

INTERNATIONAL STUDENT RECRUITMENT IN AUSTRALIA AND THE UNITED STATES

Approaches and Attitudes

TONY ADAMS,¹ MITCH LEVENTHAL AND STEPHEN CONNELLY

International students do not find their way to overseas institutions by accident. International student recruitment, especially in those countries where international students pay full fees, is an increasingly professional business, undertaken by experts drawing on years of experience; it incorporates practices from other industries, such as call centers and customer relationship management, and earns substantial export revenue. With the number of globally mobile students increasing at an average of 4% per annum since the 1970s (Banks, 2010), growth trends are projecting between 4.1 million to 6.7 million students studying abroad by the year 2020 (Calderon, 2010; see Chapter 21, this volume, for an in-depth discussion on student mobility). Legislation in countries such as Singapore and Australia, and emerging industry self-regulation in the United States, endeavor to provide a degree of consumer protection to international students (see Chapter 12, this volume, for more on international student security), while commentators criticize the practice

as the most obvious manifestation of the commercialization of education. At its best, international student recruitment matches students' educational and professional needs with appropriate study programs, leading to high levels of customer satisfaction and long-lasting, positive career outcomes, while simultaneously protecting and enhancing the reputation of participating institutions.

Australia is generally recognized as the leader in international student recruitment, while the United States is perceived as either a laggard or critic. This chapter aims to track the evolution of international student recruitment practice in both countries and then to draw more general conclusions relative to global practice.

AUSTRALIA'S EARLY ENGAGEMENT IN STUDENT RECRUITMENT

Although international students have been in Australia since at least 1904 (Meadows, 2011),

Australia's initial major engagement with international students began in the 1950s, when it played a key role in the implementation of the Colombo Plan for Cooperative Economic and Social Development in Asia and the Pacific, conceived at the Commonwealth Conference on Foreign Affairs held in Colombo, Ceylon (now Sri Lanka) in January 1950 and launched on July 1, 1951, as a cooperative venture for the economic and social advancement of the peoples of South and Southeast Asia (<http://www.colombo-plan.org/history.php>). Through the 1950s and into the 1980s, Australia became the destination of thousands of students from throughout Asia, most of whom received their schooling on generous Australian Government scholarships (Cuthbert, Smith, & Boey, 2008).

By 1985, about 20,000 students had studied at Australian universities under the Colombo Plan, which, although the largest such scholarship scheme operating in Australia, was not the only one (Meadows, 2011). The Colombo Plan alumni of Australian universities have held significant positions of power and influence in government and industry throughout Asia, as presidents and prime ministers, senior cabinet members, university presidents, and CEOs of major airlines, banks, and other trading companies.

AUSTRALIA'S FULL-FEE PROGRAM

Although self-supported students (as distinct from scholarship students) had been present in Australia since the 1960s (Meadows, 2011), higher education reforms in the mid-1980s propelled Australia from what was primarily an aid-based mission to one that was trade-based, still backed up by a range of scholarships for developing countries (Cuthbert et al., 2008). These reforms,² the outcome of the reports of the Committee to Review the Australian Overseas Aid Program (Jackson Committee) and the Committee of Review of Private Overseas Student Policy (Goldring Committee), were announced in 1985 and included the encouragement of the admission of full-fee-paying international students. Trade missions reported on the export potential of education services, and enabling legislation was introduced into the Australian Parliament (Meadows, 2011). In 1986, when the first full-fee-paying overseas

students were admitted to Australian universities under the new regime, few expected that large numbers of international students would pay fees to study in Australia. The reforms were aimed principally at improving the efficiency and international competitiveness of Australian education. However, realizing that many of the former countries that benefited from the Colombo Plan had become Asian Tigers in the interim, the Australian government deliberately set upon a course to develop education as a fee-based export industry, following what had already occurred in the United Kingdom. In 1986, the National Liaison Committee for Overseas Students was formed, a body set up to represent international students' rights, and in 1987, the first Australian Government Ministry of Education officers were posted overseas, to Beijing, Hong Kong, and Kuala Lumpur. At the same time, the Code of Ethical Practice in the Provision of Full-Fee Courses to Overseas Students by Australian Higher Education Institutions and a Code of Conduct for the Overseas Marketing of Australian Education Services were developed by the Australian Vice Chancellors' Committee.

By the mid-1990s, export of higher education had become an explicit strategy, with the Australian government continuing the spirit of the Colombo Plan through scholarships to developing countries, accompanied by the establishment of a strong global generic marketing capacity, creation of a regulatory framework, and establishment of high-quality market intelligence (Adams, 2009).

Institutions began to see the significant demand among international students, primarily in Asia, for education in Australia and were able to use the revenue gained from international students in a discretionary manner. Although the Australian government required components of the international tuition fee to be applied to capital works and provision of certain international student services, once costs of recruitment, teaching, and support services had been expended, any surplus could be used for whatever purpose universities desired. Most commonly, this revenue was used to subsidize critical university activities such as research. Other drivers to increase international student recruitment activity included diversification of the student population to benefit the largely stay-at-home domestic population and the

competition for high-quality research students to compensate for stagnant or declining growth in the pool of domestic research candidates. As a consequence, during the 1990s, international student recruitment activity by Australian universities and other institutions (e.g., English language providers) increased significantly in scope and sophistication.

RECRUITING INTERNATIONAL STUDENTS TO AUSTRALIA

Australia's onshore international student program is an important component of the country's higher education system, with fee income providing some 21% of revenue to Australian universities (Olsen, 2010). International students at Australian universities comprise about 43% of all international students in Australia, the remaining 57% being enrolled in primary and secondary schools, English language centers, vocational education, non-award programs such as Foundation Studies (see section below), and exchange or study abroad programs (Australian Education International, 2011a). Overall, international education is Australia's third-largest export and its largest services export, contributing AUD\$18.3 billion to the Australian economy in 2010 (Australian Education International, 2011b). Of that, higher education generated AUD\$10.4 billion or 59% of total onshore earnings. The economic value of education exports has grown rapidly, at an average annual rate of 15% over a decade to 2006–2007 (Australian Education International, 2011b). A recent report into the economic impact of international students estimated that more than 126,000 equivalent full-time jobs across the country are directly attributable to international education (Access Economics, 2009).

The history of international recruitment in Australia has been one of innovation.

Apple's most enduring secret is not their technology, but the culture of innovation that they have nurtured for a quarter of a century. Australia has been a great innovator in international student recruitment in the past and to remain as a significant destination for international students, must remain an innovator, as well as learning from the new innovations of others (Adams, 2010).

Whether or not Australian institutions developed the innovations that follow or adapted and improved them is not important. What is important is that Australia made them their own. So what were these innovations?

The International Office

International Offices (IOs) in Australia universities were expressly established to recruit international students, and their structures reflect this requirement. This stands in stark contrast to their counterparts in the United States, which emerged to support traditional academic exchange programs. The Australian Universities International Directors Forum benchmarking study (Olsen, 2007), conducted annually since 2002, provides a snapshot of Australian university IO responsibilities, costs, reporting lines, and other measures of performance for the universities that participate in the study. In 2010, 37 of 39 Australian universities participated (Olsen, 2010).

These annual benchmarking reports demonstrate the centralization of many student recruitment-related functions, and the relative size of Australian IOs compared with their U.S. counterparts. While the reports do show the primacy of marketing and recruitment activity for IOs, they also demonstrate the comprehensive range of internationalization activities that IOs cover, including overseeing devolved admissions functions, international student advising and support, and outbound mobility.

The Use of Agents

Although their use is a controversial practice in the United States, student recruitment agents are a critical part of the marketing and recruiting strategy of Australian institutions (Olsen, 2007). Some 50% to 60% of commencing international students in higher education are recruited via agents. The following activities are carried out in relation to agents on a routine basis:

- Providing printed materials
- Including a directory of agents by country on university websites
- Visiting the agent to ensure their premises are adequate, materials provided are available to prospective students and up to date, and locally produced materials represent the university accurately

- Training the agent and staff on academic programs, student visa issues, and other national requirements, and university processes
- Working with agents to arrange interviews for prospective students
- Participating in agent-organized student recruitment fairs and road shows
- Working with agents to ensure they have sighted and verified as authentic original student academic and English-language proficiency documentation
- Developing a student recruitment plan
- Providing selected agents with a marketing budget for agreed activities

The responsibilities of agents are part of a contractual agreement between the university and the agent, the management of which is generally the responsibility of IOs. The agreement includes clauses intended to protect the university from inappropriate behavior by agents, and it references legal requirements on universities and their agents to act in the best interests of prospective students.

Agents generally operate on a commission basis, with payments representing a proportion of the tuition fees paid to education institutions. Commissions in higher education are paid based on a percentage of first year's tuition fee, normally 10% to 15%. This means that on average, measured across a student's full program duration, universities spend about 4.1% of their gross international student tuition-fee revenue on agent commissions (Olsen, 2010). Properly managed, student recruitment agents significantly enhance the reach of education institutions in Australia seeking to recruit international students, and they are perceived as a powerful means of increasing international student enrollments.

IDP Education is Australia's major agent, providing services to all Australian education providers and recruiting about 13% of commencing international students at Australian universities annually (Olsen, 2010) via its worldwide network of 65 offices. IDP was historically fully owned directly by Australia's universities as a not-for-profit company. It is now a for-profit enterprise owned 50% by universities and 50% by SEEK Limited, a publicly listed company that operates online employment classifieds and education and training. IDP recruits for several hundred Australian institutions across higher education,

vocational education, English language, and schools sectors. It has also recently started recruiting activities for institutions in other countries, including the United States (IDP, 2010), a decision that has been controversial among Australian institutions, which have been accustomed to its exclusive attention.

Study Pathways

Study pathways are a major feature of international education recruitment in Australia and are now developing in the United Kingdom, Canada, and the United States. Pathways for international students were initially developed as a bridge between students' preuniversity education and their desired university programs, in cases where a national high school certificate from certain countries did not guarantee direct entry into Australian undergraduate programs. These programs, known as Foundation Studies, quickly developed as an alternative to the final year of high school for international students primarily from Asian countries, with in-built guaranteed entry to first year of university programs, usually linked to academic performance. Foundation Studies programs were also coupled with higher education diplomas, equivalent to the first year of an Australian university degree program and providing entry points into the second year of related university degrees. These so-called pathway programs enabled universities to access cohorts of students who did not qualify for direct entry into undergraduate studies but who could be nurtured in a more supportive environment than first year at an Australian university, in smaller classes, mainly with other international students, allowing them to improve their grades and their language proficiency before entering undergraduate programs. Navitas is the best known example of innovation and success in this aspect of international education, taking its model originally developed in Australia to the world (see <http://www.navitas.com/>).

Australian pathway programs are either run by the universities themselves within existing academic units, or they establish a separate college to offer the programs (see Monash College and Swinburne College, both in Australia), or they are outsourced to a private provider such as Navitas, which often sets up operations on the university campus or in close proximity. The private pathway provider will

teach to the university curriculum, and the student will have guaranteed entry (by performance criteria) into first or second year of the university on satisfactory completion of the program. As part of the arrangement, the university controls assessment and maintains quality assurance over teaching. The private provider often employs retired academics or university academic staff on a casual basis to teach the diploma programs.

An analysis of pathway data (Australian Education International, 2006) shows that university-operated, university-linked programs, along with a variety of private providers operating their own diplomas without direct university involvement, are responsible for 50% to 60% of all international undergraduates entering Australian universities.

Articulation Arrangements

Credit for previous studies forms an important part of undergraduate international student recruitment for Australian universities (Olsen, 2007). Traditionally, this started with universities awarding credit to graduates of the state polytechnic system in Singapore and via twinning³ or similar arrangements in Singapore, Malaysia, and Hong Kong. In a twinning arrangement, the student undertakes perhaps the first 2 years of the university's program through a private provider, say in Malaysia. The provider will, with the agreement and under the direction of the Australian university, use that university's curriculum, and the university will provide guaranteed entry, in this case into the third (and final) year of the degree in Australia.

Australian universities often have numerous credit arrangements with providers within Australia and overseas, in some cases numbering in the hundreds. Some universities have a Credit for Previous Study Assessor as an automated recruitment tool on the international website (see, for example, http://www-public.jcu.edu.au/study/apply/JCUPRD1_061219), highlighting the importance for some universities of articulation arrangements as part of their recruitment strategy. The obvious dilemma for Australian universities is maintaining oversight of these arrangements and the performance of articulating students, once they enter their degree programs, to ensure the arrangements give students the best chance of success as they

move from the preliminary program into the degree program.

Institutional Marketing and Recruiting Good Practice

Australian universities have over time developed strong elements of good practice in international marketing and student recruitment:

- A clear and powerful marketing message, linked to the university's domestic market position and brand strength
- Web marketing and social media, attendance at overseas student recruitment fairs, agent seminars, and other activities that generate prospective student enquiries and applications
- A state of the art website with contemporary web tools to capture inquiries and channel these toward application and admission
- Prospect management tools on the Web that maximize the opportunity for enrollment
- High-quality and concise print materials to back up the Web presence
- A network of agents in target countries that are serviced with regular visits and event participation in those countries
- Clear academic and English admission levels relevant to a broad range of home countries for students traveling for undergraduate education
- Use of an Australian generic marketing infrastructure via the Australian Government internationally, including education counsellors in overseas missions
- A scholarship strategy to provide scholarships to outstanding students as a marketing tool and collaboration with overseas scholarship authorities, foundations, and private providers
- Promotion of on-arrival, orientation, and student welfare services
- Engagement with the local Australian community to welcome and support international students
- A plan that gives international marketing staff control, or at least great influence, over marketing materials, both web and print, within agreed guidelines

Prospect or Inquiry Management

The classic image of the IO unprepared for managing student inquiries at volume is the box

sitting in the corner full of printed e-mail inquiries awaiting response. State of the art inquiry management is essential in these days of immediate real-time inquiry and response for all manner of services. International education is no different: Students expect prompt and accurate responses to their inquiries. Customer relationship management (CRM) or prospect management systems have the potential to provide high standards of service to prospective students, as well as significant amounts of market intelligence and other services both to the prospect and the institution. These CRM services include:

- Frequently asked question (FAQ) databases that prospects can browse
- Brochure-builder technology to deliver specified or requested information direct to an inquirer's desktop
- Access to staff to answer more difficult questions
- Inquiry statistics by country, by level of study, and by discipline, as well as comparative current trends by week, month, and year to previous inquiry periods
- Pipeline time from inquiry to enrollment by country
- Ability to survey inquiries that didn't proceed to application and enrollment as to the reasons
- Based on inquiries, the ability to predict future enrollments by country
- The addition of prospects to mailing lists for e-newspapers
- SMS and e-mail marketing campaigns, including the ability to communicate details about marketing events in a specific country to recent prospects in that country
- Follow-up on offers

Sixteen Australian universities outsource inquiry management to Hobsons Asia Pacific, which uses a system originally developed by the Good Guides Group, an Australian company (Adams, 2009). In this system, all inquiries generated via e-mail, Web forms, and telephone are diverted from the university to a central service center in Melbourne, Australia. Account managers are employed to manage the prospect from initial inquiry through to the application stage for client institutions. Inquiries are handled based on protocols agreed by client institutions

and cannot be diverted to other client institutions. A side benefit of this system has been the pooling of information from the 16 Australian universities for market intelligence purposes, from which all client institutions benefit.

International Student Admissions

Australian universities follow a number of basic normative principles in their attempt to achieve best practice in the admission of international students. Primarily, it needs to be recognized that *the admissions function is an integral part of the recruitment function*. The best marketing and recruitment practices will be undone by slow and unresponsive admissions practices. Basic principles include:

- Admission criteria need to be provided for as many countries as possible.
- The criteria should be clear and as objective as possible.
- Subject to published quota restrictions, a student who meets the criteria should have an expectation of admission.
- Any written requirements such as essays need to recognize that prospective students from non-English speaking backgrounds may not yet have reached the English-language proficiency requirements.
- Conditional offers should be made where prospective students have not yet reached the admission requirement (for example, English); when the conditions are met, the offer becomes absolute or unconditional.
- Interviews should be done only in rare circumstances, need to be at the reasonable convenience of the prospective students, and must recognize the significant cultural differences that exist as well as that English requirements may not yet have been met.
- Offers should be made on a rolling basis, with target turnaround times (e.g., maximum 5 working days to generate offers from receipt of a complete application).
- Trusted agents should be authorized to verify that documents are legitimate and correct.
- All major international English proficiency tests should be accepted (e.g., IELTS, TOEFL, Cambridge, Pearson).
- Alternate means of satisfying English language criteria must be in place, such as

recognizing students who have studied at least 2 years in the medium of English or who have passed at an appropriate level the high school English course from certain countries, without further tests required for entry.

- Admissions and recruiting staff need to work closely together, and both will normally be within the international office and often in the same organizational unit.
- Admissions and recruiting staff will most frequently be organized in regional teams to ensure they understand specific education systems and can build knowledge and expertise in a specified number of countries, develop solid working relationships with agents, and provide better service to students, their families, and internal stakeholders such as academic units.

Compliance, Standards, and Service Levels: the Education Services for Overseas Students (ESOS) Act and the National Code⁴

The ESOS Act 2000 (Australian Government, 2010a) was introduced to regulate the education and training export industry. The act and complementary legislation provide a consumer protection framework for international students studying in Australia under a student visa and a quality assurance mechanism for ensuring the standards of education provided to international students.

Violations of the ESOS Act can include criminal penalties, including prison and fines. The ESOS legislative framework includes the following.

Commonwealth Register of Institutions and Courses for Overseas Students (CRICOS). CRICOS is a database of more than 1,200 Australian education institutions (Australian Government, 2010b). All institutions that recruit, enroll, or teach international students on a student visa must be registered on CRICOS, as must each program taught to international students.

Provider Registration and International Students Management System (PRISMS). All CRICOS-approved providers and their programs are listed on PRISMS, as is each student studying in Australia on a student visa. The system interfaces

with the Department of Immigration and Citizenship (DIAC) visa data (Australian Government, 2009c). Through PRISMS, providers notify DIAC of each student's acceptance into a program, prior to the student applying for a student visa. This information generates an electronic Confirmation of Enrolment as evidence of admission to a registered, full-time program (international students in Australia must study on a full-time basis). The confirmation enables a prospective student to apply for a student visa and is proof of acceptance into a CRICOS-registered institution and program. Education providers must use PRISMS to notify DIAC of students who may have breached the terms of their student visa—for example, when the student has not been attending classes or falls below minimum pass rates (see <https://prisms.deewr.gov.au>). The SEVIS system in the United States mirrors a number of these developments (see <http://www.ice.gov/sevis/>), but lacks the sophistication of PRISMS.

The ESOS Tuition Assurance Fund. The ESOS Tuition Assurance Fund (Australian Government, 2009a) was established to protect the interests of current and intending overseas students of registered providers. It does this by ensuring that students are provided with suitable alternative programs or have their program monies refunded if, for example, the provider goes into liquidation and closes. Private providers are required to make a contribution to the fund as a proportion of their international student income.

Health Insurance. Health insurance for students under a student visa, known as Overseas Student Health Cover, is mandated by the commonwealth government and operated by a small number of licensed health insurance companies. The scheme ensures that international students can gain access to general medical practitioners and the public hospital system, with the cost to be covered by the insurer (Australian Education International, 2010b). Commencing international students in Australia must take out insurance for the duration of their student visa.

The National Code that forms a part of the ESOS Act is enforceable with both operating and criminal sanctions. It includes 15 standards of practice (Australian Government, 2009a) listed in Table 22.1.

Marketing Information and Practices
Student Engagement Before Enrollment
Formalization of Enrollment
Education Agents
Younger Overseas Students
Student Support Services
Transfer Between Registered Providers
Complaints and Appeals
Completion Within Expected Duration
Monitoring Course Progress
Monitoring Attendance
Course Credit
Deferment, Suspension, or Cancellation of Study During Enrollment
Staff Capability, Educational Resources, and Premises
Changes to Registered Providers' Ownership or Management

Table 22.1 Standards of Practice

THE RESPONSE TO EDUCATION SERVICES FOR OVERSEAS STUDENTS

Education institutions in Australia take ESOS responsibilities very seriously. Because the National Code specifies compliance issues in service delivery as well as educational program delivery, institutional compliance is the responsibility of staff right across universities. Although the IO will often manage and coordinate compliance, it cannot take on the compliance responsibility for academic departments in terms of program delivery. Typical university responses to their ESOS compliance obligations will be:

- An officer within the IO with responsibility to coordinate institution-wide ESOS compliance
- A committee with broad university membership to discuss and manage ESOS compliance issues, including coordination of internal and external audits
- Requirements that all publications (print and electronic) that are developed for domestic or international recruiting are checked for ESOS compliance

- Formal procedures for the appointment and monitoring of agents
- Formal procedures for the registration of new programs under CRICOS
- Formal procedures for monitoring student performance and reporting on PRISMS
- Published fee levels and fee refund policies, as well as complaint and grievance procedures
- Written policies covering critical incidents
- Regular audits of compliance status (some universities do this as part of ISO quality assurance processes).

Benchmarking

As previously indicated, the Australian Universities International Directors Forum is a grouping of international directors of Australia's universities. It has been extremely successful since 2002 in carrying out benchmarking into various aspects of the international operations of universities, including the costs and major operational parameters of international offices and more recently student mobility. Parameters benchmarked include costs of the operation of the international office, agent costs, recruitment costs by major market, application to enrollment conversion figures, efficiency and volume of recruitment channels, and staffing ratios for recruitment, admissions, and student services staff.

Market Research

Australia is richly served by up-to-date market intelligence. Australian university and nonuniversity providers have been fortunate that a benefit of the PRISMS system is the collection and distribution of timely market data by Australian Education International. Overview data are available in the public domain (<https://aei.gov.au/research/International-Student-Data/Pages/default.aspx>) and are updated monthly, approximately 2 months in arrears. Complete data for planning are available in the same timeframe electronically by subscription. Other sources of data include analysis and conversion of prospective students from the Hobsons Inquiry Management Service system for its 16 client institutions, IDP benchmarking of semester-by-semester enrollment for universities,⁵ and monthly surveys undertaken by English Australia, the peak English-language teaching body. In 2011, the Department of Immigration and Citizenship has introduced a

regular series of three monthly reports on student visa application and grant trends, providing invaluable information about likely prospective enrollments.

Visa Processing

Australia has been a leader in establishing a transparent framework for student visa processing. This includes international student source countries ranked via five Assessment Levels (AL) representing levels of risk associated with student visa overstay (see <http://www.immi.gov.au/students/student-visa-assessment-levels.htm>). AL 1 represents countries whose students have the least level of risk of overstay and AL 5 the highest level of risk (Australian Government, 2010c). Linked to this has been the migration skills on demand list (MODL), which has encouraged international students with specific Australian qualifications to seek permanent residence. The MODL was a list of skills and qualifications in demand for applications for permanent residence in Australia.

In recent years, Australia's leadership in the area of student visa programs and skilled migration has been seriously eroded. Inappropriate migration settings led to exponential growth over a number of years in international student enrollments in a range of vocational education programs, causing considerable stress in the oversight of compliance by regulatory authorities and allowing unethical practices by some student recruitment agents and some private providers to go unchecked. Subsequent attacks in a number of cities on Indian students (Adams, 2010) led to a crackdown on the international student visa program; this led to the collapse of the Indian student market for Australian institutions. The student visa application process was no longer transparent, financial requirements to qualify for a student visa were increased, and the link between education and migration became confused and confusing. The parallel rise of the Australian dollar in the wake of the global financial crisis has led to a significant short-term correction in international student recruitment for Australia. Current admissions data show that higher education commencements grew by just 2.6% in 2010, but those for India collapsed by nearly 47% (Australian Education International, 2010a). The pain has continued in 2011. At the time of writing, a student visa review, conducted

by former politician Michael Knight, has been completed, with the recommendations accepted by the Australian Government⁶. The framework for international student visas had been seriously compromised by a combination of poor regulation of international education in Australia by state and federal authorities, inconsistent student visa program management, and short-sighted immigration policy development, the latter two in response to unethical practices by some agents and providers, who flourished while underresourced and uncoordinated regulatory authorities were unable to fulfill their oversight responsibilities. It is hoped the outcomes of the review will restore integrity and transparency to the student visa program, reassert Australia's competitiveness with other destination countries in student visa application processing, and support an appropriate link between education and migration in Australia.

PROFESSIONALIZING INTERNATIONAL EDUCATION AND INTERNATIONAL STUDENT RECRUITMENT

Since the mid-1980s, Australian university staff involved in international student recruitment have sought to professionalize their activity. Murray (2011) refers to the four key elements of early professional development:

1. Industry briefings, conferences, and workshops
2. Industry research
3. Targeted publications on current themes and issues
4. Specialist professional groupings

The four elements have remained constants over the years as international education in Australia has matured.

In 1987, IDP conducted the first workshop, *Overseas Students: New Approaches and Practices*, in Canberra. That initial workshop has today become the Australian International Education Conference (AIEC), which celebrated its 25th anniversary in October 2011 in Adelaide. The conference attracts more than 1,300 delegates annually, the third-largest international education conference in the world, and is jointly organized by IDP and the International Education Association Australia. While international

student recruitment practice is an important part of the conference, its program canvasses a broad internationalization agenda.

Australian international education practitioners and researchers have long contributed to commentary and research in the field of internationalization, via the AIEC, conferences conducted by international education associations around the world, and publications such as the *Journal of Studies in International Education*. The IDP Database on International Education is managed by the Australian Council for Educational Research and contains details of more than 8,000 publications on various aspects of international education.

In international education, professional associations and groupings have existed in Australia for many years. Peak bodies representing different industry segments, such as the International Education Association Australia (see www.ieaa.org.au), work cooperatively for the betterment of international education, servicing their memberships with professional development opportunities and jointly lobbying government on policy issues. Groups such as the Australian Universities International Directors Forum have a specific focus on international office matters, reflecting the role of that particular group.

The maturity and level of sophistication of international student recruitment activity in Australia is evident in the above examples of engagement with policy, professional development, research, and practice. This in part reflects the fact that the export paradigm has been present in Australia since the 1980s, as it has been in the United Kingdom. However, only in the very recent past has an explicit export-oriented stance started to take hold in the United States. The debate about international student recruitment in the United States reflects its unique history as a magnet for international students, quite distinct from Australia's, although there are parallels. This next section addresses attitudes toward and approaches to international student recruitment in the United States.

INTERNATIONAL STUDENT RECRUITMENT IN THE UNITED STATES

Recruitment in the United States has progressed through three distinct phases. The first phase

lasted from shortly after the end of the Second World War until about the mid-1960s to early 1970s. The second phase continued until about 2008. The most recent phase has just started and will be the most closely addressed in the following pages.

Phase 1: Postwar Dominance (1948 to mid-1960s)

In the immediate aftermath of the Second World War, U.S. attention was focused on acquiring German researchers and other European scholars, who would advance America's strategic position in the world, particularly vis-à-vis the Soviet Union (see also Chapter 3, this volume). The Fulbright Program, established in 1948, was designed to promote peace and understanding through international educational exchange and to counterbalance Soviet efforts to make political inroads in the developing world. Fulbright represented the first formal U.S. commitment to increasing cross-border student mobility. It is probably not coincidental that the National Association of Foreign Student Advisers (NAFSA) was also founded in 1948, as it was obvious to many that the number of international students in the United States was poised to grow dramatically.⁷

With the Mutual Educational and Cultural Exchange Act of 1961, the Bureau of Educational and Cultural Affairs (ECA) was created. This bureau, which has variously moved between the State Department and the U.S. Information Agency, was created to foster mutual understanding between the people of the United States and those of other countries through promotion of educational and cultural exchange.

The emphasis during this period was on traditional academic exchange, generally under the sponsorship of Fulbright or a similar program. Beyond Fulbright, however, recruitment of students was not really organized. Rather, it occurred based on personal, one-on-one relationships. In the decade from 1948–1949 to 1958–1959, international student enrollment grew from 25,464 to 47,245. Recruitment practice during the first phase can best be described as passive, opportunistic, and individualistic.

Phase 2: Increasing Professionalization (mid-1960s to late-2000s)

By the mid-1960s, international student numbers began to grow dramatically. In

1966–1967, for example, the international student population grew 21.2% over the previous year and reached 100,262. During the next decade, student numbers would more than double to 203,068. Between 1966–1967 and 1978–1979, growth was in double digits for 8 of the 13 years. During the 4 years from 1975–1976 to 1978–1979, growth ranged from 12.1% to 16% each year. Much of this growth resulted from large cohorts of fully funded students coming to the United States from oil-rich countries, such as Iran, Kuwait, Nigeria, and Saudi Arabia.

This dramatic growth led to a much higher profile for NAFSA and for other organizations that emerged to serve international students and assist with their mobility. By the mid 1970s and 1980s, some universities began to focus more explicitly on international student recruitment. This probably resulted from two factors: First, large numbers of fee-paying international students had awakened an awareness on some campuses of the revenue potential of international students. Second, the Iranian Revolution, which led to a “bust” in Iranian student mobility virtually overnight, as well as other “busts” tied to the vagaries of oil economies, led campuses to realize that a more proactive approach was warranted. During this period, the federal government’s EducationUSA advising centers emerged to promote U.S. higher education around the world by offering accurate, comprehensive, objective, and timely information about educational institutions in the United States and guidance to qualified individuals on how best to access those opportunities.⁸

Also during this period, recognition of the importance of education as a traded service was advanced within government. Section 135 of the Trade Act of 1974 established the private sector advisory structure to advise the Office of the U.S. Trade Representative and key Cabinet agencies on trade policy, trade negotiations, and implementation. At that time, the General Agreement on Tariffs and Trade (GATT) covered trade only in goods. However, during the Uruguay Round of Trade Negotiations, which was launched in 1986, it was agreed that services would be on the negotiating table, and thus the World Trade Organization (WTO) was created in 1995 to supersede the GATT. In that year, an Industry Technical Advisory Committee for trade in education services was

formed. Of particular issue to advisors are barriers to educational trade; these barriers are understood to be increasingly important, given the acknowledgment that educational services account for billions of dollars in trade.⁹

Also emerging during this period were significant private organizations, such as Linden Educational Services (<http://www.lindentours.com>), which brought a more focused and professional approach to recruitment. Related services provided by such companies and associations revolved around small group visits to various cities and countries around centerpiece fairs where schools could present their programs directly to students overseas. For a large number of colleges and universities, educational tours run by private companies represented their first organized foray into the world of international recruitment. In a sense, this approach was closely patterned on typical industrial trade shows: fly into a venue, distribute information, and fly home to await orders.

While this approach resulted in some significant flows of international students to specific institutions, it was not accompanied by any substantial modification of U.S. admissions practice on the institution side and rarely was tied to any ongoing service level at the point of origin of the international student. NAFSA’s work was focused primarily on the international student intake side; marketing and recruitment was confined to tours and fairs. To generalize, then, U.S. recruitment during this period can be characterized as featuring (a) a heavy reliance on road shows and recruiting fairs, (b) minimal use of local recruiting teams, (c) long distance counseling, and (d) a lack of a specialized international recruiting unit.

This rather undifferentiated approach did not matter so much, however, as real sustained growth continued unabated, and with little effort, until the early 2000s. The general view was “We built it, and they are coming.” Americans looked at the aggressive marketing tactics of the Australians, and in particular their use of agents, with disdain. With the exception of a few intrepid institutions and some proprietary schools, most U.S. colleges and universities considered agencies to be unethical and an abhorrent to their professional organizations, and most even believed the practice to be illegal.¹⁰

And then the shock of 9/11 resulted in the first multiyear declines in international student numbers of the postwar era.

Phase 3: Moving Forward (2008 onward)

During the second phase of U.S. development, while international student numbers in the United States were growing with relatively little effort, the Australians were aggressively developing a new approach to recruiting, which was heavily dependent on the utilization of professional educational advising companies, otherwise known as education agents.

In the United States, views regarding agents began to change slightly in the years following

9/11, when it became apparent that the recovery was not keeping pace with the growth in recruitment being experienced by Australia and the United Kingdom. At a point, it became obvious that their growth was driven by something other than expedited visa processing, that there was a substantive difference in approach that was allowing them to capture U.S. market share. In Box 22.1, a personal view on the use of agents and its debate in the United States is provided.

As illustrated in Box 22.1, the use of agents for international student recruitment remains

BOX 22.1 The Use of Agents in the United States

The decisive factor that pushed institutions over the edge in the use of agents was the 2008 financial collapse, by which time financial benefit of a more aggressive recruitment strategy was undeniable. In January 2006, the University of Cincinnati became the first public research university to openly embrace the use of agents. During that time, the coauthor of this paper, who was serving as vice provost for international affairs, publicly advocated adopting a set of practices derived from Australian experience. During the subsequent 2 years, a significant number of both public and private colleges and universities in Ohio and beyond began to use agents.

By early 2008, it became evident that a system of professionalization was required, both to assure institutions of agency quality, as well as to act as a locus for the development of best practices among U.S. institutions themselves (Leventhal, 2008). This awareness resulted in a group of U.S. universities creating the American International Recruitment Council (AIRC), which is registered with the U.S. Department of Justice and the Federal Trade Commission as a standard development organization (AIRC, 2010; McMurtrie, 2008). The AIRC developed a set of standards based on standards and practices that had been developed in Australia, as well as among many agency associations around the world (AIRC, 2010). The standards were then tied to an agency certification process, closely modeled on U.S. higher education accreditation.

By mid 2011, more than 140 accredited postsecondary institutions had become members of AIRC, and more than 40 agencies had attained certification, collectively having several hundred branches in dozens of countries. AIRC's institutional membership represents only a small fraction of U.S. institutions using agents, and its members represent the mainstream of U.S. higher education, including leading state universities, private elite universities, and community colleges. Nonetheless, the use of agents, and particularly the payment of recruitment commissions, continues to be highly controversial in the United States. The most consistent and vociferous opposition comes from those opposed to the payment of success-based commissions, which are believed by some to be a corrupting influence on agent's behavior, one that can result in steering students not to the best institutional fit, but to the highest bidder. The U.S. State Department's Bureau of Educational and Cultural Affairs (ECA) has been particularly vocal in this regard. ECA manages the EducationUSA advising network and has taken an aggressive stance against agents—in stark contrast to its Australian and British counterparts, Australian Education International and the British Council, which view

agents as a marketing force multiplier. The State Department's 2009 Policy Guidance for EducationUSA Centers on Commercial Recruitment Agents (U.S. Department of State, 2009) represents a generalized position against the credibility of all international recruitment agencies and the institutions that rely on them. But the U.S. higher education export industry is moving ahead of the U.S. State Department. Realizing that agency recruitment has entered the mainstream, the National Association of College Admission Counseling, the organization that largely controls access to domestic college recruiting fairs across the United States, recently stepped back from a proposed prohibition on member institutions paying commissions, opting instead for a conciliatory approach focused on further study and consultation with all constituencies.

One large university system, the State University of New York—with 64 colleges and universities and nearly one half million students—has announced an aggressive agency recruitment strategy, although the action is debated even within the system. It has pledged that a substantial percentage of incoming student revenue will be reinvested in outbound study abroad scholarships, faculty internationalization grants, and other priorities. SUNY's progress is being closely watched, and if its "virtuous circle" succeeds, the likelihood of imitators is a certainty.

The development of the AIRC's agency certification system is being closely watched by both institutions and authorities in Australia, the United Kingdom, Canada, and elsewhere. While the jury is out on its effectiveness, it represents a significant innovation, one that may finally provide a degree of agency quality assurance and enforceability, which heretofore eluded other jurisdictions.

Note: This box was prepared by chapter author Mitch Leventhal.

controversial in the United States. For those who are willing to adopt global recruitment models, there is still a lag in internal expertise relative to agency-based recruitment. Unlike their Australian and British counterparts, where recruitment is firmly lodged in the IO and where revenue generated provides the resources to engage in other non-revenue generating international activity, in the United States, there is no agreed locus for international recruitment. In some universities, the function rests with the admissions office, in others, with the international office; sometimes it resides under the authority of the provost, other times with the vice president for student services. Graduate programs often do not communicate with undergraduate recruiters, or even with other graduate programs or the graduate school itself. Therefore, at most U.S. universities, there is little consensus about how international recruitment fits with overall internationalization

objectives or how it should be strategically organized and managed.

Foundation Programs, Pathways, Dual Degree Programs

These various modalities, already well established in Australia, are rapidly taking hold in the United States. Dual degree (or twinning) programs seem to be the easiest for U.S. institutions to adopt, largely because they are based on institution-to-institution relations, without the involvement of intermediaries (see Chapter 19, this volume, for in-depth discussion on dual degree programs). The concepts of Foundation Programs and Pathways, however, are not yet widely understood, nor is the concept of *conditional admission* used by many institutions. Companies such as Navitas, StudyGroup and INTO—all Australian and

British concerns—have entered the U.S. market and are actively promoting the diffusion of these models into a conservative recruiting environment, with gradual success. What is striking is that so few U.S.-based companies have as of yet emerged as major players in the global recruitment services space.

A New Virtuous Circle Emerging

A few institutions are now starting to resolve the ambiguity relative to the locus of organization and control of international recruiting activities. While presidents and provosts are now touting internationalization goals, such as increasing study abroad numbers, internationalizing the curriculum, fostering more international faculty research, and so on, the rhetoric has not been backstopped by financial resources to reach those

goals. Instead, budgets have been cut across the board. A new recognition is emerging, however, that international students can help internationalize the campus experience, while also providing a source of “found money” that is not dependent on state budgets, grants, or philanthropy. Some institutions are now experimenting with reserving a small percentage of incoming international student revenue specifically to underwrite the cost of the other imperatives that have gotten short shrift. Funding models vary, but even 5% from the first year’s tuition of international students can provide a substantial new pool of funds that can be redistributed into the international mission. This appears to be the newest trend, and it may be a transformative benefit of the newest phase of U.S. international recruitment (Redden 2011). For an overview of the United Kingdom’s recruitment evolution, see Box 22.2.

BOX 22.2 International Student Recruitment: A UK Perspective

Andy Nicol

Director of Business Development, Hobsons Asia Pacific (Malaysia)

Aggressive international student recruitment by UK universities has become a fact of life. UK universities compete against each other—and with other emerging overseas student destinations—for international student numbers that make a significant contribution both to the universities themselves and their wider economies. In 2007, the British Council estimated the value of education and training exports to the UK economy at nearly £28 billion, more than the automotive or financial services industries. Little surprise, therefore, that professional recruitment and marketing operations have emerged in UK universities to recruit, admit, support, and retain international students (Lenton, 2007).

Overseas students represent an attractive income stream to UK universities for a number of reasons; first, they pay a premium fee for degree programs, which far outweighs the funding received from government for home and European Union students; second, their numbers are unregulated by the funding councils (which fund the UK’s overwhelmingly state universities); and third, universities are free to spend the incomes generated as they wish without intervention from government. It is for these reasons primarily that UK universities have come over time to depend on a strong flow of international students, whether taught in the United Kingdom or abroad, and have increased efforts to capture greater numbers of them. Moreover, successive changes in government policy have resulted in substantially lower amounts of domestic student funding. In the United Kingdom, where almost all universities are funded by the state, government policy simultaneously sought to increase participation in higher education while eroding per capita student funding. Some commentators estimated a decrease in state funding of 38% between 1989 and 2002, while

student numbers during the same period increased 94% (Brown, 2003). It is no longer marginal activity for UK universities to recruit international students; rather, it is central to their strategies and mission, critical in terms of financial income. Without the additional funding streams provided by international students, it would be difficult to see how they could maintain investment in staff, facilities, and the wider student experience. This situation is compounded by recent global events, and more so in the United Kingdom, where the government recently announced funding cuts to universities for the first time in 10 years due in large part to the UK's deficit (BBC, 2010). One could speculate that UK universities will now work even harder to protect and maintain market share of international student numbers.

So although the last 15 or so years have seen increased international activity by higher education institutions in the United Kingdom, it would be wrong to view this as a recent phenomena. There were (and still remain) particularly strong links with the Commonwealth countries (former colonies), and a steady flow of international students—particularly from countries such as Hong Kong, Malaysia, and Singapore—came to the United Kingdom for their higher education. However, it is important to note that both push and pull factors were important, in no small part due to generous fee-subsidy packages provided by the UK government until the late 1970s. Relatively low fees combined with the reputation for quality and a lack of opportunity for higher education at home guaranteed significant numbers of international students on UK campuses.

Margaret Thatcher moved quickly to withdraw these funding measures when she came to power in 1979 because the government viewed the international fees subsidy as an unnecessary burden on the taxpayer. This measure had a negative impact on student numbers, which in due course began to decline significantly. As a result of this policy, and the subsequent decline in numbers, the recruitment of international students became an issue both for government and higher education institutions. In response to the decline, the government announced the 1984 Pym Package—a precursor to Tony Blair's Prime Minister's Initiative—which aimed to promote British education internationally and released funds for both scholarships and the generic promotion of UK education opportunities overseas by the British Council. In tandem with this government activity, many UK universities, attached central resources to international recruitment by way of establishing small central international offices, and this can be viewed as the beginning of a more focused approach to international marketing, recruitment, and promotion.

Australia and the Way Forward

Even in Australia, a recognized leader in international student recruitment, the practice can be controversial. It can mean that the discourse around international education focuses on the commercial aspects and as such can be a significant deterrent to faculty engagement. The fact is that in Australia, the discretionary revenue from international students onshore subsidizes infrastructure development, student support services, and research activity, benefitting staff and domestic students, but this message can be hard to convey amid the noise of the commercialization

issue. Added to this, Australia has had a clear message from a series of countries that the practice of simply recruiting fee-paying students is unsustainable in the absence of broader internationalization engagement activity. India will provide an interesting case study in coming years: a profitable market for Australian institutions, which has recently collapsed and is now facing a revised student visa and risk assessment regime that should enable universities to revive market fortunes. Yet if Australian universities do not re-engage with India in a more holistic manner, establishing research linkages, paying attention to the student experience in Australia, actively

promoting mobility of Australian students to India, and seriously engaging with Indian partner institutions to establish joint programs—as is the case for Australia’s engagement with other countries—then the anticipated regeneration of India as a source country for international students will not eventuate. This needs to be the new paradigm for Australia’s international student recruitment effort: holistic and strategic engagement on a broad scale. Individual institutions have known this for some time, but the system needs to do more than talk the talk. This will necessitate true collaboration within universities, for example, between international and research offices, in external facing international engagement activity, and across the university system.

CONCLUSION

This chapter has highlighted the evolution of international student recruitment in Australia, as well as outlined the debate in the United States on this topic. What can international education leaders learn from Australia’s experience in international student recruitment? First, understanding how policies in other countries address international education issues can provide impetus and insight into how to develop further policies, programs, and innovations. Second, a strategic issue like international student recruitment evolves over time as a process of continued refinement, one which is influenced by many outside factors that propel the field forward, as well as hinder its growth and development at times. Third, controversial issues such as international student recruitment require leaders to engage in informed debates that are based on a more nuanced and contextual understanding of the issues involved. Given the trend of increasing international student mobility in this century, leaders will need to remain engaged with all stakeholders in developing innovative approaches for staying on the cutting edge of international student recruitment and beyond.

REFERENCES

- Access Economics. (2009). *The Australian education sector and the economic contribution of international students*. Melbourne: ACPET.
- Adams, T. (2009, September). EAIE. Retrieved August 2, 2010, from Tony Adams and Associates: http://tony-adams.org/files/Marketing_for_Employability_1_final_1_.pdf
- Adams, T. (2010, April 16). Inaugural Dr Martand Joshi Memorial Lecture. Retrieved August 2, 2010, from Central Queensland University: <http://uninews.cqu.edu.au/UniNews/viewStory.do?story=6813>
- American International Recruitment Council (AIRC). (2010). <http://www.airc-education.org/>
- Australian Education International. (2006). *Study pathways of international students in Australia, 2002 to 2005*. Canberra: Australian Government.
- Australian Education International. (2010a). *Monthly summary of international student enrolment data1—Australia: YTD August 2010*. Canberra: Australian Education International.
- Australian Education International. (2010b). *Overseas student health cover*. Retrieved August 2, 2010, from Study in Australia: <http://studyinaustralia.gov.au/Sia/en/StudyCosts/OSHC.htm>
- Australian Education International. (2011a). *Monthly Summary of International Student Enrolment Data—Australia: YTD June 2011*. Canberra: Australian Education International.
- Australian Education International. (2011b, May). *Research snapshot: Export income to Australia from education services in 2010*. Canberra: Australian Education International.
- Australian Government. (2009a). *Australian Education International*. Retrieved August 2, 2010, from ESOS Assurance Fund: http://www.aei.gov.au/AEI/ESOS/FAQs/ESOS_Act.htm#ESOSAssuranceFund
- Australian Government. (2009b). *National Code—Part D: Standards for registered providers*. Retrieved October 3, 2010, from <http://www.aei.gov.au/AEI/ESOS/NationalCodeExplanatoryGuide/PartD/default.htm>
- Australian Government. (2009c). *PRISMS*. Retrieved August 2, 2010, from <http://www.aei.gov.au/AEI/ESOS/FAQs/General.htm#PRISMS>
- Australian Government. (2010a). *Australian Education International*. Retrieved August 2, 2010, from <http://aei.gov.au/AEI/CmsTemplates/GeneralTemplates/LandingPage.aspx?NRMODE=Published&NRNODEGUID={2F9C1196-4B2B-49A8-A64A67B003520F81}&NRORIGINALURL=%2faei%2fesos%2fdefault.htm&NRCACHEHINT=ModifyGuest>
- Australian Government. (2010b). *CRICOS*. Retrieved August 2, 2010, from <http://cricos.deewr.gov.au/>
- Australian Government. (2010c). *Visas, immigration, and refugees*. Retrieved October 3, 2010, <http://www.immi.gov.au/students/>
- Banks, M. (2010, May). Presentation to NEAS conference, Sydney.

- BBC. (2010). *Universities facing first budget cuts in years*. Retrieved August 2, 2010, from http://news.bbc.co.uk/2/hi/uk_news/education/8573432.stm
- Brown, N. (2003). *What's it worth? The case for variable graduate contribution*. London: Universities UK.
- Calderon, A. (2010, September). Emerging countries for student recruitment in tertiary education. Paper presented to the IMHE-OECD Conference, *Higher Education in a World Changed Utterly: Doing More with Less*, Paris, p. 6.
- Cuthbert, D., Smith, W., & Boey, J. (2008). What do we really know about the outcomes of Australian international education? A critical review and prospectus for future research. *Journal of Studies in International Education*, 255–275.
- IDP Education. (2010). The independent guide to Australian study opportunities. Retrieved August 2, 2010, from <http://www.idp.com/>
- Lenton, P. (2007). *Global value: The value of UK education and training exports: An update*. Sheffield, UK: University of Sheffield.
- Leventhal, M. (2008). The legality and standards of commission-based recruiting. NAFSA: Association of International Educators. Retrieved from http://www.nafsa.org/_/File/_/agents-legality_standards.pdf
- McMurtrie, B. (2008, September 10). New group aims to apply standards to international-student recruitment agents. *Chronicle of Higher Education*. Retrieved from <http://chronicle.com/article/New-Group-Seeks-Standards-for/1146/>
- Meadows, E. (2011). From aid to industry: A history of international education in Australia. In D. Davis & B. Mackintosh (Ed.). *Making a difference: Australian international education*. Kensington, NSW: University of New South Wales Press.
- Murray, D. (2011). Professionalisation and research: underpinning the industry, emergence of a profession. In D. Davis & B. Mackintosh (Ed.). *Making a difference: Australian international education*. Kensington, NSW: University of New South Wales Press.
- Olsen, A. (2007). *AUIDF benchmarking 2006*. Canberra: Australian Universities International Directors Forum (AUIDF).
- Olsen, A. (2010). *The benchmarking of Australian university international offices*. Canberra, Australia: AUIDF.
- Redden, E. (2011, July 26). SUNY bets big on agents. *Inside Higher Education*. Retrieved from http://www.insidehighered.com/news/2011/07/26/suny_plans_broad_use_of_commission_based_agents_to_boost_international_enrollment
- United States Department of State. (2009). *Policy guidance for EducationUSA centers on commercial recruitment agents*. Retrieved from http://www.educationusa.info/pdf/Policy_Guidance_for_EducationUSA_Centers.pdf

NOTES

- 1 In May 2011, after a brief illness, Tony Adams sadly passed away. His work on this chapter has been completed by Stephen Connelly, with assistance from Dennis Murray, Executive Director, International Education Association Australia, in collaboration with Mitch Leventhal, Tony's original co-author.
- 2 The well-known and so-called Dawkins Reforms, after Minister for Education John Dawkins (1987–1992), followed later, and included the introduction of the Higher Education Contribution Scheme, a funding mechanism for domestic students which is still in place. The Dawkins Reforms are often popularly cited as having provided substantial additional impetus to more aggressive export of Australian higher education.
- 3 Arrangements whereby Australian universities offer a portion of their degree program overseas with a partner institution. The program is a 'twin' of the onshore program, equivalent in content, standards and experience.
- 4 Note that at the time of writing changes were being considered to aspects of the Australian regulatory and legislative framework, including the student visa program.
- 5 Currently suspended as of this writing.
- 6 The Knight Review-proposed new visa regime, with all 41 recommendations accepted, will shift from country risk assessment to provider risk assessment, at least for universities in the first instance, thereby increasing compliance costs for institutions, but easing student visa bottlenecks.
- 7 In 1990, the National Association of Foreign Student Advisors formerly changed its name to NAFSA: Association of International Educators.
- 8 This network gradually expanded to encompass more than 400 offices worldwide by the mid-2000s.
- 9 International trade in educational services conservatively accounted for US \$15 billion in foreign exchange in 2008, making education services the fifth most valuable component of services trade. This amount includes only income from international students who come to study in the United States and does not include U.S. education services offered in other countries through distance education, branch campuses, and other joint ventures. Some estimate that, were the data kept in a more systematic way on these cross-border services,

income would possibly double, bringing education services to third in order of trade in services, surpassed only by freight and transportation/tourism.

- 10 Title IV of the Higher Education Act is often misinterpreted as prohibiting agency based international student recruitment. In fact, the act states: “By entering into a program participation agreement, an institution agrees that – (22)(i) It will not provide any commission, bonus, or other

incentive payment based directly or indirectly upon success in securing enrollments or financial aid to any person or entity engaged in any student recruiting or admission activities or in making decisions regarding the awarding of title IV, HEA program funds, except that *this limitation does not apply to the recruitment of foreign students residing in foreign countries who are not eligible to receive title IV, HEA program funds.* [italics added]