This paper is the first in a series of NACAC resources designed to guide member institutions in the implementation of the revised Statement of Principles of Good Practice: NACAC’s Code of Ethics and Professional Practice, approved by the association’s Assembly in September 2017. Specifically, this series relates to subsection E of Section II “The Responsible Practice of College Admission,” which focuses on The Use of Commissioned Agents in International Student Recruitment: Guiding Practices and Rationale.

The new mandatory requirements in this section of NACAC’s code of ethics reflect the suggested best practices highlighted in the association’s 2014 report—International Student Recruitment Agencies: A Guide for Schools, Colleges, and Universities. Drawing from this publication, this series will provide updated guidance and resources to help member institutions comply with the revised code in 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 code of ethics mandates that institutions must disclose agent partnerships on all promotional information directed toward international applicants. Learn more about specific requirements, such as the provision that the names and contact information of all commissioned agents must be included on institutional websites.

6. Institutional Training, Ongoing Supervision of Agency Activity, and Student Monitoring
   Institutions must 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

For several decades, international student mobility has been on the rise. Currently, 4.6 million students cross national borders to pursue higher education, compared to 1.7 million in 1995. Although as recently as last year experts projected that this growth would continue, recent data are beginning to tell a different story. Between 2012 and 2015, the number of students pursuing education outside their home country grew by just 100,000 (Van Damme, 2017).

Recent trends in international student enrollment in the United States, the largest host country of these internationally mobile students, add another dimension to this shifting landscape. In fall 2017 US institutions reported a 6.9 percent decrease in international students enrolling for the first time, continuing the decline first seen in fall 2016 (Open Doors, 2017). At the same time, new international enrollments have increased in Canada and Australia, other leading host countries. The number of new students entering Canada for the first time reached nearly 270,000 in 2016, a 22 percent increase compared to 2015 (ICEF Monitor, 2017). This is a sharp uptick when compared to the average annual growth rate of approximately 9 percent. In Australia, new enrollment in the higher education sector grew by 13.2 percent between 2015 and 2016 (Australia Government Department of Education and Training, Provider Registration and International Student Management System). In addition, countries that have not traditionally been destination markets for international students have established national strategies for increasing international enrollment. These trends, as well as the decline in first-time enrollments in the US, raises a critical question for the future: Will more countries be competing for a static or shrinking number of international 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 campus location, such as utilizing social media—


Total foreign students enrolled in tertiary programs (millions)

Number of foreign students enrolled (in millions)

Note: Data on foreign enrollment worldwide comes from both the OECD and the UNESCO Institute for Statistics.
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). This past year, an additional 23.6 percent of institutions reported they were actively considering engaging agents (NACAC Admission Trend Survey, 2017).

<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. Share your feedback on this series, as well as your experiences working with agencies, with NACAC.

### Table 2: International Recruitment Practices and Use of Agents, by Institutional Characteristics

<table>
<thead>
<tr>
<th>Requirement</th>
<th>All Colleges 2017</th>
<th>All Colleges 2015</th>
</tr>
</thead>
<tbody>
<tr>
<td>Require recommendations from other US schools as part of initial agency vetting process</td>
<td>53.8%</td>
<td>35.6%</td>
</tr>
<tr>
<td>Require agencies to enter into a formal contract with the institution</td>
<td>94.3%</td>
<td>73.3%</td>
</tr>
<tr>
<td>Provide agency with a training manual</td>
<td>48.1%</td>
<td>32.7%</td>
</tr>
<tr>
<td>Conduct in-person training sessions (either in-country or on campus)</td>
<td>59.6%</td>
<td>40.6%</td>
</tr>
<tr>
<td>Regularly assess the quality and satisfaction of students recruited by the agency</td>
<td>75.0%</td>
<td>59.8%</td>
</tr>
<tr>
<td>List agency contracts on a student-facing website</td>
<td>17.3%</td>
<td>5.9%</td>
</tr>
</tbody>
</table>

Source: NACAC Admission Trends Surveys, 2015 and 2017