



AMERICAN INTERNATIONAL RECRUITMENT COUNCIL



Certification Process and Standards Manual

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Introduction

AIRC Mission Statement

The American International Recruitment Council works to safeguard the interests of both international students and enrolling institutions through the promotion of ethical, standards-based international recruitment strategies.

Purposes

The AIRC is a non-profit organization governed by accredited United States post-secondary educational institutions.

The purposes of the organization are to:

AIRC's core purposes are to:

- Develop and uphold standards that promote effective and ethical international recruitment practices. Ensure transparency and integrity throughout the international student recruitment process through the communication of clear, accurate, sufficient, and relevant information by agencies and institutions.
- Certify agencies based on AIRC standards.
- Encourage US educational institutions to adhere to AIRC's Best Practice Guidelines.
- Build and support a global network of professionals dedicated to continuous improvement of standards-based international student recruitment practices.
- Advocate on behalf of its core constituencies to policy makers, media, regulatory bodies and other professional organizations on topics related to the advancement of standards in the ethical and transparent recruitment of international students.

The American International Recruitment Council (AIRC) is a 501c3 non-profit [Standards Development Organization \(SDO\)](#) controlled by United States accredited and/or state approved secondary, and accredited secondary and postsecondary educational institutions and officially registered with the U.S. Department of Justice and the Federal Trade Commission.

In addition, the organization may undertake other activities as are necessary to accomplish its goals.

AIRC Certification Process & Standards Manual

AIRC is a Standards Development organization, officially registered with the U.S. Department of Justice and the Federal Trade Commission.¹

AIRC was incorporated in Washington, D.C. on June 16, 2008.

For additional information related to AIRC's organization and activities, please visit: <https://www.airc-education.org/>



Certification Services

AIRC is an organization of members dedicated to insuring that International Student Recruitment agencies are providing a level of service that operates with integrity and is in keeping with what is expected by U.S. accredited/state recognized secondary schools, colleges, universities and related postsecondary institutions.

Central to AIRC's purposes is the Certification process whereby educational recruitment agencies are reviewed on the basis of a set of Standards which appear in this Manual. *AIRC Certification attests to the quality determined upon an external review of a recruiting agency which meets the AIRC Certification Standards for a designated period of time.*

AIRC expects that institutional and agency members fulfill the highest professional expectations of practice. Accordingly and in addition to the AIRC Certification Standards is the AIRC Policy Statement, ***Rights and Responsibilities of AIRC Institutions and Agencies*** found in **Appendix A.**

AIRC Certification is carried out by a Certification Commission, the membership of which is appointed by the AIRC Board of Directors and is derived from the institutional membership and related organizations. A current listing of members of the AIRC Certification Commission can be found at <https://www.airc-education.org/>. It is the primary responsibility of the Certification Commission to determine the Certification status of an applying recruitment agent after reviewing all relevant materials related to the application of an agency for Certification, including but not limited to: letter of intent, application form, due diligence report, third party testimony, the self-evaluation report and the external review report. Through a variety of steps outlined in this Manual, the AIRC a sub-committee of the AIRC Certification Commission, which works independently of the AIRC Board of Directors, in determines the eligibility of an agency to progress through the certification process.

¹ Federal Register, vol. 47, p. 8811, 2009.



The AIRC Certification Process

Overview

A core purpose of AIRC is its Certification process which is designed as an external quality review of educational agencies which recruit international students to U.S. accredited colleges, universities and other educational institutions. These institutions are accredited by institutional accrediting bodies recognized by the U.S. Department of Education or The Council for Higher Education Accreditation (CHEA).

AIRC follows best practice in external quality assurance. The AIRC Certification process is carried out in two major segments: (1) Applicants undergoing certification and (2) Certification.

The **Applicant** segment is carried out by a sub-committee of the AIRC Certification and includes the:

- Letter of Intent and Application Form
- Due Diligence Report

The **Certification** segment is carried out independently by the AIRC Certification Commission and AIRC Certification Staff and includes a(n):

- Self-Evaluation Report Utilizing the AIRC Certification Standards
- External Review of the Recruitment Agency
- Final Certification Decision



The Chronology of Steps Toward Certification

Eligibility Criteria

AIRC Certification is intended for agencies (including organizations and companies), located both inside and outside the U.S., which recruit and refer international students for enrollment into accredited post-secondary programs or institutions anywhere in the world and who either have already recruited for U.S. programs or institutions or intend to do so.

For the purposes of AIRC membership and certification, an agency is defined as an organization, company or association that recruits and refers students for enrollment into accredited colleges, universities and other educational institutions on a commercial 'fee for service' basis. The term 'fee for services' refers to any payment made by an institution or an individual student applicant to an agency for services related to the counseling advice, application process and acceptance into a course or program in an educational institution. Individuals that provide placement services but have not established a company or individuals within an agency, including but not limited to shareholders, owners, directors, counselors and other staff are not eligible for AIRC certification or membership.

At the time of application for AIRC Certification, agencies are required to demonstrate activity in the field of student recruitment for at least two years as a registered business entity and agencies must have placed at least 25 students in total before applying for AIRC Certification.

A Note About Business Partners, Sub-Agents, Channel Partners and Franchises

A sub-agent is a person employed or contracted by the agency to transact the whole, or part of the student recruitment process.

A franchisee is an individual or company which licenses the rights to use an agent company's trademarked name and business model to conduct business.

Agencies that engage sub-agents for part of the recruitment process or agencies that franchise their operations are eligible for certification. The agency applying for certification will be accountable for actions of the sub-agents and franchisees and any others working on behalf of the agency once AIRC certification is achieved.

The awarding of AIRC certification does not convey to sub-agents. Sub-agents may apply for AIRC certification independently.

The awarding of AIRC certification does convey to a franchisee of the agency provided the franchisee uses the agent company's trademarked name and business model to conduct business.

An applicant agency is ineligible for certification if it or any principal or material owner thereof has been convicted of fraud or has pleaded no contest or guilty in a criminal proceeding or has been adjudged to have committed fraud in a civil proceeding within the last seven (7) years.



Applicants Undergoing Certification

Letter of Intent and Application Form

Eligible agencies interested in undergoing the AIRC Certification process and becoming members of AIRC are asked to contact AIRC through its website. In addition to an outline of AIRC fees, the directions related to a **Letter of Intent** and the completion of the AIRC **Application Form** are found at this site.

https://airc.membershipsoftware.org/assoc_subscribe.asp

Eligibility Vote

Adopted by AIRC Board of Directors August 27, 2014

Applicant Stage

AIRC staff conducts a preliminary review of each applicant agency's eligibility based on eligibility criteria established by the Board of Directors. Staff may request additional information from applicants before ordering a background check, including but not limited to clarification regarding years in business, scope, sub-agent use, ownership and contact information. The background check will include the applicant's principal officers and persons or entities with a 20% or greater ownership interest.

All materials gathered by AIRC Staff in the conduct of the preliminary eligibility review are shared with the Review Sub-committee of the AIRC Certification Commission together with the Staff analysis as to the compliance of the applicant with AIRC eligibility criteria.

The Review Sub-committee of the AIRC Certification Commission will advance an applicant to the next stage of certification if the applicant 1) demonstrates that it meets the established eligibility requirements and 2) is in compliance with local laws and regulations. The review is based on the information provided in the application and additional information secured from the public record and such additional background checks into prior business practice and ethical behavior as the Commission deems appropriate and are conducted in accordance with AIRC requirements.

The decision to permit an applicant to advance to the next stage of the certification process does not in any way suggest that certification of an agency is guaranteed. An organization that has been advanced to undergo certification is notified that they are not permitted to publicize such status in any manner.

The Review Sub-committee of the AIRC Certification Commission may vote on whether to advance an application in the following ways:

A) Advance the Applicant

The Review Sub-committee votes to advance the applicant to enter the next phase of the certification process without additional questions or concerns.

B) Advance with Clarification

The Review Sub-committee votes to advance the applicant to the next phase of certification but conveys questions, concerns, or observations about the applicant to the Chair of the Certification Commission with the recommendation that they be resolved in the course of the further review in the course of Certification.

C) Defer

The Review Sub-committee requests AIRC staff to secure further clarification from the organization respecting any issues the Commission considers germane to making its decision. Once the sufficient and appropriate information is received, the review sub-committee will resume the eligibility review process.

E) Deny

If the Review Sub-committee is not satisfied that the organization has the requisite experience in recruitment or has not otherwise demonstrated that it meets AIRC eligibility requirements, it may choose to deny the applicant's advancement to the next phase of the certification process.

A decision to deny the applicant from progressing to the next phase of certification will be conveyed to the applicant agency in confidence. The application fee is not refundable.

The Reconsideration Process

Agencies not determined to be eligible for consideration for certification may request a **reconsideration** of the decision of the Review Sub-Committee. Upon such request the AIRC Board of Directors will form an ad hoc committee to reconsider the agency's application. The ad hoc committee shall be comprised of an institutional member of the Board of Directors, a former institutional member of the Board of Directors and a third member drawn from AIRC institutional membership in good standing. No one on the reconsideration committee may have an active contract with the applicant agency.

- The request for reconsideration must be made in writing to AIRC within ten (10) days of the date of receipt of written notice advising the recruitment agency of the decision to deny the advancement of the agency's application to the next phase of certification.
- The agency must file within thirty (30) days of receipt of the initial decision a written statement of the grounds for its request for reconsideration. Grounds for reconsideration may include failure of the Review Sub-Committee to properly consider certain factual evidence, and the agency may supplement the record to support its assertion.
- The grounds for a request of reconsideration may not include material not considered by the Review Sub-Committee unless the applicant demonstrates that the Review Sub-Committee failed to reasonably seek to secure such material.

In reconsidering its decision to deny eligibility for certification, the ad-hoc committee may either

- 1) set aside the decision of the Review Sub-Committee and allow the agency's application for certification to progress.

- 2) return the agency's application to the Review Sub-committee for reconsideration in accordance with specific direction;

3) sustain the Review Sub-committee's original decision.



Certification

Self-Evaluation and Self-Evaluation Report

Key to the AIRC Certification process is a Self-Evaluation report that describes the agency's organization and provides documented evidence that demonstrates that the AIRC Certification Standards are being met. The Self-Evaluation materials may be forwarded to AIRC *electronically* at: certification@airc-education.org . Printed copies are not required, but if desired may be sent to

AIRC Certification
P.O. Box 7522
Falls Church, VA 22040

Phone: + 1 240 547 6400 xt. 803

The Self-Evaluation is intended to be a positive process which informs AIRC of the extent to which the recruitment agency is in compliance with the AIRC Certification Standards. Simultaneously, the Self-Evaluation is an opportunity for the agency to consider its own internal processes and make quality improvements. It is intended that the Self-Evaluation be a reflective process which includes *broad participation* from the agency's major stakeholders. Although one person may write the final report to AIRC, the process of responding to the AIRC Standards should involve both internal and external stakeholders so that it is clear that the agency's purposes and process are generally understood consistently both internally (by staff) and externally (by student and institutional clients). The involvement of external stakeholders (e.g., student and institutional clients) can be accomplished through the outcomes of surveys or other means of collecting opinion. When the External Review takes place, it is important that there is evidence of a shared vision and consistency of purpose and policy to both the agency and its clients. It is critical to AIRC Certification that there be evidence that the agency understands the United States educational system and the unique operational aspects of working with U.S. institutions.

The agency is asked to respond in writing a "Self Evaluation Report" that corresponds to the AIRC Certification Standards. These Standards appear twice in this Manual: the first in the next major section and the second in **Appendix B**. The template in Appendix B is the *official format* for the Self-Evaluation Report and is intended to be used in electronic form (which will be sent directly to agencies which have been approved to undergo Certification).

The AIRC Standards apply to the five key areas of recruitment organization and practice:

1. Organizational Effectiveness
2. Integrity of Recruitment Process
3. Student and Family Engagement Pre and Post Enrollment

4. Institutional Engagement Pre and Post Recruitment
5. Complaints Process

The Self-Evaluation report should be a document which can stand on its own to the extent possible, ***and should not make frequent references to finding evidence in separate documents.*** For example, when responding to the Standard asking for the Mission/Purpose of the agency, please reiterate what the mission says. Please do not simply refer to an agency brochure (although you will also want to provide AIRC with agency documents in the form of Appendices to provide concrete evidence of their existence). Appendices should each be marked very clearly as to what type of documentation is included.

The Self-Evaluation will be reviewed in its documented form by AIRC external reviewers selected on the basis of expertise and integrity. If the Self-Evaluation is found to be satisfactory, an on-site external review will be scheduled with the agency.

Deadlines for Form Completion

After an agency is determined to be eligible to undergo certification it has one year from its notification of this eligibility to pay its certification fee and complete its Appendix B, Agency Self Evaluation Form.

If an agency takes more than one year to pay the certification fee and complete the self-evaluation form, it will be informed by email and certified post mail that it has exceeded the time within which to complete its self-evaluation. The agency will no longer be considered an active applicant.

If the agency chooses to re-activate its application after this one-year period and gives notice to do so within the end of the second year after its initial notification of eligibility it must give email and written notice that it wishes to re-activate its application and pay a \$500 re-activation fee.

If the agency chooses to re-activate its application but more than two years have lapsed from the initial notice of eligibility, it must re-apply for AIRC Certification and pay all associated fees for the AIRC Agency Application and certification.

The External Review (Site Visit)

Upon receipt of a completed Self-Evaluation Report from the applying agency, AIRC will schedule and conduct an external review at the earliest possible date to take place at the headquarters or primary physical site(s) of the recruitment body. (**Note:** If there are multiple sites for the agency, AIRC will determine which should be visited.) The primary purposes of this external review, to be carried out by one or more AIRC external reviewers selected on the basis of expertise and integrity, are to:

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1. Validate on-site the evidence provided in the Self-Evaluation;
2. Gather additional evidence as to the overall quality of the agency's services best collected on-site;
3. Evaluate staff knowledge of the U.S. education system (for which the *AIRC Professional Development Manual* is a key resource); and
4. Provide a report which summarizes findings and recommends a Certification status to the AIRC Certification Commission.

AIRC external reviewers are selected from among AIRC's U.S. member institutions. Their selection is based on the level of expertise and integrity in carrying out the AIRC Certification process. AIRC external reviewers are the diplomatic corps of AIRC. It is their responsibility to: (a) have a strong working knowledge of the AIRC Standards for Certification; (b) review the Self-Evaluation Reports of recruitment agencies applying for AIRC Certification; (c) conduct a site visit and the agency site(s) for the primary purpose of evaluating compliance with the AIRC Certification Standards; (d) write an evaluative report which includes a recommendation for Certification to the AIRC Certification Commission; and (e) be available to the AIRC Certification Commission and staff to answer questions related to the review of the recruitment agency.

External reviewers sign a confidentiality statement which outlines their obligations related to confidentiality, conflicts of interest, behavior toward others, and future relationships. Normally, an external reviewer will not be assigned to a recruitment agency under contract with his/her institution.

During the on-site external review*, one or more AIRC external reviewers will be asked to carry out a review which will take place over the course of at least 3 days: Day 1: Arrival; Day 2: the External Review; and Day 3: Report Writing. On the External Review Day, the following general activities are typically one (1) full day per selected site. This review format will differ according to the size, complexity and locations of the recruitment agency. In most cases the agency will be visited by one on-site reviewer and there will be a second reviewer who will either join the meeting day by teleconference or make separate arrangements to interview agency staff by telephone or electronic interview.

The external review is intended to be a positive collegial experience (not a regulatory adversarial experience). It will include activities such as those listed below which will require key staff to be present at the time of the external review and for offices and filing records to be available to the AIRC reviewer. On the External Review Day, the agency is asked to gather the key leadership of its Headquarters office. All key Headquarters staff are essential to the external review. In addition, the agency is asked to provide at least one person from each branch office (including franchises) if there are 2-4 offices; or 25% of the branch offices represented with a minimum of 5 representatives if the agency has 5 or more offices. During the external review day, the external reviewer will:

- Meet with the key leadership of the recruitment agency, including the owner and senior management
- Visit the physical venues of the agency's offices

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- Review materials and records which further document compliance with the AIRC Certification Standards, including but not limited to: student records; institutional records; records of complaints; personnel curriculum vitae; and other records mentioned in the AIRC Standards which are too large to include with the Self-Evaluation
- Meet with general staff who carry out recruitment services
- Observe ordinary business operations
- Review those matters with staff which are not fully explained in the Self-Evaluation
- Review any recent complaints made of the agency
- Administer the professional development assessment exam
- Share information related to AIRC and its processes
- Undertake other activities as determined by AIRC

In advance of the external review day, the reviewer will have access to all applicant related materials (letter of intent, application and due diligence report) and will be in contact with the agency's U.S. institutional clients.

A schedule will be provided to the agency, including how to prepare for the site visit. See the sample timetable below. The agency will want to appoint a certain staff member to act as an administrative liaison ("primary contact") between AIRC and the agency. Please note again that the agency will need to schedule an AIRC review at a time when key staff are available and when records, such as those mentioned above and in Certification Standards, are in order for inspection.

Sample Timetable for the On-Site External Review Day

1 hour: Meet with Owner, Governing Board and/or Chief Executive Officer

Review all Standards with an emphasis on Mission, Governance and Ownership, Organization, Planning, Marketing and Finance.

2+ hours: Senior Administrative Staff

Standards related to above plus day-to-day operations related to finance, record keeping, assuring quality services, and human resources administration.

2-3 hours: General Recruitment Staff

The external reviewer has 2 key purposes for conducting a session with the recruitment staff:

- (1) Evaluate staff understanding of the primary purposes of their organization, including how they view its decision-making processes, and their role in providing quality services, what those services entail, and how they contribute to the planning. (Standards 3 and 4 are key to this discussion) and
- (2) Evaluate the staff's general knowledge of the U.S. education system and basic student visa rules using as a primary reference the AIRC Professional Development Manual.

1 hour: Tour of headquarters and review of record-keeping

Certain costs of an external review will be born directly by the recruitment agency. These will include reasonable costs related to obtaining a visa (when applicable), travel (return ground transportation and economy class air from locations indicated by the external reviewer); hotel meals during the three day on-site review, and lodging for the duration of the review for at least three (3) nights (arrival day; review day; and writing day) plus any lodging necessary in traveling to and from the site. Hotels should be no less than a 3-star international level, with convenient and reliable Internet access. Travel and lodging arrangements will be made directly between the external reviewer and the agency with AIRC notified as to the dates of the external review.

The external reviewer will be paid a modest honorarium directly by AIRC which will help cover expenses related to visa, domestic airport transportation and other miscellany. This is included in the Certification fee collected from agencies by AIRC.

It is important that the integrity of the review process be upheld. Therefore, money, significant gifts, lavish meals and celebrations, or any extraordinary favors, should not be provided to AIRC external reviewers by the applying agency, regardless of the cultural hospitality norms. Attempts to bestow extraordinary favors upon the external reviewer will be noted and reported to the AIRC Certification Commission.

A primary outcome of the external review will be a report by the external reviewer which will be shared with the AIRC Certification Commission. This report will be shared with the agency to check for factual errors prior to its final submission to the Certification Commission. As with any review process which is based on a Self-Evaluation by the agency, followed by an External Review on site, the final report should not have any major surprises to any of the parties involved.

It should be noted that whereas the Self-Evaluation Report is property of the agency and can be quoted by the agency in public; the External Reviewer Report is the confidential property of AIRC and therefore may not be quoted or published by the agency.

Process in the Event of Virtual Review

The AIRC certification process requires all approved applicant agencies to undergo an External Review that includes an in-person site visit, conducted by a trained AIRC External Reviewer. AIRC reserves the right to waive the in-person site visit, and replace it with a virtual review conducted by video conferencing, for any of the following reasons:

1. The applicant agency operates fully online and no in-person student counseling/advising occurs. AIRC will determine this status through conversations with and information provided by the applicant agency.
2. An emergency is present at the time the site visit is scheduled for that prohibits an in-person site visit. Such emergency situations may include but are not limited to global pandemic or local health crisis, political instability,

natural phenomenon, or disaster. In consultation with the agency and others, AIRC staff will determine if local conditions prevent an in-person site visit.

The applicant agency may also petition to waive the in-person site visit due to extraordinary circumstances covered by the situations listed above, or for other reasons. To request a waiver of the in-person site visit, the applicant agency must submit by email a comprehensive and detailed petition stating the nature of the situation to (mail to: certification@airc-education.org). Within two weeks of submitting the petition, AIRC will notify the applicant agency whether the petition is approved or denied.

Certification Decision

The AIRC Certification Commission is the final decision-making authority on the Certification of recruitment agencies. Certification Commission members are derived from AIRC member institutions and related organizations and are appointed by the AIRC Board of Directors based on their experience and professional reputation. The Certification Commission meets regularly electronically and in person at least once a year, depending on the volume of agencies applying for Certification.

AIRC Certification Commission members sign a confidentiality statement which outlines their obligations related to confidentiality, conflicts of interest, behavior toward others, and future relationships. Normally, a Board member will not participate in the decision-making process related to a recruitment agency under contract with his/her institution.

The AIRC Certification Commission will make the final determination concerning a recruitment agency's Certification status based on the agency's application materials, due diligence report, Self-Evaluation Report, the External Review Report, and any additional relevant and appropriate information received by AIRC. The outcomes of the decision will be shared with the AIRC Board of Directors and agency, assuming all expenses related to the External Review have been paid.

There are four levels of AIRC Certification:

Certification

A recruitment agency is granted AIRC Certification for a five (5) year period if it has undergone the process and meets the AIRC Standards satisfactorily.

Conditional Certification

A recruitment agency is granted the status of AIRC Conditional Certification for three (3) years or less with AIRC Certification dependent upon reports being made to the

Certification Commission which show substantial progress toward meeting the AIRC Standards.

Certification Denied

The recruitment agency is denied Certification when it is found not to meet the AIRC Standards satisfactorily. The agency may reapply upon correction of the problem(s) cited, or one year following the denial of certification.

Certification Revoked

An AIRC Certified agency is found by the AIRC Certification Commission to be in egregious non-compliance with AIRC Standards and can have its Certification revoked. The agency may reapply after two (2) years.

On occasion, an agency may be required to submit an Interim Report on any standards identified in the agency's AIRC External Reviewer Report. The Certification Commission will determine if an Interim Report is required at the time the certification decision is made, and reporting requirements will be outlined in the agency's certification letter. Interim Reports are typically due either immediately after the certification decision, or in 6 or 12 months. Agencies will be informed about what actions are required to complete the Interim Report and will be reminded about the submission deadline 6 and 3 months before the deadline.

The Certification Commission reviews Interim Reports at its scheduled meetings each year. Failure to submit an Interim Report by the required due date, unless an extension is granted by AIRC staff, will result in consideration by the Commission as to whether the agency should be placed on Probation. (See page 26.)

AIRC will make its Certification decisions public by providing the following types of information:

- Name(s) of recruitment agency
- Scope of operations Certified (country/ies and offices – including branches and franchises)
- Year of AIRC Certification or AIRC Re-Certification
- Year for next AIRC External Review

Only AIRC Certified agencies, agencies on probation (see below), and those agencies which had their certification revoked will appear on any public lists. Agencies which had their certification revoked will be listed for two years at which time they are invited to reapply for the Certification process. Certification Denials will not appear publicly. Further, all documents related to the Certification process (including but not limited to the letter of intent, application, due diligence, self-evaluation report and external reviewer report) are confidential documents which are not made public by AIRC.

Upon Certification an agency may, on its website and public marketing documents, quote from its own self-evaluation form, but may not quote from other AIRC Certification related documents.

Re-Certification

Toward the end of an AIRC-Certified period (for Certified and Conditionally Certified agencies), the agency will indicate its willingness to undergo the Certification process for Re-Certification purposes. Re-Certification will generally follow the same process as initial Certification, beginning with the Letter of Intent, Application Form and relevant fee. Agencies which have undergone the Certification process will find subsequent experiences to be less time consuming, due to familiarization with the process and internalization of the AIRC Standards.

Proper use of AIRC Certification Statement and Use of AIRC Logos

Logo Use Disclosure

AIRC®, **American International Recruitment Council®** and AIRC’s other trademarks, service marks, certification marks, collective membership marks, logos and trade dress used on the website are property of AIRC and are protected by state and federal trademark laws, and must only be used for personal, non-commercial viewing purposes. In addition, AIRC’s certification mark may only be used by entities certified by AIRC. The certification process is described in details here: <https://www.airc-education.org/airc-member-benefits/#process>, AIRC’s collective membership mark may only be used by official AIRC members in good standing and current in their membership fees. Other trademarks may appear on the website with permission from their respective owners. Your unauthorized use of trademarks appearing on the website or any other trademarks owned by AIRC may constitute trademark infringement and fraud, which could subject you to substantial civil penalties and criminal prosecution.

There are at least two AIRC logos: the general AIRC logo and the AIRC-Certified logo. Recruitment agencies (whether AIRC Certified or not) may not use the general AIRC logo without permission of the AIRC Secretariat. AIRC Certified agencies may display the official “AIRC Certified” logo on their website and publications, but only during the period the agency is certified.

When a certified agency wishes to advertise its AIRC Certification, it may state simply that it is “AIRC Certified” or “has AIRC Certification”, and for what specific time period it has this status (e.g., December, 2020 – November 2025). Otherwise, it should use the following statement:

The [name of agency] has been awarded Certification by the American International Recruitment Council (AIRC) for the period [month and year] to [month and year]. To achieve AIRC Certification, an agency has successfully undergone a rigorous self-evaluation and external review process based on the AIRC Certification Standards which, in turn, evaluate the agency’s business practices, and the effectiveness of the services rendered in recruiting qualified students to accredited educational institutions in the United States of America. The Scope of AIRC Certification includes offices in: (list countries and municipalities). For additional information, see www.airc-education.org

The statement above, or any other claim of AIRC Certification, may only be used during the period during which the agency is AIRC Certified.

Requesting Reconsideration or Appeal of Certification Commission Decision

The agency may request **reconsideration** of the decision of the AIRC Certification Commission or may **appeal** the decision within a limited number of days from receipt of the Certification decision from AIRC. Procedures related to these processes are found in **on page 25** “Requesting Reconsideration or Appeal of Certification Commission Decision.”

Sample Timetable for AIRC Candidacy and Certification

Note: The following is a sample timetable for AIRC applicants undergoing certification. The process is possible to complete in a shorter period of time, depending on the speed of the agency in conducting its Self-Evaluation; the availability of external reviewers at short notice; and the meeting schedule of the AIRC Certification Commission.

Month 1: Agency applies for AIRC Certification

Due Diligence Report is ordered

AIRC Commission votes on applicant's eligibility

Month 2: If Agency advances to Self-Evaluation (during which it may need, for example, to develop a Professional Development program for staff on the U.S. educational system and its institutions and/or develop a system for systemically collecting evaluation records from student clients)

Month 3: Agency completes Self-Evaluation Report and submits it to AIRC
AIRC assigns an external reviewer for a paper review of the Self-Evaluation

Month 4: AIRC Schedules an External Review (site visit) at a time convenient to the external reviewer and when the agency can have the appropriate senior staff available

Month 5-7: External Review (site visit) takes place at select agency location(s) for one (1) day each

Month 8-9: Certification Decision made by AIRC Certification Commission

American International Recruitment Council Certification Standards (Modified January 4, 2012)

In 2011 the American International Recruitment Council undertook a process to review its existing Standards and propose recommendations for modifications and new Standards. This strategic decision aligns with AIRC's mission to continuously improve its framework through which participating agents can have their practices certified. The following Standards were adopted by the AIRC Board of Directors on January 4, 2012.

AIRC™ Certification Standards

The Certification Standards are monitored by the AIRC Certification Commission and reviewed on a periodic basis as determined by the AIRC Board of Directors. The Certification Standards which follow are stated declaratively and are without instruction on how the agency is to respond,

Standard 1: Organizational Effectiveness

1.1 Mission and Purposes

Statements of mission and purpose are made public and guide the agency's planning and budgeting, including providing a framework for governance, management and communication. These purposes are further reflected in every aspect of the agency and its activities, organization, and human, financial and physical resources.

1.2 Governance and Ownership

The agency describes in a clear and detailed manner its ownership, governance and organization.

1.3 Effective Management

1.3.1 Decision-Making Process

The agency is sufficiently organized to accomplish its purposes through organizational structure, policies and procedures.

1.3.2 Human Resources

Employees or other people working for or on behalf of the agency are competent, well informed, reputable and act at all times in the best interest of the applicant and institutions.

Note: The term, "Agency," refers to the entity which seeks certification. The term, "Agent," is any person or an entity working on behalf of the agency.

1.4 Scope of Operation

1.4.1 The agency describes fully all of its activities related to international student recruitment, including its geographic scope.

1.4.2 If recruitment activities are one part of a larger organization with diverse purposes,

the agency must describe how the recruitment operations function as a distinctive but fully operational unit within the larger organizational context

1.4.3 If recruitment activities are carried out by sub-agents, franchisees, or other persons employed or contracted by the agent to transact the whole, or part of the student recruitment process, the agency must describe these relationships.

1.5 Financial Integrity

1.5.1 Financial Sustainability of the Organization

The agency manages its financial resources to maximize the agency's capability to meet its stated purposes for organizational sustainability.

1.5.2 Nature of Setting and Collecting of Student Fees

The agency has a schedule of fees for services rendered student clients which is readily understood and visible to all student clients.

1.5.3 Transparent Refund Policy

The agency has a refund policy which is readily understood, publicly posted and visible to all student clients.

1.5.4 Handling of Student Financial Awards. The agency refrains from collecting remuneration from student clients that is conditional upon the receipt of scholarships and financial aid monies of any type awarded by the host or receiving institution, or other scholarship awarding organizations, and is in addition to any remuneration for placement provided by contract with the host institution. This is applicable to all types of scholarships, including academic, merit, athletic, corporate and more (see example listing: <https://www.scholarships.com/financial-aid/collegescholarships/scholarships-by-type/>) An exception to this Standard applies for NCAA Division II and III for amateur student athletes which allow for agent commission payments to be contingent on the award of scholarship provided that the student or guardian consents to this exception.

Standard 2: Integrity of Recruitment Process

2.1 Knowledge of the U.S. Education System

Agency staff have a strong working knowledge of the education system in the United States, as well as of the specific institutional clients they serve.

2.2 Advertising/Marketing

The agency represents itself honestly, claims competency when demonstrable, and avoids misrepresentation.

2.3 Respect for Intellectual Property

The agency uses only authorized material, (including logos) from educational institutions.

2.4 Accountability

The agency takes full responsibility for ensuring compliance with AIRC standards with any sub-agents, franchisees, or other persons employed or contracted by the agent to transact the whole, or part of the student recruitment process.

2.5 Conflicts of Interest

The agency manages its relationships with institutions, organizations and students to ensure

impartiality and transparency.

2.6 Transparency and Integrity of Services Rendered

The agency conducts itself in a transparent manner in which only truthful claims are made, and both institutions and students are served in an unbiased manner.

2.7 Appropriateness and Accuracy of Services Rendered

The agency renders appropriate and accurate services centering on the recruitment, advising and placement of students in secondary and postsecondary institutions or programs. Specific examples of these services can include but are not limited to the following:

2.7.1 The agency remains updated about and follows the instruction of the U.S. Consulate in regard to immigration procedures.

2.7.2 The agency uses current information about institutions and their admissions criteria (including language proficiency), program offerings and their academic prerequisites; rate of graduation, tuition and fees; personal expenses; scholarships; health insurance; calendar and academic support services as well as support services for international students; housing opportunities; the grounds on which the student's enrollment may be deferred, suspended or discontinued; work opportunities while a student and upon graduation and other matters of importance to the student.

2.7.3 The agency provides accurate information concerning the specific nature of the institution to which a student is being recruited – such as whether study will be at the parent institution; a branch campus in or outside of the United States; by distance education; a joint degree or twinning program outside of the United States, etc.

2.7.4 The agency provides accurate information concerning the nature of the academic qualification/degree being received as per location above and degree level.

2.7.5 The agency provides accurate information related to the transferability of academic credit.

2.7.6 The agency provides accurate and current information concerning the cost of travel to the host institution.

2.7.7 Students who are under the age of 18 in the United States lack many legal rights and need special support. The agency understands the special needs of minor students and provides appropriate services.

Standard 3: Student and Family Engagement Pre- and Post-Enrollment

3.1 Pre-Enrollment

The agency carries out its pre-enrollment services with students and their families characterized by the following:

3.1.1 There is a written legal relationship in the form of a contract or agreement with a readily understood and up-front disclosure of services and related fees.

3.1.2 The agency maintains the confidentiality of records, notes, and client information and discloses confidential information only with written consent from the student on a need-to-know basis.

3.1.3 In the case of students under the age of 18, parents/families are included in the communication process as appropriate and timely.

3.1.4 Promises or guarantees are made by the agency only when backed by facts that they will be achieved.

3.1.5 The agency demonstrates the knowledge that recruitment and admissions in the U.S. educational context are generally prohibited from discrimination based on age, race, gender, sexual orientation, religion, marital status, ethnicity, disability, socioeconomic status, or other reasons.

3.2 Post-Enrollment

The agency carries out its post-enrollment services with students and their families characterized by the following:

3.2.1 The agency keeps individual student records for at least three (3) years for purposes of internal evaluation and external review.

3.2.2 The agency keeps recent (within 3 years) student/family client satisfaction records on file for purposes of external review.

Standard 4: Institutional Engagement Pre- and Post-Recruitment

4.1 Pre-Recruitment

The agency only contracts with or places students at U.S. educational institutions whose accreditation is recognized by the U.S. Department of Education, State governing board, or Council on Higher Education Accreditation (CHEA). Characteristics of these services shall include the following:

4.1.1 There is a written legal relationship in the form of a contract or agreement which clearly states the nature of the partnership, scope of respective roles and responsibilities, quality assurance measures to be implemented and method of monitoring the contractual obligations (such as an annual report to the institution on the results of recruitment practices or other mutually agreed stipulations).

4.1.2 The agency maintains regular contact with institutions which enables consistent and timely communication.

4.1.3 The agency maintains the confidentiality of the relationship between institution and agency as agreed.

4.1.4 The agency provides legitimate documents to institutions which are properly notarized or attested as to their authenticity.

4.1.5 The agency does not knowingly provide false or misleading records of student academic achievement, preparation, and financial capability. Further, the agency ensures that essays and/or statement of purpose, are originally created by the student to whom they are attributed.

4.2 Post-Recruitment

4.2.1 The agency keeps recent (within 3 years) institutional client satisfaction records on file for purposes of external review.

Standard 5: Complaints Process

The agency has an internal mechanism for processing complaints and making necessary changes in the nature of recruiting services as needed.

AIRC Policies on Membership, Withdrawing, Recertification, Compliance, Complaints and Appeals

AIRC Membership

AIRC Certified Agencies must remain in good standing with AIRC by complying with all AIRC standards and policies, paying annual member dues, submitting any required Interim Reports, submitting Annual Reports each year after the first year of certification, reporting substantive changes in advance of the change, as well as being responsive to all requests from AIRC.

Agencies may choose to voluntarily withdraw from AIRC Certification and AIRC membership at any time as long as they are in good standing and not a subject of a complaint proceeding. If an agency withdraws during a complaint proceeding, the public notation made about the agency's withdrawal in emails and on the AIRC website will state: "Withdrawal – Unresolved Complaint Pending." If an agency withdraws while under Probation, the public notation made about the agency's withdrawal in response to inquiries, emails and on the AIRC website will state: "Withdrawal – On Probation." If the agency withdraws during the pendency of the appeal of an Adverse Action (Probation or Removal), the public notation made about the agency's withdrawal in response to inquiries, emails and on the AIRC website will state "Withdrawal – Appeal of Adverse Action (Probation or Removal) Pending."

When an agency withdraws from AIRC Certification, it must immediately cease (a) representing itself as having AIRC certification; and (b) using any trademark, service mark or logo of AIRC. Specifically,

- AIRC will require the withdrawing agency to remove immediately the AIRC logo from its website and any and all marketing materials.
- AIRC will remove the agency from its member list and inform its membership as described above by posting such action on its website for a period of six (6) months from the effective date of the withdrawal.
- If the agency wishes to re-establish AIRC membership after withdrawal it will need to re-apply and undertake the full Certification process. Unless otherwise specified in the Notice of Suspension there is a waiting period of one year for agencies to reapply following their suspension of membership. Further, agencies must be able to demonstrate that corrective action has been taken if AIRC had identified issues of concern or if a complaint had been lodged against the agency prior to voluntary withdraw.

AIRC conference attendance rules will apply and the agency will no longer be able to register to attend unless it re-applies for certification and is an approved applicant for certification.

Reporting Substantive Change

AIRC's substantive change policy requires Certified Agencies to report major changes being considered to an agency's business operation to AIRC in advance of the change. The complete requirement is below.

By definition a change in a certified agency that constitutes a “Substantive Change” is not subsumed within an agency's certification. Therefore, in order to determine whether a specific action rises to the level of a Substantive Change requiring review and approval, AIRC must be informed **in advance** of the implementation of any proposed changes that may substantially alter or affect the conditions or operations that existed at the time the agency was granted certification. This includes, but is not limited to, changes in ownership, mission, the nature of institutions served, legal structure, business name of the agency or additions or deletions of offices, branches, franchises or any locations where recruiting services take place. A Substantive Change may also arise from any acquisition of, loss or changes in licenses, permits or authorizations granted by any agency or organization that exercises oversight or supervision over the agency, including but not limited to suspension, removal or other adverse action, including fines or the imposition of any other penalties or restrictions. Upon receipt of a description of an action that may constitute a Substantive Change, AIRC staff will determine whether the action does indeed constitute a Substantive Change and advise the agency accordingly. A change or action determined to constitute a Substantive Change must be reviewed and approved by the AIRC Certification Commission *prior to* implementation. Failure to secure timely approval of a contemplated Substantive Change, including failure to report an action that is subsequently determined to constitute a Substantive Change may be grounds for termination of certification or other adverse action.

Recertification Timeline and Agency Annual Reporting

Effective January 1, 2012 the period of AIRC Certification for fully certified agencies is extended from three years to five years. The change is effective for agencies certified before that date as well as new applicants. The change allows AIRC to conduct more thorough reviews while limiting the burden on certified agencies.

Not less than nine months prior to the end of the extended certification period an agency must submit a completed AIRC Self Evaluation Report Form. This will be followed by a review visit from a team of two AIRC External Reviewers. Such visit will be at agency expense in accordance with AIRC policies. The External Reviewers will prepare a site report. The Certification Commission will review the agency's Self Evaluation Review Form and the site report before determining whether the agency's certification should be renewed for a further five-year period.

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As a result of the longer time period between reviews for certification, effective January 1, 2012 AIRC instituted an annual reporting requirement for all certified and conditionally certified agencies. An Annual Report will be due from each agency each year in March or August (see Certification Timeline Annual Report Due Dates below). The annual report serves as a means for AIRC certified agencies to inform AIRC about continuous improvement in agency operations and to notify AIRC of progress made in bringing themselves into full compliance with any AIRC Standards that were not fully met at the time of certification.

The annual reporting process will proceed as follows.

- Each year a form containing the information provided in the original application will be sent to each certified agency for updating.
- An agency will be asked to report on its successes, progress made on fully meeting any standards where deficiencies were previously noted, and changes it has made to its business operations that are related to the AIRC Standards. An agency will provide documentation to substantiate its progress and improvements.
- An agency will be required to provide results from student and institutional client satisfaction surveys (as specified in Standard 3.2.2 and 4.2.1). AIRC will provide standards for conducting such surveys early in 2012. The agency will be required to report the conclusions it has drawn from the survey responses and identify plans to address shortcomings and suggestions for change.
- An agency will be required to post a link on its website that connects to the AIRC Call for Comments link on its website so that students and institutional clients can make comments directly to AIRC.

Annual Reporting for Conditionally Certified Agencies

An agency that is conditionally certified will also be required to submit annual reports starting in 2012. Annual reports for conditionally certified agencies will be similar to those required from certified agencies. A conditionally certified agency will have the additional requirement of reporting on AIRC Standard areas noted deficient in the initial certification letter.

Recertification for Conditionally Certified Agencies

Upon its initial certification review the Certification Commission may grant conditional certification for one, two or three years. During the final year of the conditional period, the conditionally certified agency undergoes a review subsequent to the submission of updates to its AIRC Self-Evaluation Report Form. A review visit will be conducted by a team of two AIRC External Reviewers (at agency expense). After reviewing the documents, the Certification Commission will either extend the certification of the agency for the number of years remaining to total 5 years or the agency's certification will be revoked. If the agency is no longer certified, it must follow the AIRC guidelines to re-seek AIRC Certification. See example timelines below.

Certification Timeline and Annual Report Due Dates

Certified agencies must submit annual reports to AIRC. The due date is determined by the certification date and is either May 1 or August 1. Reporting institutional and student client

survey results reflects AIRC Standards 3.2.2 and 4.2.1. Agencies must survey their clients annually and they must report the survey results to AIRC. As AIRC strives to continuously improve its framework, AIRC members also want to know that agencies are working to continuously improve their operations. Surveying of clients helps to inform agencies of areas to improve.

There is a fee for agencies that are 6 months overdue in their annual reporting.

Failure to pay the fee and to submit annual reports may result in the agency being placed on probation or having its certification revoked. Both of these actions are publicized.

Probation Status

Effective January 1, 2012 agencies that have failed to meet one or more Standards, or are likely to fail to do so, but which appear in the judgment of the Certification Commission capable of correcting such deficiencies, may be placed *on probation*. Such information may be adduced from complaints (see below), in information contained in an Annual Report or as a result of an AIRC review, or should an agency fail to comply with requests from AIRC, such as submission of an Interim Report.

- Once the Certification Commission determines that an agency is not in compliance with a Standard, AIRC will so notify the agency in writing.
- The agency will have fifteen (15) calendar days to prepare its response.
- The Certification Commission may, if it deems necessary, order a review visit by a team of two AIRC External Reviewers.
- If the response and review visit (if necessary) verify that the Standard is being met, no further action will be taken.
- If the response and review visit (if necessary) verify that one or more Standards are NOT being met, the Certification Commission will notify the agency that it may be placed on probation, or it may initiate more serious action (see below).
- The agency may request a reconsideration of its probation status before it is made public on the AIRC website.
- Reconsideration allows the agency to make changes and provide new information to the Certification Commission. New information and supporting documentation is due within twenty-one (21) days.
- The grounds for the request of reconsideration may include material not in the record before the Certification Commission when the decision was made to place the agency on probation. The grounds for the request for reconsideration may not challenge the reasonableness of AIRC's published Standards, policies or procedures.

In reconsidering its decision to place an agency on probation the Certification Commission may:

- set aside its decision and continue the agency's Certification without probationary notice;
- set aside its decision and continue Certification with conditions which the agency must agree to meet within a stated period of time;
- sustain its original decision.

If the decision to place the agency on probation is sustained, the Certification Commission's decision is final. An action to place an agency on probation is not an adverse action; such action may not be appealed.

The period of probation will be no longer than one year and the steps necessary to remove the probation status within that time will be clearly explained to the agency.

Probation status should not be confused with revocation of certification which results in removal of AIRC Certification. An agency on probation will continue to be an AIRC member and must be current in its dues. Probation status will be made public on the AIRC website, with the following statement: "On Probation for Violation of AIRC Standard [number]."

This public notification will be removed upon determination that the issues giving rise to the action have been corrected.

An agency that fails to meet its probationary conditions within the specified timeframe will have its certification revoked. However, prior to the expiration of its probationary period the agency may voluntarily withdraw from AIRC Certification and membership.

An agency that withdraws will be removed from the AIRC Directory of Certified Agencies and must cease using the AIRC name and Certified logo. Public notification of the action will consist of a statement on the AIRC website that the agency has voluntarily withdrawn from AIRC membership.

Complaints Against AIRC Certified Agencies

AIRC Comment Process

The AIRC Certification process provides an opportunity for third parties, whether individuals or on behalf of public or private entities, including but not limited to higher/tertiary education institutions and programs, and governmental and non-governmental organizations, to make written comments on whether, in their opinion, the organization meets AIRC Certification Standards.

Comments are strictly confidential and will not be made public by AIRC.

Comment Procedure

Comments may be supportive or may express concerns or complaints. All comments must be in writing and submitted through one of the channels described <https://www.airc-education.org/airc-public-comment> Comments or complaints that are not submitted in writing will not be accepted.

All comments will be provided to the identified agency for its review and response. However the individual or entity submitting the comment may request that his, her or its name or other identification be redacted when the comment is transmitted to the agency in question.

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Submitted comments must meet the following guidelines in order to be considered by AIRC:

- The comment must reference a specific AIRC Certified Agency or an entity that is a current applicant for AIRC Certification.
- The comment must relate to agency activity that occurred after it formally applied for AIRC Certification and must have arisen from events that occurred within the previous 7 years.
- The comment must be signed. Anonymous comments will not be accepted.
- The comment may relate to activities regardless of geographic location.
- If a complaint or concern, the comment must make specific reference to how the alleged conduct relates to either the AIRC Certification Standards, available at <https://static1.squarespace.com/static/5d1cea1f24c080000113b415/t/5e6bf4f159bf4c196cd273bb/1584133364040/AIRC+Standards+2015.pdf>
- The comment should be accompanied by supporting documentation, which may be in any form, including written, photographs, audio or video. Links to publicly accessible sites will be accepted.
- A concern or complaint that is related to a currently pending AIRC adjudication will be referred to that process for consideration. A concern or complaint that is the subject of or related to a criminal, civil or administrative proceeding may be considered at AIRC's discretion or may be deferred pending the outcome of such proceeding.
- AIRC reserves the right to refuse to respond to or proceed with any comment that is defamatory and will not consider any comment that contains profanity or hate speech.
- If a comment constitutes a complaint or concern and relates to conduct respecting an individual, the complainant must provide documentation that demonstrates that he or she has made a good faith effort to follow the prescribed complaint/grievance procedures of the certified agency to resolve the complaint.

In the event AIRC staff determines that a concern or complaint is related to an AIRC Certification Standard, the original comment, together with the agency's response will be provided to the Certification Commission for their review.

Reliance on Publicly Available Information Such as News Reports

As an organization whose actions are relied upon by the public, AIRC must take cognizance of any information that comes to its attention respecting the conduct, activities, integrity or reputation of a Certified Agency or of an entity that is seeking AIRC Certification.

In addition to the third party comment process, AIRC staff will review any media report that comes to its attention that reflects adversely on the conduct, activities, integrity or reputation of a Certified Agency or of an entity that is seeking AIRC Certification. If AIRC staff considers the issue raised by the media report relevant to the AIRC Certification Standards, the affected agency will be asked to provide its written comments. If, based upon review of the agency's comments AIRC staff determines that there remains the possibility of a violation of AIRC Certification Standards, the matter will be provided to the Certification Commission, together with the agency's response.

- Certification staff will review the complaint to determine whether it falls within an AIRC

Standard area and if so which Standard(s) may be implicated.

- AIRC staff may request further information and documentation from the complainant.
- Within 10 days of receiving a complaint, AIRC shall send the original copy of the complaint to the agency.
- The agency must submit a written response, with accompanying documentation, if any, within thirty (30) days of receiving the complaint from AIRC.
- AIRC may prepare a staff report to accompany the complaint and agency response.
- The complaint, staff report, if any, and the agency's response, together with any supporting documentation shall be forwarded to the Certification Commission, which shall review the material.
- The Certification Commission will review the complaint and all related information and shall, within thirty (30) days take one of the following actions.

i. Dismissal

If the Certification Commission is satisfied that the agency is in compliance with the AIRC Standards, the complaint will be dismissed. If the complaint is dismissed, the Certification Commission will notify the agency and the complainant of the decision. No further action will be taken.

ii. Complaint investigation

If the Certification Commission believes that more information is required to determine whether the agency is in compliance with the AIRC Standards, it shall order an additional investigation, specifying what questions the investigation is designed to answer and indicate specifically the nature of the additional investigation recommended (such as, a site visit; requesting additional documentation, face-to-face interviews of agency personnel, or a face-to-face² meeting with the complainant). The certified agency about which the complaint has been made shall pay for the investigation expenses. The investigation will be completed within 60 working days.

A written report of the results of the investigation will be compiled and sent to the agency within 10 days of the conclusion of the investigation. The agency will be asked to respond to the written report of the investigation within 15 days of receipt of the report.

Based on its review of complaint, the report of the investigation and the response from the agency, the Certification Commission shall vote on action to be taken. The Certification Commission may:

- 1) dismiss the complaint,
 - 2) send a letter to the agency requiring corrective action, which letter will be kept in AIRC's files,
 - 3) place the agency on probation with a time frame of no more than one year) to take specific corrective action,
- or,
- 4) revoke certification.

² This need not be in person; telephonic or video conferenced interviews will suffice.

Right of Reconsideration and Appeal: Certification Denied, Certification Revoked

An agency may request reconsideration or appeal an adverse decision, that is one that:

- 1) denies certification, or
- 2) revokes certification

The agency may request **reconsideration** of the decision of the AIRC Certification Commission or may immediately **appeal** the decision.

- The request for reconsideration or appeal must be made in writing to AIRC within ten (10) days of the receipt of the written statement advising the recruitment agency of the decision to deny or revoke certification.
- An Appeals Fee must accompany the agency's request for reconsideration or appeal.
- The agency must file within thirty (30) days of receipt of the initial decision a written statement of the grounds for its request for reconsideration or appeal. Grounds for reconsideration may include failure of the Certification Commission to properly consider certain factual evidence, and the agency may supplement the record to support its assertion.

The agency's accounts must be paid in full at least ten (10) days before the date of the hearing. The agency's failure to have its accounts paid in full by this date shall be deemed a waiver of its right of reconsideration or appeal and will cause the Certification Commission's decision to become final.

The Reconsideration Process

The grounds for a request of reconsideration may include material not in the record before the Certification Commission when the decision was made to place the agency on probation or deny or revoke certification. The grounds for the request for reconsideration may not challenge the reasonableness of AIRC's published standards, policies or procedures.

In reconsidering its decision to deny or revoke certification, the Certification Commission may:

- 1) set aside its decision and certify or continue the agency's certification;
- 2) set aside its decision and certify or continue certification with conditions which the agency must agree to meet within a stated period of time;
- 3) set aside its decision and direct that a new certification process take place; or
- 4) sustain its original decision.

Reconsideration of Certification Denial or Revocation

If the agency's request for reconsideration is not successful, the agency may invoke the AIRC Appeals Process, described below. If the decision is not appealed within the specified timeframe [as noted above] the action of the Certification Commission becomes final. An agency which is denied certification is not eligible to reapply for certification for a period of one year; an agency which has its certification revoked is not eligible to reapply for certification for a period of two years.

The Appeals Process

The agency's appeal is heard by an independent panel. The panel consists of three (3) members. The members are appointed by the AIRC Board of Directors from a list of former Certification Commission and Board of Directors members or other knowledgeable individuals who are free from any conflicts of interest, one of whom is designated Chair. A vote of a majority is required for any action, which may either remand the decision for further review by the Certification Commission or sustains the action of the Board.

In filing an appeal the agency must set forth the specific grounds for its appeal and state the reasons the agency believes the adverse decision should be overturned. To prevail in its appeal, the agency must show that the Certification Commission's decision resulted from errors or omissions in the execution of AIRC Certification policies and procedures. The appeals panel will consider the grounds for appeal, the institution's presentation, and the record that was before the Certification Commission when it made the decision to place an agency on probation or deny or revoke Certification. Factual evidence not in the record that was before the Certification Commission may not be considered.

The Appeals Panel is bound by AIRC's published Standards, policies and procedures, and the agency's appeal may not challenge their reasonableness.

If the appeals panel denies the appeal, the Certification Commission's action becomes the final action of AIRC, effective upon the date of the Appeals Board decision.

If the Appeals Panel upholds the appeal, it will provide an explanation of its reasons and remand the decision to the Certification Commission for review in accordance with its decision. The agency will pay any costs related to a new review.

An agency which is denied certification is not eligible to reapply for certification for a period of one year; an agency which has its certification revoked is not eligible to reapply for certification for a period of two years.

The Appeals Panel can only remand a decision for further proceeding; it cannot reverse a decision of the Certification Commission. It may, however, remand with instructions respecting

curative measures the Certification Commission must take in conducting a review on remand. The decision of the Certification Commission on remand will be final.

Within ten (10) days following the conclusion of the reconsideration or appeal hearing, the Certification Commission shall send the agency a written statement advising of the decision and the basis of that decision on the reconsideration or appeal.

APPENDIX A



Rights and Responsibilities of AIRC Institutions and Agencies

Preface

American secondary and postsecondary education reflects a diverse, semi-autonomous and independent composite of institutions. In the diversity of the system lies its strength. By design, U.S. education functions with considerable latitude and few restrictions. Compared with most other countries, there has been a remarkable degree of freedom from government regulation and intrusion. Accordingly, systems of self-regulation have developed to assure the quality of education. A key form of self-regulation is accreditation which in the U.S. context serves as the balance between institutional autonomy, independence and freedom and the institution's responsibilities to students and other stakeholders. All institutional members of AIRC are accredited by institutional accrediting bodies recognized by the U.S. Department of Education. Within this context, AIRC Certification serves as a means of assuring the quality of agencies which recruit international students to accredited U.S. educational institutions. Recruiting agencies which receive AIRC Certification comply with the AIRC Certification Standards and have undergone a rigorous process of self-evaluation and external review to achieve this status. Coupled with the responsibilities of AIRC Certified agencies to comply with the Standards for Certification, are the rights and responsibilities of institutions in assuring that they participate in the AIRC self-regulatory process and interact responsibly with the AIRC Certified agencies toward the ultimate goal of providing quality education to international students.

Preconditions

A statement related to rights and responsibilities of AIRC institutions and agencies is rooted in general assumptions:

1. That the institutions and agencies are partners in the system of voluntary quality assurance through AIRC.
2. That there is a mutual commitment among AIRC institutions and agencies to:
 - a. Voluntary self-regulation,
 - b. Assessment and enhancement of educational quality and services,
 - c. Candor,
 - d. Cooperation,
 - e. Integrity, and
 - f. Confidence and trust.

Given these preconditions, there are certain institutional and agency rights and responsibilities that relate to (a) the process of self-regulation through the AIRC Certification process and responsibilities of general membership; and (b) the chronology of an international student's experience from pre-enrollment to graduation.

AIRC Certification and Membership

Institutional and agency members of AIRC, in cooperation with each other, have the responsibility to:

1. Involve all stakeholders in the development and acceptance of standards, processes and policies to ensure a high quality of education and services to international students.
2. Develop standards, processes and policies which:
 - a. Are consistent with the purposes of quality assurance
 - b. Are sufficiently flexible to allow for effective program development according to local conditions
 - c. Allow and encourage institutional and agency freedom and autonomy
 - d. Allow both institutions and agencies to exercise their rights within a reasonable set of parameters relevant to the quality of education and services to international students.
3. Conduct periodic reviews of the AIRC Certification Standards and Policies.
4. Participate fully in the programmatic offerings of AIRC and fulfill general responsibilities of membership.

Stages of Institutional Rights and Responsibilities

Related to the Chronology of an International Student's Experience

The responsibilities of recruitment agencies are clearly delineated in the AIRC Standards of Certification. The following follows a similar chronology to the AIRC Standards but focuses on the responsibilities of educational institutions:

[Note that AIRC Certification applies only to recruiters as agencies; not individual agents. Accordingly, individual agents will apply as an “agency” thus the term “agencies” rather than “agents” will be used throughout.]

Pre-Enrollment Engagement of Students

Students and their families are often first exposed to the U.S. education system through institutional marketing information. It is important that this information is of a high standard, professional, clear and unambiguous, so that prospective students and their families can make informed decisions.

The recruitment of students is a first step in establishing a formal relationship between the student and the recruiting agency. It is imperative that the recruitment is ethical and upholds the integrity of U.S. education. Prospective students need to be able to access information about the institution's academic program, fees and refund policies, facilities, services, resources, and policies plus information related to U.S. education and living in the United States prior to enrollment in order to make informed choices. In turn, institutions need to assure that they admit students who are adequately prepared for U.S. education, including appropriate language skills and age consideration.

Recruitment agencies and agents can be a first point of contact between institutions and prospective students and their families. It is the responsibility of the institution to assure that its information is accurate and is shared in a transparent manner with recruiting agencies. Just as the AIRC Certification Standards call for a contractual relationship between agencies and prospective student clients, so should there be transparent, written contracts between institutions and agencies, including the provision of transparent and ethical fees for services, including refund policies. It is expected that AIRC member institutions will participate in the recruitment process without conflicts of interest which can violate the integrity of U.S. education.

Institutions will take care to uphold the integrity of the recruitment process by cooperating with each other in an impartial and open manner, including ethical practice in admissions and transfer. Foremost, AIRC institutional members will, where practicable, use AIRC Certified agencies in its recruitment efforts. By virtue of the AIRC Certification process, including its professional development requirement, AIRC institutional members are best served by agencies which are familiar with the U.S. educational system; are honest; and carry out their duties with professionalism and integrity.

Post-Enrollment

In addition to providing the best possible academic advising to assure student progress, it is the responsibility of institutions to provide adequate student support services for its international recruits. These include but are not limited to orientation to living in the United States, health, lodging, meals, travel, visa conditions, student activities and policies related to due process.

It is further the responsibility of institutions to fulfill the contractual obligations with recruiting agencies in a timely and professional manner; and participate ethically in U.S. student visa processing.

Finally, it is expected that AIRC institutional members uphold the highest standards of practice relative to international students, including but not limited to the general monitoring individual progress and generally assuring a positive experience in U.S. education.



AIRC Self-Evaluation Report Form

(APPENDIX B)

Agency Legal Name (as it appears on Agency Application Form):

Agency "Doing Business As" Name (if different from above):

D Date of Submission: _____ Month Day Year

v.9. 2021

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<p>Agency Primary contact person</p> <p>Name: _____ SURNAME First Name Middle</p> <p>Headquarters Mailing Address:</p> <p>_____</p> <p>_____</p> <p>_____</p> <p>_____</p>	<p>Contact Numbers</p> <p>Phone:</p> <p>_____</p> <p> If dialed in country</p> <p>_____</p> <p> If dialed internationally</p> <p>Mobile:</p> <p>_____</p> <p> If dialed in country</p> <p>_____</p> <p> If dialed internationally</p> <p>Fax:</p> <p>_____</p> <p> If dialed in country</p> <p>_____</p> <p> If dialed internationally</p> <p>Skype ID:</p>
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Year agency founded: _____

Number of students placed globally last year – Total _____

Graduate _____ **Undergraduate** _____ **IEP** _____ **Secondary School** _____ **Camps/Work**

Visa success rate (%) for students admitted to U.S. institutions: _____

Self Evaluation Report Form American International Recruitment Council

The agency applying for AIRC Certification completes this form in order to describe to AIRC how it is meeting the AIRC Standards. Form sections may be expanded to the length of your reply. Where noted, the agency must attach documentation. When possible, insert the documentation into the document. If adding appendices, please save them by Standard number and include a list of all appendices at the end of the report.

When completed, email the completed form with attachments to Certification@airc-education.org. If the files are large you may send a Drop Box or other file sharing link.

Information written in this form should apply to all agency locations that counsel students, including all agency branches and agency franchises that are operating with the same name as applicant agency). Agency branches, franchises or sub-agents that have a different “Doing Business As” name will not be included in this certification. If information differs from headquarters to branch or branch to branch, please describe these differences. Information must also be shared about the agency’s sub-agents, when applicable.

***** Agencies that use sub-agents must also complete sub-agent supplement form at the end of this Self Evaluation Form.**

Standard Section 1: Organizational Effectiveness

The AIRC Standard:

1.1 Mission and Purposes

Statements of mission and purposes are made public and guide the agency's planning and budgeting, including providing a framework for governance, management and communication. These purposes are further reflected in every aspect of the agency and its activities, organization, and human, financial and physical resources.

The purpose of this standard is for AIRC to understand that the agency has a vision that is understood by its staff and understandable to the public and that the mission is appropriate for the main work of the agency. **Definitions:** A mission statement defines what an organization is, why it exists, and its reason for being. At a minimum, the mission statement should define who your primary customers are, identify the services your business provides, and describe the geographical location in which you operate. A mission statement is different than a motto, which is a brief statement used to express a principle, goal, or ideal.

What the agency needs to provide AIRC:

- 1.1.1a:** State the mission and/or vision statement of the agency here:
 - Attach as an appendix a photograph of the posted mission statement from the agency headquarters and also a screen shot of the agency's website with the vision and mission text.
- 1.1.1b:**
 - Briefly describe how the mission guides the agency's organization and services.
 - Provide an example of how the mission was used to improve an operation or start a new project.
 - Also, let AIRC know if the agency decided not to pursue certain activities because it was determined these were outside the mission.
- 1.1.1c** Describe how a typical student is provided with counseling and advising for study abroad from the time the student first contacts the agency through the submission of an application for admission to an educational institution.

1.1.2 Describe how the agency makes short-term and long-term decisions. If the decision-making process is documented, please provide AIRC with a sample of **one** of the following

- meeting minutes that describe planning
- strategic plan notes or SWOT analysis notes
- business plan notes

If planning is not written down but done through discussions, please provide an example of a plan that was executed.

The AIRC Standard:

1.2 Governance and Ownership

The agency describes in a clear and detailed manner its ownership, governance and organization.

The purpose of this standard is for AIRC to understand the structure of the organization, its size, and whom AIRC reviewers should meet with when they visit the agency.

What the agency needs to provide AIRC:

Paste into this document an organizational chart (or attach one as an appendix). Make sure that names are also listed with the titles. Include the senior leadership, managers and counseling staff, marketing staff and finance staff.

The AIRC Standard:

1.3 Effective Management

The agency is sufficiently organized to accomplish its purposes through organizational structures, policies and procedures.

The purpose of this standard is for AIRC to understand that the agency is well organized, that it has a process for making and implementing decisions.

What the agency needs to provide AIRC:

1.3.1a Describe the decision-making process and what employees are involved in decision-making.

- **1.3.1b** Provide documentation or a description of how a certain decision was made, for example from a staff meeting, executive meeting, or Board meeting discussion. The example evidence can be minutes from that meeting, a business plan that was completed or an idea presented by a staff member that was implemented as operational practice.

The AIRC Standard:

1.3.2 Human Resources

Employees or other people working for or on behalf of the agency are competent, well informed, reputable and act at all times in the best interests of the applicant and institutions.

The purpose of this standard is for AIRC to understand how hiring decisions are made, how staff are trained and evaluated and continually updated on aspects of their knowledge and if the agency also contracts with sub-agencies.

What the agency needs to provide AIRC:

- **1.3.2a** What steps does the agency take to ensure it hires qualified staff members?:
 - List the qualifications required for agency counselors, such as required education level and experience. Alternatively, you may attach job posting samples.):
 - Attach c.v.'s for 1 -3 managers and 2- 5 counselors.
- **1.3.2b** Describe the training of counseling staff after they are hired:
- **1.3.2c** Describe how the agency continually trains and updates its counselors and staff on information that changes, such as visa and immigration regulations and any rules or laws that effect your business operations:
- **1.3.2d** Describe how the agency continually trains and updates its counselors and staff on the admission requirements and procedures of its contracted institutional partners:
 - Provide an example of an institutional admission requirement update, how this update was shared with staff, and how the supervisors checked to make sure the staff understood and knew the change:

1.3.2e Describe how counseling staff is evaluated in their jobs and how often evaluations take place:

1.3.2f Does the agency contract with sub-agencies?

- Yes
- No

If yes, describe how the sub-agencies are screened initially and how the sub-agencies are evaluated on their performance and how often to evaluations take place?

The AIRC Standard:

1.4 Scope of Operation

The agency describes fully all of its activities related to international student recruitment, including its geographic scope.

The purpose of this standard is for AIRC to understand all the aspects of the agency business.

What the agency needs to provide AIRC:

1.4.1 Attach a screen shot of the “About Us” page from the agency’s website or provide a brochure that includes basic information about the business.

1.4.2 Does the agency have other business functions besides educational recruitment?

- Yes
- No

If yes, list and describe these other business functions:

Describe these other business functions and their management. Are they separately managed or managed within the agency recruitment operations?:

1.4.2a Attach a contact and address list of all agency branch locations and franchises that operate under the same agency name as the applicant.

1.4.2b Describe the purposes and activities of the organization which are not related to recruitment.

1.4.2c Are there plans to expand the agency’s business activities into areas beyond recruitment?

- Yes

- No
- If yes, will the mission of the organization change? If so, how?

The AIRC Standard:

1.4.3 *If recruitment activities are carried out by sub-agents, franchisees, or other persons employed or contracted by the agent to transact the whole, or part of the student recruitment process, the agency must describe these relationships:*

[NOTE: If the agency contracts with sub-agents, it must answer questions 1.3.2f, 1.4.3, 1.4.3a, 1.4.3b, 1.5.2b AND complete the supplement **AIRC Agency Self-Evaluation Form Supplement on Sub-Agents** found at the end of this report.]

The purpose of this standard is for AIRC to understand if and how the agency works with sub-agents.

What the agency needs to provide AIRC:

Mark this section Not Applicable if the agency does not contract with sub-agencies. For the agencies that do contract with sub-agencies please provide the following.

- 1.4.3a** Attach a current list of sub-agency partners.
- What type of agreement is made with sub-agencies? (contract, memorandum of understanding, etc.)?
- Attach a sample agreement used to partner with a sub-agency.
- 1.4.3b** What services are sub-agencies providing to your agency?
- Does the service provided by different sub-agencies vary?
If so, describe the different services provided.
- 1.4.3c** For sub-agencies that provide student applications for your institutional contracts, at what point in the student recruitment process does your agency receive the student application or other student materials?

The AIRC Standard

1.5 Financial Integrity

1.5.1 Financial Sustainability of Organization. *The agency manages its financial resources to maximize the agency's capability to meet its stated purposes for organizational sustainability.*

Although it is not a primary purpose of AIRC to review financial records of an agency, it is important to AIRC that the agency has sufficient funds in order to serve students and institutions appropriately and sustainably.

What the agency needs to provide AIRC:

Please provide recent documentation which reflects compliance with third party financial review, such as an official response to national financial reporting, or the results of an independent external audit which is no more than 5 years old. Please indicate where in the Appendix documentation can be found.

1.5.2 Nature of Setting and Collecting Fees. *The agency has a schedule of fees for all services rendered student clients which is readily understood and visible to all student clients.*

The purpose of this standard is for AIRC to have evidence that the agency has a published fee schedule for student clients (printed for clients in the office, and/or online). AIRC needs verification that students are provided with information on fees for service when students first contact the agency. AIRC also needs verification that the schedule of fees is the same for all students in a location. AIRC also requires that the agency has a written refund policy that all prospective clients are informed about and that the agency has a written policy that it does not charge students a commission fee or for a portion of any award of student scholarship or financial aid.

What the agency needs to provide AIRC:

1.5.2a Attach or insert here the student fee sheet. The fee sheet needs to be inclusive of all fees for all services (such as counseling, processing applications, fees for application processing by number of institutions or type of institutions, visa advising, shipping, etc.)

Note: If no fees are charged for any service provided to students please inform AIRC how students are made aware of this fact.

1.5.2a If sub-agents of the agency carry out recruitment, tell us at what point and how the student is informed of agency and sub-agency fees for service.

1.5.3 Transparent Refund Policy. The agency has a refund policy which is readily understood, publicly posted and visible to all student clients.

State below the agency's refund policy and provide documented evidence of how it is made public. [Note: If no refunds are provided, there must exist a policy that states this.]

1.5.4 Handling of Student Financial Awards

1.5.4 Handling of Student Financial Awards. The agency refrains from collecting remuneration from student clients that is conditional upon the receipt of scholarships and financial aid monies of any type awarded by the host or receiving institution, or other scholarship awarding organizations, and is in addition to any remuneration for placement provided by contract with the host institution. This is applicable to all types of scholarships, including academic, merit, athletic, corporate and more (see example listing: <https://www.scholarships.com/financial-aid/collegescholarships/scholarships-by-type/>) An exception to this Standard applies for NCAA Division II and III for amateur student athletes which allow for agent commission payments to be contingent on the award of scholarship provided that the student or guardian consents to this exception.

State below the agency's financial award policy and provide documented evidence of how it is made public:

Standard Section 2: Integrity of the Recruitment Process

***** Agencies that use sub-agents must also complete sub-agent supplement form at the end of this Self Evaluation Form.**

The AIRC Standard:

2.1 Knowledge of the U.S. Education System

Agency staff members have a strong working knowledge of the education system in the United States, as well as of the specific institutional clients it serves.

The purpose of this standard is for agencies to demonstrate to AIRC that all counseling staff members for study in the U.S. have a high level of understanding of U.S. education at the post-secondary level and that they can distinguish differences between the U.S. and education systems of other Anglophone countries, in particular the U.K. and Australia. NOTE: AIRC has provided the agency with the Professional Development Manual and the On-Line Training Modules to assist the agency in training staff on US higher education. Please contact AIRC if you need these items sent again.

What the agency needs to provide AIRC:

Please provide a list of staff members that counsel students on studying in the U.S.:

- Describe how these counselors were trained on U.S. higher education:

- Provide AIRC with a sample of the training materials (manuals, Power Point presentations, etc.)

- Describe how new employees are tested on their knowledge of U.S. higher education and provide an example of the evaluation tool used (test sample, or list of questions covered):

- If the agency has additional methods for keeping its agent counselors current on U.S. educational practice, provide examples of this:

The AIRC Standard:

2.2 Advertising/Marketing

The agency represents itself honestly, claims competency when demonstrable, and avoids misrepresentation.

The purpose of this standard is to ensure that the agency represents itself and its services honestly in its printed materials and on its website.

What the agency needs to provide AIRC:

- Provide AIRC with a list of written materials it uses to advertise its services (such as brochures, flyers, etc.):

- Provide copies of printed publications (attach PDF versions or scans).

- List all agency website addresses here:

- If there are other forms of advertising (such as newspaper ads, TV ads, YouTube ads, social media, radio) please list these and provide samples and links:

- If advertising materials are in electronic form, place them in the Appendix of this report. If they are in printed form, please include these items with the printed materials delivered to AIRC's office.

The AIRC Standard:

2.3 Respect for Intellectual Property

The agency uses only authorized material, (including logos) from educational institutions.

[Note: examples of intellectual property for certification purposes are: (a) Copyrightable material produced from creative and scholarly activity, such as text (manuscripts, manuals, books, and articles); videos and motion pictures; music (sound recordings, lyrics, and scores); images (print, photographs, electronic, and art); and computer software (programs, databases, web pages, and courseware); and (c) Trademarked materials, such as words, names, symbols or logos, domain names, trade dress, and slogans or any combination of words which has been adopted by the University to identify itself and to distinguish itself and its sponsorship from others.]

What the agency needs to provide AIRC:

The agency must document that it has a policy or statement related to intellectual property. Share the agency's policy with AIRC. Here is an example of such a policy. AIRC recommends that this policy be included in an organizational policy manual or marketing policy manual:

[The agency] ensures that all marketing materials or items considered intellectual property that include information about partner institutions are produced with the permission of that institution. No pictures, logos, or information is otherwise produced or created without the express authorization of that partner institution.

Information and intellectual property (including pictures, logos, brands and trademarks) from non-contracted or partnered institutions are not included in any marketing material, without the owner's express written permission.

Describe how the intellectual property policy is enforced with employees. (For example, this policy is in the personnel manual or agency operations manual, which is signed by each staff member. Or, this policy is presented to each agency staff person and they must sign the policy to show their agreement.)

Describe any past or current issue or complaint the agency has received related to intellectual property and how those were resolved, if applicable:

The AIRC Standard:

2.4 Accountability

Responsibility. *The agency takes full responsibility for ensuring compliance with AIRC Standards with any sub-agents, franchisees or any other persons employed or contracted by the agency to transact the whole, or part of the student recruitment process.*

Note: A sub-agent is a person or agency business contracted by the applicant agency to transact the whole, or part of the student recruitment process. (Sub-agents may include lead generators, education agents and counselors and fully operational agencies). A franchisee is an individual who purchases the rights to use a company's trademarked name and business mode to do business. AIRC Certification would apply to franchises and any owned agency branches, as long as they operate under the same name as the AIRC applicant agency. AIRC certification does not apply to sub-agents, or any business or individual that is sub-contracted on an ad-hoc, temporary or permanent basis to assist in the recruitment of students.

What the agency needs to provide AIRC:

2.4.1 Explain how the applicant agency is responsible for its actions in the recruitment process.

Provide AIRC with any past or current issue about which the agency has received complaints and describe briefly what the agency has done to correct this situation. These complaint examples do not have to be serious in nature. An example can be, for example, "the agency had me wait to see a counselor for 20 minutes without explanation". AIRC is interested to know how the agency responds to complaints.

The AIRC Standard:

2.5. Conflicts of Interest

The agency manages its relationships with institutions, organizations and students to ensure impartiality and transparency.

[Note: A conflict of interest occurs when an [individual](#) or [organization](#) is involved in multiple interests, one of which could *possibly* [corrupt](#) the motivation for an act in another.] AIRC recommends that a conflict of interest policy be included in the agency's organizational policy manual, personnel policy manual or letter of employment.

What the agency needs to provide AIRC:

Provide AIRC with any policy statement the agency may have about the transparency of its operation, including any official statements, internal training programs or other indications that the agency avoids creating conflicts of interests in its relationships:

The AIRC Standard:

2.6. Transparency and integrity of services rendered

The agency conducts itself in a transparent manner where only truthful claims are made and both institutions and students are served in an unbiased manner. (Examples of false claims can include but not be limited to: claiming that using the agency's service is mandatory for admissions; claiming a special relationship with immigration services; inaccurately representing competing institutions and national systems of education; claiming exclusivity of

services where none exists; denigrating competing institutions in the United States and other countries.)

2.6.1 Provide AIRC with any policy statements, documentation and/or evidence of personnel training programs which state that the agency employees may make only truthful claims and unbiased service to student and family clients and others doing business with the agency:

The AIRC Standard:

2.7. Appropriateness and accuracy of services rendered

The agency renders appropriate and accurate services centering on the recruitment, advising and placement of students in accredited educational institutions or programs.

The purpose of this standard is for the agency to demonstrate to AIRC that it has a thorough knowledge of its institutional partners, that this knowledge is continually updated, and that counseling staff are trained thoroughly on all aspects of the institution as listed below.

In the seven areas listed below describe operations and procedures that ensure that recruitment, advisement and placement activities are appropriate and accurate. Provide relevant documentation (representative examples or samples) in the Appendix or inserted in the Self-Evaluation preceded by an explanation of what is included. These services would normally appear in the agency's public documents or materials shared with clients. Additional examples of appropriate and accurate services are welcomed. As part of the AIRC Certification process, a post-placement evaluation by clients will be expected annually, reported through the AIRC Annual Report, and kept on file for re-certification.

What the agency needs to provide AIRC:

2.7.1. Indicate how the agency updates and follows the instruction of the U.S. Consulate in regard to immigration procedures. Tell AIRC what sources the agency uses to learn about U.S. immigration updates:

State here the success rate (percentage) for the previous year of visas obtained for students admitted to U.S. institutions:

What the agency needs to provide AIRC:

For AIRC Standards **2.7.2, 2.7.3, 2.7.4, 2.7.5, 2.7.6** choose an institutional example to share with AIRC. Describe to AIRC how the agency informs student clients of these aspects of the institutional partner and its offerings.

2.7.2. The agency uses current information about institutions such as their

AIRC Certification Process & Standards Manual

- admissions criteria (including language proficiency criteria),
- program offerings and their academic prerequisites;
- rate of graduation,
- tuition and fees; personal expenses; scholarships;
- health insurance;
- calendar
- academic support services as well as support services for international students;
- housing opportunities;
- the grounds on which the student's enrollment may be deferred, suspended or discontinued;
- work opportunities while a student and upon graduation and other matters of importance to the student.

For AIRC Standards 2.7.2, choose an institutional example to share with AIRC on how the agency informs student clients of these aspects of the institution and its offerings:

2.7.2a Describe how the agency ensures it has the most recent and accurate materials from institutional partners and that all obsolete documents are removed, or all on-line information is continually updated:

For AIRC Standards 2.7.3, choose an institutional example to share with AIRC on how the agency informs student clients of these aspects of the institution and its offerings:

- the specific nature of the institution to which a student is being recruited – such as whether study will be at the parent institution; a branch campus in or outside of the United States; by distance education; a joint degree or twinning program outside of the United States, etc.:

For AIRC Standards 2.7.4, choose an institutional example to share with AIRC on how the agency informs student clients of these aspects of the institution and its offerings:

- The agency provides accurate information concerning the nature of the academic qualification/degree being received as per location above and degree level:

For AIRC Standards 2.7.5, choose an institutional example to share with AIRC on how the agency informs student clients of these aspects of the institution and its offerings:

- The agency provides accurate information related to the transferability of academic credit:

For AIRC Standards 2.7.6, choose an institutional example to share with AIRC on how the agency informs student clients of these aspects of the institution and its offerings:

- The agency provides accurate and current information concerning the cost of travel to the host institution:

The AIRC Standard:

2.7.7 Students who are under the age of 18 in the United States lack many legal rights and need special support. The agency understands the special needs of minor students and provides appropriate services.

What the agency needs to provide AIRC:

- Does the agency serve student clients under the age of 18?
 - Yes
 - No

If yes, describe what the agency does to ensure services or information to minor students is appropriate and describe how the agency interacts with minors.

Standard 3: Student and Family Engagement Pre- and Post-Enrollment

The AIRC Standard:

3.1 Pre-Enrollment

The agency carries out its pre-enrollment services with students and their families characterized by the following.

The purpose of this standard is for the agency to demonstrate to AIRC that it creates a service agreement to all student clients, that it keeps these agreements and the student application materials confidential, that it makes no promises or guarantees it cannot fulfill, that minors are served appropriately and that students are surveyed on the agency's service.

3.1.1 *There is a written legal relationship in the form of a contract or agreement with a readily understood and upfront disclosure of services and related fees.*

What the agency needs to provide AIRC:

- Provide an example of a written student contract (formal agreement that student signs for service) with a transparent and up-front disclosure of services and related fees and indicate whether this it is standard operating procedure to provide the same contract to each student client:

If the student agreement is different depending on the market or branch, provide all the different examples in appendices.

3.1.2 The agency maintains the confidentiality of records, notes, and client information and discloses confidential information only with written consent from the student on a need-to-know basis.

What the agency needs to provide AIRC:

Provide evidence that confidentiality of records is maintained. Evidence can be a description and screen shot of a password-protected database, description and photos of locking cabinets, and example signed FERPA release forms:

3.1.3 In the case of minor students under the age of 18, parents/families are included in the communication process as appropriate and timely.

Describe how the agency includes parents in the communication process for students under the age of 18 and include an example of a parental permission or agreement form:

3.1.4 Promises or guarantees are made by the agency only when backed by facts that they will be achieved. (The agency does not promise anything more than it can actually deliver.)

Provide AIRC with evidence that the agency has an operational policy that states that it does not make promises it can not deliver.. Evidence can be staff employment offer letters or contracts, policy from an employee manual or operational manual, or signed statements by employees:

3.1.5 Recruitment and admissions in the U.S. educational context are generally prohibited from discrimination based on age, race, gender, sexual orientation, religion, marital status, ethnicity, disability, socioeconomic status, or other reasons. [Please note that this standard does not apply to agency non-discrimination policies or state or national non-discrimination policies. While helpful for AIRC to know about these, AIRC wishes to ensure that agency counselors for the U.S. understand general admission policies in the U.S. context.]

Provide evidence that agent counselors are trained on this U.S. general admission practice. Evidence can be the portion of the training manual, presentation slide or other printed matter or URL:

The AIRC Standard:

3.2. Post-Enrollment

The agency carries out its post-enrollment services with students and their families characterized by the following:

3.2.1 The agency keeps individual student records for at least three (3) years for purposes of internal evaluation and AIRC external review.

What the agency needs to provide AIRC:

Please indicate here if this is currently an agency practice or describe the agency's plan to commence this practice of keeping student records for 3 years:

3.2.2 The agency keeps recent (within 3 years) student/family client satisfaction records on file for purposes of external review.

Indicate here if this is currently an agency practice or describe the agency's plan to begin this evaluation practice: [Note: Surveying is required for AIRC Annual Reporting and Recertification.]:

Attach in the appendix an example of the most recent student/family survey form or URL link. If you have survey data to share at this point please share it:

Standard 4: Institutional Engagement Pre- and Post-Recruitment

The purpose of this standard is for the agency to demonstrate to AIRC that it maintains contractual agreements with institutional clients; that all institutions are legitimate, accredited institutions; that it keeps institutional agreements confidential; that the agency does not engage in creating or disseminating fraudulent documents; and that institutional clients are surveyed on the agency's service.

4.1. Pre-Recruitment

The agency contracts with or places students at U.S. educational institutions whose accreditation is recognized by the U.S. Department of Education or Council on Higher Education Accreditation (CHEA). Agencies should always check the accreditation of its prospective U.S. partners. The CHEA database can be found here: <http://www.chea.org/search/>. The U.S. Department of Education database can be found here: <http://ope.ed.gov/accreditation/>.

Characteristics of these services should include the following:

4.1.1 There is a written legal relationship in the form of a contract or agreement which clearly states the nature of the (U.S. institution / other higher educational institution and agency) partnership, scope of respective roles and responsibilities, quality assurance measures to be implemented and method of monitoring the contractual obligations (such as an annual report to the institution on the results of recruitment practices or other mutually agreed stipulations).

What the agency needs to provide AIRC:

Provide a sample institutional contract and note where it can be found in the Appendix:

4.1.2 The agency maintains regular contact with institutions which enables consistent and timely communication.

Describe how the agency assures open and continuous communication with its institutional partners:

Attach in the appendix example email threads between the agency and the contracted institution.

4.1.3 The agency maintains the confidentiality of the relationship between institution and agency as agreed.

Provide evidence that confidentiality of records is maintained. Evidence can be description of password-protected databases, description and photos of locking cabinets that contain contracts and commission arrangements:

4.1.4 The agency provides legitimate documents to institutions which are properly notarized or attested as to their authenticity.

Describe the procedure the agency follows to ensure authenticity of student documents (academic credentials, bank statements, test scores):

4.1.5 The agency does not knowingly provide false or misleading records of student academic achievement, preparation, and financial capability. Further, the agency ensures that essays and/or statements of purpose are originally created by the student to whom they are attributed.

Describe how the agency informs its clients and trains its staff on the importance of authentic (not falsified) documentation for students, including transcripts, financial statements and test scores.

Attach the agency's student service agreement form to verify that it includes a requirement that all student documentation must be authentic, verifiable and attributable to the student.

Also attach agency policy statements that cover this standard, such as a personnel manual, operations manuals, training materials, signed employee statements, etc.

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- Attach signed agency employee and counselor attestations or employment agreements that affirm employees do not knowingly provide false or misleading records of student academic achievement, preparation, and financial capability.

- Describe how the agency trains its staff on the importance of authentic (not falsified) documentation for students, including transcripts, financial statements and test scores. Attach policy statements regarding this standard, such as personnel manual, operations manuals, training materials, signed employee statements, etc.:

- Describe how the agency ensures the originality of student work and prevents counselors from doing the written work (essay writing, for example) for the student. Attach policy statements regarding this standard, such as personnel manual, operations manuals, training materials, signed employee statements, etc.:

- Describe how the agency explains the importance of authenticity of documents to its student clients and their families. Attach statements provided to students about this standard, if in writing:

The AIRC Standard:

4.2 Post-Recruitment

4.2.1 The agency keeps recent (within 3 years) institutional client satisfaction records on file for purposes of external review.

What the agency needs to provide AIRC:

- Describe how the agency surveys its institutional clients or describe its plan to begin surveying institutional clients:

- If the agency has already developed an institutional client survey please provide a sample.

- If the agency has institutional survey client survey data, please share the most recent data.

The AIRC Standard:

Standard 5: Complaints Process

The purpose of this standard is for the agency to demonstrate to AIRC that it has an internal mechanism for processing complaints and making necessary changes in the nature of recruiting services as needed based on client feedback.

What the agency needs to provide AIRC:

- Provide a detailed description of how the agency processes complaints and uses these for corrective action related to services provided to student and institutional clients:

- Use as an example a recent complaint that the agency handled (who processed the complaint, how it was determined to escalate the complaint, how it was determined to resolve the complaint, and if the agency determined to correct an aspect of its operations to prevent future similar complaints.)

Sub-Agency Appendix

AIRC Agency Self-Evaluation Form Supplement on Sub-Agents

Complete this section only if the agency contracts with sub-agents.

Note: A sub-agent is a person or agency business employed or contracted by the applicant agency to transact the whole, or part of the student recruitment process. AIRC Certification does not cover or apply to the applicant agency's sub-agents. The sub-agent would have to apply for AIRC Certification separately. However, AIRC Certification requires that the Certified Agency is accountable for the actions of its sub-agent partners for their assistance in recruiting students. For AIRC reporting purposes the applicant agency partnering with the sub-agent is called the master agent.

What the agency needs to provide AIRC:

- Attach a list of current sub-agent partners in the appendix, highlighting agencies that have AIRC Certification.

The AIRC Standards:

2.1 Knowledge of the U.S. Education System

Agency staff members have a strong working knowledge of the education system in the United States, as well as of the specific institutional clients it serves.

What the agency needs to provide AIRC:

- Describe how the master agent ensures that sub-agents it contracts with have a strong knowledge of U.S. higher education:

AIRC Certification Process & Standards Manual

- Provide AIRC with a sample of the training materials on U.S. education that the master agent uses to train sub-agents (manuals, Power Point presentations, etc.).

2.2 Advertising/Marketing

The agency represents itself honestly, claims competency when demonstrable, and avoids misrepresentation.

What the agency needs to provide AIRC:

- Provide AIRC with samples of 5 sub-agents' marketing materials and where these can be found in the Appendix:

2.3 Respect for Intellectual Property

The agency uses only authorized material, (including logos) from educational institutions.

What the agency needs to provide AIRC:

- Describe how the intellectual property policy of the master agent is enforced with its sub-agent partners:

2.4 Accountability

Responsibility. The agency takes full responsibility for ensuring compliance with AIRC Standards with any sub-agents, franchisees or any other persons employed or contracted by the agency to transact the whole, or part of the student recruitment process.

What the agency needs to provide AIRC:

- 2.4.1.a Provide AIRC with any past or current issue about which sub-agents have received complaints and describe briefly what the agency has done to correct this issue:

2.5 Conflicts of Interest

The agency manages its relationships with institutions, organizations and students to ensure impartiality and transparency.

[Note: A conflict of interest occurs when an individual or organization is involved in multiple interests, one of which could possibly corrupt the motivation for an act in another.]

- Describe how the conflict of interest policy of the master agent is enforced with its sub-agent partners (these might include, for example, the partnership contract, or a policy statement required by the master agent).

2.6 Transparency and integrity of services rendered

The agency conducts itself in a transparent manner where only truthful claims are made and both institutions and students are served in an unbiased manner. (Examples of false claims can include but may not be limited to: claiming that using the agency's service is mandatory for admissions; claiming a special relationship with immigration services; inaccurately representing competing institutions and national systems of education; claiming exclusivity of services where none exists; denigrating competing institutions in the United States and other countries.)

What the agency needs to provide AIRC:

- 2.6.1.a Provide AIRC with any policy statements and/or evidence of training programs provided by the applicant agency to its sub-agent partners that state that the sub-agent employees may make only truthful claims and unbiased service to student and family clients and others doing business with the agency:

2.7 Appropriateness and accuracy of services rendered

The agency renders appropriate and accurate services centering on the recruitment, advising and placement of students in secondary and postsecondary institutions or programs.

What the agency needs to provide AIRC:

- 2.7.1.a Indicate how the agency ensures that sub-agent partners receive updates and follow the instruction of the U.S. Consulate in regard to immigration procedures:

For AIRC Standards 2.7.2, 2.7.3, 2.7.4, 2.7.5, 2.7.6 choose an institutional example to share with AIRC to describe how the master agency trained the sub-agent partners on these aspects of the institution and its offerings:

- Attach a sample of the training material or agenda or slides of the training provided.

2.7.2 The agency uses current information about institutions such as their

- admissions criteria (including language proficiency criteria),
- program offerings and their academic prerequisites;
- rate of graduation,
- tuition and fees; personal expenses; scholarships;
- health insurance;
- calendar
- academic support services as well as support services for international students;
- housing opportunities;

- the grounds on which the student's enrollment may be deferred, suspended or discontinued;
- work opportunities while a student and upon graduation and other matters of importance to the student.

2.7.3 The agency provides accurate information concerning

- the specific nature of the institution to which a student is being recruited – such as whether study will be at the parent institution; a branch campus in or outside of the United States; by distance education; a joint degree or twinning program outside of the United States, etc.

2.7.4 The agency provides accurate information concerning the nature of the academic qualification/degree being received as per location above and degree level.

2.7.5 The agency provides accurate information related to the transferability of academic credit.

2.7.6 The agency provides accurate and current information concerning the cost of travel to the host institution.

2.7.7 Students who are under the age of 18 in the United States lack many legal rights and need special support. The agency understands the special needs of minor students and provides appropriate services.

What the agency needs to provide AIRC:

2.7.7.a Describe how the sub-agents provide appropriate services to minor students.

- For sub-agencies that provide services to students under the age of 18, describe and provide evidence of what the master agent does to ensure that services provided to minor students are appropriate. (example evidence may be the partnership contract, or a policy statement on minors required by the master agent):

The AIRC Standard:

3.1 Pre-Enrollment

The agency carries out its pre-enrollment services with students and their families characterized by the following.

3.1.1 There is a written legal relationship in the form of a contract or agreement with a readily understood and upfront disclosure of services and related fees.

What the agency needs to provide AIRC:

- 3.1.1.a Provide evidence that the master agent ensures that student service contracts are provided to every student seeking service by all sub-agency partners. (example evidence may be the partnership contract, or a policy statement around student service agreements required by the master agent):

3.1.2 The agency maintains the confidentiality of records, notes, and client information and discloses confidential information only with written consent from the student on a need-to-know basis.

- 3.1.2.a Provide evidence that the master agent ensures that sub-agents maintain the confidentiality of records, notes, and client information and discloses confidential information only with written consent from the student on a need-to-know basis (example evidence may be the partnership contract, or a policy statement around student service agreements required by the master agent):

3.1.3 In the case of minor students under the age of 18, parents/families are included in the communication process as appropriate and timely.

What the agency needs to provide AIRC:

- For sub-agencies that provide services to students under the age of 18, describe and provide evidence of what the master agent does to ensure that parents/families are included in the communication process and that communications are appropriate and timely.

3.1.4 Promises or guarantees are made by the agency only when backed by facts that they will be achieved.

What the agency needs to provide AIRC:

- 3.1.4.a Provide AIRC with any policy statements and/or evidence of training programs provided by the applicant agency to its sub-agent partners that state that the sub-agency employees may make promises or guarantees only when backed by facts that they will be achieved.