

# Use of Agents in International Student Recruitment

INT-05

## About This Policy

**Effective Dates:**

02-01-2011

**Last Updated:**

05-13-2019

**Responsible University Administrator:**

Vice President for International Affairs

**Policy Contact:**

Christopher J. Viers

Associate Vice President for International Services

[cviers@indiana.edu](mailto:cviers@indiana.edu)

## Scope

University units involved in the recruitment and enrollment of international students.

## Policy Statement

1. The recruitment of international students through direct contact with prospective students and their families is limited to appointed employees of Indiana University and individuals employed at an Indiana University Global Gateway Office subject to oversight by IU International Research and Consulting, LLC. Such employees and individuals may not receive compensation in any form from any other party for services related to the recruitment of students.
2. The use of agents for the purpose of recruiting or enrolling international students is prohibited. Thus, Indiana University units may not enter into contractual arrangements or any other third-party agreements with agents to represent the university in the recruitment of students or in the administration of any part of the application and/or enrollment process.
3. This policy does not preclude the following activities:
  - a. The use of institutional consultants to provide indirect services in support of the university's recruitment efforts. Such services may not include direct personal contact with or representations made to prospective students and their families.
  - b. The promotion by a foreign partner institution of an educational opportunity offered jointly with Indiana University, such as a student exchange program or a dual or joint degree program.
  - c. The use of Indiana University alumni, current students, and other affiliates to assist in the recruitment of international students on a volunteer and university-approved basis.
4. This policy does not cover the use by prospective students or their families of independent educational consultants or advisors.

## Reason For Policy

1. Indiana University prohibits the use of agents in recruiting and enrolling students for a number of reasons, including the potential for conflicts of interest, the harm that can be caused when students receive poor advice, and the potential for damage to the university's reputation.
2. Title IV of the Higher Education Act makes it illegal for schools that accept federal assistance to offer incentives to agents, educational advisors, or consultants. Title IV applies to all domestic students regardless of location of study. While the law does not apply to international students, Indiana University believes the same standards should be used to guide policy and practice in the recruitment and admission of international students.

Maintaining ethical parity among students throughout the recruitment and admission process—regardless of citizenship, location of study, experience and demographic—promotes integrity within that process. Moreover, due to increasing global mobility among secondary school students, recruitment activities abroad often include ancillary or peripheral recruitment of domestic students outside the United States that falls within the scope of Title IV.

3. Indiana University is best served by recruitment and outreach initiatives that strive to share with prospective students the full range of educational opportunities available to them. The Office of the Vice President for International Affairs places high value on ensuring that its efforts assist students in identifying the college or university best suited to meet their educational goals and abilities. This recruitment approach is in keeping with the university's public service goals and is a global extension of Indiana University's mission to promote access to higher education through meaningful and student-centered activities. The university has among its faculty, staff, students, and alumni significant capacity for successful recruitment and international engagement in an increasingly complex and competitive international recruitment environment. There is tremendous value in retaining and further strengthening these internal resources in ways that maintain institutional commitments to academic integrity and ethical student interactions.

## Definitions

**Agent:** an individual, company, or organization engaged to recruit students from an overseas market as part of a contractual agreement, partnership, or any other arrangement that results in payment for services in any form.

**Independent educational consultant or advisor:** an individual, company, or organization working exclusively for the student or the student's family without compensation from Indiana University.

**Institutional consultant:** an individual, company, or organization engaged by Indiana University on a fee-for-services basis – not tied to the number of student contacts made, applications referred, or enrollment yield – to provide indirect services in support of a unit's student recruitment effort. Such services include, but are not limited to:

- Hosting web profiles and other types of lead generation services
- Local travel support and logistics planning, including translation services and arrangements for school visits by Indiana University personnel
- Local support for yield event logistics, advertising, and follow-up
- Local media releases and outreach

Such services shall not involve personal contacts with or representations made directly to prospective students and their families.

**Foreign partner institution:** a foreign college or university that has entered into an agreement with Indiana University pursuant to university policy [INT-01, Agreements With Overseas Institutions and Cross-Border Activities](#). A registry of the university's agreements with foreign partner institutions is available on the Office of the Vice President for International Affairs website.

**Indiana University Global Gateway Office:** an Indiana University office providing a base of operations in a foreign country under the authority of IU International Research and Consulting, LLC. As of February 2019, IU has Gateway offices in Beijing, China; New Delhi, India; Mexico City, Mexico; Berlin, Germany; and Bangkok, Thailand.

## Sanctions

Violations of university policies, including the failure to avoid a prohibited activity or obtain required approvals, will be addressed in accordance with applicable university policies and procedures. These may include disciplinary actions up to and including termination from the university.

## Additional Contacts

Policy-OVPIA	John Wilkerson	812-855-6380	<a href="mailto:wilkerjh@iu.edu">wilkerjh@iu.edu</a>
Enroll Mgmt IUB	David Johnson	812-855-8908	<a href="mailto:dj44@iu.edu">dj44@iu.edu</a>
Enroll Mgmt IUPUI	Boyd Bradshaw	317-274-3880	<a href="mailto:bobradsh@iupui.edu">bobradsh@iupui.edu</a>
VPGC	Jeffrey Goetz	812-855-1052	<a href="mailto:jmgoetz@iu.edu">jmgoetz@iu.edu</a>

## History

This policy was established in February 2011.

Revised in 2014 to address introduction of personnel working at the affiliate Gateway entities.

Updated in 2019 to reflect changes in policies promulgated by the U.S. Department of State.