This paper is the first in a series of NACAC resources designed to guide member institutions in the implementation of NACAC’s Guide to Ethical Practice in College Admission, approved by the association’s Assembly in September 2020. Specifically, this series relates to subsection D of Section II “The Responsible Practice of College Admission,” which focuses on Use of Agents for Recruiting International Students.

The new advisements in this section of NACAC’s Guide to Ethical Practice reflect the association’s long-standing best practices. This series will provide updated guidance and resources to help member institutions navigate their engagements with commission-based recruitment agencies and agents. Given the global nature of the topic and growth in international membership within the association, these papers will highlight and reference, when appropriate, relevant policies and practices from other countries.

Additional resource papers in this series will include:

2. Legal Requirements and Accreditation Standards
   Review pertinent regulations and standards, as well as the implications for institutions that fall out of compliance.
   Learn how accreditation and laws in the countries from which and in which an institution or agency operates influence compliance.

3. Vetting and External Training
   Institutions should exercise care in the selection of agencies. Learn how to identify and vet prospective partners.

4. Contracts
   Contractual relationships should be a condition of partnership with agents or agencies. Review the elements of a contract and stipulations to protect the institution and students.

5. Institutional Transparency
   NACAC’s updated Guide to Ethical Practice in College Admission advises that institutions should disclose that the institution has employed agents to recruit on its behalf. Learn more about specific suggestions to protect students, such as providing the names and contact information of all commissioned agents on institutional websites.

6. Institutional Training, Ongoing Supervision of Agency Activity, and Student Monitoring
   Institutions should commit to frequent training and ongoing supervision of contracted agencies. Explore how to assess the performance of agencies, as well as that of students recruited via agent partners.

The remainder of this introductory paper explores the current landscape related to international student recruitment and the use of commission-based agents.
International Student Mobility Trends

Prior to the pandemic, international student mobility had been on the rise. More than 5 million students crossed national borders to pursue higher education, compared to 1.7 million in 1995. Recent data, however, were beginning to tell a story of a slower rate of growth (Van Damme, 2017), and the toll of the pandemic on international student mobility is yet to be seen.

Recent trends in international student enrollment in the United States, the largest host country of these internationally mobile students, added another dimension to this shifting landscape. Fall 2019 marked the fourth year of declining enrollments at US institutions of new international students (Open Doors, 2020). During this time of decline in the US, international enrollments were increasing in Canada and Australia, other leading host countries. Canada’s international student population tripled over the past decade to 642,000 in 2019 (El-Assal, 2020). In Australia, they experienced an average annual international student enrollment growth rate of 7 percent, with 952,271 international students enrolled in 2019 (Australia Government Department of Education, Skills and Employment). In addition, countries that had not traditionally been destination markets for international students established national strategies for increasing international enrollment. These trends, as well as the decline in first-time enrollments in the US, raise critical questions for the future: Will more countries be competing for a static or shrinking number of international students? How will travel and immigration restrictions as a result of the pandemic impact the flow of internationally mobile students?

The competition may continue to intensify as more institutions realize the value that international students bring to their campuses and local communities including cultural, academic, and economic contributions. Furthermore, institutions are constantly examining their international recruitment strategies to optimize their return on investment and meet enrollment goals. NACAC found that more than 70 percent of institutions consider international students an important population for meeting enrollment goals (NACAC Admission Trends Survey, 2017).

College and university admission offices typically employ a variety of international recruitment strategies, ranging from campus-based recruitment—activities that can be completed from a home

Long-term growth in foreign enrollment in tertiary education worldwide, 1975–2017

Total foreign students enrolled in tertiary programs (millions)

Number of foreign students enrolled (in millions)

campus location, such as utilizing social media—to traveling abroad to meet with students, parents, counselors, and alumni at schools, education fairs, and receptions. Some institutions engage with third-party, private sector recruitment agencies to grow their international student enrollment. If contracted and paid by colleges on a per capita basis, these individuals are referred to as commissioned agents. Commissioned agents allow institutions to establish a local presence in particular regions abroad, and to meet growing enrollment targets, oftentimes with limited budgets. From a student perspective, commissioned agents may be a main source of guidance for many families in countries that lack a significant presence of school-based college counselors, independent educational consultants, and college fairs.

Commissioned Agent Trends

Policies and practices for working with commissioned agents vary considerably throughout the world and depend heavily on the system of higher education, the history of the practice, and its regulatory oversight. International student recruitment agency use is common in some countries, such as the UK and Australia. It is much less so in others, such as the US, although the practice is growing.

It is helpful to compare US practices with those of other countries, especially those that make more extensive use of agents than the US. As Table 1 illustrates, it is estimated that a smaller proportion of international students in the US use agents in their college search. However, the number of US institutions employing agents has risen in the past few years and is expected to continue to increase.

Consistent with this data, NACAC research has shown that more US colleges and universities are now utilizing, or considering utilizing, commissioned agents than did in 2010. However, it is important to note an amendment to NACAC’s code of ethics in 2013 permitted the once-prohibited practice—a significant change.

The change in the code was predicated on a recommendation of the 2011 NACAC Commission on International Student Recruitment to study the long-running controversy over the use of commission-based agents to recruit internationally given the inherent risks to students and institutions. For students who interact with agents, these include financial risk, misinformation risk, and the risk of being referred to an institution based not upon what is educationally and socially best for them, but, rather, what is financially advantageous for the agent. Actions of unscrupulous agents impact the admission opportunities of students who are either not using agents or using them and trying to play by the rules. Bad actors can also undermine the integrity of an institution’s admission process. Risks to institutions include financial, legal, and reputational risk. The commission recommended that the association maintain a healthy concern over the potential effects of commissioned recruiting, while acknowledging the current state of international recruitment by removing the absolute restriction in favor of a more nuanced, best practice stance.

Perhaps because of this change, as of 2017, 38.5 percent of US colleges and universities reported using commissioned agents—up from 30 percent in 2010 (NACAC Admission Trends Survey, 2010 & 2017). In 2017, an additional 23.6 percent of institutions reported they were actively considering engaging agents (NACAC Admission Trend Survey, 2017). NACAC’s latest research revealed that nearly half of responding institutions were partnering with agents, and an additional 5 percent were actively exploring partnerships (NACAC, 2021).

Table 1. Country Comparison of International Students and Agent Usage

<table>
<thead>
<tr>
<th>Country’s Stance</th>
<th>Total number of international students (IIE, 2015)</th>
<th>Estimated share of international student enrollments via agencies</th>
<th>Usage of international student recruitment agencies by institutions</th>
<th>Sources</th>
</tr>
</thead>
<tbody>
<tr>
<td>USA</td>
<td>Mixed</td>
<td>974,926</td>
<td>22%</td>
<td>37%</td>
</tr>
<tr>
<td>UK</td>
<td>Pro-agent</td>
<td>493,570</td>
<td>38%</td>
<td>40%</td>
</tr>
<tr>
<td>Canada</td>
<td>Pro-agent</td>
<td>263,855</td>
<td>41%</td>
<td>69%</td>
</tr>
<tr>
<td>Australia</td>
<td>Pro-agent</td>
<td>269,752</td>
<td>62%</td>
<td>n/a</td>
</tr>
<tr>
<td>New Zealand</td>
<td>Pro-agent</td>
<td>50,525</td>
<td>31%</td>
<td>n/a</td>
</tr>
</tbody>
</table>

As Table 2 indicates, it is encouraging to see that more institutions are engaging in best practices related to agent management than did two years ago.

**Does Your Institution Know What it Takes?**

To protect all stakeholders and ensure best practice it is critical that institutions engaged in or considering using commissioned agents take measures to ensure accountability, transparency, and integrity.

The decision to use commissioned agents as part of an international student recruitment strategy should not be a “get enrollments quickly” undertaking, nor is it inexpensive. The decision to develop agency partnerships will have campus-wide implications. It is important to evaluate an agency-based strategy relative to the institution’s current enrollment management practices, campus readiness, and alternative recruitment approaches. Operational protocols and institutional policies, if strategically developed and effectively implemented, can help ensure consistent and effective practice across the institution.

**Steps in the process:**

**Step 1: Assess the agency-based recruitment model as a strategy**
- Engage key stakeholders in critical conversations
- Assess existing policies and practices relevant to international student recruitment agencies
- Review regulations, standards, and requirements to which the institution must adhere

**Step 2: Develop institutional protocol for working with agencies**
- Develop a departmental or institutional policy
- Define agency roles and responsibilities
- Identify and assign responsible individual(s) at the institution as agency liaison(s)
- Discuss process for updating marketing materials and website with agent policy and information
- Design curriculum for agency training
- Develop agency manual
- Create an assessment plan

**Step 3: Develop contract**
- Consult legal department or external counsel. Confirm signatory authority and protocols.
- Confer with risk management department
- With same colleagues, develop an approved certificate of representation or letter of authorization

**Step 4: Select an agency**
- Consult with peer institutions and trusted colleagues to identify prospective agencies
- Develop an agency questionnaire or application
- Evaluate agency applications
- Interview agencies/agents
- Check references
- Update marketing materials and website with agent policy and information

**Step 5: Train agency**
- Deliver training in-person or through a virtual format, using agency manual

**Step 6: Monitor agency activity during a recruitment cycle**
- Visit the agency’s office regularly
- Review agency-generated reports

**Step 7: Assess agency relationship as stipulated in the contract**
- Evaluate outcomes against terms of the contract
- Track and benchmark student performance
- Gather student feedback
- Address performance with agency

**Step 8: Evaluate agency model vis-a-vis broader international enrollment management strategy**

**Conclusion**

Commission-based recruitment of international students continues to change and evolve at a fast pace. NACAC is committed to staying informed of evolving models and shaping best practices. We hope you find these resources helpful in your collaborative partnerships with agents and your efforts to recruit international students.

**Table 2: Percentage of Colleges with Various Agent-Related Policies**

<table>
<thead>
<tr>
<th></th>
<th>2017–18 (N=57)</th>
<th>2016–17 (N=52)</th>
<th>2015–16 (N=101)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Require Recommendations</td>
<td>44.0</td>
<td>53.8</td>
<td>35.6</td>
</tr>
<tr>
<td>Require Formal Contract</td>
<td>94.2</td>
<td>94.3</td>
<td>73.3</td>
</tr>
<tr>
<td>Provide Training Manual</td>
<td>58.8</td>
<td>48.1</td>
<td>32.7</td>
</tr>
<tr>
<td>In-person Training Sessions</td>
<td>58.8</td>
<td>59.6</td>
<td>40.6</td>
</tr>
<tr>
<td>Assess Students Recruited by Agency</td>
<td>78.8</td>
<td>75.0</td>
<td>59.8</td>
</tr>
<tr>
<td>List on Student-Facing Website</td>
<td>28.0</td>
<td>17.3</td>
<td>5.9</td>
</tr>
</tbody>
</table>