



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.

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

The purposes of the organization are to:

- Develop standards of ethical practice pertaining to recruitment of international students to American educational institutions, such standards address two constituencies: educational institutions and student recruitment agents;
- Develop best practices and training to assist overseas student recruitment agents and institutions themselves to better serve both students seeking admission to American educational institutions, and
- Establish a framework through which participating agents can have their practices certified. In addition, the organization may undertake other activities as are necessary to accomplish its goals.

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: www.airc-education.org

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



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 colleges, universities and related postsecondary institutions.

Central to AIRC's purposes is the Certification process whereby 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 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.



The AIRC Certification Process

Overview

A core purpose of AIRC is its Certification process which is designed as an external quality review of 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 international students to 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 places students 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 have been in the student recruitment business for two years, and have a successful record of placing students in accredited post-secondary programs or institutions. The date of first student placement must have been at least 18 months before the AIRC application is made.

Agencies must have a record of placing at least 25 students total before applying for AIRC certification. Agencies that are at least two years old but have placed between 25 and 50 students in accredited post-secondary programs or institutions may apply for AIRC Certification, however they may be awarded conditional certification until they have a more substantial record of student placements.

Agencies which have a successful record (at least two years of placement of at least 25 students) of placing students at U.S. accredited secondary schools only, and that intend to use this experience for recruiting students for the U.S. post-secondary programs and institutions, are also eligible to apply for AIRC certification.

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: http://www.airc-education.org/AIRC_Certification.htm. 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.

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 Board 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 Board 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 and 2 printed copies (including all Appendices) should be couriered to:

AIRC Certification
4710 Rosedale Avenue
Bethesda, Maryland 20814 USA
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 on-site 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 achieved Candidacy).

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:

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 post-secondary 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
- 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. higher education system 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.

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: <http://www.airc-education.org/airc-certification-applic>, 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, 2010 – November 2015). 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 Board 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 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.

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 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 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.

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 at <http://www.airc-education.org/call-comments>. 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.

AIRC Certification Process & Standards Manual

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 http://airc.membershipsoftware.org/files/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 postsecondary education reflects a diverse, semi-autonomous and independent composite of institutions. In the diversity of the system lies its strength. By design, postsecondary 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. postsecondary 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. postsecondary 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. postsecondary 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. higher 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 postsecondary 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. postsecondary 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. postsecondary 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. postsecondary education.

APPENDIX B



AIRC Self-Evaluation Report Form

v.3. 2012
1/3/2012

Self Evaluation Report Form

American International Recruitment Council

The following pages are designed for the applying agency to respond to each of the AIRC Certification Standards as part of its Self-Evaluation process. Agencies may request a downloadable form from certification@airc-education.org and expand sections, as space is needed to reply to a Standard. When completed, the Self-Evaluation should be sent to: certification@airc-education.org and two hard copies with appendices should also be couriered to AIRC Certification, 4710 Rosedale Avenue, Suite 200, Bethesda, Maryland 20814 USA Phone: +1 240 547 6400. Suggestions related to how an agency should conduct a Self-Evaluation are found in the AIRC Certification Manual under The AIRC Certification Process.

Please note that the **Application Form** for AIRC Certification or Re-Certification (Appendix B), submitted at the time of application for AIRC Certification, should be double checked for accuracy as it helps provide the organizational context for the external evaluation and responds to some of the Standards which follow. The Certification process, and thus this Self-Evaluation, applies to all locations and jurisdictions in which your agency carries out recruiting services and which appear on the Application Form.

Date of Submission: _____
Month Day Year

Agency Name (as it appears on Agency Application Form)

Primary contact person

Name: _____
SURNAME First Name Middle

Mailing Address:

Contact Numbers

Phone: _____
If dialed in country

If dialed internationally

Mobile: _____
If dialed in country

If dialed internationally

Fax: _____
If dialed in country

If dialed internationally

Standard 1: Organizational Effectiveness

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.

1.1.1 Provide evidence that the recruitment agency has clear and publicly stated purposes consistent with its mission and appropriate to an agency of international student recruitment.

1.1.1.a State the mission, purpose and/or vision statement which appears in the agency's public and/or operational documents. (Include a copy of these documents here or as an Appendix.)

1.1.1.b Provide a brief statement as to how the mission and purposes provide the framework for the organization's organization and services:

1.1.2 Provide evidence of long and short-range planning Briefly describe below how the agency plans for the short and long term. Provide documentation of the planning process such as: minutes of meetings, a business plan, a strategic plan and/or other evidence of planning.

1.2 Governance and Ownership

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

Please provide at this point in the Self-Evaluation Report (or clearly marked as an Appendix) an organizational chart which includes the owner; what body or individuals are primarily responsible for the agency - e.g., governing board and/or senior staff; and how the agency is otherwise organized to carry out its services. Please include the names of individuals for each part of the chart. Include who is responsible for recruitment services, including sub-agents, if applicable. How the decision-making process works can be found in Standard 1.3.1.)

Note: 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.

1.3 Effective Management

1.3.1 Decision-Making Processes. The agency is sufficiently organized to accomplish its purposes through organizational structures, policies and procedures.

Please check your AIRC Application Form to assure that the information is current for each jurisdiction (municipal, canton/province/state, and/or country) and the nature of the legal status (e.g., incorporated, chartered, etc.) in which the agency conducts business. If you need to make additions, please list all jurisdictions below and provide a copy of relevant legal documents for each corporate entity in the Appendix.

If not listed in the AIRC agency application please also list here any persons or entities that are involved in the recruiting of students for your agency such as sub-agents or sub-contractors. Note the nature of the engagements, such as memoranda of understanding, consulting agreements, partnership agreements, etc.

1.3.1.a Referring to the organizational chart provided in 1.2, describe briefly how the decision-making process flows - i.e., what individuals or groups of individuals make what decisions at what levels.

1.3.1.b Provide sample minutes of meetings, Bylaws, or other documentation representing the decision-making process of the agency. List them below and note where they can be found in the Appendix.

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.

Please provide evidence of how the agency assures the following for all its employees *and* any sub-agents that provide counseling to students.

1.3.2.a Qualified staff.

1.3.2.b Best professional practice among its agents.

1.3.2.c Currency with laws and regulations related to recruiting, immigration, visas, labor regulations, taxation, etc.

1.3.2.d That its new and continuing agents maintain currency with vital information and processes - such as through institutional visits, attendance at professional conferences, continuing education and professional reading which can be measured.

1.3.2.e Briefly describe how agents and sub-agents are evaluated.

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.

1.4.2a Carefully describe all recruitment services and activities, including all countries and office locations in which these services are provided (if different or in addition to the information provided on the AIRC Application for Certification or Re-Certification at Appendix B):

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

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.

1.4.3a Describe the sub-agent activities in recruiting students. If activities of different sub-agents vary, describe the varied activities.

1.4.3b Provide a narrative of how a typical student is provided with counseling and advising for study abroad from their initial referral to the agency to the submission of their admission application.

1.4.3c At what point does a student's application or file transfer from a sub-agent to an agency branch or headquarters for completion and submission to U.S. institutions?

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 be sustainable in order to serve students and institutions appropriately. Please provide recent documentation which reflects compliance with third party financial review, such as an official response to national financial reporting, although preferred would be an independent external audit which is no more than 5 years old. Please indicate where in the Appendix documentation can be found, unless you indicate that this was already submitted with the AIRC Application Form.

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.

1.5.2a Provide a complete listing of all fees for recruitment services, including but not limited to counseling, processing applications, visa advising, etc. and sample documentation of where and how this information is made public – including publications, websites, etc.

1.5.2b if sub-agents of the agency carry out recruitment note at what point and how the student is informed of 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:

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 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.

State below the agency's policy on the handling of student scholarships and financial aid and provide documented evidence of how it is made public. If the agency has a fee for assisting students with scholarship and financial aid applications provide evidence of how the fee is made public.

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 it serves.

It is critical that agencies can distinguish the fundamental differences between the U.S. educational system and that of other Anglophone systems, in particular the U.K. and Australia. AIRC will provide professional development opportunities concerning the educational system in the United States and agencies which seek AIRC Certification will be expected to have their key recruiting staff participate.

Please provide a list of staff members and AIRC professional development programs or other development activities related to the practice of counseling students each person (counselor, agent or sub-agent) has attended. If the agency has additional means for keeping its agents current on U.S. educational practice, provide examples.

2.2 Advertising/Marketing

The agency represents itself honestly, claim competency when demonstrable, and avoid misrepresentation.

Provide AIRC with a descriptive list in this report and provide copies of all electronic and/or printed publications, website addresses and a description of other forms of advertising which describe the agency's recruitment services. If the agency engages sub-agents and they do their own advertising, include these ads.

If these are in electronic form, place them in the Appendix of this report. If they are in printed form, please deliver by express mail 3 copies of each document to the AIRC Certification office at the time this Self-Evaluation form is submitted.

2.3 Respect for Intellectual Property

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

Provide any policy or statement the agency has related to intellectual property. If the agency engages sub-agents describe how the intellectual property policy is enforced with them.

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 employed or contracted by the agency to transact the whole, or part of the student recruitment process. A franchisee is an individual who purchases the rights to use a company's trademarked name and business mode to do business.

2.4.1 Explain how the 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

2.4.1a If the agency engages sub-agents, provide AIRC with any past or current issue about which the sub-agent has received complaints and describe briefly what the agency has done to correct this situation.

2.5. Conflicts of Interest

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

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.

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 reflect the agency's philosophy of service.

2.6.1a If the agency engages sub-agents, provide AIRC with any policy statements and/or evidence of training programs for the sub-agents that reflect the agency's philosophy of service and transparency.

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 postsecondary institutions or programs.

Describe how the agency's operations and services reflect appropriate and accurate recruiting, advising and placing student clients in the areas listed below and provide relevant documentation (representative examples or samples) in the Appendix or at this point 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, and kept on file for Re-Certification.

2.7.1. Indicate how the agency updates and follows the instruction of the U.S. Consulate in regard to immigration procedures.

2.7.1a If the agency engages sub-agents, indicate how the agency ensures the sub-agent(s) receive updates and follows the instruction of the U.S. Consulate in regard to immigration procedures.

2.7.2. The agency uses current information about institutions such as 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. Provide a representative sample of how this information is shared with student clients either here or in the Appendix.

2.7.2a If the agency engages sub-agents, indicate how the agency ensures the sub-agent(s) keep current about institutions in the areas as listed in 2.7.2. Please provide a representative sample.

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. Please provide a representative sample.

2.7.3a If the agency engages sub-agents, indicate how the agency ensures the sub-agent(s) provide accurate information about the specific nature of the institution to which a student is being recruited in the areas as listed in 2.7.3. Please provide a representative sample.

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. Please provide a representative sample if different from above.

2.7.4a If the agency engages sub-agents, indicate how the agency ensures the sub-agent(s) provide accurate information concerning the nature of the academic qualification/degree being received as per location above and degree level. Please provide a representative sample if different from above.

2.7.5.The agency provides accurate information related to the transferability of academic credit. Provide a sample statement which you share with clients.

2.7.5a If the agency engages sub-agents, indicate how the agency ensures the sub-agent(s) provide accurate information related to the transferability of academic credit. Please provide a representative sample.

2.7.6 The agency provides accurate and current information concerning the cost of travel to the host institution. Provide a sample of this type of information.

2.7.6a If the agency engages sub-agents, indicate how the agency ensures the sub-agent(s) provide 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. Describe how the agency does this.

2.7.7a If the agency engages sub-agents, describe how the sub-agents provide appropriate services to minor students.

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 upfront disclosure of services and related fees.

Provide an example of a written contract (formal agreement) 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.

3.1.1a If the agency engages sub-agents, describe how the sub-agents provide the student service contract to student clients.

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. Provide evidence that confidentiality of records is maintained.

3.1.2a If the agency engages sub-agents, describe how the 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.

3.1.3 In the case of minor students under the age of 19, 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.

3.1.3a If the agency engages sub-agents, describe how the sub-agents include parents in the communication process for students under the age of 18.

3.1.4 Promises or guarantees are made by the agency only when backed by facts that they will be achieved. Does the agency have an operational policy to reflect this? Provide an example.

3.1.4a Do sub-agents have an operational policy to reflect this? Provide an example.

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.

Please demonstrate how agent counselors and any sub-agents are trained on this U.S. general admission practice.

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. Please indicate here if this is currently an agency practice or describe the agency's plan to commence this practice.

3.2.2. The agency keeps recent (within 3 years) student/family client satisfaction records on file for purposes of external review. Please indicate here if this is currently an agency practice or describe the agency's plan to begin this evaluation practice. (These will be important for AIRC Annual Reporting and Recertification.)

Standard 4: Institutional Engagement Pre- and Post-Recruitment

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). 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 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). Provide a sample 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:

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

4.1.4 The agency provides legitimate documents to institutions which are properly notarized or attested as to their authenticity. Describe the process of ensuring authenticity and provide an example.

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 checks for authenticity of student documents and how it ensures originality of student work and provide an example.

Describe how the agency explains the importance of authenticity of documents to its student clients and their families.

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. Please describe this practice or your plan to begin this practice.

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.

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

Appendices & Supplemental Information to Self-Evaluation Report

Please provide a summary below of what documents you have submitted to supplement this Self-Evaluation report either as an Appendix (if in electronic form) or as separate printed documents. Indicate at which Appendix or page number these can be found. This can include such items as brochures which describe agency services, an example of student records, bylaws, minutes of meetings, contracts, summaries of client satisfaction or other documented evidence of complying with the AIRC Certification Standards.

List Standard Number	Nature or Title of Documentation (Write Standard number at top of each document)
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