

### **Reason for Policy**

The University of Wisconsin-Madison (UW-Madison) is committed to excellence in the provision of international student services, and is aware of the complex legal and ethical issues associated with international student recruitment. Title IV of the Higher Education Act makes it illegal for schools that accept federal assistance to offer incentives to educational advisors, consultants or agents. While the law does not apply to international students, the UW-Madison believes the same standard should be used to guide policy in the recruitment of international students. Commission-based compensation in particular, can lead agents to act out of self-interest rather than in the best interest of the student.

The purpose of this policy is to ensure that international students receive appropriate information and the services they need while applying to the UW-Madison, while ensuring federal compliance, that the reputation of UW-Madison as a leading global public research university is maintained and that the university relationship with international students conforms to the highest ethical standards.

### **Policy on Recruitment for Degree Admissions**

Only appointed employees (or authorized alumni, as indicated below) of the University of Wisconsin-Madison are authorized to officially represent the University in the recruitment of international students for degree granting programs through direct contact with prospective students and their families. The use of "agents" for the purpose of recruiting or enrolling international students in a degree program is not permitted. "Agent" is defined as an individual, company or organization engaged by the institution to recruit students from an overseas market as part of a contractual arrangement, partnership, or any other arrangement that results in payment for services in any form. Thus, UW-Madison units shall not enter into contractual arrangements or any other third party agreements with "agents" to represent the University in the recruitment of degree students, or in the administration of any part of the application and enrollment process. Appointed UW-Madison employees may not receive compensation in any form from any other party for services related to the recruitment of students.

This policy is not intended to prohibit or otherwise address the instances of international students who transfer to UW-Madison seeking a degree and who may have been brought to their current institution by a recruiter under the circumstances this policy otherwise seeks to prohibit.

### **Non-Degree International Student Recruitment**

The Division of Continuing Studies (DCS) offers non-credit continuing education classes and admits visiting non-degree students to enroll for a short term at UW-Madison. DCS is authorized to use "institutional consultants" or "agents" for purposes of providing services in support of their non-degree recruitment efforts. The Division of Continuing Studies adheres to the "Statement of Principles of Good Practice" stated by the National Association for College Admissions Counseling (NACAC), as well as by other professional bodies and commits to the following:

- DCS posts their policy regarding agencies/advocates on their website to ensure that families, students, and institutions know the terms of the relationship with UW-Madison, and that DCS has full authority to accept and admit students in non-degree programs.
- All contracts specify services provided by the agent and are reviewed by Purchasing Services in UW-Madison's Division of Business Services. They will consult with UW-Madison legal counsel as needed.
- DCS identifies and conducts due diligence in review of prospective agents prior to presenting a contract to UW Madison Legal Affairs. The vetting process entails consulting national resources, such as the AIRC Certified Agent List, EducationUSA, NAFSA (Association of International Educators), other universities, and campus partners with relevant knowledge in the specific area
- All agencies/agents are limited to advising about only DCS programs, such as ACE, VISP, and full-time ESL, and not degree admissions or study at UW-Madison.
- Initial contracts will be for a limited term as appropriate to a program, and DCS staff are responsible for providing the content to be delivered to individuals and groups.
- DCS is responsible for a thorough on-boarding process to assure the agency/agent/advocate has the knowledge and tools to provide services at UW-Madison standards of excellence, and with regular follow-up training.
- DCS will monitor the information received by prospective students for accuracy and quality, regularly review the level of service, and take steps to discontinue a relationship as necessary.
- All contracts will be either for a lump sum or based on a per student commission, estimated for non-degree/non- credit continuing education programs based on size, cost of the program, and the prevailing compensation rates for agents in various countries.

No student's application will be granted preferential treatment if the student is assisted by an agency representative.

### **Use of Alumni in Recruitment**

The use of UW-Madison alumni and other affiliates to assist in the recruitment of international students on a volunteer basis is entirely appropriate and remains an important component of the campus recruitment processes for both degree and non-degree programs. For degree program recruitment, the Alumni Admissions Volunteer program is a partnership between the Office of Admissions and Recruitment and the Wisconsin Alumni Association, providing opportunities for alumni to support student admission efforts to enroll a competitive and diverse student body. Volunteers assist by connecting with prospective students in communities across Wisconsin, the US, and around the world. Upon registering and maintaining enrollment as an Alumni Admissions Volunteer, volunteers connect with students through a variety of volunteer opportunities at the direction of the Office of Admissions and Recruitment.

## Definitions

Agent - (For purposes of this policy): 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.

Institutional consultant - an individual, company or organization engaged on a fee-for-services basis – not tied to the number of student contacts made, applications referred, or enrollment yield.