ethical working relationship (Chang, 2003).

In March 2012, Australia, the Republic of Ireland, New Zealand, and the United Kingdom issued an international code of ethics for education agents called the London Statement, aiming to ensure students receive better service when utilizing agents to help them apply to university overseas (British Council, 2012). It stresses “the need for professionalism and ethical responsibility on the part of the commission-based agents who help many schools, colleges and universities to recruit international students” (British Council, 2012, para. 4). The London Statement identifies seven principles that agents “will be urged to adhere to, in an effort to ensure they practice responsible business ethics, providing current, accurate, and honest information to prospective students” (British Council, 2012, para. 7). The London Statement, however, provides no incentive for agents to comply, and no way of measuring performance of agents (Leventhal, 2012).

Vincenzo Raimo, director of the international office at the University of Nottingham in the United Kingdom, writes that most UK universities “make explicit use of recruitment agents” and “place a great deal of value on our work with agents...and put a lot of time and effort into valuing them and supporting them” (2013, para. 2). Agents are viewed as a distinct market, and are given “privileged access to

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internal university resources” as well as support through a staff member, whose sole job is to manage agency relations (Raimo, 2012, para. 6). The university he represents, along with many others in the United Kingdom and Australia, make no secret of their work with agents. To remain ethically transparent, Raimo’s university lists, on their website, “details of all of the agents and recruitment consultants we work with...the basis of our relationship with them, including how much we pay them for each student they support who goes on to register at the university” (Raimo, 2013, para. 2). However, Raimo talks of the change in education agents over the past ten years, giving agents much more power than they previously wielded (Raimo, 2012). In the beginning, agencies worked directly with the universities they represented, did not charge prospective students a fee, and received money from the universities for marketing, as well as commission on student fees. Now, some agencies are brands in their own right, representing many universities and providing (and charging for!) a variety of services including visa interview preparation and career advising (Raimo, 2012). Universities in the United Kingdom are seeing demands for increases in commission payments to stay competitive, and are looking to rebalance the relationship between agents and universities (Raimo, 2012).

### Financial impacts of international students

Many colleges rely on agents to bring international students to their campuses, and as universities are facing budget cuts, the revenue stream from international

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students is crucial. For some universities, recruiting international students “can benefit domestic students, more and more of whom have significant financial need” (Fischer & Hoover, 2011, para. 16). The 2013 IIE Open Doors report notes that international students contribute more than \$24 billion to the American economy and showed a 7% increase in international student enrollment in US universities from the previous year (IIE, 2013). Compared to ten years ago, there are 32% more international students studying in the US (Kingkade, 2012). The increases in international student enrollment can be attributed in part to the fact that many US institutions have experienced budget cuts, and are accepting more international students, as they pay full out-of-state tuition (Goda, 2012). The tuition from international students can help US institutions offer scholarships and financial aid to domestic students (Goda, 2012). The University of California system, for example, has “steadily increased the amount of out-of-state and international students admitted over the past three years” (Kingkade, 2012, para. 6). In the 2011-12 academic year, the UC system admitted 43% more out-of-state and international students than in previous years, while the percentage of California residents declined (Kingkade, 2012). While administrators argue that the increase in international students enrollment is not just about filling the budget gaps, major international student recruitment is done in locations where students and their families have “the ability to foot the higher out-of-state tuition bill” (Kingkade, 2012, para. 12).

Views of professional organizations

AIRC, the American International Recruitment Council, is a “non-profit membership association of accredited U.S. post-secondary institutions and recruitment agencies which work together to establish quality standards for international student placement within the United States” (AIRC, 2013, para. 1). They believe that the internationalization of US institutions is vital to their educational missions, and is “best served by attracting students from other countries who are well matched to the institution and whose expectations are met by transparent knowledge of the institutions’ strengths and weaknesses” (AIRC, 2013, para. 5). They recognize that not all institutions have the budget or means to travel internationally, and therefore rely on in-country agencies with “recognized standards and practices” (AIRC, 2013, para. 5). The approach used by AIRC “is predicated on agencies voluntarily undergoing a rigorous certification process that, if successful, culminates in the award of a valuable brand of excellence,” and is modeled on higher education accreditation (Leventhal, 2012, para. 6). This process is based on good practices from countries that have a history of using agencies, such as Australia and the United Kingdom, and while certification costs agents money, “recourse exists for both students and institutions” if the agency does not comply with AIRC’s standards (Leventhal, 2012, para. 6). AIRC’s White Paper, “Toward Professional Standards and Practices in International Student Recruitment,” discusses the use of recruitment agents in US higher education institutions, as well as

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AIRC's role in maintaining high professional standards and ethical practices in the recruitment of international students. The White Paper also outlines AIRC's stance on the benefits of working with recruitment agents, such as the benefit of having representatives in countries where universities are financially unable to send international recruitment staff (AIRC, 2011). Universities can also face challenges in understanding "the unique and subtle complexities of individual international markets" and what the most effective strategies are, which recruitment agents can help overcome (AIRC, 2011, p. 2).

NAFSA, in its "Guidelines for Ethical Practices in International Student Recruitment," advises that schools must train agents and take care to separate legal and ethical issues (Kallur & Reeves, 2006). Training of agents is the responsibility of the universities, and agents should never mislead students (Kallur & Reeves, 2006). In the American Association of Collegiate Registrars and Admissions Officers (AACRAO)'s International Guide, their best practices require colleges to vet prospective agents, confer with colleagues on their use of agents, and work with the campus legal department to develop an agent agreement (Baxton, 2010). Both of these organizations place most of the responsibility on the university entering into an agency agreement.

EducationUSA, the body tasked with promoting US education overseas, does not recommend the use of agents in most countries, while the US Department of Commerce,

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looking at higher education as a commodity, has been more in favor (Thomas, 2013).

The Department of Commerce considers agents as business, and also assists with matchmaking between international-student recruiters and institutions (Fischer, 2012).

The U.S. State Department, in turn, actually “prohibits its EducationUSA student-advising centers from working with commercial recruiting agents who have contracts to represent specific American universities” (Fisher, 2011a, para. 4). The U.S. State

Department believes that when colleges are paying commission on student tuition, the student’s interest is no longer first priority (Fischer & Hoover, 2011). They feel that some agents misrepresent colleges to meet recruitment quotas, and this could

“undermine the integrity of American higher education abroad” (Fischer, 2011b, para.

19). Students could end up in colleges that are poor fits if agents are incentivized to push one college over another. They are also wary of agents that misrepresent students by writing their admissions essays, forging transcripts, and charging exorbitant fees for their services, in addition to charging universities commission. The Department of

Education’s views are in line with the State Department’s, stating that their

“overarching goal is for foreign students to have the highest quality education,” and that they do “favor a recruitment approach that doesn’t just pay for warm bodies”

(Fischer, 2012, para. 12). The Department of Homeland Security is “agnostic on the use of agencies,” but favors “bringing down barriers that prevent foreign students from studying in the United States” (Fisher, 2012, para. 15). Having US government



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organizations with conflicting opinions can make it difficult for universities to navigate international education markets.

### Pros and cons

The debate on the use of recruitment agents has been in the forefront of discussion and news of international student recruitment for the past two years, while the National Association for College Admission Counseling (NACAC) Commission worked to clarify the organization's stance on the use of commission-based recruitment agents. Vocal proponents on either side of the agency debate have discussed the pros and cons regarding the use of agents in international student recruitment for US universities. Those on the "pro agent" side cite agents' ability to represent institutions where they might not be able to travel themselves, local market intelligence and integration with local culture, and the ability to assist students in their own time zones. The growing competition among education providers requires new market initiatives, and agents are a low-cost method to retain and grow market share (Forman, 2013). Furthermore, universities with little or no name recognition are unable to recruit on reputation alone, and must be proactive in attracting the type and mix of international students needed to optimize both the diversity and size of their student population (Connelly, 2013). The widespread practice of using recruitment agents in other Western nations is seen as a pro as well, as students in many developing countries already embrace their use; agents assist students in understanding complex application

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procedures and requirements as providing personal guidance to select a university that is the best fit for the student (ICEF, 2012).

Diana Forman, in “The Benefits of Working with Education Agents,” outlines some of the benefits in working with agents:

- Represent universities to potential students on a year-round basis.
- Provide universities with up-to-date and reliable market information and tell you which programs local students are currently seeking.
- Distribute universities’ promotional materials on a regular basis.
- Advertise in targeted local student media on universities’ behalf.
- Represent universities at local student fairs and exhibitions.
- Pre-arrange appointments and speaking opportunities for universities.
- Provide universities with a local office infrastructure when they visit the area (2013, para. 9).

Markus Badde, in “Working With Commission-Based Education Agents: the Real Issue” reports that those with bad experiences with agents report a variety of offenses:

- Not disclosing that they’re working on commission;
- Steering students to institutions that pay the most commission;
- Misrepresenting an institution’s programs of study, the credential conferred, and the portability of the credential;
- Collecting fees for institutional services prior to the student’s arrival that they never forward to the institution;
- Authoring student essays intended to assess the applicant’s written English proficiency;

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- Colluding with students in misusing the visa process (2013, para. 10).

International educators who oppose the use of agents also “argue that many universities view them as a shortcut to increasing international enrollments, and tuition revenue, without making the necessary investments to support international students when they actually show up on campus” (Redden, 2013a, para. 12).

Concern surrounds the payment of commission, which can incentivize agents to recommend one university over another (ICEF, 2012). That agents have a financial interest in encouraging students to attend a specific institution can cause agents to put their interests ahead of the student’s (Redden, 2013a). Other concerns are that agents might “misrepresent an institution...or offer help of an overly ‘hands-on’ nature, writing the essay for the applicant or even securing falsified transcripts. There are concerns about a lack of transparency...and disagreement about the acceptability of ‘double-dipping,’ in which agents collect fees from both the student and the institution” (Redden, 2013a, para. 12). While regulation has been suggested to provide oversight for the use of agents, such as in Australia, “opponents cite that the US does not have the infrastructure to regulate agents, and the creation of new regulatory processes would be difficult” (ICEF, 2012, para. 6). The diversity apparent in the US higher education system also provides roadblocks to the creation of a new regulatory framework (Jaschik, 2012).

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### Recent controversy and developments

The NACAC (National Association for College Admission Counseling) Commission on International Student Recruitment was formed with the charge of clarifying NACAC's views on the use of recruitment agents. The Commission was designed to recommend "ethical standards for best practices in international recruitment" (Fischer & Hoover, 2011, para. 6). NACAC originally proposed to "ban its members from paying per-student commissions to overseas recruiters," a practice that is already forbidden under federal law for domestic students (Fischer & Hoover, 2011, para. 6). The original proposal would have modified NACAC's "Statement of Principles of Good Practice to make clear that language prohibiting per-student compensation applies to both domestic and international recruitment" (Fischer, 2011b, para. 2). The panel analyzed the issue, considered alternatives to using a commission-based model, and discussed ethical standards of international student recruitment. The panel included members of the American International Recruitment Council (AIRC), who sets standards for overseas recruiters, as well as "overseas high-school counselors, registrars, foreign-student advisors, and even college presidents" (Fischer & Hoover, 2011, para. 9).

Previously, wording in NACAC's policies stated that members of NACAC "may not" use recruitment agents. In the United States, federal law, specifically Title IV, does not allow payment of commission to recruiters of American-based students, and

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NACAC said that “its ban on members paying agents by commission applied to both domestic and overseas recruitment activities” (ICEF, 2013, para. 4). However, Title IV states explicitly that the inability to pay commission does not apply to the recruitment of international students residing in countries outside of the United States who are not eligible to receive financial aid, or title IV funding (Leventhal, 2007). The wording in NACAC’s policy would have prevented members from working with recruitment agents, as well as prevented member institutions from attending domestic college fairs that NACAC runs if they chose to work with agents (Fischer, 2011a). In March 2011, the NACAC Commission was formed with the hope of finding a middle ground on the debate of the use of recruitment agents.

Institutions that use overseas recruiters expressed concern that if NACAC decided to ban colleges from using agents, losing their NACAC memberships would bar them from admissions fairs (Fischer, 2011b). AIRC has stated that a prohibition on paying agents commissions could result in “colleges resorting to ‘work arounds,’ like signing on with agents through third parties or entering into ‘convoluted’ compensation structures, such as the payment of marketing fees” (Fischer, 2011a, para. 22). AIRC believes when institutions pay agents commissions, it makes the arrangements clear and takes expenses off of students and parents (Fischer, 2011a).

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In June 2013, the NACAC Commission released its international student recruitment report. The report recommended that NACAC change the wording in its policy from “may not” to “should not” work with agents, and “for institutions that employ incentive-based arrangements for international recruitment, implement a series of strict requirements for transparency, integrity and institutional accountability” (NACAC, 2013, p. 4). On September 21, 2013, NACAC member delegate assembly voted to adopt the language change in their Statement of Principles of Good Practice (SPGP) as recommended by the Commission, signaling a change in the association’s long-held beliefs about recruitment agents (NACAC, 2013). The small change in wording may not change the opinions of those who have decided to work with agents, or those who did not plan to (Fischer, 2013). However, the report states that the change in wording should not be seen as a full endorsement of commission-based recruitment (Fisher, 2013).

As the above review outlines, many opinions about the use of recruitment agents have been shared, and there is lack of consensus as to effectiveness. This research project proposes to fill a major void in a controversial topic: to summarize common views on the use of recruitment agents from international educators that are working in the field of international student recruitment in higher education on a daily basis. The literature to date only reflects the views of outspoken proponents for or against recruitment agents, and some of the literature might not accurately reflect views

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currently held by international educators and people working in the field. My research hopes to give a wider population of international education professionals a voice, and to discover if the topic is as controversial as it is made to seem.

### **Research Design**

To research international educator's views on the use of recruitment agents, an anonymous online survey in Google Forms was designed to be sent to adults over age of 18 in the field of international education (IE). The survey was designed to be completely anonymous; there is no information that will allow the readers of this capstone to identify participants. The researcher went through the Human Subject Review (HSR) process and was approved as exempt. After HSR approval, a link to the survey was sent to the following sources:

- NAFSA Networks:
  - Recruitment, Advising, Marketing and Admissions, Intensive English Programs, and Admissions & Credential Evaluation Networks in the International Enrollment Management Knowledge Community
  - Leading Internationalization in the International Education Leadership Knowledge Community
  - International Student Advising, International Scholar Advising, and Campus and Community Programming in the International Student and Scholar Services Knowledge Community
- AIRC LinkedIn page
- NAFSA LinkedIn page

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- NAFSA Facebook page
- NAFSA Regional Facebook Pages (I, II, III, IV, V, VI, VII, VIII, X, XI, XII)
- NACAC 69<sup>th</sup> Annual Conference Facebook page
- Members of the California State University (CSU) International Office Listserv
- SECUSS-L Listserv
- Inter-L Listserv

These sources were chosen to get a wide cross-section of international educators.

By targeting each of the NAFSA regional Facebook pages, the researcher was able to collect responses from across the United States. A link of the survey to most recent NACAC annual conference Facebook page, to hopefully receive opinions from those who might have been involved in the recent NACAC discussions on the use of recruitment agents. The survey link was also posted in various Knowledge Communities on the NAFSA website, to reach those who do not use Facebook, or haven't "liked" the NAFSA regional pages. I chose to send the survey to my colleagues in the CSU system as I had easy access to direct contact information for those who work in the international offices. I included the SECUSS-L Listserv and the Inter-L to reach a wider breadth of international educators. Even though those listservs are not directed at IE professionals in international recruiting, the researcher expected that they would include management or directors, or those who may be involved in both study abroad and international recruitment for SECUSS-L, or international admissions and



international recruitment, for Inter-L. I sent the survey out on a Monday and kept it open for two weeks to allow ample time for data collection.

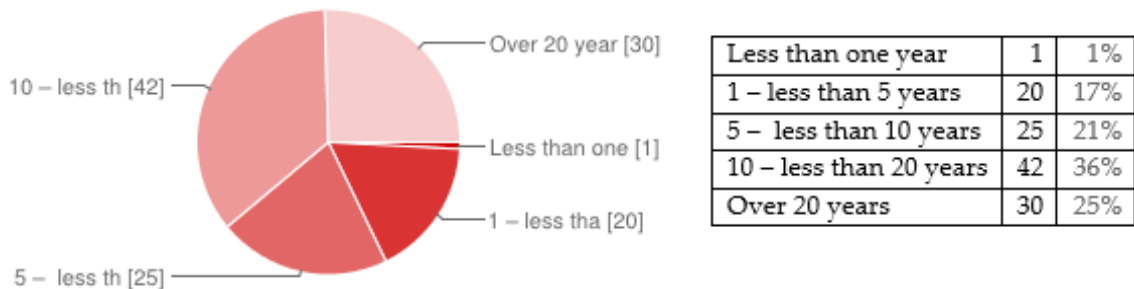
Data was analyzed by comparing and summarizing common themes in the open-ended survey responses. Common themes emerged as data was analyzed. I sought to find out if the use of agents is becoming more accepted, widely accepted, or if the opinion is split. Common problems and suggestions were also identified.

**Findings**

118 respondents took the survey. One respondent proceeded to the consent page and selected no, thereby leaving the survey, and one respondent stated that they are not currently working in the field of international education, which disqualified them from the study.

Participants were asked how long they have worked in the field of international education. Responses are summarized in Figure 1.1 below.

**Figure 1.1 – Time in the field of international education**

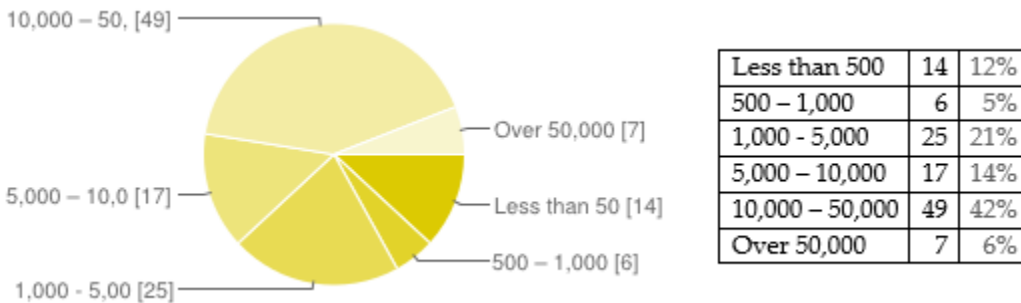


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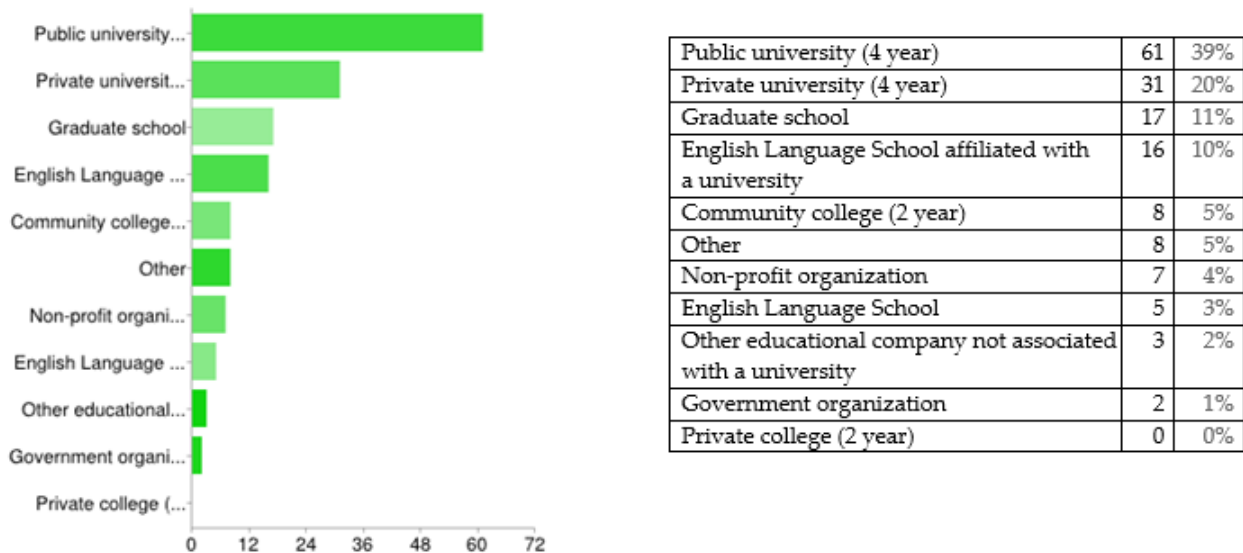
Participants were asked information about the organizations where they worked.

Responses are displayed in Figure 1.2 and 1.3 below.

**Figure 1.2 – Total enrollment of students**



**Figure 1.3 – Respondent’s workplace**



International student enrollment varied among institutions, from zero to 20,000.

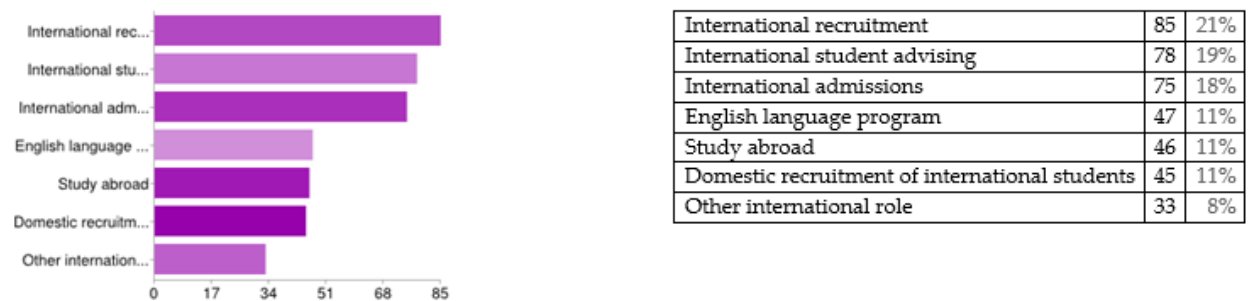
The majority of respondents have over 1,000 international students (40%), with 21% having over 2,000. The next largest group, 20%, has 100-200 international students.

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112 of the respondents are from 34 of the United States, two are from the United Kingdom, one from Australia, one from Canada, one from India, and one from Hungary.

Respondents were asked what fields of international education they are involved in. Responses are summarized in Figure 1.4 below.

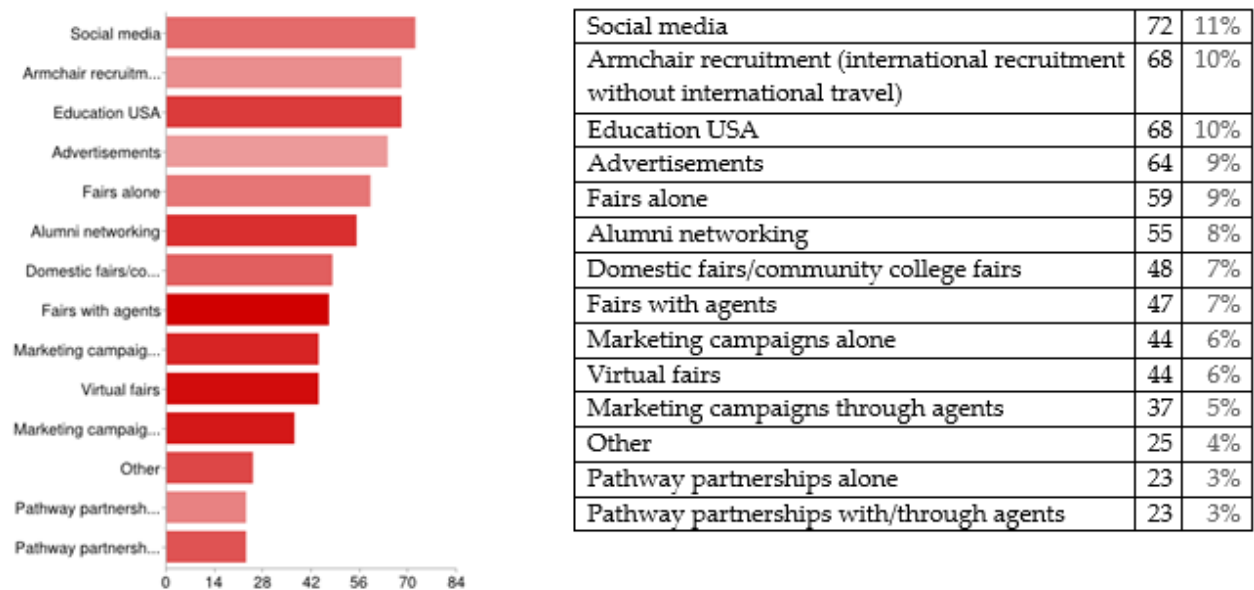
**Figure 1.4 – Respondent’s fields**



Over half of the respondents, 104, are members of NAFSA. 11% of respondents are instructional members of AIRC, and 20% are institutional members of NACAC.

Survey participants were asked about the methods they use for recruiting international students, and were allowed to select all relevant options. Responses are displayed in Figure 1.5.

**Figure 1.5 – Methods used to recruit international students**

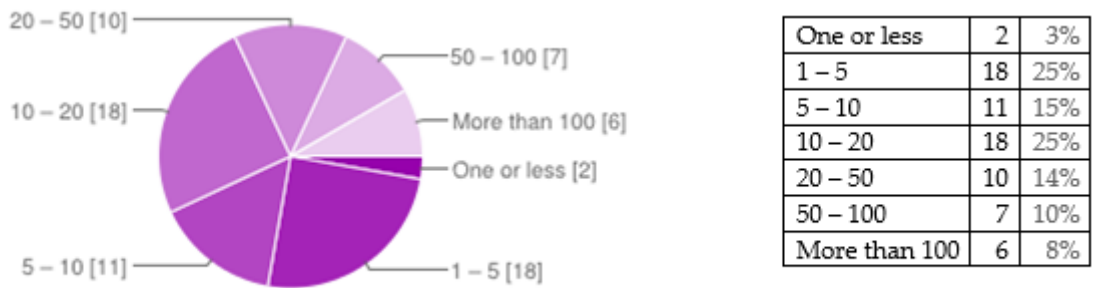


Next, respondents were asked if they worked with recruitment agents. If they answered yes, they were directed to a series of questions about their work with agents. If they answered no, they were directed to a series of questions about why they do not. Both sets of respondents were also given the opportunity to comment freely on their opinions about recruitment agents. 61% (72 respondents) answered that they do work with recruitment agents, and 39% (46 respondents) answered that they do not.

#### Respondents that do work with agents

Of the respondents that do work with agents, 28% have worked with agents for over 10 years. 31% of respondents have worked with agents from two to five years. 25% of respondents work with one to five recruitment agencies, and 25% work with ten to twenty.

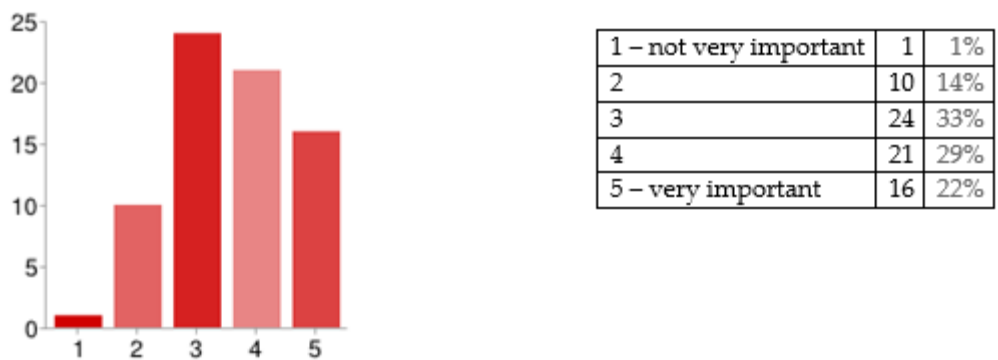
**Figure 1.6 – Number of agencies worked with**



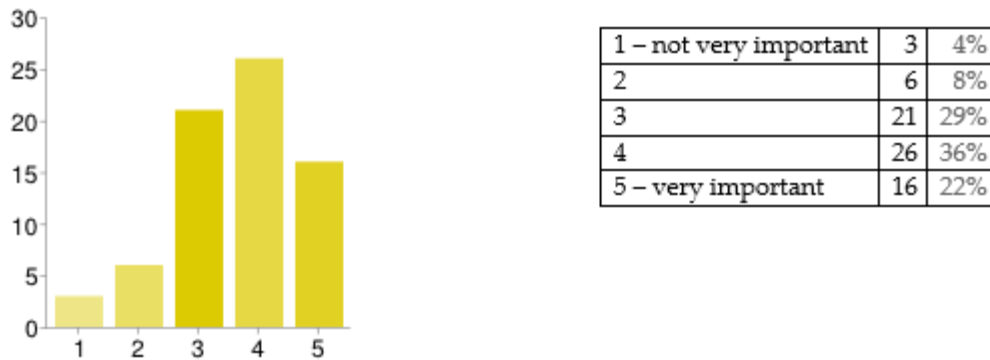
38% of respondents work with recruitment agents to recruit for undergraduate programs, while 28% each use agents to recruit for ESL and graduate programs. The majority of respondents (54%) place high importance on increasing international student enrollment. Respondents were asked what level of importance their institution places on the use of agents in their recruitment plan, and what level of importance they place on the use of agents.

See Figure 1.7 and 1.8 below.

**Figure 1.7 – Level of institutional importance of the use of agents**



**Figure 1.8 – Level of personal importance of the use of agents**

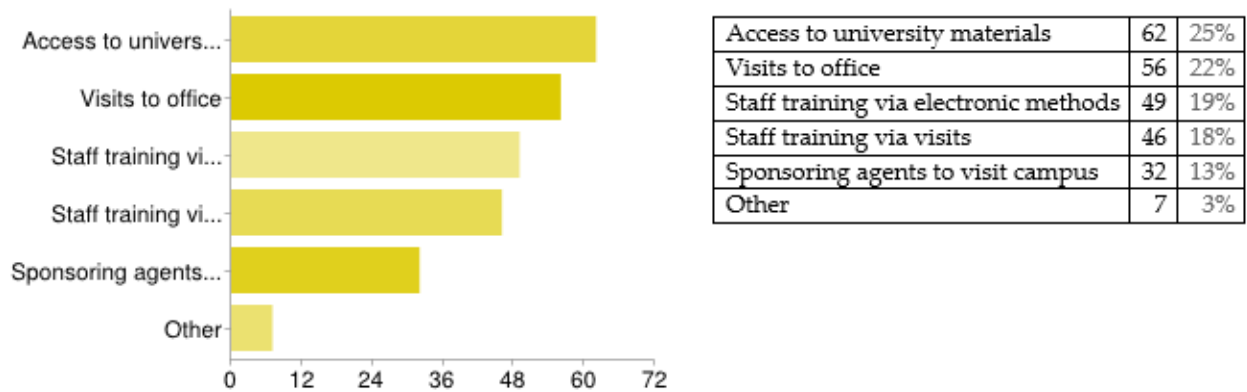


Of the respondents, 65% use agents for selected markets, and 35% use agents for all available countries. Almost one quarter of respondents offer recruitment agents exclusivity to particular markets, while 76% do not. 35% of respondents restrict the number of agents per country, while 65% do not.

Survey participants were asked if they pay commission to recruitment agents. 5% do not, and 4% chose not to answer the question. Of the total number of respondents, 33% pay commission on undergraduate students, 29% pay commission on ESL programs, and 25% pay commission on graduate programs. 6% pay commission on extension programs. 51% of respondents do not offer other incentives to recruitment agents, while around 13% of respondents offer scholarships, marketing bonuses, or advertising budgets.

Respondents give a variety of support to recruitment agents. Please see figure 1.9 below.

**Figure 1.9 – Recruitment agent support**

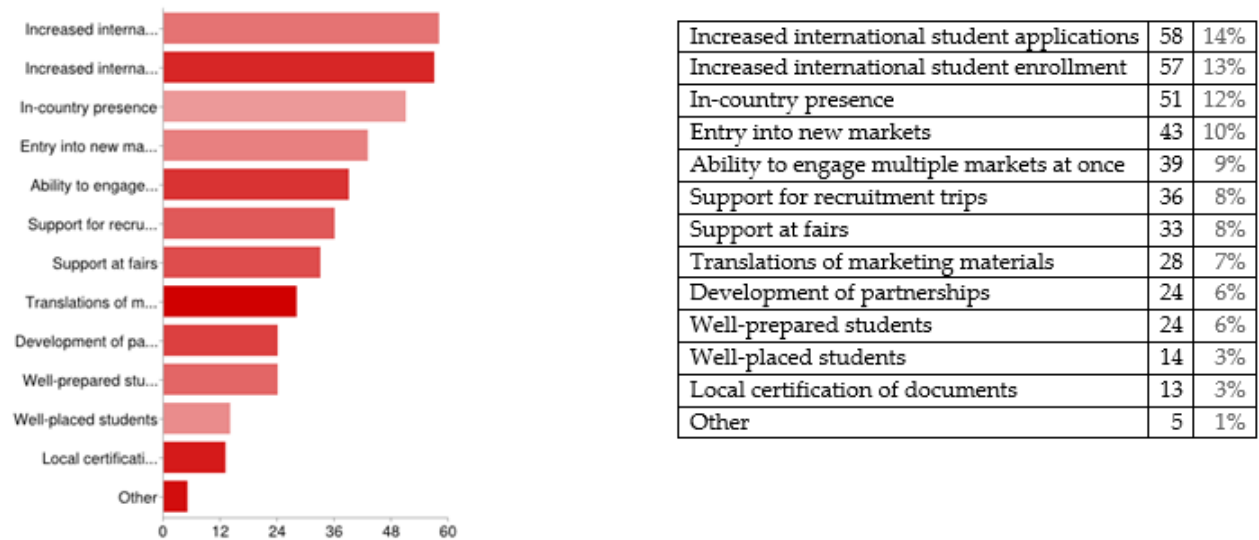


The majority of respondents (40%) select agencies to work with through recommendations, while 24% goes by AIRC certification. When agencies approach respondents, 41% rely on reference checks to vet the agencies, while 31% utilize agency questionnaires.

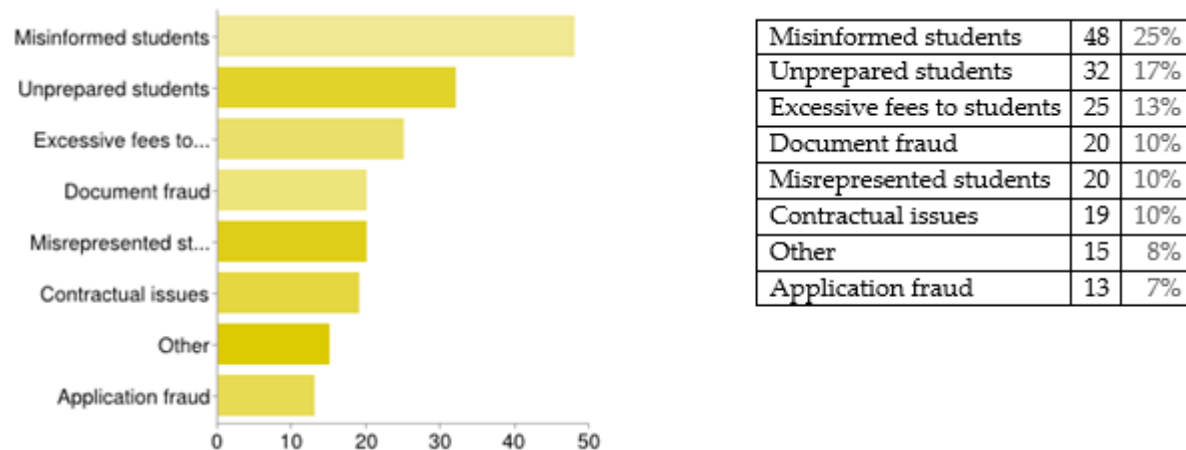
Respondents were asked what recruitment agencies are assisting them with. 46% of agents assisted respondents with recruiting students, 24% with marketing, 15% with developing partnerships, and 11% with developing custom ESL programs.

Respondents were asked about the benefits and challenges of working with recruitment agents. Please see figures 2.0 and 2.1 below.

**Figure 2.0 – Benefits of working with recruitment agents**



**Figure 2.1 – Challenges of working with recruitment agents**



Respondents were asked how they ensure the satisfaction and quality of international students recruited through agents. 19% evaluate agency operations and legitimacy of documents each, 18% visit agencies and provide ongoing trainings, and 17% review the quality of applications against student performance.



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Of the respondents, 57% have terminated past agency agreements, while 31% had not. Respondents were given the opportunity to comment on why they terminated agreements. The responses were in free-text format, and were grouped to represent similarities. Termination due to:

- Disqualification or withdrawal from AIRC
- Misrepresentation of the university
- Poor/unacceptable performance
- Poor service, poor communication
- Dubious, deceitful, dishonest or unethical work practices
- Misinforming/misrepresenting students
- Student complaints

**Respondents** were given the opportunity to comment freely on their attitudes regarding recruitment agents. A summary of the common themes addressed is below.

**Positive:** “Well-chosen representatives are essential to our international business.”  
“We've been fortunate to work with a number of highly skilled, professional and personable individuals who truly represent our institution well and in doing so are part of our student success team.”

**Neutral:** Not inherently bad or inherently good: each institution must evaluate their use of agents for their own needs. “Some are good while others are profit making operations that should be avoided.”

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**Negative:** “Evidence of the further commodification and commercialization of higher education.” “Not an ethical recruitment method as things are currently operating with many agents.”

**Necessary:** “I don’t like working with them but I feel that I have to.” “An important business reality in today’s international student marketplace.” Necessary “for small schools with no name recognition.”

**Regulation/Oversight:** One respondent noted that AIRC certification is a pre-requisite for the agents they work with. “I support the efforts of AIRC to start a process of verification.” “As with all business the key is in the oversight and supervision, standards, ethics, professional development, etc.” “Vetting, oversight, monitoring, training and supervision are necessary.”

**Useful as a tool:** An important part of a diverse recruitment portfolio. “I would not want to depend heavily on agent work for recruitment...we only get 10% of our student body through agents.” “Fine as a tool within the wider recruitment portfolio.”

**Cost-effective:** A few respondents stated that agents are good for return on investment (ROI); “with a limited budget, agents have been able to reach out to students in regions we would not have access to before.” However, one respondent started signing agents in May 2013, and mentioned “anxiety about unrealistically high expectations of supervisors that the agent model will result in rapid exponential growth

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at minimal expense or investment of staff time. Concern that administration does not understand that agents are not a get-rich-quick promise.”

**Time commitment:** Many respondents noted that working with agents requires time, staff, and commitment to do it well. “It is really a full time job for someone to manage agent contracts and communications,” “huge investment of TIME,” “some require a lot more hand holding than others...they are very time consuming.”

The response below outlines one respondent’s feelings toward the time commitment associated with working with agents.

A problem I've had at both institutions [I've worked at] is not seeing results based on the amount of time and effort put forward for the partnership. Many agents I have worked with do not train their staff effectively and do not proactively seek information resulting in more work on my end to resolve questions that could be answered easily from our website. By the same token, agents sometimes expect to be treated differently and expect to be allowed a variety of exceptions, which is hardly ever possible (I've experienced some pushback on this which is a concern within a partnership). Bottom line is that there is a lot of seemingly unnecessary correspondence on sometimes irrelevant points and I have felt that the need to keep the agent happy and well informed is overly burdensome for the results attained.

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Along the same lines, one respondent mentioned, “oftentimes, it feels like we work for [the agent] instead of them assisting us.”

### Respondents that do not work with agents

Respondents that answered that they do not work with agents were directed to a separate section of the survey than discussed above. Of the respondents that do not work with agents, 48% of respondents would be willing to work with agents if their use was more regulated, while 52% would not. 76% do not plan to work with agents in the future, while 24% do. 28% do not work with agents due to a personal or departmental decision, 28% as well due to a state or school policy, 16% due to previous experience, and 13% due to an inability to pay commission.

Respondents were given the opportunity to comment freely on their attitudes regarding recruitment agents. A summary of the common themes addressed is below.

**Unethical:** Agents are more concerned with their own profits than the well-being and “best fit” of the students. Agents do not work in the best interest of the students, and do not have the interests of the schools as their guiding principle. “No liability to the university as a regular university employee. This bothers me.” “Concern is whether agents can be trusted.” “An ethical quagmire that doesn't serve students or institutions well.”

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**Negative:** “The vast majority of the agents with whom we interacted (paid by the applicant, not our institution) were very shady, submitting incomplete and falsified educational and financial documents, rushing deadlines, insisting on special treatment, and behaving in a manner that ensured my former institution would not engage a relationship with them.”

**Necessary:** “It is becoming the expected way for students in many countries to sift through the mountains of information on US universities.” “I feel agents are the way that many from other countries navigate education.” “Necessary...but we are entering this stage with reluctance and concern.”

**Not necessary:** “It isn't necessary with the social media tools. I understand that culturally it has its place but given word of mouth, Skype, YouTube and Facebook, there's nothing prospective students can't find out before they arrive.” “No need to recruit at my school, there is no recruiting activity.”

**Not permitted:** “Agent fees are not part of our budget.” “Prefer to work with agents but school policy doesn't permit.”

**Regulation/Oversight:** Monitoring, training, and due diligence are important when working with agents. Agents are useful if high ethical standards are upheld. “Parameters must be transparently outlined, transparency maintained, correct information...is of paramount importance.” “It is my understanding there is now a

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recognition/accreditation process for agents, and I'd be interested in learning more about that, because I do understand the appeal for applicants and institutions who don't have the finances or other resources to more actively recruit, but the lack of regulation and pay-by-application methodology is fraught with problems for everyone except the agency getting paid." "AIRC is a step in the right direction towards developing standards."

One respondent noted that the survey did not specify commission-based agents, as they feel that the commission-based agencies present the ethical dilemma.

When you pay a third party to represent you, you give up control of the message. You take on a lot of liability if the message goes wrong. Further, how can it be ethical for us to prohibit commission-based recruitment of American students, but it's okay to pay for international enrollments? When the college pays the agent, rather than the student, the temptation is for the agent to do everything in their power to make their client-colleges look as attractive as possible and to dissuade students from looking at other schools that may be a better fit.

Another respondent echoed this sentiment, saying that "commission-based pay complicates the process, we're not sure we're receiving authentic application materials from students." Another respondent wrote that agents "don't seem to work for

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institutions and students, but for the commission,” and another wrote that “for-profit [agents] conflicts with our non-profit interests as a government agency.”

The following response summarizes many of the concerns expressed in working with agents.

We do not - and will not - pay for someone to steer students (who are not a good fit) to attend our institutions. We are in profession of enrolling students who will succeed at and graduate from this institution...we are not in the numbers business. Sadly, the majority of agents and universities that use them see them as a means to fill seats. My institution does not have this goal; we want students who are a good fit and who have made the decision to attend here after reflecting on their options and then making a decision. I worked at an institution many years ago that employed several agents; some really got to know the institution and made an effort to match their students with the institution but others constantly tried to dictate to us what the student would pay, what we would put on the I-20 form, etc. This is a violation of law as well as a violation of ethics. I doubt that my institution will ever use agents - it is inconsistent with our mission.

### **Discussion**

Many of the comments on the pros and cons of working with recruitment agents that were summarized in the literature review were supported and expanded upon by

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the write-in responses to the survey. Respondents provided insight into the murky waters of working with agents; often, positive and negative feelings were expressed in the same response. It was also found that those who do not work with agents have similar opinions to those that do work with agents: that working with agents requires active managing from the universities involved. Comments from both those who do work with agents and those who currently do not, but are considering working with them, were that agents are a necessary evil and that they can be useful in certain markets; skepticism appeared in comments from both sides as well.

Out of the 46 respondents that do not work with agents, 24 stated that they would not be willing to work with agents, even if they were more regulated, with 22 stating they would. Of the 22 who would be willing to work with agents were their use more regulated, some expressed interest in learning more about the AIRC regulation process, and one respondent is considering working with agents following the recent NACAC decision. Some of the 22 who would work with agents are currently not permitted to due to school policy, or are unable to work with them due to the inability to pay commission. One respondent stated that they are “very eager to begin working with recruiting companies,” and some felt that while they would work with agents under a more regulated model, the “careful selection and relationship building of trust is necessary.” Out of the 119 total respondents, 94 (78%) either do work with agents or are willing to.



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That the majority of respondents are not looking for an outright ban of working with agents supports NACAC's decision to allow the use of agents. However, many of the comments expressed issues with agents; 57% of the "yes" respondents have terminated agency agreements due to a suite of issues (misrepresentation, poor performance, unethical work practices, misrepresentation of students, student complaints), which illustrates the need for regulation of the use of agents. During the NACAC Commission's discussions, they found that those working with agents had real problems, which led the Commission to make the recommendation to work with agents with accountability, transparency and integrity (NACAC, 2013). Accountability emphasizes institutions taking responsibility for how they are represented, including oversight and responsibility for training and management of recruitment agents. Protecting against misrepresentation and ensuring student satisfaction with the recruitment agent is paramount (NACAC, 2013). This can be ensured by constant communication and training with agents, as well as follow-up with students when they arrive on campus to ensure the institution was represented correctly and their experience with the recruitment agent was positive. Transparency is perhaps where most US universities are lacking. Clarity about relationships with recruitment agents to students and on universities' websites would be a step in the right direction, as well as ensuring that recruitment agents disclose all fees and commission-based arrangements with universities to students. Integrity addresses the issue of ethics that came up in

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many of the survey participants' responses. All parties involved with international student recruitment must hold the student's interests in the highest regard and maintain ethical business practices. The NACAC Commission recommends adhering to NACAC's Statement of Principles of Good Practice, as well as standards set by other associations, such as NAFSA (2013).

As mentioned above, one survey respondent expressed disappointment that the survey did not specify commission-based recruitment agents. The NACAC Commission did not reach consensus on whether the practice of incentive-based recruitment and the payment of commission is to blame for the issues surrounding recruitment agents, "members generally agreed that there were circumstances under which incentive compensation could prove problematic by exacerbating tendencies toward misbehavior" (NACAC, 2013, p. 11). Again, protecting students came to the forefront of important issues to consider when making the decision to work with recruitment agents (Redden, 2013b). A recent study by World Education Services (WES) discovered that only 13% of students who utilized recruitment agents realized that the agents operated on a commission-based model (Redden, 2013c). Many international education experts, respondents to the survey, and the NACAC Commission recommend transparency as the utmost important when working with commission-based recruitment agents. That students are not aware of agents being paid commission is concerning, especially if students are paying the agents as well. Students may believe

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that agents have their best interests in mind and are paying them to provide them assistance with selecting and applying to the best college or university for them. If agents are only pointing students toward institutions they have relationships with, students may not be given the opportunity to select a university that is the best fit for their educational needs.

The survey responses also echo current trends in international education. In 2011, in a poll done by Inside Higher Ed, the majority (65%) of admission directors supported NACAC's previous ban on working with recruitment agents, while this year, the majority (58%) supports the new policy to allow members to work with them (Redden, 2013). Advocates generally say that the only way to prevent ethical problems is to regulate the use of recruitment agents, not to ban their use (Jaschik, 2013). South Dakota's public universities are also looking at commission-based international student recruitment, and are formulating guidelines and regulations for doing so (Young, 2013). During the assembly meeting where NACAC's revised policy was approved, a motion asking the board to commission a 'best practices' document was put forward and overwhelmingly passed (Redden, 2013a). The document could serve to educate colleges and universities entering into agency relationships on best practices and guidelines, and might address "such agency practices as charging students for visa processing and pocketing a proportion of scholarship awards (Redden, 2013a, para. 16).

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Of the researcher's survey respondents, 20% stated that they would be willing to work with agents if their use was more regulated, which may be a useful development.

### Recommendations for Further Research

The main issues in the literature and from survey participants' responses are issues that may be solved by regulation, either from institutions themselves or organizations such as NACAC or AIRC. Further research is needed to look at successful regulatory practices – perhaps in Australia or the United Kingdom, perhaps at universities in the US that are successfully working with recruitment agents that could be models for other US institutions. It would also be interesting to research the issue of transparency. Many involved in the agent debate call for transparency of disclosing commission payments and agent partners. Transparency is required in Australia under the ESOS Act, and Australian institutions have their agent partners clearly stated on their websites. Could NACAC require that its member institutions disclose information about commission-based agents on their websites? Do the institutions calling for transparency that do work with agents already have this information listed? This may be a first step toward a more open and honest practice of working with agents.

Conclusion

The research conducted provides a broad overview and a snapshot of current attitudes toward recruitment agents in international student recruiting. It also provides first-hand accounts of working with agents, and could help inform offices positioned along any point of the “working with agents spectrum” (those who choose not to work with them, those who want to work with them but cannot, those who are beginning to work with them, and long-time agent-university partnerships) decide how to proceed with their agent relationships. The issues university officials have experienced in regards to terminating agreements could be considered; measures could be put in place to ensure that issues such as misrepresentation and fraudulent documents are controlled. The AIRC agent database could be expanded to include member reviews of agencies, to further increase transparency of relationships.

Many respondents that currently work with agents commented on the time commitment necessary to ensure positive outcomes on both sides. Offices considering working with agents must take this time commitment into consideration. Some universities may look at agents as a low-cost (in both money and time) way of increasing international student enrollment. In times of budget concerns, anything that can save money on the front end and increase revenues to the university should be considered, but unless managed correctly, the effort spent developing agent relationships could turn out less than lucrative. Expectations must be managed in

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relation to the time and energy given to the use of recruitment agents in international student recruitment. In addition, the idea of recruitment agents as necessary in some markets, but also as part of an overall toolkit of international recruitment methods, may be the best way to look at the use of agents.

In the survey responses and NACAC Commission findings, the issue of ethics and regulation were mentioned over and over again. The regulation of agents by an outside certification body such as AIRC gives institutions the peace of mind to know that agencies have met good practices and standards. However, institutions must do their own work to determine the agencies they choose to partner with operate in an ethical manner that has the best interests of students in mind.

International student recruitment will remain important for universities as higher education and the workforce become increasingly global, and the ability to analyze methods of recruitment in relation to international recruitment goals becomes even more necessary. As the NACAC decision to allow its members to work with agents takes effect, hopefully more discussion will emerge with regards to regulating the use of recruitment agents to ensure the safety and satisfaction of students, agents, and universities alike.

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APPENDIX A

International Education Professionals Attitudes on Recruitment Agents  
Survey

Page 1

Hello, and thank you for your interest in participating in this questionnaire. My name is Emily Kirsch, and I am a graduate student at SIT Graduate Institute. I am studying opinions on the use of recruitment agents in international student recruitment. This questionnaire is anonymous, your participation is optional, and you can withdraw at any time. Choosing to complete the survey acknowledges your consent to participate.

You will need 10 to 15 minutes to complete the questionnaire. Please feel free to contact me at [emily.kirsch@mail.sit.edu](mailto:emily.kirsch@mail.sit.edu).

If you consent to participate in this research study, please select 'yes', below.

- Yes
- No

Page 2

Are you currently working in the field of international education?

- Yes
- No

If NO:

Thank you for your time and interest.

IF YES:

How long have you worked in the field of international education?

- Less than one year
- 1 – less than 5 years
- 5 – less than 10 years
- 10 – less than 20 years
- Over 20 years

## THE USE OF AGENTS IN INTERNATIONAL STUDENT RECRUITMENT

Please select the answer that best describes where you work.

- English Language School
- English Language School affiliated with a university
- Private college (2 year)
- Private university (4 year)
- Community college (2 year)
- Public university (4 year)
- Graduate school
- Non-profit organization
- Government organization
- Other educational company not associated with a university
- Other (please describe)

What is the total enrollment of students at your institution?

- Less than 500
- 500 – 1,000
- 1,000 - 5,000
- 5,000 – 10,000
- 10,000 – 50,000
- Over 50,000

What is the total number of international students at your institution?

(Blank entry field)

Where is your institution located?

(Blank entry field)

What fields in international education are you involved with? Please check all that apply.

- √ Study abroad
- √ International recruitment
- √ Domestic recruitment of international students
- √ International admissions
- √ International student advising
- √ English language program
- √ Other international role



## THE USE OF AGENTS IN INTERNATIONAL STUDENT RECRUITMENT

Please describe of your role in recruiting international students. Please check all that apply.

- Directly involved with recruiting international students
- Management/director role overseeing recruitment of international students
- In-country representative
- Consultant
- Other

Are you or your institution a member of any professional organizations? Please check all that apply.

- Institutional Member - AIRC (American International Recruitment Council)
- Institutional Member – NACAC (National Association for College Admission Counseling)
- Institutional member – AACRAO (American Association of Collegiate Registrars and Admissions Officers)
- Individual member – NAFSA
- Other
- None of the above

What methods do you use for recruiting international students? Please check all that apply.

- Fairs alone
- Fairs with agents
- Domestic fairs/community college fairs
- Marketing campaigns alone
- Marketing campaigns through agents
- Armchair recruitment (international recruitment without international travel)
- Alumni networking
- Pathway partnerships alone
- Pathway partnerships with/through agents
- Virtual fairs
- Education USA
- Advertisements
- Social media
- Other

Does your institution currently work with recruitment agents?

- Yes
- No

## THE USE OF AGENTS IN INTERNATIONAL STUDENT RECRUITMENT

If no, have you worked with recruitment agents in the past?

- Yes
- No

Page 3 (yes)

If YES:

How long have you worked with recruitment agents?

- Less than one year
- 1 – 2 years
- 2 – 5 years
- 5 – 10 years
- Over 10 years

How many recruitment agents do you work with?

- One or less
- 1 – 5
- 5 – 10
- 10 – 20
- 20 – 50
- 50 – 100
- More than 100

What programs do you use recruitment agents to recruit for? Please select all that apply.

- √ ESL Only
- √ Undergraduate
- √ Graduate
- √ Extension programs

What level of importance does your institution place on increasing international student enrollment?

Sliding scale 0 - 5

What level of importance does your institution feel agents have on your student recruitment plan?

Sliding scale 0 - 5

## THE USE OF AGENTS IN INTERNATIONAL STUDENT RECRUITMENT

What level of importance does you feel agents have on your student recruitment plan?

Sliding scale 0 - 5

Do you use recruitment agents for all countries?

- All available countries
- Selected markets

Do you offer exclusivity to agents in any particular markets?

- Yes
- No

Do you restrict the number of agents per country?

- Yes
- No

Does your institution pay commission to recruitment agents? If yes, which programs do you pay commission for? Please select all that apply.

- √ ESL (English as a Second Language)
- √ Undergraduate
- √ Graduate
- √ Extension programs
- √ No
- √ Choose not to answer

Do you offer other incentives to agents? Please select all that apply.

- √ Scholarships
- √ Marketing bonus
- √ Advertising budget
- √ Other
- √ No

What support do you give to agents? Please select all that apply.

- √ Visits to office
- √ Staff training via visits
- √ Staff training via electronic methods
- √ Access to university materials
- √ Sponsoring agents to visit campus
- √ Other

## THE USE OF AGENTS IN INTERNATIONAL STUDENT RECRUITMENT

How does your institution select agents to work with? Please select all that apply.

- By recommendation
- Cold calling
- Web searches
- AIRC certification
- Other

When an agency approaches you or your office, what sort of vetting process do you go through? Please select all that apply.

- Reference checks
- Agency questionnaire
- Other

What sort of contract do you use?

- Standard contract
- NAFSA
- State approved
- Other

What are the recruitment agencies you work with helping you with? Please select all that apply.

- Custom ESL programs
- Develop partnerships (2+2, etc.)
- Recruiting students
- Marketing
- Other

What benefits have you experienced from working with agents? Please select all that apply.

- Increased international student applications
- Increased international student enrollment
- Entry into new markets
- In-country presence
- Development of partnerships
- Translations of marketing materials
- Local certification of documents
- Support for recruitment trips
- Support at fairs

## THE USE OF AGENTS IN INTERNATIONAL STUDENT RECRUITMENT

- √ Well-prepared students
- √ Well-placed students
- √ Ability to engage multiple markets at once
- √ Other

What challenges have you faced in working with agents? Please select all that apply.

- √ Unprepared students
- √ Misinformed students
- √ Misrepresented students
- √ Contractual issues
- √ Excessive fees to students
- √ Document fraud
- √ Application fraud
- √ Other

What methods do you use to ensure the satisfaction and quality of international students recruited through agents? Please select all that apply.

- √ Evaluation of agency operations
- √ Review of quality of student applications vs. student performance
- √ Legitimacy of documents
- √ Student testimonials
- √ Visiting agency
- √ Ongoing training
- √ Infrastructure investment
- √ Other (please describe):

Have you terminated agency agreements?

- Yes
- No

If yes, why?

(free text)

Please summarize your attitudes regarding recruitment agents.

(free text field)

Page 3 (no)

If NO:

## THE USE OF AGENTS IN INTERNATIONAL STUDENT RECRUITMENT

If you don't work with agents, are you planning to in the future?

- Yes
- No

What prevents you from working with agents? Please check all that apply.

- State or school policy
- Inability to pay commission
- Personal or department decision
- Previous experience
- Other

If working with recruitment agents was more regulated, would you or your institution be willing to work with agents?

- Yes
- No

Comments:

Please summarize your attitudes regarding recruitment agents.  
(free text field)

Page 4

If you are willing to be contacted for a follow-up interview, please send me an email at [emily.kirsch@mail.sit.edu](mailto:emily.kirsch@mail.sit.edu).

Thank you for taking the time to complete this survey.