AGENCIES, THIRD-PARTY VENDORS, AND THE GROOMING OF THE COLLEGE APPLICANT IN CHINA

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To the memory of Diogenes the Cynic

and his search for an honest man

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It is because of such individuals that this topic had to be examined.

ABSTRACT

AGENCIES, THIRD-PARTY VENDORS, AND THE GROOMING

OF THE COLLEGE APPLICANT IN CHINA

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This dissertation is an examination of the implications of the sudden increase in the use of agents in admission practices. For a variety of reasons, there has been an increased interest in globally educating students, both on the part of host institutions and on the part of sending countries. Reasons include worldwide visibility of universities, enrollment targets, diversity goals, full fee-paying "customers," but also impact on local economies, not only because of revenue brought by these students but because of contributions to the labor force. This interest has fueled the admission profession's gradual acceptance of agents and third parties working with international populations. With the emergence of China as a new "market" of able, fee-paying students, there has been explosive growth in agents and third-party vendors, often with little attention to regulation of the practice. This study examines in greater depth the forces which have contributed to the acceptance of agents, the resulting cynicism of students and educators, and the possible long-term effects of the growth of the industry.

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CHAPTER ONE: INTRODUCTION

NACAC Commission's report on the use of agents

In 1992, the Higher Education Act was amended to prohibit the use of commission-based agents in the admission process (Pub. L. No, 89-329, Section 487[a][20] of the Higher Education Act of 1965). A scheme involving Pell grants had prompted the change; students eligible for federal funding were enrolled in some tertiary institutions despite their lack of preparation so that the institution could harvest federal funds (NACAC, 2006).[1] A 1984 government report had indicated that 66% of the 1,165 institutions "in their universe" had lured students to their gates by misrepresenting themselves to varying degrees in the recruitment process (Government Accountability Office, 1984, pp. 15–17).[2] The government reacted by prohibiting use of commission based agents in the United States, but left open the use of commission-based agents abroad. At the time, the general opinion of admission officers was that agents should not be used internationally if they could not be used nationally. Published statements by the National Association for College Admission Counseling (NACAC)[3] reflect the prevailing sentiment on admission issues, and this was no exception; the assembly approved revisions to the Statement of Principles of Good Practice (SPGP) to extend the prohibition against commission-based recruiting to international students (NACAC

[1] Some for-profit institutions put pressure on students, via agents, to enroll, resulting in "losses of hundreds of millions of dollars to students and taxpayers through defaulted loans and wasted financial aid" (NACAC, Policy Brief on Incentive Compensation, 2006).

[2] The abuses enumerated were many and included the admission of unqualified students, misrepresentations, "making errors in computing and disbursing Pell Grant awards and refunds, among other abuses" (GAO, 1984). Legislation banning commission-based agents came eight years later. For further discussion, see Review of Literature s.v. Conflicts of interest and ethical concerns.

[3] NACAC is the professional member organization for college admission counselors in both tertiary and secondary education. It features prominently herein because as a member organization, it represents the voice of the college admission counseling profession.

History: 1993). As early as 1951, NACAC had anticipated the HEA Amendment of 1992, and had stated in its SPGP that admissions counselors should be paid a fixed salary rather than commissions or bonuses (Ballinger et al., 2013). As late as 2011, board notes stated,

> The Board of Directors and the Admission Practices Committee affirm NACAC will not abandon the principle that payment of commissions based on the number of students recruited or enrolled is fraught with problems and stimulates behavior that is against the interests of students and the profession. (NACAC, 2011, p. 2)

This statement reflects the belief that such a practice did not serve the student. When it became evident, however, that many of the constituents of NACAC were in fact quietly using agents to bolster enrollment, to increase visibility, to attract fee paying students, or to enhance their rankings, NACAC appointed a commission to investigate agent use and to make recommendations to the assembly.

The focus of the Commission on International Student Recruitment was China because of the higher numbers of Chinese applicants seeking an education in the United States (Ballinger et al., 2013). The conclusions of the Commission, published in June 2013 and presented at the national conference of NACAC the following September, recommended a cautious endorsement of agents. At the beginning of the document, the commission stated it maintained concerns and did not encourage commission-based recruitment (Ballinger et al., p. 4). Throughout the document, the commission interjects caution; it stresses that its recommendation should not be seen as a blanket endorsement (Ballinger et al., p. 7), and it enumerates risk factors such as potential misrepresentation of the nature of specific institutions to students and misrepresentation of documents to institutions (Ballinger et al., p. 12). It urges transparency and integrity, suggesting that

these principles might be compromised (Ballinger et al., p. 31). From the language of the document, it appears that many commission members remained unconvinced that permitting this practice was good for higher education.

NACAC's about-face was announced at the national meeting which, in 2013, was held in Toronto. This was the first time the annual gathering was held in another country and heralded a change in the organization's self-image. It was now a global, and not only domestic, organization. The government had identified a conflict with reliance on agents. The possibility of conflict was an issue which already had been anticipated by NACAC as early as 1951 (Ballinger et al., p. 9). NACAC's shift in sentiment triggered many questions, among them Why the shift? Why were agents no longer "against the interests of the student and the profession?" Is there a conflict of interest in the use of third parties who recruit and prepare students for placement, as is implied by the previous quote? What are the effects of the growth of the industry on perceptions of education?

To understand this shift, namely the rationalization for and the growth of the agent industry, it is important to explore the forces and the historical factors that have supported the practice, such as the push toward internationalization, the market forces influencing higher education, and student migration. The practices which have been adopted to meet institutional needs come with ethical concerns for admission offices in their recruitment of international students, and concerns about growing commercialization in the process, issues which are often raised among NACAC members at annual conferences, and at the International Association for College Admission Counseling (IACAC). To gain a better understanding of their role, it makes sense to

understand the portfolio of activities in which agents are involved to support the stakeholders.

In order to examine further the growth and complexity of agents and agency, this study focuses on two agencies in China, where the growth of a market of students along with third-party vendors to facilitate the process for both students and institutions has been the most pronounced. Understanding of agency work is limited, as are the perceptions of those using their services. The questions which guide this study pertain to some of the functions and activities of agents and agencies, as well as the perceptions of those with whom they interface. How do the two agencies interact with students, secondary schools, tertiary institutions, and professional organizations? How are these interactions perceived by the various stakeholders? A familiarity with the various definitions of the term *agent* is important as an introduction to these questions.

What is an agent?

The definition of *agent* is vexed. What follows recreates some of the interpretations and nuances which might be part of any attempt at a working definition. This study assumes the broadest definition of an agent or agency as a third party, even though its focus is two multiservice agencies.

Any discussion about agents at professional conferences which concentrate on international student admission, such as IACAC,[4] whose membership includes institutions all over the world, invariably includes a lengthy conversation about the definition of *agent*, particularly since different institutions hold different perceptions, and NACAC/IACAC international membership contributes to the complexity. Even a recent

[4] Overseas ACAC; as of January 1, 2016, International ACAC.

NACAC publication on international agencies starts with a working definition pertinent to the publication, suggesting that the reader might benefit from clarification (West & Addington, 2014, p. 7). Individual agents have grown into agencies.[5] Some agencies have grown into corporations, moreover, and continue to transform. The definitions offered below are therefore many and reflect the tenor of the discussions.

An agent in the broadest sense of term is a third party—employed by an educational institution, or a student, or both—who helps institutions and students find one another, much as a head hunter or search firm might help potential employers or employees find one another. The broad definition is the working definition for this study. Given that more narrow definitions have been used and continue to be used, it may be instructive to outline the evolution of the term and the context of the narrower definitions, especially because there continues to be disagreement. Moreover, internationally the term can be understood differently, adding to confusion.

The 1992 Amendment to the Higher Education Act (HEA) refers to commission-based agents, but that designation in itself might imply a category of agents who are not commission-based. In light of the fact that one of the concerns of NACAC, as a member organization, was interpretation of the HEA, NACAC put an emphasis on issues about incentive compensation.

Jean Krasocki, in a 2002 publication on agents for the British Council, defined an education agent as "an individual, company or other organization providing services on a commercial basis to help students and their parents gain places on study programmes

[5] Since "agencies" presuppose agents, the terms are often used interchangeably, according to the context. An agency cannot exist without agents.

overseas" (Coffey, 2013, p. 13). As noted, she wrote for the British Council; however, because student mobility is an international issue and because educators in each country often consult the practices of other countries, language and definitions used in one place often influence other places. The 2013 Report of the Commission on International Recruitment, for example, references the practices of other countries, as does a monograph on the history and development of the American International Recruitment Council (Ballinger et al., 2013; Leventhal & Rota, 2013).

NACAC, as recently as 2010, defined *agent* as "an individual, company, or organization that provides advice, support, and placement services" (2010) and continued to refine the definition as it pertained to those working internationally.

> International agents operate in three primary ways. First, agents can serve as contract representatives of a college or collection of colleges exclusively. . . . Second, agents can represent students, much like independent counselors or educational consultants in the United States. . . . Finally, agents can serve as both contract representatives of colleges and representatives for students. (NACAC, 2010, pp. 1–2)

Yi (Leaf) Zhang further elaborated on the agent role. Zhang's dissertation, a quantitative study of the student experience with the use of agents in one city in China, reports findings on the role of the agent based on student responses (Zhang, 2011, p. 134). Most students indicated that they used agents to help with student visa applications. Some retained their agents in their college years for coaching and support. This was a broader role than that suggested in any of the definitions used by the UK, the US, and Canada, and included any third party that facilitated the transition from high school to college. This broader definition suggested that agents were becoming more complex.

Linda Hagedorn, who was Zhang's dissertation advisor, defined *agent* as a person, agency, or consulting company that helps a student with some aspect of the application process (Hagedorn, 2015, p. 8).

Richard Coffey and Leanne Perry (Michigan State University), in a 2014 report commissioned by the Council of Ministers of Education, Canada, offered the following definition: "Agents and agencies provide advice, counsel, and placement assistance to prospective students and their families. They are paid for their services by the educational institutions they represent, the students they assist, or both" (Coffey & Perry, 2014, p. 3).

The broader definition was reflected in subsequent publications, as well as earlier ones, which further refined the differences and similarities between agents and people more intimately involved in students' educational journey. Educational agents were independent contractors who are privately hired to coach or help students, whom they usually never have advised or taught, with the college admission process, or who have been hired by institutions who seek to increase enrollments or to enroll certain types of students (Altbach, 2015; Ruby, 2011).

The focus of NACAC, however, often remained on the narrower definition—i.e., commission-based agents, even after so many broad interpretations, including its own broad interpretation of 2010. The 2013 Report of the Commission on International Student Recruitment focused specifically on commission-paid agents, again in response to the 1992 Amendment to the HEA, which addresses commission-paid agents (Ballinger et al., 2013; Pub. L. No, 89-329, Section 487[a] [20] of the Higher Education Act of 1965). The heightened concern of those who examined this issue of agent use in the

US was the perception that "commissioned 'sales' of college admission" was a breeding ground for unethical behavior (NACAC, 2006). Double-dipping (when an agent or agency double-charges or acts as a dual agent), for example, is a practice that most of the commission members regarded as a conflict of interest and a danger over which tertiary institutions exercise little control (Altbach, 2015; Ballinger et al., p. 13). That which was legal could come into conflict with best practices. Gradually, publications and discussions indicated a more lenient position, however, as there was deliberation on the ethical use of agents and the avoidance of conflicts (Ballinger et al., 2013).

NACAC continues to focus on the narrower definition and to address caution in the use of commission-paid agents. It does permit the practice, though, even while counselors and admissions professionals caution against the use of agents, in the broader sense of the term, who charge students exorbitant fees, which can escalate depending on the ranking of the receiving institution (West & Addington, 2014; private communication with a former agency employee, December 2015). NACAC acknowledges the fluidity of the field and that the practices and the definitions of agent are no longer straightforward (West & Addington, 2014). It also points out that, to students, the differences might not be so obvious. This is reflected in the definitions offered above.

Changes in the definition, however, have occurred because of distinctions which that have become blurred, especially in multiservice agencies having many functions. Internationally, the definitions provide no more clarity. Traditionally, for example, there has been a differentiation between private counselors, or independent educational consultants—namely, individuals employed by a student to assist in the college admission process—and agents, who are retained by a college or university and often

paid by the head (West & Addington, 2014, p. 7). Today, many agencies are full-service offices which fill different functions: they can deliver certain curricula to schools, act as an outsourced school counselor, provide visa assistance, advise students on secondary or tertiary education both in a school context and privately, head-hunt for tertiary institutions, provide college visit services, set up "cram" schools, and coach for external examinations such as the TOEFL or SAT. There are hybrid organizations whose clients include schools and/or universities but which take on private students as well. These often are accompanied by actual, potential, or perceived conflicts of interest. For example, one agency, which calls itself "Admissions Office," is hired by national schools to advise students interested in studying in the US. For those high schools, Admissions Office provides the services of a traditional high school–based college counselor, such as advice on appropriate colleges which are a good fit, in addition to private counseling services for students who are not enrolled in schools which that have a US-style counselor. When a student is accepted, however, Admissions Office takes credit for the decision as a private agency in order to attract more private clients. The complexities of the practices and the subsequent development of different business models by many of the agencies have demanded a broader definition.

If many functions exist within one agency, the fee structure can be equally complex. One type of agency, or one type of service within a multiservice agency, can receive a commission, typically a percentage of first-year tuition, according to some US public university officers. The agency might charge a student, however, for extra services on the application, or for extra time. The agency might specify in a contract that

charges will be on a sliding scale depending on the ranking of the university to which the student has been admitted, according to an education officer in China.

The agency might charge a secondary school if it serves as a kind of outsourced counseling office for applications to foreign universities. It may even outsource some of its services, such as college fairs or presentations, to other agencies. If the agency is paid by the school (and indirectly by the student who pays the school tuition) for any kind of preparation for students who intend to study abroad (test prep for SATs or Test of English as a Foreign Language [TOEFL], curricular services for the Advanced Placement [AP], counseling services), it can charge an additional fee for more time given to the student. An agency with different services might have a separate fee structure for each service it offers. "Commission-based," therefore, is clearly no longer an adequate definition for agents as the industry has become complex.

The broader context in which agents, particularly in China, may be seen puts them in the tradition of middlemen, known as compradors. During the China Trade, the role of the comprador was to work with foreigners in transactions involving business and trade (J. Wrenn, personal communication, March 2015). This class of middlemen evolved to meet the needs of Chinese who needed assistance in dealing with companies from abroad (Feldman, 2013). Students seeking an educational opportunity abroad are no exception; they, too, need assistance in negotiating educational opportunities in other countries. Similarly, institutions seeking international students, or seeking help in implementing a curricular program, need expertise in their dealings with China.

Accordingly, this research uses the broader definition of agents and agencies—i.e., any entity employed by an institution or student, or both, or any entity which that has

different branches, one of which may serve as a kind of buyer's agent while another may serve as a seller's agent. The broader definition is appropriate, moreover, both because business practices and agencies themselves grow and are transformed, and because the debate about the use of agents in NACAC and other professional circles is not always limited to the narrower definition. It is not only the student for whom distinctions are not clear. The term *agent* is often used to denote any externally paid third party in the process, in part because practices have become more complex and definitions hazy.

For the purposes of this study, agents can fit any combination of the definitions offered above because the role of the middleman to the admission process of tertiary institutions is the focus. Since the student, as the heart of the educational process, is the person with whom we should be most concerned, it seems appropriate to consider any third party in the process, no matter how they are compensated or what services they offer.

History

What precipitated the renewed interest in this issue? In fact, the issue seems to resurface periodically. Although the emphasis has been on commission-based agents, some of the very concerns that have been raised for this arrangement have been voiced for third parties in general (Altbach, 2015, pp. 11–14). It may be useful to consider the history of the issue and the views which that have been published by professional organizations such as NACAC.

In NACAC's SPGP of 1951 there is an indication that admission counselors once filled the very role that agents occupy now: they received commissions or bonuses for the students they recruited. The organization at the time felt a need to stress that admission

counselors be "viewed as professional members of their institutions' staff," evidence of which would include a fixed salary. There was a need, at that time, to address the issue of how admission professionals were to be compensated.

Just because a university pays someone a fixed salary, however, it does not follow that the person is a full-time employee, analogous to contract or adjunct labor. The commission report of 2013 clearly interprets the 1951 statement to mean that the college admission profession is more closely aligned with the educational mission of a university than an outsourced work force would be. Admission professionals are "not simply a sales force working on the institution's behalf" (Ballinger et al., 2013, p. 9). Despite NACAC's acquiescence in the practice of using agents, there is a clear preference for a model in which admission employees are viewed and employed as any other department of university administration.

Yet when the Higher Education Act was amended in 1992, it was clear that despite NACAC's earlier statements, some institutions engaged agents to enroll students and harvest federal funding. Although the amendment had left open practices regarding international students, the NACAC perspective at the time was that rules that applied to domestic students should govern all students. The organization was decidedly against the use of commission-based agents because of the potential conflicts. A position brief outlined the history of the issue and decried agent use.

> Commissioned "sales" of college admission produces incentives for unethical behavior. Reducing the basis for compensation to the number of students enrolled in any circumstance introduces an incentive for recruiters to actively ignore the student interest in the transition to postsecondary education, and invites complications similar to those that preceded the enactment of the ban on incentive compensation under the 1992 Higher Education Act reauthorization. . . . Combined with the incentive to boost enrollments, the motivation for "serving" students is tainted. (NACAC, 2006, p. 2)

Institutions used agents for specific programs, or for a limited number of international students (personal communication with a high-ranking official from a state university, November 2015). The sudden increase in Chinese applicants in the mid-2000s meant a surge in the dependence on agents.[6] When it became clear that much of the membership engaged in agent use, NACAC formed a commission to investigate.

Other factors converged which helped to put a spotlight on the issue of increased agent use. With the exponential increase of Chinese students seeking university placement at the undergraduate level, there was an increase in the requests to College Board for a code or authorization of AP examination delivery to accommodate students preparing for tertiary study abroad, according to a College Board representative. Given that schools could not plan for the new curricula quickly, they and the College Board turned to facilitators to introduce the AP program into schools (personal communication with College Board representative, November 2015). The College Board partnered with several providers, currently slightly more than two dozen, to help facilitate the delivery of the curriculum and the training and hiring of teachers. In partnering with these providers, the College Board also worked through the Chinese Ministry of Education. Curriculum delivery was not new, but the sharp demand for more AP programs was. Historically, it was the modus operandi for middlemen to facilitate dealings with foreigners (personal communication with James Wrenn, March 2015), such a system was acceptable and even expected. Foreign curricula were not limited to the US-based AP. A number of schools

[6] In 2007–2008, the number of students from China soared, increasing nearly 20% from the previous year. The following five years witnessed increases of more than 20% (Open Doors Fact Sheet, 2015).

offered curricula such as the British Advanced levels (A-levels) and the International Baccalaureate (IB).

With the emergence of many new programs which prepared students for study in the US and a bevy of students eager to matriculate, many US tertiary institutions turned to other middlemen to help negotiate cultural and linguistic barriers, as well as any obstacles created by modest national and international rankings, to help attract students to their campuses.

To onlookers from the world of admission, it seemed clear that the commission's report would recommend lifting the ban on commission-based agents (personal communications, IACAC). Already, agents in the broader sense—i.e., third parties such as independent counselors—attended international admission conferences such as IACAC. Member institutions, both on the secondary and tertiary levels, used agents. Since NACAC was a member organization and had to listen to the voice of the membership, it came as no surprise that it would change its rules.

The issue of ethics in recruiting was much discussed by admission professionals and secondary school counselors at these conferences. In the words of one NACAC representative, "Our standards say one thing. The law says one thing. Here's our member colleges, a significant chunk of them, doing something very different overseas, and we have to come to grips with what that is and how that applies to our standard." One might ask why NACAC had not taken action sooner. NACAC is a member organization, with regional chapters, which primarily serve domestic secondary schools and universities. There is a relatively young international chapter, but the focus has been on domestic issues such as funding for underserved students or matters pertaining to the

application. To this day, most of the secondary school membership does not understand the impact of the agent issue because it does not apply to them.

The issue began to gain momentum because of media inquiries and relevance to the SPGP. When the Commission on International Student Recruitment began its deliberations, commission members reported skepticism, and they still are skeptical, as is reflected in their very cautious and sometimes reluctant approval of commission-based agents indicates. NACAC has since developed brochures such as *International Student Recruitment Agencies: A Guide for Schools, Colleges, and Universities* (West & Addington, 2014) and recommendations beyond those found in the commission report. Although designed to underline the importance of integrity, transparency, and accountability, a publication can imply acceptance and even approbation—however cautious and reluctant—of agent use. A second publication, a guide for students, has the same implication. And yet the alternative was producing no guide, which seemed more dangerous.

At the fall 2013 annual meeting at which the Commission's report was accepted, the International Association for College Admission Counseling (IACAC) raised important issues in conversation. That meeting was held in Toronto, the first and only time the meeting took place outside the US. It heralded a new era for education and indicated an acceptance of globalization. Yet there were questions on the part of secondary schools abroad. Can the schools allow an agent to recruit? Can agents recruit US citizens, given the ban on recruiting domestic students, if the school is abroad? If they can recruit non-US citizens, how can they be allowed into a school when the school has to tell US citizens that they cannot participate in a meeting? Furthermore, can agents

of foreign universities—say, in the UK—recruit students in US schools to attend institutions in the UK? Curiously, US secondary institutions—which were very willing to allow agents to recruit in international secondary institutions—were visibly distressed at the suggestion of including agents who recruited in US secondary schools for tertiary institutions abroad. All of these questions underscored some of the dilemmas secondary and tertiary institutions faced in introducing direct interaction with third parties and suggested that interactions were fraught with potential conflicts.

For US higher education, agents provided a pathway to new markets and ensured enrollments. They were, moreover, a route to worldwide visibility of the host universities. Arguments in favor of increased international presence included impact on local economies, both because of revenue brought by these students and contributions to the labor force. (See IIE: Open Doors, 2015. Enrollment figures, benefits for the economy, and for the labor market are cited in the various fact sheets.) Agents provided access to students who could add to diversity on campus and who could pay the total fee or a large part of it. One state institution pointed out that foreigners who received a partial scholarship were nevertheless paying an amount greater than that paid by an in-state student.

The open debate about the use of third parties who have direct interaction with students in the college application and recruitment process and about agents, both in the narrower and in the broader sense of the term, spawned by NACAC and the 2013 Report of the Commission on International Recruitment represented a shift in thought. According to one university participant in this study, not 10 years before the commission report of 2013, the term *agent* was not a concept discussed in "polite company." As a

result of the Commission Report on International Student Recruitment of 2013, the agent debate has become part of every NACAC conference and has dominated the discussion about best practices among those charged with international recruitment, as the programs of the annual IACAC will attest. The open discussion heralded a sort of acceptance of the practice.

Students as market forces

Neil Ruiz, in two studies published under the auspices of the Brookings Institute, sees international students as desirable because they help build a "knowledge economy." Ruiz saw international students as helpful to the economy, but also helpful to international understanding as the students then presumably returned to their home countries (Ruiz, 2013 and 2014). The presence of international students has been a celebrated source of economic benefit (IIE, Open Doors, 2015). Even though there have been misgivings and criticism about the amount of money paid to agents by public institutions both in the US and abroad—despite the American International Recruitment Council's claim to their acceptance abroad—the rejoinder has been that the economic benefits far outweigh the expenditures. And yet there are questions, even abroad.

A Times Higher Education survey of UK universities, for example, found that total commissions paid to agents amounted to 86.7 million pounds (ICEF Monitor, 2015), and that all but 19 of the 158 higher education institutions used agents to enroll international students. Another reported that agents were paid an average of 1,767 pounds per non-European Union recruit (Havergal, 2015, https://www.timeshighereducation.com/news/agents-paid-an-average-of-1767-per-non-

eu-recruit/2018613.article).[7] Governments, however, readily reported how much income is generated from international students. A press release from the UK government reported a push "to grow UK's 17.5 billion pound education exports industry" (https://www.gov.uk/government/news/new-push-to-grow-uks-17.5-billion-education-exports-industry). Australia's trade minister, Andrew Robb, indicated that the 16.6 billion Australian dollars that international students brought to the Australian economy made international students Australia's fourth largest industry, right behind natural gas (20 billion), according to the *Australian* (2015).

The International Institute of Education (IIE) reported that international students bring close to 30 billion US dollars to the American economy (http://www.iie.org/Research-and-Publications/Open-Doors/Data/Economic-Impact-of-International-Students). Even Michigan State University states in its statistical report that international students contribute $273 million to the Greater Lansing economy (http://oiss.isp.msu.edu/about/statistics.htm). With almost a third of international students coming from China, Chinese students have an impact on the US economy. In addition, according to an Organisation for Economic Co-operation and Development (OECD) report, public and private suppliers of education see international students as a source of income (http://www.oecd.org/education/skills-beyond-school/EDIF%202013--N%C2%B014%20%28eng%29-Final.pdf). The economic benefits of international students also have contributed to the agent phenomenon.

[7] A recent visit to several East Coast US universities by a group from the UK included agency involvement. The agencies helping the delegation plan recruitment activities so as to attract US students to the UK.

Why this study?

The purpose of this study is to examine the offerings of two multiservice agencies which act as middlemen for students and US tertiary institutions, and the perceptions of those interactions. The two agencies themselves are the foci of this study. Their names have been concealed, even in direct quotes from those who were interviewed for this study.

Agency A and Agency B are two of many large-scale, multiservice agencies, also called "companies" or "organizations" in this study, that offer assistance which offer many services relating to different aspects of the college preparatory process for students who plan to study abroad. Their functions include any combination of the following: college counseling, advising, teacher training, counselor training, test preparation, independent counseling services, curriculum delivery, curriculum development, interview services, transcription verification services, document translation services, visa facilitation services, financial advising (as it pertains to college), educational conferences, college fairs, summer camps, educational tours, exchange programs, board work, and collaborative arrangements with high schools in other countries.

They are, in other words, agents in the broadest sense in that they offer a broad range of college preparatory services and have a complex fee structure. They produce students who test well on various international examinations such as the AP examination, and they provide extracurricular opportunities for students. Each of these agencies will be introduced in more detail in the sections devoted to them. Both are based in China but have offices in the US. This study describes the services but focuses on the services of

the agencies which are located in China and engage with the college admission process. Their clients are primarily Chinese students.

It is important to underscore that China is but one location of multiservice agencies; there are similar agencies in the US as well, and there are agents worldwide who are ready to help students who seek an experience from beyond the borders of their own country.[8] Some of these are multinational collaborative efforts, even as others are based in one country.

Each of the organizations in this study has its own programs and its own mission, but the focus is not on the differences except insofar as they help to showcase the nature of each operation. This study examines only their relationship with US college admission offices, not admission to universities in countries such as the UK, Australia, or Canada. Although there are many similarities between practices in the US and abroad which that are often referenced, the admission process in those countries is different and recruiting is often outsourced.

Why China, and why a multifunction agency? Mainland China has been the largest source country of overseas students in the world in the past several years (Yao, 2004). With sustained economic development on the mainland, the option to study abroad became more affordable (Bodycott, 2009, p. 350). Both the agencies in this study started on a much smaller scale and specialized in only a few areas, such as visa processing or exchange programs. As disparities in wealth increased and educational

[8] Uniagents provides a website with information on agencies around the world. ICEF, which "connects Educators, Education Agents, Work and Travel Professionals, and Industry Service Providers to key markets and networks worldwide, supporting the growth and development of international education and global student mobility" (http://www.icef.com), and PIER even launched an agent-finder app based on a GPS location device and an agent-training course (Baker, 2015).

opportunities in other countries became acceptable, as evidenced through the increase of foreign curriculum branches in high schools, the agencies grew to meet demand. They eventually expanded to include many other related functions. Owing to their size, the inherent conflicts were magnified and thus easier to see, as was the increase in commercialization. Similarly, because China sends such a large number of students to universities outside of China,[9] it seemed more informative to consider the development of third parties through a lens that already provided magnification.

Both agencies are two of several which deliver foreign curricula to national schools. Many national schools, to which students are admitted through a district-wide examination, had opted to create an international division which resembled a school-within-a-school model. Although students had some national requirements, they opted to pursue US AP courses and prepare for the AP examinations, or the British A-level curriculum with corresponding examinations, or the IB (International Baccalaureate) program and corresponding examinations.[10] These students were not preparing for the *gao kao*, the national higher education entrance examination required for admission to tertiary institutions in China. In most cases, the foreign curricula were delivered by agencies who hired a number of staff members, including Western counselors and teachers (according to the contract agreed upon by the school principal), whom they trained. According to Bridget Allworthy, a College Board representative, the sudden and sharp demand for a US-based curriculum such as the AP program necessitated work with

[9] According to data provided by Open Doors, 31% of international students in the US are from China (IIE, 2015). According to UNESCO, in 2013 more than 700,000 of more than four million students studying abroad were from China (2016).

[10] The IB generally delivers its own curriculum and provides its own training. At times, however, a school opts to hire a facilitator.

agencies because schools were not equipped to implement a second curriculum quickly enough to satisfy demand. Both national schools in China and the College Board turned to agencies which served as a middleman who delivered the employees and training.

Both agencies had experience with education. They delivered other curricula; they were involved with cultural exchange. They hired American teachers and had a presence in the US as not-for-profit entities,[11] although they were reported by participants to be for-profit in China. Both agencies were known to universities, as they sought NACAC and OACAC membership, and invited universities to work with them either on boards or through other programs. Both offered many services, adding to some confusion among tertiary institutions about their roles and mission. There were services and programs which operated independently of the schools to which the agencies were attached; there were summer school programs, for example, and there were extra services which a student could select.

Through an examination of these services and the perceptions on the part of the study participants who work/worked with or for the selected agencies, this study contributes to our understanding of the role filled by the agent and examines the efficacy of that role in education.

[11] This tax status has been challenged.

CHAPTER TWO: REVIEW OF THE LITERATURE

Introduction

Student migration patterns have shifted and grown in the past two decades. There is an increased presence of international students in tertiary institutions in the US and in other Anglophone countries, reflecting both increased globalization within and outside of education (Australian Government Department of Education and Training. International Student Data, 2014; British Council, 2015; OECD, 2013; Open Doors, 2015). This movement has many benefits, enumerated not only by educators but by the US Department of State (Sonenshine, 2012). International student exchange can promote intercultural peace and understanding and can be a catalyst for thought and discussion. Many, although not all, of the students who study in the US are exposed to a broad liberal arts education with which they are invited to engage actively. Students encounter fellow students from different ethnic, socioeconomic, and religious backgrounds whose perspectives can challenge their beliefs (Sonenshine, 2012). Many reports tout the economic benefits to the receiving country; international students contribute more than 30 billion to the US economy (Open Doors, 2015). Similarly high figures are reported in the UK (Conlon et al., 2011, p. 9; UKCISA, 2014) and Australia (Deloitte, 2016, p. 2).

A third-party industry—consisting not only of education agents but also of test-prep centers, advertisers, interviewers, video producers, college fair organizers, and even a parasitical fourth-party industry to verify the work of the others—has grown to facilitate the college admission process. Education agents were among the third parties who could help students get into college or help address the enrollment needs of many colleges and universities, or even both. They could be seen as a bridge between cultures,

a human touch in areas where colleges might not travel, and a service which families unfamiliar with US higher education practices could consult to navigate the system.

Although it may be argued that there is a need and justification for agents, in the wake of the rise of this profession there have been charges of widespread abuses and loss of integrity, both on the part of the agent and on the part of the host institution, in an educational process which has been respected and revered (Altbach, 2015). Increased agent use has prompted questions about ethical practices, about justifiable expenditure, about the welfare of the students, and about the admission process itself (Altbach, 2013; Ballinger, 2013; Hagedorn, 2014). For example, agents might misrepresent the student to the institution, or might misrepresent the institution to the student in order to collect a commission or a fee (Hagedorn, 2014; Robinson-Pant and Magyar, 2014). Cognate issues regarding third parties have been identified in funding of athletics and even research, which undoubtedly impact the sorts of concerns raised about third parties in admission (Bok, 2003). Even though we have a sense from prior literature why this model has developed, since the 2013 NACAC Report of the Commission on International Student Recruitment is so recent, best practices and questions about the effects of third parties are still being examined.

What are the services offered by agencies to connect students with higher education in the US? What are the perceptions of benefits and/or negative outcomes of these interactions? A review of the literature considers some of the forces contributing to the development of agencies, including the economic and philosophical impetus for globalization and internationalization in education; perceptions of commercialization and commodification which stem from the economic considerations; and student migration

patterns as a context for the growth of third parties, specifically agents, in college admission.

Globalization and internationalization

International students are not a new phenomenon. Cicero, Caesar, and many other Romans studied in Greece; many of the universities founded in medieval Europe included students from other countries. To judge from Cicero's descriptions of his studies with the Stoic philosophers of Rhodes, cultural exchange was mutually beneficial (Shackleton Bailey, p. 12). Both students and scholars moved about in medieval Europe (Altbach, 2002, p. 2). In the East, Nalanda University welcomed scholars from other lands in the 6th century (Altbach, 2015, p. 5). Nor are international students new to the US. Interest in internationalization across the university and across the curriculum, however, has gained momentum since the fall of the Iron Curtain (Altbach, 2015, p. 8) and since the European Commission saw educational exchange as central to its formation (Altbach, 2015, p. 9).

In recent years, prospective students from China, among other countries, have considered a high quality of education, along with international experiences, as important; for their parents, employment and immigration prospects were important (Bodycott, 2009, pp. 358–59). Although both parents and students placed importance on the wisdom of friends and family for college recommendations (Mazzorol & Souter, 2002, p. 85) and although they were wary of agents (Bodycott, 2009, p. 358), the agent industry grew to facilitate the rapid growth of international student mobility, in part because tertiary institutions were turning to agents (Jaschik, 2014). International

students, study abroad programs, and exchanges are a part of internationalization and even globalization, a trend that reaches beyond the academy.

The terms *globalization* and *internationalization* have become buzzwords. They are forces affecting economic markets in general and, in particular, the academy. What is the difference between the two terms? Philip Altbach and Jane Knight define globalization as "the economic, political, societal forces pushing 21st century higher education toward greater international involvement" (Altbach and Knight, 2007, p. 290)—in other words, the external forces affecting education. Altbach defines internationalization as "specific policies and programmes undertaken by governments, academic systems and institutions, and even individual departments or institutions to cope with or exploit globalisation" (Altbach, 2004, p. 64). One such program might include, but is not limited to, recruitment of international students or internationalization of the curriculum. Among the issues driving internationalization and globalization are the rush for globalization, the awards given by NAFSA: Association of International Educators to institutions that internationalize their campuses, the desire for global recognition and enhanced international profile, and the wish to strengthen "international knowledge capacity and production" among students and faculty (Knight, 2005). Although this growth might not always be as commercially driven as those terms may suggest, much of it in recent years has been propelled by economic forces (Lumby & Foksett, 2014). A subset and outgrowth of globalization is the push for international presence, in the form of students and scholars, on campuses.

Globalization and internationalization can be positive forces in the transformation of higher education and social relationships, but they can divide as well as integrate

institutions (Mitchell & Nielsen, 2012, pp. 7–9). Despite any of the misgivings due to the increase in globalization, there is a positive response to the innovation and reshaping that comes about because of these forces, whether external or internal (Widavsky, 2010). Internationalization of the academy has become popular because of national economic competitiveness in mastery of languages and preparation of students to function globally (Hamrick, 1999).

For all the benefits globalization might bring, there are perceived risks as well; one is the "constriction of moneys" for postsecondary education (Slaughter, 1997, pp. 36–37). A 1993 British white paper claimed that postsecondary education in Australia, Canada, the UK, and the US was directed toward "wealth creation" rather than the more esoteric pursuits of the liberal arts (Slaughter, 1997, p. 37). The constriction of moneys affects recruitment as well, because institutions turn to outside help to secure enrollment numbers and paying customers. North American respondents to the 2013 International American University survey ranked recruiting fee-paying international undergraduates as one of the top three internationalization activities (Egron-Polak & Hudson, 2014). Indeed, modern "admissionspeak" refers to students who have accepted an offer of admission as "deposits" and international students as "cash cows."

Other naysayers suggest that globalization and internationalization have happened so quickly that the movement is a goal in itself, instead of a means to an end (De Wit, 2013, p. 4). Hill and Kumar see globalization as a neoliberal tool for capitalist growth (2009, p. 2), which extends to education. Government subsidy cuts to education, they explain, and subsequent privatization lead to a business-driven agenda in education in that business funds substitute for government funds. Globalization, which is promoted by

the World Trade Organization (WTO), interacts closely with higher education (Cudmore, 2005, p. 40). In a paper prepared for the House of Lords in January 2002, Glenn Rikowski, an independent researcher (formerly a researcher at University of Birmingham and University of Northampton), argued that globalization was essentially capitalist globalization (Rikowski, 2002, p. 1) and that the movement had ramifications for education. He argued that the WTO's education agenda is to take over education by influencing curriculum and encouraging "federations" of schools which functioned like "education chain stores" (p. 9). Similar trends exist in four Anglophone countries—Australia, Canada, the UK, and the US (Currie & Newson, 1998, pp. 45–70). The Bayh-Doyle Act of 1980, "to promote collaboration between commercial concerns and nonprofit organizations, including universities," further encourages academic capitalism, according to Sheila Slaughter (Currie & Newson, 1998); the association between academia and business produces an inherent conflict of interest (Henderson & Smith, 2002, p. 7). Internationalization, the academy's internal manifestations of global awareness, raises complementary concerns and receives similar commentary.

Internationalization is driven by both philosophical and economic concerns (de Wit, 2013; Lumby & Foksett, 2016, p. 96). They caution that higher education's commercially driven goals can take precedence over disinterested ones (Lumby & Foksett, 2016, pp. 107–108; Lynch, 2006). International student recruitment is an outgrowth of all these factors, particularly as the commercially related goals have made education an export commodity that has expanded student recruitment (Cudmore, 2005, p. 44).

Agents are a part of the internationalization movement because they help to push the agenda in terms of student enrollments. But as pressures mount to fill spots with fee-paying candidates who produce high scores, the holistic process is blurred, and in the name of greater selectivity and internationalization, the emphasis is on enrollments and not the enrollee. Education, instead of being a vehicle for producing good citizens, becomes an "internationally traded commodity" that changes both what knowledge is taught and how it is perceived (Altbach, 2002, p. 2). All these factors contribute to a concept of commercialization in education which ultimately can affect students' perceptions of and interactions with their education.

Commodification and commercialization

"The stain of commercialization in international higher education has been tremendously aided by agents and recruiters" (Altbach, 2015, p. 14). Any discussion of agents, and even globalization and internationalization, must include the broader context in which the third-party industry has developed—namely, the issue of commercialization and commodification of education, of which globalization is a part. Studies on the broader topic of "marketization" processes in university administration have relevance and provide a framework in which the emergence of third-party vendors in the admission process can be understood.

Many scholars are critical of business practices adopted by colleges and/or of the economic metaphors which have influenced our thinking about education (Bok, 2003; Collini, 2012; Shumar, 1997; Slaughter, 2004). Universities, in which practices are increasingly commercialized and both students and research are treated as commodities, have been under criticism. The criticism is not recent; Thorstein Veblen famously

proclaims that “Plato’s classic scheme of folly, which would have the philosophers take over the management of affairs, has been turned on its head; the men of affairs have taken over the direction of the pursuit of knowledge” (Teichgraeber, 2015, p. 77).

The IAU identified commercialization and commodification as risks to quality in education based on responses to a 2005 survey of higher education institutions in 95 countries, which Jane Knight summarizes (2005). Though the survey indicated that respondents did not see internationalization as primarily a profit-making venture, they did see commercialization as a big risk. This continued to be a concern; commercialization and commodification were identified as the most significant risk of internationalization by almost all 1,300 respondents worldwide (except for Africa, Latin America, and the Caribbean) in a subsequent IAU survey in 2014 (Egron-Polak & Hudson, 2014; Matthews, 2014). The increase in reliance on agents and the issues associated with agents, such as double-dipping (Ballinger et al., 2013), the need for students to consult several agents because of their mistrust of the process (personal conversation, EducationUSA), and the fear that agents will push only schools which retain them rather than concerning themselves with a good match (NACAC, 2006) contribute to perceived commercialization of education and commodification of the student.

A long line of writers has raised cries of alarm at the erosion of education and the demise of the university because of commercial or practical concerns (Bok, 2003; Nussbaum, 2010; Shumar, 1997; Slaughter & Lesley, 1997). Slaughter and Lesley (1997) dubbed the trend “academic capitalism,” in which they included globalization. Even though new initiatives resulting from financial incentives are not necessarily bad, they become problematic when maximization of profit is the guide (Bok, 2003, p. 31).

The "preservation of educational values" and awareness of conflicts of interest erodes (Bok, 2003, p. 144 and ch. 9). Such commercialization arising from administrative compromises offers bad examples for students' moral development, the cornerstone of an education (Bok, 2003, p. 109). It is precisely this argument that is at the heart of the consideration of a university's work with agents and the messaging. There is a perception that luring wealthy international students to campus is not for the good of the student but for the economic well-being of the university given that many budgets are tuition-driven. There is an accusation that agents not only help students get in, but they help them get out by writing their papers.

Incidents such as the scrutiny of practices at Dickinson State University (DSU) are an indication that administrations look the other way (Public Disclosure Notice on Dickinson State University, 2012). DSU had awarded degrees to many Chinese students who had not completed requirements (Kiley, 2012). An audit indicated that some students did not meet minimum requirements for admission, that Chinese student transcripts were not official, that many did not have standard English proficiency test results, and that they did not have the required credits to earn a degree. To earn a degree, 120 to 128 credit hours were required, but nearly all the students in two of the special programs took two semesters, or up to 34 credits, and were awarded a four-year degree (DSU Internal Review Report, 2012, p. 17; Redden, 2012).

Richard Chait has argued for greater faculty involvement in admission and has recommended that admission report to academic affairs. This "shortens the organizational distance between products and markets" and helps to ensure that academic considerations will be at the forefront (Chait, 1987, pp. 44–45). This is a sensible

suggestion but not one that necessarily will lead to the outcome he suggests, particularly if there is any kind of third party involved in the process. Agents take admission a step further away from the realization of Chait's goals.

Growth of the agent industry: student mobility

The focus of the agent industry is a factor which corresponds to the sudden increase in student mobility (OECD, 2013, references the sharp increase of international students since 2000). Several factors, such as mastery of a language and degree recognition in the home country, can influence migration patterns (Kahanec & Králiková, 2011, pp. 20–27). From the host country's perspective, some percentage of international students can be expected to stay. More than half of the international population go to six destinations for their studies: the US (18%), the UK (9.9%), Australia (7%), Germany (7%), France (6.8%), and Canada (5.2%), according to a 2011 Organisation for Economic Co-operation and Development (OECD) report, contributing to the knowledge economy (Shields, 2013). The US had received 38% of that population; it lost 20% of that market between 1985 and 2009 as places such as Australia increased their efforts to attract more students, a factor which has increased recruitment efforts abroad. Nevertheless, despite high tuition costs, the US is still an attractive destination for international students who wish to study in another country.

According to the OECD, between 1990 and 2011, the number of international students worldwide more than tripled: 4.5 million students enrolled in tertiary education outside their country. China, India, and Korea send the most students abroad (OECD, 2013, p. 2). Students study abroad, according to that report, for cultural enrichment, to gain or enhance their language skills, for high-status qualifications, and for a competitive

edge in the job market. Some students come with intent to return to their home countries; others decide to try to stay in the country in which they received their education (OECD, 2013, p. 1).

The loss of the US in international student market share, however, has resulted in greater interest on the part of the government in international students and scholars, and some relaxed regulations. Some restrictions have been eased, such as the length of time a STEM student can stay for training once his or her degree has been completed. Similarly, students with a nursing degree are welcome to stay longer and even apply for permanent residency (Suter & Jandl, 2006, p. 71). There is also a high retention rate of foreign graduates with a doctoral degree. Seventy-one percent of all foreign passport holders in the physical sciences have stayed in the US. The OECD reported that international students who stayed on in their country of schooling had a long-term influence on the economy (OECD, 2013, pp. 3–4). Overall, among the OECD countries with available data in 2008–2009, the stay rate is up to 25%. Nevertheless, despite improvements, visa restrictions and modest governmental involvement in recruitment have been cited as issues of concern to international students (NAFSA, 2006, pp. 6–7; Ruiz, 2014). The increased competition for international students has led to an increased reliance on agents (Clark, 2010).

There are several motivating factors for students to stay in the country from which they have received a degree: professional, societal, and personal. Motivating factors were often cultural and therefore depended on the student's country of origin, partially because different cultures placed different emphasis on each of the motivations (Alberts & Hazen, 2005). The factors influencing student migration have been described as a

"push-pull" model (Mazzarol & Soutar, 2002). Economic and social considerations push students out of their countries, while governmental and institutional considerations (knowledge of host country, reputation for quality, recognition, personal recommendations, costs, environment, geographic proximity, and social links) pull them to specific places. The English website of the Chinese Ministry of Education corroborates this description. Private recruitment agencies were identified by Mazzarol and Soutar as a factor influencing student migration (Mazzarol & Soutar, 2002, p. 85; Pimpa, 2003). Although relatives had more influence than agents in most countries at the time of the study, Mazzarol and Soutar surmised that personal recommendations (such as parents, relatives, alumni/ae, and agents) would become increasingly more important based on surveys of students (p. 85). A subsequent study by Nattavud Pimpa suggested that agents in some cases surpassed even relatives (Pimpa, 2003, pp. 180–85).

The push-pull factors described above have influenced Chinese student migration. Bodycott (2009), drawing on Mazzarol and Soutar as well as others, identified 10 pull factors in all. In contrast to Mazzarol and Soutar, Bodycott's survey of students in Guangzhou, Shanghai, and Beijing indicated a parental reluctance to use agents for anything other than information gathering because they knew of people who had been "financially burned" by agents (Bodycott, 2009, p. 358). Students reported that when they used agents, their parents did the negotiation and they had little or no personal contact, posing another concern for the best interests of the student. Students were more positive about other means of gathering information, such as college fairs, despite their objections to the hot, crowded, and claustrophobic conditions. It is important to note, however, that even fairs are often sponsored or run by agents, who sometime employ

graduates of elite or not-so-elite colleges who claim to be from that institution, implying that they are employees. Bodycott recommends that recruiters learn to be culturally sensitive to the needs of parents as well as students by visiting countries more frequently and working closely with families (Bodycott, 2009, pp. 368–69).

The Green River Community College case study (Ballinger et al., 2013, p. 44) confirmed the benefits described by Pimpa in his study of Thailand and by Mazzarol and Soutar in their study of other Asian countries (Mazzarol & Soutar, 2002; Pimpa, 2003, p. 189). Agents in the case of Green River Community College provided help to families by establishing a bond which often lasted into the college years. They became trusted by both the college and the families as a resource. Agents visited campus, and admission representatives visited their agents. They involved parents and alumni/ae as well. By forming close bonds and cultivating trust, they created a model that was a benefit to everyone—college, agent, and student/family.

Green River Community College is a gold standard.[12] Ultimately, this kind of working relationship helps to attract students not only to an institution but also to a country which is seen as welcoming. In this model, an agent is a sort of outsourced admission officer. There are ethical concerns about this model, however (Altbach, 2015, p. 11; Bodycott, 2009, p. 358).

Growth of the agent industry: the role of the university

Are students being recruited because of their perceived fit and because of their strong qualifications, or is the university simply struggling to keep its doors open? When

[12] A Green River Community College vice president was one of the commission members of the NACAC group which produced the report.

the University of Illinois decided to enroll almost 5,000 students from China, there were worries about the university's survival in the face of dwindling enrollments due to population shifts and budget cuts. It raised the question, however, of what the mission of a state university is (Redden, 2015). A parallel study of the rationale behind importing students to Australia's universities suggests that the practice signaled the commodification of the student (Gillan, Damachis, & McGuire, 2011).

The large-scale import of international students was one way to secure revenue. Declines in government funding prompted creative measures in internationalization and globalization. Some universities entered into partnerships with businesses as a result of declining government funding and claimed that these partnerships had grown out of the "forces of globalisation" (Shuk-ching Poon, 2006, p. 99). Some saw businesses as predatory on such practices; universities were places used by corporate interest, either to develop "technologies of consumption" or to train labor (Shumar, 1997, p. 5). Education was valued only for those products or for the labor, and its meaning was lost beyond what it could do to serve the market. This mentality has resulted in a narrow view of education as related to practical value and not intellectual value (Schwartzmann, 2013, p. 2). These forces pushed many universities to market themselves abroad and to increase enrollments from abroad.

The "pulling" of institutions has been supported by governments abroad, which have established regulations. Australian universities retain agents all over Asia who work from offices in the students' home country, whose role it is to help students through the application process and even the visa process along with other services (Pimpa, 2003, p. 181). A glance at some Australian university websites will reveal a prominently

displayed link to agencies which are endorsed or retained by the university. Agents were responsible for the sudden growth of international students in Australia, which increased tenfold between 1990 and 2007—from 25,000 to 250,000 students (Coffey, 2013). It seemed to be in the government's interest to promote international student enrollments—not for the good of the student, and not for the good of diplomatic relations, but for the good of the growth of the education industry. Many tertiary institutions have successfully relied on agents, counting on their cultural and linguistic expertise to help push the student to specific destinations. The growth of the industry can be seen in websites such as Uniagents, which have information based on country (https://www.uniagents.com/index.php).

For US tertiary institutions such as Green River Community College and institutions such as Dickinson State and the University of Illinois, enrollment of full

fee-paying international students became a source of tuition money (Ballinger, 2013; Choudaha, 2012; Redden, 2015; Shields, 2013). Declines in state funding resulting in part from the view that higher education was a commodity for private gain rather than a public good meant higher education turned to internationalization of the student body for funds (Shields, 2013).

The language referring to students as market forces was to be found outside the academy. Increasingly, foreign governments—and US organizations—wrote about international students as if they were a merely a source of revenue and correspondingly treated the agents who helped recruit them as a part of foreign trade. This very concept caused some scholars to raise objections:

> [T]he presence of education agents is consistent with the neoliberal commodification of higher education. Although questions have been raised

> about agents' sometimes unethical practices, we suggest that these concerns have diverted attention from the process of commercializing education which led to the need for agents in the first place. This means that little critical attention has been paid—in policy or research agendas—to the variety of agencies that are now fixtures in the HE recruitment landscape and the range of services they provide. As a consequence, little is known about how agents might impact on teaching and learning and student engagement. (Robinson-Pant & Magyar, 2014, p. 1)

Although admission offices cite the importance of international perspective as well as international peace and understanding, some more crassly will address the need for enrollments and paying customers, and even the need for alumni/ae who can provide opportunities and connections. Hill and Kumar (2009) are not alone in pointing out that the emphasis, however, is on students who can afford to attend, to the detriment of those who cannot, which is a problem not only with local populations but with countries where almost all students do not have the means to attend.

Agents are one of the symptoms of the growing commercialization of education and commodification of the student (Altbach, 2015). As universities become more dependent on foreign enrollments, they became dependent on agents and implicitly condone some of the practices which are simultaneously deplored.

Conflicts of interest and differences in approach

Conflicts of interest arising in recruiting have been at the root of many a NACAC discussion (e.g., 1951, 2006, 2010, and the Commission Report of 2013) and were among the reasons given for concerns addressed by the Department of Education (DOE) (NAICU, 2010). The HEA Amendment of 1992 had banned safe harbors; exceptions had been made in 2002; there was a proposal in 2010 to revert to language similar to that of 1992 (NAICU, 2010, p. 1). The DOE's proposal is detailed; of relevance is the concern that "unscrupulous actors . . . circumvent the intent of 487(a) (20) of the HEA," that

students are frequently the victims, and that if admission personnel are compensated based upon the number of matriculants, "the incentive to deceive or misrepresent the manner in which a particular educational program meets a student's need increases substantially" (NAICU, 2010, p. 5).

The Federal Register addresses these issues in its final regulations, clarification, and additional information. It stresses that the regulations exist

> to shelter all students from abusive practices that have historically occurred when recruiters were rewarded based on the number of students enrolled, as opposed to a more fulsome evaluation of a student's particular needs and an institution's capacity to meet those needs. (Federal Register, 2015, 80 FR 73993)

Although international students were not included, the reasoning above clearly can be applied to all students.

There is a sentiment that agents, the tertiary institutions which hire them, and the sorts of activities in which they engage to recruit students have a deleterious effect on not only students but on academic standards and integrity, which in turn affect the academy itself (Altbach, 2015; Molesworth et al., 2009, pp. 277–80; Natale & Doran, pp. 193–94). Students are seen increasingly as consumers and as customers, with the result that they begin to see themselves in that way. They desire a credential rather than learning (Molesworth et al., p. 277). The perception of education is that it is a private benefit rather than a public good (Tilak, 2008). The growing view that education is a commodity to be traded further advances the notion that education is a private, and not a public, benefit—resulting in a corresponding decrease in public funding (Tilak, 2008). Universities cater to student expectations and conform to the demands of a consumer culture (Molesworth et al., pp. 278–79). Education is no longer a process of personal growth but a product of economic value, and it is driven by capitalist demands for the

utility of knowledge at the expense of critical thinking (Molesworth et al., 2009; Natale & Doran, 2011). Natale and Doran see the consumerist shift in pleasing the student rather than engaging him/her as an ethical issue, because the statistics they cite indicate that a large percentage of undergraduates show little or no progress in their four years in critical thinking, complex reasoning, and writing skills (Natale & Doran, 2011, p. 193). The use of agents is perhaps a natural outgrowth of the shift in attitude toward education. This may be seen as resulting from and contributing to the notion of education as a commodity.

To examine further the perceptions of the positive and negative outcomes of agencies, this study considers the services offered by agencies and the perceptions of those who work with them.

CHAPTER THREE: METHODOLOGY

This is a case study of two multiservice educational agencies. It seemed beneficial to examine closely two of the larger organizations since they offer many services and have broader interactions. Agencies are organizations which serve as middlemen in the interactions and transactions between students or their schools and U.S tertiary institutions. Multiservice agencies seem to be the most involved in different aspects of college admission, including delivery of curricula, test preparation, teacher training, counseling and counselor training, conferences, relationship building with admission offices, and administrative aspects of preparation for study abroad, such as test registration and preparation of immigration documents. A multisite case study seemed to be the approach most conducive to understanding the services of the two agencies. Different perspectives allowed for a "complex, detailed understanding" of the issue (Creswell, 2013, ch. 3). I compared these accounts from different perspectives with the information presented in the US websites of each agency, as well as agency newsletters and documentation from one college. Case studies of the agencies seemed to be the best route to addressing the complex relationship of the agencies and their stakeholders, and to allow for cross-analysis of the findings (Yin, 2009, chs. 1 & 6).

To that end, this study has targeted two selected agencies and examines how they act as the middleman between Chinese students and US institutions of higher education. To examine the role of agencies more closely, this dissertation has narrowed its focus to agency services and the perceptions of those who work with them or are affected by them. The research questions which guided the study were:

1. What are the services in which the two selected agencies engage to connect students in China with higher education institutions in the United States?

2. How are these activities perceived by educators whose work is impacted by agencies?[13]

Consistent with typical case study methods, the study relied on data from multiple sources, including semistructured interviews; documents, data, and other information available from websites such as those of NACAC, IIE, the College Board, and the Chinese Ministry of Education; and agency websites. These data were used to help understand the cases and address the research questions as well as to illustrate and to reveal complexities and ramifications of their practices.

Site selection

The two agencies on which this research focuses were purposefully selected because they are well known and visible organizations (Maxwell, 2012, ch. 5). They are not the only multiservice agencies, but they are among the most visible since they have offices and centers both in the United States and in different cities in China. Both have worked with many institutions of higher learning and secondary institutions in China. Both have worked with US professional organizations such as the College Board and NACAC. Their capacity to have an impact in international education is great; hence, they were selected as part of the study. In addition, larger sites often can serve as a magnifying glass through which one can more clearly see a trajectory, some of which can be seen as beneficial, some not. Both agencies have, or have had, a presence in several national schools, some of which I visited to get a sense of place.

Schools which had worked, or continue to work, with these agencies were selected as a part of this study because they are top schools which are visible because

[13] Although students and parents are central to the existence of agencies, they are not part of this study, in part because of the scope and because they have been the subject of other studies.

of a reputation for excellence in education. It seemed that conversations with employees of such schools might yield thoughtful comments. Some of the participants were colleagues with whom I had worked; some were recommended to me; some I cold-called. Participants who work, or worked, for the agencies work(ed) in the following cities (order is strictly alphabetical): Beijing, Chengdu, Hangzhou, Shanghai, Shenzhen, and Xi'an. Both agencies have a presence in schools in Beijing and Shanghai; both have a presence in several other cities as well. Interlocutors in China and some currently outside China had experience with students in several Chinese cities.

To understand each case further, I visited some of the secondary schools in which the students were studying and observed the surroundings to get a sense of the classrooms and facilities. I also visited the administrative offices and facilities of the two cases/agencies selected for this study.

Selection of interlocutors and sampling strategy

Understanding agency work required perspectives gathered from a variety of educators. Selected participants worked/work with or for one of the two agencies, or both, or had interacted with them, or had been impacted by them. Interviewees are educators whose observations indicated how deeply they cared about students and educational opportunities. They are university representatives, school representatives, employees of not-for-profit educational organizations, employees of for-profit educational groups, and government employees. Table 1 lists the interviewees and their connections to the two selected cases.

Selection of interviewees, based on the roles they filled, was intentional; the roles were represented in an initial pilot study. In almost all cases, selected individuals had

experience with more than one of the roles identified. Some were selected through a snowball sampling strategy, but most were selected through a maximum variation sampling because they represented a broad spectrum of experiences appropriate for a qualitative study and were known for their expertise on this subject (Creswell, 2013, ch. 7). Agencies do not exist apart from the individuals who make up the organization. Accordingly, accounts of agency work are primarily from those with a direct connection with one of the two agencies, or whose work has been impacted by them.

Maxwell stresses the importance of selection of participants with whom one can establish productive relationships, which in turn provides the best data (Maxwell, 2012, ch. 5). The study focuses on two agencies through the eyes of present and former employees—individuals who have worked closely with the agencies. In an effort to explore the issue from different angles and to triangulate information, this study includes not only agency representatives but representatives of tertiary institutions and educational organizations as well. These are described in more detail below. Given that roles and relationships are complex, and the services were as well, it seemed important to gather different perspectives from a broad spectrum.

For the two cases, I interviewed 35 individuals, not including two China scholars who offered some historical perspective. In addition, current senior staff in both the United States and China were contacted; only the US office of one of the agencies agreed to a conversation, which was not taped at the request of one of the interviewees.

Interviews were primarily conducted by phone or Skype, but several were conducted during site visits to four schools in two of the cities in China where the selected individuals were currently employed.

Data collected included descriptions of each individual's role vis-à-vis the agencies, including specific examples illustrating the role, and the perceptions each individual had about the agency experience. Of the 35, 12 were employed by universities at the time of the conversations. The colleges and universities represented different types of institutions: public and private, large and small, undergraduate and graduate research institutions, East and West Coast. Each higher education institution was selected based on the affiliations they had with one or both of the agencies. Some were selected because agency employees identified the university liaison as knowledgeable. Others were selected because the college name appeared on the agency website. Perspectives from different types of universities were deemed important in research on agent activity because many institutions in the United States depend on agents for international enrollments. Colleges and universities included among the participants use, or have used, agents; some were represented on the NACAC Commission which studied the use of agents. Some of the university representatives were selected because of their roles in organizations such as NACAC and OACAC, however. Both agencies have been involved with either NACAC, OACAC, or both.

Thirteen served as school counselors or private counselors and worked most directly with students. Ten worked exclusively for educational organizations such as NACAC, the International Baccalaureate Organization (IBO), the College Board, and EducationUSA. Since both agencies have worked with the delivery of curricula offered in the United States, it was important to get the perspective of the educational organizations that develop the curricula (i.e., the IBO and the College Board). EducationUSA, which is under the auspices of the State Department, does not partner

with agencies, and it was important to ask why. Ten were Chinese nationals. Fifteen were women; 20 were men. The names chosen for all the participants are fictitious. Western participants have been given Western pseudonyms and Chinese participants have been given Chinese pseudonyms, all drawn from literary and mythological sources. Genders have been randomized because so many participants were concerned about possible identification. In one case, even a city was given a fictitious name.

Table 1 is arranged first according to agency affiliation and then alphabetically according to the primary role for which each participant was selected. In some cases, individuals concurrently held two positions, such as university employee and officer on the board of an agency or an organization such as NACAC.

Dramatis personae

Table 1

Agency "A"–Affiliated

Name	Primary Affiliation
Bower O'Bliss	Secondary
Chang'e	Secondary
Daniel von Blumenthal	Secondary
Digory Kirke	Secondary
Feng Yi	Secondary
Merlin Ambrosius	Secondary
Morgan LeFay	Secondary
Thomas Gradgrind	Secondary
Wen Chang	Secondary
Fanny Dashwood	Tertiary
Frederick Verisopht	Tertiary
Henry Sowerberry	Tertiary

Table 2

Agency "B"–Affiliated

Name	**Primary Affiliation**
Digory Kirke	Secondary
Erlang Shen	Secondary
Jia Bao-yu	Secondary
Lin Dai-yu	Secondary
Morgan Le Fay	Secondary
Cynric Wessex	Secondary
Horace Slughorn	Secondary
Jia Yu-Cun	Secondary
Xi He	Secondary
Drusilla Fawley	Tertiary
Frederick Verisopht	Tertiary
Tristan Meliodas	Tertiary

Table 3

General

Name	**Primary Affiliation**
Anonymous official (US) working on educational exchange	Dept of State/EducationUSA
Kui Xing	Dept of State/EducationUSA
Wenchang Wang	Dept of State/EducationUSA
Bridget Allworthy	College Board
Cyren Blair	IACAC
John Blifil	IACAC
Merry Brandybuck	NACAC
Sam Gangee	NACAC
Will Whitfoot	NACAC
Ethelberta Petherwin	IBO
Abraham Van Helsing	University Employee
Charlotte Guest	University Employee/general agents
Elaine Peerless	University Employee—research university

Participant characteristics

The tables above indicate the role of the participants and their affiliation with the agencies. Given that the affiliations are at times complex, the categories below may provide more useful detail:

Employees of agencies

Employees of agencies include former and current employees of one or the other of the agencies which are the focus of this study. These individuals are, or were, on an agency payroll. Some of these individuals had worked for both of these agencies (not concurrently). Both Chinese nationals and US nationals were represented in this group. Their roles included a) school counselors within schools with international curricula delivered by one or the other of the two agencies; b) private counselors in an agency division that served private clients. Clients could include students who attended the agency-managed international sections of schools even when the agency or the school provided its own counseling services. Clients could also include students who were in schools which had no counselor. This category also includes c) individuals who worked for an agency in an administrative capacity.

Employees of Chinese national secondary schools impacted by agency-run international divisions

This category includes both Westerners and Chinese whose work in a Chinese national secondary school was directly impacted by agencies, such as educators who work, or worked, as school counselors and administrators within schools with international curricula which were currently, or formerly had been, delivered by one of the two agencies (or initially introduced by one or the other of the two agencies) but on a

school payroll. The two agencies in this study had a presence in schools in which some employees were on a school payroll and others on an agency payroll, depending on the arrangements the school had made with the agency. The individuals were colleagues working in the same space as agency employees and with the same students, and whose work was therefore interconnected. For example, at times a school elected to hire its own college counselor for all students, whether or not the students were in the agency-managed section of the school. One school registrar was employed by the school but interacted with teachers or counselors employed by the agency in the international curriculum branch of that school since there was one registrar and since resources were often shared. These individuals were able to offer an insider's view of the practices and goals of agencies and the students who use them. The category also includes, because of the perspective offered, a school with an internally administered international division.

Enrollment management/admission professionals

This category includes current or former admission professionals whose institutions work, or worked, with one or both of the agencies which are the focus of this study. Their work includes, or included, participation in agency-run events or in agency-run schools, and/or advisory board work for the agency. It also includes some admission professionals who have considered different agency options. University representatives offered perspective on the services and activities offered by the agencies which are the focus of this study.

Professional educational organizations

To complement information offered by secondary and tertiary institution representatives, staff of educational organizations described their interactions with agencies. There was a perspective to be gained by individuals working in professional organizations, given that they represent the membership, including secondary and tertiary institutions as well as some third parties. This category includes individuals who worked with NACAC[14] and OACAC (now IACAC) to consider best practices regarding university work with agencies. NACAC and the regional IACAC, the association specifically for international admission counselors in higher education and counselors in secondary education, is made up of admission professionals and both independent and school-based college counselors. NACAC and IACAC members include colleges, universities, schools, and even private counselors. NACAC's voice is the voice of the membership. Best practices are defined for the world of admission counselors by this organization. Some schools in China associated with the agencies which are part of this study belong, or have belonged, to NACAC. NACAC continually monitors general issues pertaining to the use of agents.

Representatives from the College Board[15], which develops a curriculum that was introduced to the international branches of public schools, offered their perspective as well. Curricular organizations such as the College Board rely on a middleman to deliver their curricula in China. The College Board develops the Advanced Placement (AP)

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[14] The National Association for College Admission Counseling.

[15] The College Board is a nonprofit organization which develops and administers standardized tests and curricula. It provides resources to families to assist them in college planning and transition to tertiary education. The organization conducts research and provides advocacy for education (retrieved from https://www.collegeboard.org/about).

Examination, which is delivered by agencies—including but not limited to the two in this study—to schools in China. The IBO[16] is, similarly, an organization which develops a curriculum which is international and is offered as a curricular option all over the world, including the United States.

Representatives from EducationUSA,[17] a network of advising centers under the auspices of the US Department of State, and from a State Department officer in China contributed to this study as well. EducationUSA is an initiative funded and overseen by the State Department; their offices provide information on colleges in the United States to interested students. In China, there are EducationUSA centers in the public affairs section of the embassy and consulates in several cities. These centers exist to promote US education and to help advise students and parents. They do not work with or endorse third parties. Their role, in the words of one diplomat, is to give families "the information and the tools [so that] they can successfully do this research and be able to successfully navigate the process to find a school or programs that are the best fit for their own interests and their own goals." Since good diplomatic relations with China are essential, it is important for Chinese students to have a positive experience with the US college process, from the time of application through the time of commencement.

I include the perspective of the State Department because representatives in China encounter students who work with agencies frequently. The Department of Commerce and the State Department are at odds over agency use. The State Department does not

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[16] The International Baccalaureate was founded in 1968. It is a nonprofit educational organization which develops and delivers an international curriculum (retrieved from http://www.ibo.org/about-the-ib/).
[17] EducationUSA is a US State Department initiative which provides college advising centers throughout the world (retrieved from https://educationusa.state.gov/about-educationusa) for international students. There are 400 centers in more than 170 countries.

support the use of agents. The Department of Commerce, on the other hand, supports agents (Ballinger, 2013), in line with its view of universities as a business, or at least as an enhancement to business. The disagreement of the two governmental offices foreshadows the conflicts inherent in this issue: Is international education a commercial venture, or is it a diplomatic one?

There were a few school-based and college-based professionals involved in counseling and admission whose work was impacted by agents, as described above. I selected them for interviews because they were knowledgeable in the field and used to gain an additional perspective. These included individuals who worked in Chinese national schools in which the school itself administered the foreign curriculum. They had studied curriculum development in other schools in China to develop their own model. Their work was often impacted by agency work in other schools. Their students were also affected. Their perspectives contributed to the data and offered an outside perspective. Participants in this category included both Chinese and US nationals. There were college representatives in institutions which had well-developed working relationships with agents, but not the two in this study. They had general observations about the development of the model.

The China-based principals of the two selected agencies did not respond to my requests for interviews. Both agencies have offices in the United States; one of the two agencies welcomed a visit to their well-appointed suite of offices and agreed to share information but declined to be recorded. The staff was gracious and eager to showcase the programs and new developments, however, and spent time explaining the role of the organization and sharing some of the publications they produce. I tried to collect

information from individuals referenced by the agency I visited, and I attempted to gather additional data from other employees of the other agency in an attempt to obtain as many perspectives as possible.

Data analysis

Participants in this study were generous with their time and eager to have their stories told. Most of those whose accounts are a part of this study requested anonymity; many feared repercussions, even if they were former employees who lived far away. Some softened their stories between the time of the initial appointment and the time the recorder button was depressed.

Interviews of those who worked within agencies or agency-affiliated high schools started with a general request for a description of the agency with which the interlocutor worked, his/her role with that agency, and how he/she and the agency interacted with US higher education. These questions generated lengthy responses, punctuated by questions aimed at clarity.

Interviews of higher education representatives started with questions about their work with agencies and the impact their work had on international recruitment (see Appendix C). Interviews of US education organizations were also about their work with agencies and its impact on higher education. The College Board delivers the AP curriculum through agencies, for example, and I was curious to learn how a third party was used for curriculum delivery and how that method of delivery was received in secondary schools. NACAC and IACAC includes, or has included, some third parties in its membership, including agency-paid school personnel, but their stance has shifted.

Analysis is an ongoing process. The shifts in presentations of some of the interlocutors from the time of informal conversations at conferences to the time of more formal recorded interviews made analysis complex. Each participant was interviewed from 30 to 90 minutes. Ten interviews were conducted in person, as face-to-face interactions can be productive. Given that the Chinese culture values personal relationships and because familiar surroundings may be more conducive to conversation, my hope was that personal interactions would result in more fruitful conversation and a better understanding of nuances. The questions appear in Appendix C and were designed to elicit details about the agencies. The interviews were semi-structured so that themes could emerge organically during the course of the conversation. I recorded the interviews and had them transcribed by a service. Then I collected and carefully reviewed the transcripts, after which I shared them with the interlocutors for comments or emendations.

I reviewed the transcripts once again using Nvivo 10 software, which helped to categorize themes. The themes which emerged pertained to perceptions of the role of agents, ethics and conflicts of interest, cultural differences, money and profits, market needs, commercialization of education, and transparency. Although some of the themes emerged because of probes suggested by initial responses, most emerged organically. The software provided a mechanism to organize and identify themes.

I reviewed the websites of the agencies in this study and compared the information therein to the descriptions and themes which emerged in my conversations with the interlocutors. Many of the same concerns and observations were addressed on the websites.

The findings are organized according to the themes which became prominent for each of the agencies, after an introductory statement describing the characteristics of each agency.

Challenges

One issue which contributed to the richness of the data, but which made perspectives more complex, is that many participants were not limited to knowledge of one type of professional role or experience. There were, for example, former agency-employed counselors who had admission experience or school counseling experience. Many had worked in admission and in school-based counseling and in non-school-based counseling. Although I sought their perspective and experience based on a specific role, they often preferred to share experiences from some other role. Sometimes it was impossible to disentangle the different roles since their experiences in one role often impacted their approach and reaction. It was important for them to share their stories and for me to hear what they had to share. A prismatic approach was an overall benefit, but it sometimes went beyond the scope of the research questions.

Some were interviewed because of their experience working for an agency, for example, but they had previously held college counseling positions in which their salary came from a school and not an agency, or they had had experience as college admission officers. Those experiences had led to their employment by the agencies, but they also influenced their perceptions and their responses. Although questions were directed toward a specific experience, responses were often given from multiple perspectives.

Seven of the participants had worked for, or were currently working for or with, Agency "A"; nine had worked for or with Agency "B"; of these, two had worked for or

with both. Some worked with schools, but externally; others worked within schools. Some had been admission professionals in tertiary institutions but also had worked in secondary schools. Although questions were usually geared to one specific role, experience from another role influenced—and enriched—the response. At times, they insisted on sharing experiences which were not directly relevant to this study even when they were asked to comment on something more relevant, because the other experiences had shaped their view. They were eager to speak, even when they were apprehensive about what I might write.

Role of the researcher

This topic became of interest to me before I knew that agents existed. When I was young, I observed, with horror, that in my culture people often acted *gia ta matia* – for appearances' sake. These actions were often not governed by some sense of good manners or desire to spare another person's feelings but rather were calculated to derive some personal benefit. There was a greater emphasis on seeming virtuous than being virtuous. Appearances, however, are complicated; they are not always bad. The issue of seeming versus being recurred in senses beyond the ontological when I became a student of the Classics. The issue recurred on a daily level when, as an employee of the academy, my naïve illusions of virtue in education were assaulted. Educational endeavors often seemed good without being so.

In professional organizations where I served, third parties often would offer, sometimes aggressively, to host an event or underwrite an activity. In exchange, they derived advertising benefits. Those of us who served on boards and committees would debate the issue of sponsorship. The advantage of sponsorship was economic; we would

not have to charge participants from struggling not-for-profit institutions high fees to attend a particular conference or event if a third party underwrote a meal or some other cost. In some cases, sponsorship seemed collegial: former colleagues worked for the third parties (and as they were good, well-intentioned people, it was easy to overlook the implications of sponsorship), adding another layer of complexity. In one particular instance, we debated accepting the proposal of a reception held in honor of the many higher education representatives who had traveled together to another country. We decided that it might be damaging if word got out to students that the test-prep agency, then owned by the Washington Post Company, had held a reception for admission officers. We would leave students with the impression of our endorsement of the agency and the message that we wanted students to sign on with the agency for test-prep courses. This implied endorsement would furthermore be harmful to students who could not afford the extra cost.

In matters more internal to my place of employment, in my role as an admission professional, I carefully consider site selection when I hold open presentations. If Throttlebury Country Day School offers its auditorium for an open presentation, I must consider the message to students in public schools and to students who are poor. Does the implicit connection with Throttlebury signal a preference for the wealthy? Moreover, will I feel obligated to accept a student from Throttlebury because the school was kind enough, even if the kindness was self-interested, to offer its space for free? Even in a neutral space, such as a hotel, I must consider messaging. A luxury hotel, for example, can be off-putting.

It was natural for me, therefore, to have misgivings when educational consulting agencies began applying the same tactics that the test-prep agencies had applied. The hosts were agency employees whom I knew to care deeply about students and education. The situation was not so clearly that colleges and universities were good and third parties were bad. Yet the scenario seemed no different than the test-prep sponsorship scenario I had encountered in the past. The passion for education held by the hosts made the situation awkward. Had the hosts been clearly calculating, refusal might have been easy. Because they were sometimes former colleagues, however, or at least people with an interest in the process, it was necessary to consider whether there was the potential for a conflict. Appearances played an important role.

In other cases, I began perceiving questionable practices among some agents, which made the situation more difficult. Many students would apply from the same home address. I was reassured that China was a populous country, so that it was not strange that so many people were in the same building. I was not entirely convinced, however, that so many people in the same building had children of the same age all applying to and apparently qualified for Ivy League admission. In one case, an alleged admitted student with a very mature voice challenged my knowledge of a student visa regulation and said he had never encountered the regulation before, as if he had had frequent experience with F-1 visas. He was clearly not the student, as he claimed to be.

In addition, I was suddenly bombarded on a daily basis by people who wanted to partner or "tie-up" with my office, or who were offering me expense-paid journeys to China if I would talk with their students, or who would sponsor college fairs (participation at which, it seemed, would give a tacit endorsement to the people running

it). Although there always have been fraudulent applications and businesses trying to insinuate themselves, the scale and the frequency suddenly had changed. On the other hand, it seemed it could be useful for an institution to have a representative who could better navigate the culture.

Finally, it struck me as odd that a class of admission professionals who had no experience with either college admission counseling or college, except that they themselves had once attended college, and not always in the United States, had evolved as self-proclaimed experts. The business was flourishing everywhere and clearly lucrative. School counselors were upset because they felt their credibility undermined and their jobs threatened. The adolescent voice which I had so prized was getting lost. College admission always represented to me an opportunity to see students at their best. They were creative, they were full of joy. Suddenly, Botox had been injected into the applications they completed and the picture they presented. They were becoming increasingly packaged or groomed and often cynical about education. The people coaching them did not know them through an academic environment.

It further concerned me that the applications of the poor did not have the polishing and sculpting of the rich. Of course, those who have means always will have access to more opportunities and a better education and tutoring. But the one equalizer was disappearing. It became more and more difficult to make an argument in favor of a student with raw power and potential over a student who appeared perfect. For international students, the joy I had derived from being introduced to a new world or to a new perspective was quickly disappearing.

Researcher bias

I am biased—and should be. I am knowingly biased but hope that I'm not unknowingly biased as well. Just as my interlocutors' experiences influenced their responses, so my experiences undoubtedly have influenced mine. I am employed by a highly selective institution where the emphasis is on selection rather than on recruitment. The question of fit, because we are in an environment of an "embarrassment of riches" in terms of the quality of applicants, is important. I do not have to worry if my university will have a class (although I have to worry about the quality of the class), or if there will be international representation (although I worry about socio-economic diversity within that class). The notion of the use of agents in recruitment is therefore an odd one. At the same time, because my institution does not need to use them, my perception is not clouded. I do not need to justify or equivocate. I have the luxury of being able to observe.

Second, in an environment in which I have to sign conflict-of-interest forms annually, I reflect upon relationships which give an appearance of conflict. A relationship with agents is replete with possibilities for conflicts of interest.

Third, my personal bias is against for-profit entities in the academy, because they benefit only those who can afford the services and because the people who run the businesses are often not admission professionals or education experts and because I distrust the motivation when I hear about the amounts charged and when it seems profit is the primary impetus.

Finally, I teach. I see constant attempts at gaming the system. This behavior is a part of everyday life, but the pressure that students and their families feel leads them unto

temptation. Although this does not mean that all agents and students game the system, there is so much evidence of gaming the process that it is hard to understand why one would invite it.

In order to address my biases, I discussed agent use with colleagues from institutions which rely on agents to understand the phenomenon better. Some defended the use of agents; others tried to steer agencies from within. My biggest surprise was what I learned about universities. My conclusions became more nuanced because of these conversations.

In reviewing agency websites and newsletters, I once again confronted my biases. I found many very good services. I also found information which was erroneous. It was not surprising that the positive and the negative co-existed. The details were nevertheless unexpected.

I also discussed the phenomenon with scholars of East Asia and a Chinese scholar in the Department of Education at Brown University. I could not share transcripts with anyone outside my committee since I had stressed anonymity, but I shared my findings with a former professor living in Asia who has some knowledge of educational issues in the region. She was able to provide useful feedback on the presentation of the research.

Validity and ethical considerations

The biggest challenge to this study was ascertaining the validity of the findings. In embarking upon the research, I wondered whether interlocutors would withhold information because they were so concerned about being identified. In some cases, the version of events I heard in informal conversation, before I had selected a research topic, was much more vivid and forceful. The formal, taped interviews for the research were

often muted. I wondered whether informal conversations were exaggerated, as such conversations often can be, or whether taped conversations were downplayed. Caution on the part of interlocutors who were taped did not change the data, but in many cases the edge was lost. Whether the data as presented is more thoughtful or merely more cautious is hard to say. There was a greater attention to accuracy, but there was a greater sense of fear as well. I was asked on several occasions to confirm my willingness to share the final product, and I was asked for assurances that the stories could not be traced to the interlocutor. I even received a fearful call three months after an interview asking for an assurance that I would not harm the interlocutor.

Maxwell (2012, ch. 5) warns that "a primary ethical obligation . . . is to try to understand how the participants will perceive your actions and respond to these." In keeping these words in mind, my first consideration was protection of privacy. Accordingly, interlocutors were given anonymity through pseudonymity.

At every step of the way, I gave participants the chance to react. I sent initial transcriptions to each participant for review and approval. Once my chapters were written and had received preliminary approval from the dissertation chair, I asked participants if they could review sections in which their comments appeared. In cases in which multiple pseudonyms might appear, I forewarned participants and asked permission to send the passages in question to each interlocutor who was quoted. All sent their approval with some minor changes, usually grammatical. One participant was dismayed by her candor and given the option of opting out.

By interviewing people in many different roles, I hope to have presented the issue from varying angles and thereby to have given as accurate a rendition of the benefits and drawbacks of agencies as I could.

Limitations

Despite all the interviews, this study was faced with a number of limitations. First, the principals currently employed in the Chinese offices of the agencies did not respond to me. They were aware of this study, as some of my interlocutors attempted to make introductions. I tried to address the limitation by relying on websites and obtaining information from individuals who had worked closely with the principals.

In addition, I did not seek out one group of key stakeholders: students and their families. Students and families are not part of this study partially because their perspective seemed to warrant its own study. Most of the information presented, therefore, comes from individuals who worked in some capacity with one or both agencies, either as employees or as university affiliates, or who had knowledge of the landscape.

Another major limitation is that I have not yet learned any dialect of Chinese despite many years of travel to the region. In order to gain trust and be in complete control of nuance, one has to have a strong understanding of a culture. To understand a culture thoroughly, one must know the language and be familiar with the literary tradition which has informed both language and thought. One must also have a sense of history of a place. I have tried to overcome some limitations by gaining familiarity with the literature and history of China, as I do whenever I travel to a new region. I also have

tried to address limitations by checking my findings with people who understand both cultures well and by continuing to learn more about China.

This study examined agencies with several functions. Not all agencies are so complex, however. Some of the higher education interlocutors in this study had developed models which appeared to resemble outsourced extensions of their offices. Others had experienced shifts in the models they had used when a new administration rejected the outsourced models. Although it seemed that a study of a complex model might magnify the potential outcomes, both positive and negative, and might better illustrate the inherent conflicts of interest, this study does not consider all types of agencies and third parties. It does not, for example, include interviewing agencies which provide assessments of students who are interviewed. It does not include smaller operations.

Other limitations are related to the issues alluded to in the discussion of validity. A number of participants were eager to share stories but anxious that anonymity might be inadvertently compromised. Were the participants sufficiently forthcoming? By including many participants, by reading agency websites, and by studying documents and data made available by NACAC, IACAC, the College Board, IIE, and government sources, I hope to have provided a clear depiction of agency work and the perceptions of stakeholders.

CHAPTER FOUR: FINDINGS

The number of international students in the United States has been increasing. In 2000–2001, there were 547,867 international students in the United States (Open Doors, 2001). With the exception of a dip from 2003 to 2006, there has been a steady increase. In 2014–2015, there were 974,926 international students in the United States, a 10% increase from the previous year (IIE, Open Doors "Fast Facts," 2015). Similarly, there was a steady increase in students from China. In 2000–2001, there were 59,939 students from China, representing nearly 11% of the foreign student population in the United States. Until 2006–2007, the percentage change of annual increase from the previous year had generally been in the single digits, with the exception of a 10% increase in 2000–2001 and a period of rapid increase in the 1980s. From 2007–2008, there was a sudden surge in numbers of students from China. The increase in the 2007–2008 year was 19.8%. In 2009–2010, the increase peaked at just under 30% (Open Doors, 2015).[18] There continued to be large increases until 2012–2013, when the annual increase from the previous year continued to be more than 20%. China is still the country with the largest representation of students outside the United States, at 304,040, a record it has held for six consecutive years. This represents 31% of the foreign student population (IIE, Open Doors Data, 2015).

According to the website of the Chinese Ministry of Education, growth began in 1978 when Deng Xiaoping allowed study abroad to advance beyond the Soviet Union (MOE, n.d.). The hope, according to the Ministry of Education site, is that such students

[18] In 2013–2014, the increase fell to 16.5%, and in 2014–2015, the most recently recorded year, the increase was 10.8%.

and scholars will contribute to the economic and social development of China. "The American and Oceanian area is always one of the priority areas for China's international exchanges and cooperation," reports the site, "and the scale of educational exchange and cooperation has been widening day by day." The site further reports growth in the numbers of students in the United States, the majority of whom pursue studies funded by their own resources, and growth in teaching and in research through multinational corporations. Indeed, China is the top sending country of students to the United States, a position it has held for six consecutive years, from 2009–2010 to 2014–2015, the last year for which we have data (IIE, Open Doors, 2015).

It was in this period that NACAC commissioned its study of agents, who were a topic of discussion among the membership. According to NACAC representatives (Merry Brandybuck, Sam Gangee, Will Whitfoot, personal communication, November 2015), the agent issue came up "organically." NACAC felt that, in some ways, the United States was, in its thinking of recruitment practices, far ahead of countries which rely on agents to import international students, such as the UK and Australia (Merry Brandybuck, Sam Gangee, Will Whitfoot, personal communication, November 2015). In 1951, the SPGP prohibited commission-based recruiting—roughly 40 years before the amendment to the HEA of 1992. The British Council's London Statement (2012), a statement on agent use, was published while the Commission on International Student Recruitment was deliberating, but that was nearly 60 years after NACAC had expressed initial concerns. The London Statement was hailed as a "landmark International Code of Ethics" (British Council, 2012), but NACAC felt that while best practices were better defined, the US already had anticipated some of the issues pertaining to the potential

conflicts inherent in outsourced or commission-based recruitment. Will Whitfoot, a NACAC representative, described NACAC's research on the London Statement and the comparison to NACAC's statements on agent use.

> We did a side-by-side comparison of that and it read like a Cliff Notes version of the SPGP. In some ways, the business practices are much more well formed overseas than they are in the US, but I'd say that the regulatory structure here in the US is much more well informed by the history of this issue and potentially is better positioned to address some of the problems. Again, factoring into the Commission's decision to talk about fluidity, it's possible, not necessarily likely, but possible that we could see all of the same stumbles that the US has experienced domestically over the last 50 to 60 years happen overseas. I wouldn't be surprised to see this become more regulated and, in fact, move back in the direction where NACAC started. If not all the way to the position, at least to a more strict interpretation of what is allowable.

In order to better understand some of the issues which NACAC had been considering for so long and was continuing to study, it is important to consider the services offered by agencies and the perception of educators working with those services. The educators had noted the growing student migration from China to the United States and had decided to become involved in helping students and families navigate the unfamiliar. Some were Chinese who had had an experience abroad or who were interested in global education; some were Westerners who wanted an international experience. They had worked for one or both agencies, or alongside the agencies. Through their accounts, we learn about the services which were rendered or expected, and how those services were perceived by agencies, employees, and universities. The accounts focus on services which impact US university admission. Some services, such as the educational exchange services and visa services which had been a large part of agency work before US college admission-related services had become so prevalent

within the organizations, are not—as a rule—a part of this study except insofar as they illustrate the sorts of activities in which the agencies engage.

Agency "A"

In the mid-2000s, several young, energetic former admission officers set out in succession to help train Chinese counselors in the art of college counseling. The former admission officers answered ads or were actively recruited by an organization in China. They moved to China in the belief that they would teach their new colleagues about US-style holistic admission and they would help them set up their counseling offices. Instead, many of them found themselves counseling students with the expectation that they would use their connections to help clients succeed in their goal of securing a spot at the best institutions, whether or not they felt it a good match. They were hired by a company called Agency "A".

Agency "A", alternatively referred to as "Agency 'A'", is an organization which was founded more than 25 years ago in the early 1990s. Its functions were initially related to emigration and education, and grew to include other services in various cities around China. Agency "A" was not unusual in its evolution to a multi-service agency. Several agencies grew to be complex; they usually started as an agency which offered a service, such as immigration services or test preparation, and expanded to include other education services. Agency "A" was no different. A little more than 10 years after its founding, it began to provide educational services, according to the website, to schools in China. More recently, it added counseling services which were offered within secondary schools to students seeking tertiary education outside China, and services offered privately outside secondary schools.

None of the interlocutors in this study were able speak in any detail about the organizational structure of Agency "A" and could not even articulate what branches and services existed. They often gave confusing accounts of branches and services beyond the one or two with which they were involved. Based on accounts corroborated by the company's own website, however, Agency "A" includes, or included, branches which specialize(d) in visa services, educational exchange, delivery of foreign curricula, test preparation, external educational enrichment programs, and college counseling both with secondary schools and outside schools. Curriculum-delivery services, in which a foreign curriculum is introduced to a section of a national school, already existed for non–United States curricula, such as the British A-level. United States–based AP programs had typically been found within international schools whose population was not primarily native Chinese. In the mid-2000s, however, that changed due to a sudden demand for placement to US universities. Third-party organizations were retained by Chinese secondary schools and by the College Board to facilitate the delivery of the AP to the international sections of those schools.

Agency "A" was already a provider of other foreign curricula such as the British A-level. It became one of the many providers of the AP. Currently, Agency "A" partners with several top secondary schools throughout China, with different levels of partnership, helping to deliver the A-level, the AP, and the IB. The company endeavors to develop the sorts of skills, normally in the purview of educators within a school, valued by United States tertiary institutions, such as critical thinking. On its website, it capitalizes on the language of holistic learning and well-roundedness. It advertises a pathways-type year—a year during which students sharpen English skills and prepare

for two years of foreign curriculum study—in advance of embarking on foreign curriculum preparation.

Depending on contracts with each school, Agency "A" offers different levels of services to schools. On some sites, there is a school-within-a-school model in which students prepare to study outside China by choosing a curriculum such as IB or AP or A-level along with some national requirements. The service provided by the agency includes a corps of teachers, often foreign, who are employees of Agency "A" and in-school counselors, also Agency "A" employees. Students who are not in this division study the Chinese national curriculum in preparation for the *gao kao*, the examination which determines university placement in China.

The two divisions are not necessarily entirely separate; there is usually some collaboration or integration of services with regular school employees. For example, there might be a school-employed registrar in charge of all transcripts, both for the national and the agency-delivered international divisions. The school might choose to provide all the counseling services, both for students in the national curriculum and those in the foreign curriculum. Other schools might include Agency "A" counselors in the company-run section but arrange for national curriculum students to work with the Agency "A" counselor as well. At one school, the foreign curriculum division was physically housed on another campus, but students from one division were invited to the other for, say, US college visits. In some cases, there was a double administration which included a principal for the national division and one for the international. In such cases, some staff was on a school payroll and others on a company payroll. In others, efforts were not duplicated. Funding is complicated; students in the international section pay

more but can usually use resources of the national section, ranging from physical space to employee time. This has created some tension, as some perceive that public funds are used for private gain.[19]

Agency "A" has developed a service which is of particular importance to this study in that it involves some interaction, directly or indirectly, with US universities: an independent counseling service. Students in Agency "A" schools, both those with company-hired, company-paid counselors and those with school-employed counselors, can pay an added fee for additional counseling. Students not enrolled in Agency "A" schools can also avail themselves of this service. The branch under which the college counseling service falls includes a test-prep center and other enrichment programs, as well as counseling. The website advertises ethical service delivery, thereby suggesting that unethical services exist and are a concern, and help to families in understanding holistic evaluations. The site proclaims that the service is unlike the usual counseling model in China, in which agents "take complete control of a student's application."

Eight individuals, four women and four men, who work, or worked, either directly with Agency "A" as counselors (on the Agency "A" payroll) or indirectly (on a school payroll, but had direct collaboration with the Agency "A"–facilitated branch of the school) were interviewed for this study. Of the five who were/are on the company payroll, one worked as a college counselor within a school and four as part of the independent counseling services. The four who worked as independent counselors were

[19] A new law concerning the international sections of national schools is apparently being introduced. International sections are being told that they must move off campus and may not use the name of the parent school. One of my sites was an international section which had recently moved to another location. Many interlocutors felt that the motivation of the government came from concern about a parasitical relationship between the international and national sections.

either graduates of highly selective institutions, or had been employed by highly selective institutions, or both. Three of the four independent counselors were people of color. Of the group of eight, the three individuals on school payrolls were, or had been, employees of schools which had an international section facilitated by Agency "A". Three were native Chinese and five were non-Chinese Americans. The individuals were employed in seven different cities throughout China; four worked in at least two different cities. All were individuals who cared deeply about students and about education in word and in deed.

In addition, four university representatives representing very selective institutions of various sizes had had interactions with Agency "A". They had worked with Agency "A" students in summer programs, or had advised Agency "A" on some of their endeavors, or both.

The prominent recurrent themes in the accounts about Agency "A" centered on perceptions about expectations of the services which employees would provide, about ethical issues, and about perceptions of conflicts of interest. Many experienced some discomfort with practices they observed. Although not all the participants felt that there were actual ethical concerns or conflicts of interest, every participant addressed this issue. Even the Agency "A" site references the issue of ethical practices, suggesting that such a question might be of concern.

Discussion of cultural differences was embedded in the issue of ethical practices, because interlocutors worried that ethical behavior was a culturally relative term. Another theme that was presented both as a dilemma and as a cultural difference was transparency about the organization. Yet another recurring theme, often uttered in

observations about ethical concerns, was money. Words such as "profits," "money," and "commercialization," terms that were used more than any other, formed a great part of the conversation.

Agency services: school-based college counseling and perception of practices

When simply asked to describe work with or for Agency "A", most of the interlocutors who worked primarily in secondary schools or with high school students enjoyed their work and their students but recounted practices with which they felt uncomfortable. Two counselors spoke positively about the organization's work. Universities were more divided in their views. Perspectives from employees who worked within schools, or within the private counseling branch of the organization (not school-affiliated), and from university administrators helped to draw a composite picture of the organization's work.

Chang'e, an Agency "A"–employed school counselor in an international school-within-a school, offered positive perspective about the agency's work. At her school, the Agency "A" international division employees worked closely with their national curriculum counterparts. An old, well-respected school with boarding facilities, it was one of the more respected. The school and its grounds appeared to be modern and well appointed. The students seemed very engaged and excited about the prospect of studying abroad. Chang'e cared about education and was especially concerned about the application experience because of her own experiences applying to study abroad. She now worked within a school context. Chang'e worked out of a spacious, shabby-genteel office containing old mahogany furniture with elegant lines which gave the impression

that the old veneration for education was now in decay. As we spoke, a large cockroach purposefully made its way across the room.

Chang'e explained that she had become interested in counseling because she had been cheated by an agent when she had applied to institutions in English-speaking countries. She felt that agents' motivation was business benefits and profits and that tertiary institutions were recommended only if the agent would profit. She had been invited to join Agency "A" because of her experience abroad. She felt she could help others avoid falling prey to people whose motivations were questionable. Agency "A", for her, was not in that category. Chang'e had worked with a few Agency "A" schools and found that the individual interactions she had and the counseling classes she taught meant that she could actually impart knowledge to others and provide them with a positive experience. Colleagues who previously had worked for agencies and who now worked with her found the new experience with this company enjoyable because they could work with the students "genuinely." Her colleagues had joined Agency "A" because of genuine interactions, despite a cut in pay. "We pay less, I mean far less, than what they gained outside as an agent," she said. She did not consider Agency "A" an agency but rather a service which was essential for those who intended to study abroad. The energy that came out of the triple efforts of Agency "A", the school, and the government produced a great product, she felt.

She worked closely with her national curriculum counterpart, moreover, and enjoyed professional development opportunities, as did all the Agency "A" staff. Agency "A" gave training to the teaching staff, both Chinese and foreign, to help teachers better instruct the students in the division. The company encouraged creative innovation. This

included a “flip” class in which students were assigned preview work which they did at home so that class time is used to discuss. There was emphasis on the continual development of innovative methods in teaching; Chang’e had been given the freedom to adopt Western models, such as encouragement of self-reflection and development of community service ideals. Her description of the teaching methodology, the latitude she was given to develop new programs, and the support she received lent a different view of the work of the agency, both in scope and in the quality of the services offered.

Agency “A” supported Chang’e by sending her to summer institutes and to conferences, including the IACAC.[20] IACAC has since, however, instituted a requirement that members be on the payroll of a school and not on the payroll of any outside organization. Nevertheless, she felt that she and the company would continue to work closely with IACAC guidelines to strengthen their own policies. She said that not all 200 to 300 counselors in the organization had the same opportunities for development, but they were at least given the chance to attend more local professional development events.

In her office, there were several Chinese counselors and a Western one. There was a regional quality manager who assessed the staff and helped them streamline the process since there were so many students. In her school, there were also foreign instructors who taught the foreign curricula. The school had around 30 Agency “A” staff members. Slightly more than half were Chinese.

Chang’e interacted with US universities at conferences and also on summer college tours arranged by Agency “A”. She stressed that services Agency “A” offered

[20] As of January 1, 2016, the OACAC acronym has been changed to IACAC, or International ACAC.

made students feel they understood themselves and the US system better as a result of their interactions with her and with her colleagues.

In another large city, Morgan LeFay was employed as a college counselor in an Agency "A" partner school. Her experience and observations were different. In her role, she provided counseling to students in the national curriculum of the school who wished to study in another country. She was also a registrar and in that role also worked with teachers from the international section to produce a transcript with the required grades. Her school's principal had chosen not to buy into the Agency "A" counseling package and to limit Agency "A"'s presence in the school but had included a curriculum director and a few teachers supplied by the company. According to the agreement with the company, students from the international section who wanted advice were to go through Agency "A" Central, where they paid an added fee for college counseling.

One day in her first year, LeFay was confronted by a group of parents whose children were a part of the Agency "A" branch. They were outraged because they felt the company's group was not giving information that matched what other kids were hearing at school. They demanded to be allowed to use LeFay's services. Agency "A" finally agreed to allow LeFay provide the counseling for North America. LeFay thus engaged in college advising and handled all applications of students who wished to study in another country. Within three years, the number of students considering universities abroad had quadrupled. Students did not have to use the counseling services offered off-campus by Agency "A". There were Agency "A" counselors employed by the company who visited campus "at regular intervals, supposedly not counseling." Some students chose to avail themselves of their services.

After the parent confrontation and their demand that students in the international (Agency "A") division be allowed to use the school counselor, LeFay began to interact more closely with the company. She began to work with Agency "A" on letters of recommendation and on grades. As LeFay prepared transcripts, she received information from Agency "A"–paid personnel on student grades. She discovered one day in the second year of her contract that the courses that she reported as A-levels (British)[21] on transcripts were not actual A-level courses.

> That first year and a half, there was egg on my face. They were sending down information that indicated students were doing a couple of things. The most grave was this: They were sending down information indicating which students were taking A-level English and had taken AS English which is the first year of A-level or AS1. We were reporting to colleges and . . . nobody questioned that on the transcript there was A-level English. I was just trying to develop the sense of what we were sending out and how accurate we were with our predicted scores. I said I wanted to see all of our kids' sheets. I started seeing these sheets come to me that had no A-level English, so I questioned it in early October. That took me until December to finally get an answer that you're right, we don't have this course on campus.
>
> I pursued the principal, [and] the A-level coordinator on campus. Again, I was concerned with integrity, and reaching out to a lot of schools, "Listen, all that's said on our part, our A-level English program is not A-level. It's not a Cambridge program, yet it is advanced English, which includes essay writing, expository prose and writing assignments and some literature. It is in fact an internal course." We corrected it and I think for the most part that became a cornerstone trying to present a truthful application transcript, in the end. I think that's for me probably the most grave—the absence of integrity, the absence of good practice.

As the in-school counselor and registrar, she required that all applications be submitted to her before being sent on to the colleges. There, she noted more integrity-challenged behavior:

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[21] A-levels, or Advanced Levels, are subjects offered in the final two years of secondary school as preparation for university in the British system. At the end of two years, students take A-level examinations in the subjects they have chosen to study.

> Teachers and counselors in Agency "A" regularly wrote essays for kids and I know that because as the assistant registrar we required that all applications come through me whether or not they worked with us or someone else. It was obvious, some of the things. When I do my consultation, I'd show them. Three or four years in, I'd send the kids maybe an essay. We'd have the conversation and they'd admit that their counselor had written it for them.

Finally, in collecting other information required for applications to the US, LeFay worked with the Agency "A" curriculum developer to collect letters of recommendation. That, according to LeFay, presented another dilemma. The Agency "A" director collected the letters and returned them to teachers because they "weren't appropriate enough and wouldn't support a student's admission ambitions." There was pressure on teachers to tart up their letters.

The dilemmas did not stop there, however. In another egregious instance, Agency "A" engaged in false advertising, unbeknownst to the students involved, according to LeFay's account.

Two students who were working with Agency "A" counselors at the Agency "A" central office had been told they had been admitted to schools to which they had never applied. One was a highly selective school, and the other less selective. Upon checking with her admission colleagues, LeFay discovered that neither student had been an applicant. She approached one of the students and said, "Great news on your acceptance. Whom did you hear it from?" "My counselor told me." "Are you going?" The student replied, "My counselor feels that Mirkwood State is a better fit for me, so I'm planning on going to Mirkwood." A poster of both students was prominently displayed in the hallway of the school stating that they had been accepted to the highly selective and selective schools. The Agency "A" coordinator refused to remove it until the following

year. Asked if she had confronted the administration about the incident, she replied that she had but that the Agency "A" coordinator insisted that the information was true. The coordinator stated she was absolutely certain the students had been admitted. Upon being asked to produce the acceptance letter, she could not. "It was just a game of evasion," said LeFay, "It was just a game of avoidance from all ends." Even the principal assured LeFay that her complaint was "opinion, subjective opinion." LeFay considered the principal reluctant to pursue it further because, for both the company and the school, the poster was good advertising. The principal, she felt, did not want to scare others away by exposing the incident.

It is telling in this story that the students, according to LeFay, had not been told that they had not applied to selective schools. The students seemed oblivious to the fact that one needed to produce one's own application. One may argue that students are led to believe that a third party or a teacher or a school official handles applications to foreign universities. But as students are likely to trust that their advisors are knowledgeable about the application process, Agency "A" betrayed that trust. Instead, the students were used by Agency "A" for false advertising. It is possible that the students were accomplices in the deception, but LeFay perceived them to be telling the truth in their belief that they had submitted an application when they were confronted. Had the way of handling applications been considered appropriate behavior, Agency "A" would presumably have been more transparent.

LeFay witnessed yet another violation which contributed to her decision not to sign another contract. She realized that predictions on final results for the IB and the A-

Levels[22] were produced by the students and not by the teachers. Her ethical sensibilities had been assaulted and her morals compromised. She left after three years.

Feng Yi, a Chinese counselor at LeFay's school, felt that the school realized there were some doubts about the Agency "A" employees, including the teachers, and had tightened its policies. Students were still permitted to work with independent Agency "A" counselors but encouraged to use school resources. Teachers of foreign curricula were more closely monitored by the school. She felt that in the early days of foreign curricula, schools relied on outside companies such as Agency "A" because the schools were not equipped to provide international resources as quickly as they were being asked. One more practical view from two other counselors associated with the schools was that many principals wished to cooperate for their post-retirement job prospects.

Feng Yi stressed that there was a good reason to include third parties for curriculum delivery in the beginning, but that a principal with good vision clearly would recognize that the school eventually should take over the administration of international programs and curricula. Erlang Shen, an administrator at another school, had come to a similar conclusion and had severed ties with Agency "B", the agency with which his school had been associated, once Agency "B" had established the foundations.

Agency services: private college counseling and perceptions of practices

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[22] Typically, final grades on IB examinations become available in early July of the final year (or the year in which the student sits the examination) in the Northern Hemisphere, and final grades on the A-levels become available in August. Because these results are so late, schools furnish predicted results. This system is a result of British university norms; Oxford, for example, will give a conditional offer of admission based on final results. US universities usually expect predicted results of their international applicants in the absence of any other transcripts. Schools abroad do not always give term grades.

Those who had worked for Agency "A's" "VIP" division, which provided private college counseling, had differing perspectives on ethics within the operation because of differing perspectives on the expectations set for them. Their stories, presented chronologically according to the time they were employed, show some evidence at an attempt on the part of the company to build credibility but also demonstrate an attempt to leverage relationships with selective universities.

Merlin Ambrosius, a college counselor in the international division of a Chinese school, had worked for Agency "A" on an Agency "A" payroll in cities other than the ones in which Chang'e, LeFay, and Feng Yi were employed. He voiced similar concerns to those expressed by LeFay and Feng Yi. Ambrosius left after only a few months of employment because he had concerns about the values of the organization.
He had been initially hired to train counselors and run their network of counselors. He realized before too long that he had been hired to make the organization appear to be Western and therefore accessible to universities in the United States and even to clients. To make matters worse, he was, in reality, prevented from implementing any of the Western methods for which he had been hired. He felt that there was little interest in educating a new corps of counselors. Ambrosius had been stationed initially in a large city and was later moved to a smaller location.

I just had a problem with the values, with the whole concept, in terms of how it was catering to the needs of the parents. It's clearly a two-track strategy of communicating in English with certain people. I was a Western face put on a program. They weren't consulting with me about the nature of the program, so there wasn't a

sharing of information. It was clearly, to some extent, well, a sham. I would use that word.

Despite his initial employment in the central office, he could not offer insights about organizational structure which might have been key to understanding its goals. He believed the counseling section had been created to compete with another large company. Competition became overt and aggressive; a former admission person from an Ivy League school was hired into another division, and the logo of that school was used freely in advertising, implying that the institution had a relationship with the company. Other companies used the same tactic; some even attended conferences and used pictures from the conferences in their advertising in such a way as to imply that they had a relationship with US institutions attending the conference. These conferences, sessions, and meetings were used to imply a working relationship.

Drusilla Fawley, an administrator at a highly selective university, recollected a trip to a program run by one of the agencies. She came across a rather large and prominent photo of herself and commented that one could not do anything in China without the big signs. Ambrosius regarded this practice as misleading.

Daniel von Blumenthal, a current school counselor who had been employed in the private counseling section of Agency "A", had been hired because of his expertise in college admission and had been told, as Ambrosius had, that he would be working to help train Chinese educators to be counselors. He found the position through a firm in the United States which specialized in placing personnel in secondary schools. When he arrived in China, however, he found the reality was different; he was involved in the advising of students rather than in the training of counselors, as he had been hired to do.

In advising students, he felt pressured to produce applications, an expectation with which he was uncomfortable and which did not set a good example for the counselors he was supposed to be training. His direct supervisors were two individuals who had been international college counselors or admission people; even as both were supportive of him, they also expected him to acquiesce. When another job away from the company became available at the end of the year, he did not hesitate to leave.

> When I came in, Agency "A" was trying to integrate that international curriculum with more of a college counseling spin. What I had been made to understand that I'd be doing was helping them create a process through which we could educate national local counselors that were working in those schools and help them with understanding what the college process was all about, helping them understand what a letter of recommendation means. Helping them understand the different pieces of an application in order to help those students then be successful in the application process, because most of the students who go through these international programs in the national curriculum schools are looking to go to the US.
>
> That was the post. That was the job that I had understood I was going to be hired for, and I was told that I would be based in [a smaller city], that I would be travelling to some of the centers because Agency "A" has centers all over China. When I got to China, though, I was told that I would no longer be needed in [the major city] but instead they were going to be moving me to [a smaller city]. Basically they were making me an independent. My job then was to work with students who were in the international curriculums at an Agency "A" school but that had paid a premium to work with me as their college counselor.
>
> For the rest of that year, they had me doing odd jobs, like had me promote their Independent Counseling model, they did have me work with some of the counselors on site, but they started a program that I worked with. It was basically an Independent Counselor model, in a very traditional sense.
>
> I would get complaints from the parents saying that I wasn't helping their children enough, and I would sit there and explain to them, but what they mean by enough is that they want me to write this essay and I'm not. As a former admission officer and somebody who actually cares about the process, I refuse, I won't do it. You can send me home if you want to, but I'm not going to sit here and write children's essays for them.

Although von Blumenthal felt supported by his superiors, he was convinced that the expectations of families caused management to transfer the pressure onto him.

> I could get pulled into the manager's office, where she would try that very passive-aggressive Chinese way to tell me that the parents weren't happy ("you know, is there anything else that you could be doing, because the families they feel that the essays could use more work") and I would sit there and be like, I absolutely think they could use more work. The students should be working more.
>
> I knew what she was trying to say to me, but I was going to play dumb for as long as I could. I knew that she wasn't going to outrightly ask me, because then that would put me in a position to have to say "no," which you don't really do in China. You don't say no to anybody's face and you also don't ask a question directly if you know that the answer is going to be no. Culturally, you don't put people in those positions. This was a very tenuous dance that we had around each other where every couple of weeks, there would be somebody who said, "They just feel like they could use a bit more help." I was always very careful to make sure that she understood that there were lines that I simply would not cross.
>
> I know that when I would have those conversations with my Chinese counterpart he'd just ask me, "I don't understand. Why would you keep fighting this?" I said, "It's not fair. It's not fair to the school. Fundamentally, it's not fair to the kids either." He was like, "Your job is to get them into school." I said, "No, no, no. This is the fundamental difference. You're defining my job differently. You see my job as getting them into school, I see my job as getting them ready for the right schools."
>
> I think as we started to have more and more of those conversations, he started to understand where I was coming from.

Von Blumenthal's perception was that he had been hired to train staff to advise students in the way a US college counselor might advise them: to find the right fit. His counterpart's perception of the job was that the counselor helped the student get into the best school possible. When the office manager ran into von Blumenthal after he had left, she said, "I have to say that I admired your ability to stick to your guns. I know you knew what I was asking you to do and you wouldn't do it, but you would never say no. You knew how to play the game in China to provide a solution knowing full well it wasn't the solution we wanted."

> That's what I had to do because that's how China works. I knew that if I wanted to walk away with my head held high and feeling like I had any control over what I was doing, that I had to play the game that way. That's one of the big

> reasons that I was so happy to leave because I didn't want to have to play the game at all.

As von Blumenthal was leaving, he interviewed another person for a similar position. Like him, Bower O'Bliss was excited by the prospect of living abroad and helping to educate a generation of counselors from China. She had been told that she would be helping Chinese counselors learn how to be college counselors because counseling was a new profession in China. Eventually, that training would extend to public schools. Her perception of the job differed from the expectations her employer had of her. O'Bliss had no idea, she said, what she was walking into.

When she arrived in the same big city which had first hosted von Blumenthal the year before, however, she found that her job was to counsel students described as "high-end" and "elite." Again, college counseling was not about fit but about admission to highly selective institutions.

> Each of us was assigned a Chinese counselor, and that Chinese counselor/translator translated wherever necessary when we met with students' parents. The Chinese counselor was sort of taking care of them and again this came into my understanding slowly because none of this was completely explained at the start, but what I figured out was that Chinese counselors were there to support the process. They were handling parts of the process that I wasn't fully aware of. I discovered later what that meant—they were handling the translation of recommendations that were written either by the student or someone else. They were representing teacher recommendations.

She, too, had been told she would train counselors but felt that the expected outcome of her job was to get students into certain schools by whatever means she could, using the Chinese counselors as accomplices rather than trainees. She had been recruited not by a Chinese employee of Agency "A" but by an American employee who had been an admission professional at a highly selective institution. Yet her job did not meet the

description she had been given, and she felt uncomfortable with the job she was expected to perform.

Asked if she ever confronted management, O'Bliss replied that when she realized the recommendations were fake, she complained to her boss. The Chinese counselor had said falsified recommendations were common practice and accompanied her to her boss's office. At first, the boss looked appalled. By the second meeting, however, the boss, an American, became evasive and got red and looked as if to say, "Please don't push this point," but instead said that the kids had no other way of obtaining letters, so this is what they had to do. At weekly meetings, O'Bliss would complain that what was being asked was unethical. At another meeting, which became confrontational, according to O'Bliss, the boss revealed that Agency "A" "and all the other international admission officers knew that recommendations are fake and they just kind of turn a blind eye to it and don't really care at all in the end, as long as the application is complete."

The turning point occurred shortly thereafter. O'Bliss was working with a student who had sought Agency "A"'s services.

> She was slowly becoming frustrated with me because she wanted me to take the essays that she had written—one in particular, but all the essays that I was working on with her, she wanted me to correct them. She wanted me to correct the grammar, change sentence structure; she wanted me to make the essay perfect —in her words, "Perfect," she said, "I want you to make them perfect." What I was doing instead—I was pointing to places where her sentences could be stronger, pointing to grammatical errors and literally drawing an arrow, like a teacher would, and talking with her about . . . What I was trying to do was guide her through what the problem was grammatically. It was a fine balance because I saw that she just hadn't achieved a level of understanding about a particular grammar rule or a way that we structure a sentence. If I knew that she couldn't achieve a certain stylistic way of expressing herself, I would drop it and just let it go. Let the grammar errors go, or let the awkward sentence structure remain as it was, because I realized that she just didn't get it, and I wasn't going to change it for her.

> She must have shown her essay to someone else, and she realized that I wasn't correcting all her mistakes, I wasn't changing the awkward sentences, I wasn't providing ultimately the service that she felt her family had paid for. She thought that would threaten her ability to get into the schools she was applying to. She became very angry, I guess her parents got angry and told. It went up the ladder in the company. They finally pulled their business and went to, I think, Agency "B" or whatever their name is. I think they went to Agency "A"'s biggest competitor. The people in charge were angry with me because they accused me of not providing the service that I was being paid to provide and that they had heard that I wasn't using my contacts with the universities that I knew to try to get the kids into those schools.
>
> It was at that point when they decided to send me somewhere else. Shangri-la was too valuable of market in that if that's the way that I was operating, if I was refusing to rewrite students' essays essentially and rewrite paragraphs rather than rewrite a sentence; if I was refusing to do that, if I was refusing to use my contacts.
>
> I guess there was another complaint against me, there was a son of a pretty high-ranking government official who could not understand why I wouldn't write chunks, huge chunks, of his son's college essays because his writing was so poor. He couldn't understand why I wouldn't do it and this is a very valuable customer/client, whatever you want to call him. Pretty much a VIP person. Mom and dad came in and started talking, being translated of course, and they didn't pull their business but they complained about me because I wouldn't do what they thought was part of the service that they had paid for.
>
> That's when they pulled me from Shangri-la. It ended up being a big to-do. I had to talk to the owner of the company.

One of the top people in the office said he understood "where Bower was coming from" because he had had experience in other cultures and understood O'Bliss was trying to help; however, he explained that the company would have to move her to a satellite city because the major city was too valuable a market. This had been Ambrosius's experience as well. In the satellite cities to which she was transferred, O'Bliss worked intensively with students in explaining the admission process. She said that there were 14 employees of the counseling division in the main office; half were Chinese. Since her departure, the service has expanded to provide enrichment experiences which will help students look better on paper and help them transition. O'Bliss felt she was being asked

to create a student who did not exist —one with embellished essays, recommendations, and even extracurriculars.

The same official who understood where O'Bliss was coming from also had supervised Thomas Gradgrind, who had a more positive experience. Gradgrind felt that the management respected his opinion and, in general, wanted to learn to behave in ways which were acceptable to their Western employees. Gradgrind, too, had been recruited to help the company deliver college counseling in a Westernized way. He counseled students in a center located away from school premises. Students paid extra for these services, and Gradgrind's role was to determine how counseling would be divided among the employees, much as he might if he directed a college counseling office of a US preparatory school. When faced with situations such as the client expectations that confronted his predecessors, he firmly told management that if he had to compromise his standards, he would quit. He was very direct in his response and was respected for it. Perhaps the company wanted to learn Western ways, as Gradgrind surmised, or perhaps it decided not to throw caution to the winds by offending too many Westerners who had previously been employed by highly selective institutions in the United States. There would be damaging publicity with the very schools with which the company was trying to align itself if Merlin Ambrosius, Morgan LeFay, Daniel von Blumenthal, Bower O'Bliss, and Thomas Gradgrind aired their complaints.

All the counselors whose stories appear above cared deeply about educating the student. Three revealed some egregious instances of behavior which most would find questionable. Only Gradgrind, however, felt that management had not asked him to sacrifice his integrity.

Digory Kirke who served as an administrator in a Chinese national school, Morgan LeFay, and others stated that the VIP counseling service was where Agency "A" made its money. Agency "A" might attach itself to a well-known school at a loss for the publicity, but the profit came from college counseling services. Students paid extra to be a part of the Agency "A" division of such a school. According to Chang'e—an Agency "A"–paid, school-based counselor—in 2015–2016 students paid 100,000 RMB (approximately $15,000 at the time of this writing) in tuition to attend the international section of her high school, and they paid an additional 30,000 RMB for the Agency "A" school-based counseling fee. She said that this initially upset her, until someone convinced her that she would have no salary without that fee.

Chang'e harbored one criticism. She was puzzled about the existence of the VIP Service for college counseling and reasoned that the external service existed to keep students from hiring bad agents. She did not find the applications from the VIP service over-polished, as they were from other agents. She felt, however, that because there were both Chinese and Western counselors in the school, the extra layer was unnecessary. She said the cost for the service was more than 100,000 RMB (roughly $15,000 USD at the time of the interview). She did acknowledge, however, that it was better than the 400,000 RMB one of her students had paid an external agent not affiliated with Agency "A".

Ambrosius confirmed the charges:

> That's the biggest problem. Running schools is expensive, and there's much more of a margin on independent counseling. When you can charge USD 25,000 and then double that if you include other services, test prep and things like that, that's a lucrative business. The running of schools is expensive with hiring administrators and doing all that. My perception is that at this point, there's more of a profit center with the independent. That seems to be where the

> push is. The school-based counseling is much cheaper. The ballpark when I was there was . . . about USD 6,000 for the school-based counseling. There's a reason why you pay for it. There's a reluctance in Chinese schools to charge and bundle it all together the way an American institution would. It's more ala carte. The counseling program is ala carte. You have, generally speaking, the academic program, and then the counseling program is an add-on. It's a matter of which add-on. Is it the cheap add-on or the one that's five times as expensive outside the gates? That's why, increasingly, the school-based thing can be a cut-rate version, limited. If you want our full service, you got to pay more. You got to pay market rate.

The VIP counseling division cost 25,000 USD, according to Ambrosius, for "high end, one-on-one counselling." Agency "A" drew its revenue from that service. Another division, in a smaller city, was more of a "traditional agenting business" where they "process thousands of students" to less selective institutions. LeFay had described the VIP counseling function as well structured; however, the branch lost credibility because the counseling function had established such a poor reputation among US tertiary institutions as a result of reports of applications produced by professionals. Ambrosius added:

> My perception . . . is that their main business priority over time has shifted toward the $25,000 quasi-transparent VIP, which we would say is process-inclusive, independent counseling, but they still have a well-developed traditional agenting business that's not to be forgotten, that's largely based in [a smaller city], where they process thousands of students mainly to less selective institutions. They still do the traditional agenting that they've always done for years and years.
>
> Some of those counselors are very competent, but there's just a fundamental misleading when the Agency "A" top administrators . . . were neglecting to tell me that they were agent number one. The person who created the agency industry, as much as any other, was the person who runs Agency "A". I was being misled the whole time I was there. I was running the school-based program and I was told, "Yeah, we're fighting off the agents," when, in fact, the idea is different revenue streams. We're going to have the revenue . . . that's the concept now. I know it is. We're going to have the revenue stream from the independent counseling. We're going to have the revenue stream from the school base, and we're going to have the revenue stream from the traditional agenting. Different revenue streams for different market segments.

Another source of revenue was from summer camps which were developed to help students with the application process and to introduce universities to students. Those summer camps were weeklong programs designed to help students write and prepare their applications.

Agency services: summer camps and perceptions of practices

The benefits of the summer camps and of the Agency "A" Center visits were that Agency "A" students were exposed to admission officers who could help them navigate the application process. For the universities, an introduction to Agency "A" students provided a potential pool of well-prepared, fee-paying candidates.

These interactions, however, were seen as conflicts of interest by some universities. The college and university representatives interviewed for this study represented different types of schools on the East and the West Coasts, and included private and public universities of different sizes and ranges of selectivity. The three which had interactions with Agency "A" represented that range.

Agency "A" began holding summer camps and offered a stipend to enable admission officers to attend. By offering a stipend to colleges to attend the camps, Agency "A" could more effectively promote itself because it could ensure the presence of US college representatives. Tristan Meliodas, a college admission professional at a large, highly selective university felt it important to work with Agency "A" and organizations like it because "we're actually working with people that we know, or with people who know about Western university admissions." Attendance, however, came at a price: implied endorsement.

Frederick Verisopht, an international admission officer at a small liberal arts college, described the summer interaction as one which was a sort of admission boot camp. Admission officers were invited to help with workshops on completing the college application or on writing the college essay. There might be presentations on the colleges which the officers were representing, or a college fair. This created greater exposure both for the attending institution and for the students who were part of the camp. It also provided exposure for the agency running the camp.

Such camps exist in different forms in the United States. In some cases, they are a fringe benefit in a summer academic or enrichment program. The admission portion is an add-on. There are also camps in which the goal is to provide greater access for students who might not otherwise have exposure to colleges. College Horizons, for example, is a program designed to help Native American students think about college. At the end of five days, students—who are assigned to a team of college counselors and admission officers—will have researched colleges, developed a list of colleges in which they are interested, filled out a Common Application, and completed a preliminary FAFSA. Admission officers pay, but college counselors do not, to serve as faculty members; some students pay to attend and others receive scholarships. Thomas Gradgrind, a former agency employee, had served as a college counselor at Horizons.[23] For a college or university, College Horizons is partially a service and partially an opportunity to meet students. For the students, it is a chance to bond with other Native

[23] Even College Horizons has begun to ask institutions the identity of Horizons alumni/ae who have applied and what the final decision is, which crosses a line in terms of privacy.

Americans and an opportunity to think about higher education. It is a nonprofit organization which exists to help an underserved population.

In the case of the Agency "A" summer camp, Frederick Verisopht said that it was clear that the students in attendance just paid a fee to be part of the camp, which consisted of about 100 students. Agency "A", unlike College Horizons, which charges universities for participation, offered a stipend for US institutions to participate, which Verisopht's institution did not accept. He did accept reimbursement for the cost of travel, but he believed that others took the stipend for other expenses in China. Asked why they accepted the invitation, he replied that they were always very careful with such invitations and initially had felt that there were trustworthy personnel at this camp. The stipend has been perceived to be questionable; a reporter who had attended the 2015 Council of International Schools conference in Edinburgh last November questioned admission officers about the honorarium and had asked why a college would help a for-profit organizer of a boot camp get richer. The reporter felt that there was a conflict.

Agency "A", moreover, is a different type of organization than College Horizons. It is for-profit in China. Collaboration with Agency "A" can imply endorsement; endorsement sends a message that in order to get into a top institution, a student should work with Agency "A". When asked whether attendance at the camp implied endorsement of the organization, Verisopht replied that he realized the dangers of that interpretation after he agreed to attend. A poster had been prominently displayed highlighting his institution's attendance and implying a direct connection between the company and Verisopht's institution.

> It [was] in Chinese and one of our alums in China had noticed it and sent it to us, and it was right around the time when the camp was happening. We asked

> the person running the camp—I mean we told them that—we are not comfortable with this—that they should take it down, and I believe they did at the time, but a couple of weeks [later] we discovered that it's up again. They are essentially making the claim that their students are getting admission to these universities who are participating in the camp because of their participation in the camp, which is not something that is our intention when we are a part of it and it's certainly not true at all. There were actually even more applicants who were part of the camp who are refused in the admission process.

For Meliodas, however, working with Agency "A" meant collaborating with a trusted source. For Verisopht, the perception of Agency "A"'s services were different; there were ethical issues arising from the commercial aspects of the program. Some colleges had severed their relationship with Agency "A" when they felt that Agency "A" misrepresented their intentions. Many colleges and universities did not seem as concerned; they continued to attend the camps, which give them visibility and which provide them with a source of applicants and potential matriculants. The system helped Agency "A" be successful, it helped universities with enrollments, and it helped students who could afford the programs forge a relationship with colleges.

Despite the stories that circulated in admission circles, colleges and universities continued to work with Agency "A" by attending summer programs or by making connections with their students. Asked if they worked with agents, all the universities and colleges answered that they did not. The interlocutors who had worked for agencies had encountered admission representatives only sporadically when someone visited a school in which company employees were present, or when groups of traveling admission officers participated in workshops held at summer enrichment programs. In fact, while colleges and universities which claimed they did not work with agents meant that they had not retained an outsourced representative or that they did not pay someone

to find students, their participation in Agency "A" programs was a type of work with agents. By collaborating with any organization such as Agency "A", a university or college would grant a tacit stamp of approval. Agency "A" was not blind to that; it used university participation in its advertising, as Verisopht had pointed out. The message to students was clear: work with Agency "A" and you will have access to select institutions of higher learning in the United States.

John Blifil, an IACAC board member, discussed the complex nature of an agency—managing several types of services such as running high school programs, offering private counseling services, and providing university services—as creating a potential conflict:

> I think we can show our discretion in saying okay, there's no conflict within an Agency "A" high school, but if you take the Agency "A" high school in concert with the parent company that also runs services for universities, it's a conflict. The money is all flowing in the same direction, even if it's at a really distant level. I've met some of the counselors in Agency "A" schools. They're working for who they work for, but they're providing totally functional college counseling services to kids in their high school environment, which is a good thing and we want to encourage that, but if at the highest level there is money crossing lines that could represent a conflict of interest, then that is an ethical concern for their involvement in the organization.

"Cultural differences" in perceptions of the role of the agency services

Merlin Ambrosius, Bower O'Bliss, Thomas Gradgrind, Daniel von Blumenthal, and Cyren Blair, an international admission professional at a large state university, referenced so-called cultural differences regarding interpretation of ethical behavior. Cultural differences were a theme referenced by many, primarily Westerners. Indeed, Gradgrind thought that part of his value was his ability to train Chinese counselors to understand Western norms.

When pressed, however, Gradgrind and other interlocutors, especially those who worked in China, believed that actions which Westerners might consider unethical were a result of a sort of impasse: teachers were unable to communicate in English well enough to write recommendations, and schools were unwilling to help. Universities seemed to believe that there were different outlooks toward cheating.

Many interlocutors referenced approaches and so-called cultural differences rooted in Confucius, but it was unclear exactly what that meant and even to what extent different stresses in recent history might have affected approaches. A study done regarding educational developments in the 20th century, including the equalization of educational opportunities, chronicles a few stages of educational reform in China, from the adoption of a Western model in 1922, to resistance to that model because it aligned with the values of an industrialized country, to expansion of educational opportunities for the poor under Mao, to internationalization of the curriculum in the post-Mao years (Evans et al., 2016). There seems to have been some social stratification during the Cultural Revolution (Evans et al., 2016). Nevertheless, it is hard to know what "cultural difference" and "cultural tradition" mean since the past few generations have witnessed, and are witnessing, so much political and social change. There is some evidence that the state's frequent redistribution of resources and opportunities have contributed to attitudes toward educational attainment (Zhou et al., 1998). This may have contributed to heightened anxiety about educational attainment as well. Anxiety concerning college admission is a frequent topic of discussion. Agencies help to alleviate some of that anxiety by promising to place students.

Von Blumenthal referenced cultural differences in social norms—for instance, the way one politely refused a request, as he had done when his office manager had asked him to act in a way he considered unethical. He also found it in the importance of saving face and in *guanxi*, the system of calling favors through personal networks and connections.

Attitudes toward transparency within any company, including an educational agency—a theme that recurred in many conversations—may be seen as a cultural difference. It is perhaps not unusual for employees to have limited knowledge of an organizational chart, but in conversations it was hard to ascertain even a basic description of the agencies, giving them an aura of elusiveness. Ambrosius could not describe the organization beyond what someone could gather from a website. The opaque nature of the operations had led to his dissatisfaction. Morgan LeFay, who worked with Agency "A" employees, could describe only what he had deduced. Von Blumenthal, O'Bliss, and Gradgrind, who had been hired from the US, could not explain why their jobs did not match the advertisements they had answered any more than Ambrosius could.

Chang'e, who seemed to be the most supportive and knowledgeable, could not describe Agency "A"'s work outside of her own realm. She could not describe Agency "A"'s work with their UK partners as far as the responsibility for A-levels. When she was asked how the main agency interacted with examination boards abroad, she did not know. She thought that the National Education Bureau had oversight but could not say more. Bridget Allworthy, a representative of the College Board, later explained that, for the administration of US-based examinations, there was Chinese government

involvement and oversight, a safeguard that the College Board supported. Internal employees who worked with curricula, however, did not seem clear.

Reasons for the VIP service, as it pertained to students in Agency "A" schools, were also unclear. Chang'e knew of the VIP service for college counseling but could not understand why her students were encouraged to avail themselves of these services. The mission of her division was clear, but the overall mission of Agency "A" seemed to lack transparency in this instance.

Agency services: perceptions of other collaboration with US universities

Agency "A" found other means of collaboration with colleges and universities. It approached a large private research university to forge a partnership. Henry Sowerberry, a dean of admission at the university, reported that Agency "A" had approached his provost to explore the possibility of opening a branch campus of the university in China. This venture did not materialize, but Agency "A" stayed involved with the admission side, and the university took part in the summer camps. By that time, two years after Verisopht's experience, the camps had expanded to include smaller cities. Eight universities visited 10 cities in 12 days and then joined a sponsored program in a major city with 16 US universities, 16 US guidance counselors, and 16 Chinese counselors. The perception was that there was involvement of a couple of other third party agencies in this venture—that Agency "A" had joined forces with at least one other multiservice agency. Sowerberry was under that impression.

> In both cases I had thought that Agency "A" was the actual source of the funding. In the case of the 10-city tour, it became sort of apparent that the actual funding source was Agency "C". Certainly they're a massive test-prep operation in China. They might have some agency activity that is part of their core

> business. I'm not sure if they would talk to that or not. Everything officially came from Agency "A" in terms of the support for the travel, but there definitely was some other partner involved in the planning and the conversation. At the very least, I think Agency "A" outsources some of their activities in the actual schools. They have a direct relationship with some schools and then they reach out through some other network more broadly to involve students from other schools.

It appeared from this conversation that Agency "A" had joined forces with other companies. Although the nature of these collaborations remains unclear, it is clear that from the early days of Agency "A", when it provided a few educational enrichment programs, to the present, when there is a growing corporate structure and corporate mentality, that the business has become more commercialized.

There continue to be other ventures. Sowerberry reported that one venture which was being explored by the company was a service to verify transcripts:

> A group was presenting their new ideas about verifying the accuracy of Chinese transcripts, a credentialing service basically, and of course there's been several ventures like this. This is the first one I recall. We don't know where it's going. They're working with a nonprofit agency. If I took them at their direct word, their aim is to bring more transparency and coherence to the process of Chinese students applying for American colleges, so their involvement in trying to combat the fraud issue wasn't a surprise.

At the same time, Sowerberry did not find any of this activity unusual or suspicious.

> I'd say I've never met anybody whose intentions were that dubious. The worst thing you can say about any of them was that they were seeing an opportunity to make a buck, but they weren't trying to ruin kids' lives or anything like that. I don't think anybody in the business is. I don't know if I feel like there's a horrific nature to this involvement. It's just not exactly what I want to recognize or hope we'll all experience.

Another college representative concurred; she could not bring herself to believe that companies were evil: They were interested in student success.

Fanny Dashwood, an administrator at a large research university, commented on the new venture; she discussed with the CEO of Agency "A" the importance of reducing fraud in China by launching a transcript and credentials verification system. The venture would be run as a separate, nonprofit entity. When asked about the aspersions cast on Agency "A", she said she could find no evidence that these were more than rumors. When questioned about reconciling her perspective with the views of those who had worked for the VIP counseling branch, she replied that the reputation of the counseling branch did not impact this project.

> I believe that their CEO, despite the wide-ranging practices of their company, who I have had a chance to meet with on many occasions and who has presented to our group and to others we are talking to, who might ultimately join the project, has a genuine interest in reform. That I can't quite reconcile how that works in their business model, is of some concern, but . . . Thus far, I have not found reasons not to continue with this because virtually everything that we have asked in terms of what we believe is appropriate and ethical in dealing with such a system, including using all of the NACAC practices, good principles of good practice, have been addressed.

When asked whether it was conflict for an organization that produced information for transcripts, as described by Morgan LeFay, to verify the transcripts, Fanny Dashwood pointed out that the organization would be verifying the work of others. The reporter who had questioned admission officers at the Council of International Schools apparently had told Dashwood that there was a conflict of interest, but Dashwood commented, "I hope they won't tar a project that seeks to remedy the very issue they are concerned with."

Whatever one believes the agency's motives to be, this venture, along with its other collaborative ventures, seems to change the picture of the agency drawn at the beginning of this chapter. It gives a more commercialized feel than the organization

described by Chang'e. A comparison of Agency "A" with another multiservice organization, Agency "B", illustrates how each of the organizations shaped themselves and developed additional services to accommodate the growth of student mobility and the globalization that affected China.

Agency "B"

In the mid-2000s, several colleges were invited to participate in activities offered by an organization which was beginning to employ former US college representatives to help with college counseling and other college-preparatory services. This was an organization which responded to the need of US colleges to bridge perceived cultural divisions and reach out to a growing pool of prospective applicants. The organization, which had a Western name, was called Agency "B".

Agency services and interactions with US higher education

Agency "B", like Agency "A", is a multiservice agency that offers many services: it delivers foreign curricula to national schools, is involved with student-exchange programs and teacher exchanges, concerns itself with external test design, and is involved in the admission process, according to both participants in this study and the company's website. It, too, had its beginnings in one branch of education and has expanded to include related areas within education or enrichment. The agency was founded in the late 1990s, or at least its American branch was; sometime in the mid-2000s, according to its website, it began to create programs between Chinese secondary schools and institutions in other countries. It has some ties to a political party with which it has worked to promote cross-cultural educational endeavors.

Agency "B" has provided many services which promote cultural exchange. As the business has grown, so have the types of services. These services correlate with Agency "A"'s, but there are differences in scope and type.

Agency "B" has been more focused on student exchange and educator exchange than Agency "A". The company has designed many short-term programs for both students, such as test preparation, and for foreign teachers, such as year-long opportunities in China. Agency "B" administered, according to a former employee, the SSAT[24] in China, for which it received a percentage of the registration fee for every student who took the test. The company is also involved in a "*gao kao* failure program" in which students who have failed to gain placement in a Chinese university, because of their final *gao kao* score, can study to prepare for admission to a United States university. Agency "B" hires Western teachers for this project, according to Merlin Ambrosius. Recent college graduates from the United States, according to a flyer, can spend a year living and working in China as teachers.

Agency services: identification of select students and perception of practice

Agency "B" advertises a service, under a different name, whose mission it is to identify top students using "an extensive networking system" to select the students. Agency "B" states that it will "screen and evaluate elite students' academic abilities and potential through a series of applications based on criteria designed to assess exceptional students"; it will verify documents upon request. The identified students are those who are presented to universities abroad, particularly in the UK and in the US, for admission. In addition, Agency "B" promises to "guide qualified students" though the admission

[24] Secondary School Admission Test

process of tertiary institutions. Although the website lists UK universities as partners, the flyer provided during a site visit lists a major state university in the United States. A sample letter of cooperation on the website includes a letter, in the form of a certificate, from a renowned UK university. These credentials would impress any onlooker.

The services offered by Agency "B" which are the focus of this study are the ones concerned with college admission and with the scrupulous identification of top students in China who aspire to attend top universities abroad, as well as the intersection of this branch with the branch responsible for delivery of foreign curricula to sections of international schools. Examination of the interactions between Agency "B" and its stakeholders, namely universities and clients, including secondary schools and students preparing for tertiary education, follows.

In discussions of the programs in which Agency "B" engaged to prepare students for higher education, themes emerged which were similar to the those which had emerged for Agency "A", but a more prominent concern of the participants in this study was the lack of transparency in business practices. Other themes which were prevalent included perceptions and reality, ethical practices, and money. As in the case of Agency "A", the themes are often interwoven and sometimes difficult to disentangle.

Business practices and mission of Agency "B"

It was difficult to determine from conversations and other research not only the organizational structure but also the mission of the organization. Interlocutors, both employees on the school level and former employees and advisors of the administration, felt that they did not always fully understand Agency "B" and its goals.

I examined some of the different services in order to gain a better understanding of the organization.

One former top officer of Agency "B" believed that the organization had wonderful goals in its commitment to international education but that cultural practices meant he was not privy to basic information about budget. The secrecy about the budget seemed to make him uncomfortable, and seemed to make him question his understanding of what the organization was trying to achieve. He was at a loss when making recommendations for new programs or expenditures, which formed part of his job description as a top official, and uncomfortable in negotiations when he did not know what the income was from various partnerships. Ultimately, he left the organization in part because of the lack of transparency about funds.

In a pro bono initiative in which some students received funding to attend a special program run by the organization, it was unclear to a top official of Agency "B" how much money was devoted by the agency to the project. It was therefore hard to plan for an effective outcome because the officer had neither budgetary control nor knowledge of budget allocated for the program. Invitations to underserved students seemed haphazard. Withholding information from a person so involved in the project created uneasiness. Presumably the officer was afraid that a poor outcome, or negative perceptions of the program, or questions about sources of funding, might reflect badly on him.

Another consultant from a large research university who served on an advisory board felt that even though she could list some of the services offered, she never fully understood either the administrative structure or the funding structure, making it difficult

to engage fully in advising the organization. Drusilla Fawley, an administrator from a highly selective university who sat on an advisory board, summarized her experience:

> I don't ever quite get how all of those services then fee up into this larger Agency "B", where they get politicians, and larger heavy hitters, it's the umbrella organization and then there's kind of the higher ed division. Then within that division, they have all these products/services. Services of curricula, services of hiring a high school counselor to help those on the western track, in the high school, those various things—but that's just how I've conceptualized how they're structured. I've never seen an org chart.

Although Fawley could list some of the services, despite her role on the board, she admitted to having a vague understanding of the services or how they were funded. The lack of transparency may be cultural, but it made working conditions for Westerners challenging, both with respect to their authority to make or recommend decisions and with respect to their work with collaborations external to the organization. This was the case both for agency-paid administrators and for professionals on an advisory board.[25] Westerners were more likely to discuss lack of transparency than their Chinese counterparts.

As an initial approach to the question of transparency, it may be instructive to consider how Agency "B" promotes and describes itself on the US website. According to the website, for a university, the advantages of the services Agency "B" provides are many, among them protection from those who might prey on tertiary institutions and students alike:

> In addition, a plethora of unscrupulous, profit-driven agents in China promise local students entry into top-tier schools by any means necessary. As a non-

[25] Chinese interlocutors did not flag lack of transparency as an issue; they said there were processes they did not fully understand, but they did not seem to question lack of transparency in the same way—at least not openly.

> profit organization, [branch name] circumvents such disadvantages and allows tertiary institutions to accurately guage [sic] the merit of prospective students.

Agency "B", just as Agency "A", presents itself on its website as an organization aware of some of the issues and dedicated to eliminating the unscrupulous and profit-driven cells which had infiltrated education. Agency "B" references problems with forgery of documents and authorship of essays, and the problems with for-profit models. Both organizations address the perception of questionable practices.

Some institutions of higher learning in the United States have chosen to align themselves with Agency "B"—according to informal conversations at IACAC or CIS meetings—in their search for well-prepared applicants and in their desire to focus on markets outside the major cities. Apparently, they feel the organization's mission is transparent enough based on how Agency "B" presents itself.

The reader perusing the website will find that Agency "B" describes itself as not-for-profit.[26] The not-for-profit designation is important in university relations because the company's motives seem untainted. A newsletter highlights events run by Agency "B"; one story describes a program similar to the Model United Nations, which brings together students with the end of promoting cultural understanding and global leadership. Another feature showcases teachers who were part of the teacher exchange. The reader hears the voice of the teacher in the quotations chosen for the story. There are articles on other ventures which bring a new kind of learning to the classroom.

Other news items showcase donations to US organizations which promote education. There is a desire to create good will as well as international peace and

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[26] This status has been challenged by an educator in China. The status was allegedly taken away. The status apparently can be reinstated after a period of time.

understanding. Since the organization describes itself as nonprofit and non-governmental, it gives the impression of a charitable venture. It presumably wants to succeed at its mission and has been attentive to US innovations in education, which it applies to its programs, as will be discussed below. A board of advisors from US universities helps to keep the company informed about issues in higher education.

The company is for-profit in China, however, according to several independent sources consulted for this study. Although one university dean pointed out that there is nothing wrong with the organization making money, the for-profit/nonprofit contradiction makes the operations suspect. A participant in this study challenged the status, pointing out that the tax forms did not represent all the activities in which Agency "B" was engaged. The participant challenged the claim that operations were "based in America." Even if the US operation is not-for-profit, that tax status, which has been used as an advertising ploy, is misleading. The lack of clarity on status could potentially affect interactions between the agency and stakeholders such as secondary schools, universities, and high schools.

Digory Kirke, an employee of a school which does not use an outside agency for its international division, stated that the nonprofit status in the United States was a way of legitimizing themselves in front of admission offices. Although some institutions in the United States have used Agency "B"'s not-for-profit status as a validation of the company's trustworthiness, impressions of interlocutors in China were more guarded, because their claim was that the operation was very much for-profit, with profit being the driving force. Will Whitfoot, a representative from NACAC, discussed the confusion that has ensued:

> One other thing that's interesting to note and one thing we're still kind of grappling with on our end is the face of a multinational organization within the US versus their practices and policies within perhaps their home country or their base country. The Agency "B" group in the US operates very differently than what their practices are in China. That's something that we still haven't fully wrapped our heads around—is that how they present themselves in different country contexts and how that, then, is perceived by different people differently. There's no easy way to put it. There's a spider web of networks and connections that we haven't fully grappled with.

Agency "B"'s international programs seemed to promote transparency of operations when they were described on the US website or by various employees. The semblance of transparency, however, is paradoxically sometimes a veil. Merlin Ambrosius described one of the teacher-exchange programs:

> They have this sort of Teach in China for a year. They portray it to be some kind of social service when, actually, it's getting Western faces to send to the schools that they are administering. In effect, they're paying below-market-rate salaries portraying this program as a service project when, really, these people are essentially becoming employees of their [Agency "B's"] schools. They look for young graduates who want an experience in China, teach in China. What they're doing is they're putting people into the schools that they run at salaries that are below market rate.

Many of the interlocutors referenced similar perceptions of the services offered by Agency "B"; many services existed mostly to promote the visibility of the company.

Agency services: school-based services and perception of practices

Agency "B", like other multiservice organizations, offers many services, such as the teach-abroad program described above, summer camps, and delivery of foreign curricula to sections of national high schools which want an option for students not in the *gao kao* track.

When secondary schools had chosen to create international divisions because of sudden demand, they had partnered with various agencies, including Agency "B",

because of the need to deliver the required product quickly. Morgan LeFay said that Chinese law dictated the necessity of a partner. Erlang Shen, whose school had at one time partnered with Agency "B", confirmed this. Ambrosius explained, however, that partnering was not a requirement. College Board speculated that the quick and sudden demand of foreign degrees necessitated partnerships because schools were not equipped to plan for and provide a new division that quickly. The legal requirements for delivery of foreign curricula were never quite clear; there were schools which did not partner with agents, but whether these were exceptions to the rule was never clarified. Agency "B" presented itself as an expert which helped to facilitate delivery and was retained by some top secondary schools in various cities.

Employees and former employees at a school which had incorporated an Agency "B" branch, but then decided to administer the foreign curriculum without Agency "B's" help, discussed some of Agency "B's" practices. While delivery of the AP curriculum seemed straightforward and transparent, the reality was different.

For example, according to Morgan LeFay, who had worked at an Agency "B" school after she left the Agency "A" school, if school started on September 1, the Agency "B" AP division did not start until the first Monday of November or December, following the date on which SATs were administered. Students spent the first two to three months of the school year cramming for SATs and then started school and attempted to double or triple up on the hours in their AP classes to satisfy the number of classroom hours required by the College Board. They might be in AP Environmental Science, for example, from 8:00 a.m. until 11:30 a.m. to make up for lost time. They often could not complete enough hours or enough labs.

This came to light when universities to which they applied asked for mid-term grades. For Early Decision applications, which are typically due on November 1 or November 15, there were no provisional grades available because there had been no students and no class in September and October. Some sophisticated counselors would record an "I" (Incomplete) for AP courses, knowing that grades on the required Chinese curriculum courses would make the transcript look complete enough for a college to render a decision on an early application.

For Regular Decision, some students would simply withdraw from class, but only after the application had been submitted. Colleges and universities often expect semester reports before rendering an admission decision and final transcripts before incoming students can matriculate. When the secondary schools realized that they had to account for the withdrawals, they had an issue vis-à-vis the colleges. "Ws" on a transcript always raise red flags; admission officers want an explanation of why a student has chosen to withdraw. "Ws" could result in a denial or a withdrawal of an offer of admission, affecting college admission statistics and potentially harming the company. For students who remained in class but had to account for an incomplete, on the other hand, inflated grades were submitted, according to one employee.

The question of authorship of college essays was another example of the hidden agenda. Many of the participants had voiced suspicions about authenticity of college essays; Morgan LeFay reported that she had confronted students whose voice she could not recognize in written work.

Many other practices employed by Agency "B" left people nervous once those practices came to light. Erlang Shen confirmed that questionable practices led him to

rethink the relationship with the organization. He reported that when the population of students in the international section had tripled, resulting in a request for more teachers, the teachers Agency "B" had sent were "far from qualified."

> I had to spend a lot of time on dealing with academic problems, including non-excused absence, lack of basic knowledge, and copy text paper from public website. I requested Agency "B" to improve their service quite a few times, but did not find any significant change. I can understand that Agency "B" is a business, which puts profit as the first priority. But I will never reduce the quality of service for this.

When asked why the school had engaged Agency "B", Erlang Shen replied that he had needed help to hire and train teachers. These were on Agency "B"'s payroll. He chose not to use the Agency "B" college counseling service. "In this point," he said, "we cannot trust any agency." Though he credits Agency "B" with helping to start the program and to hire the foreign teachers, most of whom were quite good, the quality of the teachers declined and the relationship with Agency "B" suffered after the first year. An employee at Shen's school said that Shen had fired many teachers appointed by Agency "B". Shen confirmed that Agency "B" had been helpful in starting an international program, however. He felt that Agency "B" benefited from being aligned with a top secondary school.

Digory Kirke, whose school had chosen to develop its own curriculum, concurred with Shen's view about motives and questionable business practices:

> Now, again, what they do is they'll attach themselves to a named school, a known entity within the country, a top school in the city, a top-ten school in the city and they will offer them the services of [the agency's] running their counseling. Sometimes they'll also do the full running of the program, they'll hire the teachers, everything else as well. Do an IB and A level or an AP curriculum. Mostly, the AP curriculums are easier to incorporate right away. But they'll, again, offer those services cheap. They'll still want money for it, but they will then take a loss on that so they can do their advertising out in public. And again, they're working with the best kids. They're not the ones teaching

> those kids, they're not the one producing those kids' resumes, but they're able to use those kids to further their other business interests.

If AP cramming was perceived as objectionable by some, so were some of the teaching methods which were introduced. Xi He, a former employee at a school with an Agency "B"–run section, described the implementation of a program in the school in which she had been employed. Agency "B", she said, studied innovative teaching methods used in the United States and applied them—or attempted to apply them. The company had introduced, for example, Project Based Learning classes. She felt, however, that Agency "B" merely appropriated the language of American education without implementing the model in a meaningful way. They were good at listening to the language used in the US and repeating it, even though their programs were far different. The company provided Western teachers and touted new models but provided no training. For that, students paid 100,000 RMB for one school year. According to Xi He, Agency "B" took a percentage of the fees; the percentage was based on negotiation with the school and on services rendered.

Morgan LeFay said that although Agency "B" had provided a lot of personnel—teachers, an American principal, and a counselor—the school became nervous and concerned about how Agency "B" was perceived by US institutions of higher learning and consequently considered severing the relationship. This view was corroborated by Lin Dai-yu, a pre-Agency "B" graduate of the school, who had considered a position with the company but was told by one of her former teachers to avoid it.

Merlin Ambrosius, who had worked at a school which had previously used Agency "B", shared the experiences reported by the school which led them to rethink their contract with outside agencies.

> This is a bad, bad, dysfunctional organization. To me, it's amazing that they can operate. The high school, where I came to help set up college counselling for their IB program, previously had Agency "B" essentially helping them set up the program. Agency "B", at one point, had been charged with finding Westerners, so hiring coordinators of the IB program. Agency "B" had failed to do that. Agency "B" sent people who pretended to be IB coordinators when IBO was visiting. If you can imagine, IBO is set to visit to inspect the IB program. Agency "B" has not followed through and does not have an administrator in place. Agency "B" sends Westerners who stay there for a week or two and pose as the IB coordinators while the IBO representatives are there. When the IBO people leave, they're not there anymore. I mean this is the level. And so this high school got rid of them.

Because of its experience with Agency "B", the school had hired Ambrosius to restore order. According to him:

> The fundamental fraud is that it pretends to be a US entity when, in fact, it isn't. It's not a legitimate US nonprofit. They're very good at convincing powerful people to get their picture taken with them. As far as I can tell, that's their main expertise.

Those two calculated impressions created by Agency "B", namely that it was non-profit and that it had the endorsement of "powerful people," seemed to be effective. University representatives at various conferences, such as IACAC and CIS conferences, which took place in the late 2000s, cited the nonprofit status as an indication of legitimacy. Although some rolled their eyes at the pictures of powerful people on posters and websites, the images were clearly noticed. Universities, in an attempt to take advantage of the new market of international students, were eager to find an organization which they felt they could trust so that they could make inroads. Agency "B" was non-

profit and had the endorsement of respected people. It had representatives of elite institutions on an advisory board. Therefore, many colleges concluded, they were trustworthy (personal communication, IACAC and CIS, 2008–). The benefits to US universities were that Agency "B" had the legitimacy of an organization that had been involved in cultural exchange, thereby providing familiarity with both China and the US, and the legitimacy of a nonprofit organization recognized by well-known individuals in the government and in education.

Agency services: special programs and the perceptions of the benefits of agency and university collaboration

Even as some universities were already working with agents, those who thought the practice of using agents questionable nevertheless believed it innocuous to take part in summer school activities in China, where they could meet local students, much as they might take part in summer school fairs and workshops in the United States. These summer programs were run by organizations such as Agency "B" and Agency "A". Former employees of elite US tertiary institutions who now worked for Agency "B" and Agency "A" contacted their former colleagues to persuade them to attend the summer programs, offering financial incentives such as transportation.

Cynric Wessex, a consultant who had worked with Agency "B", elaborated on one of the summer programs, which he described as a Chinese Model United Nations:

> It's essentially a program that brings together a couple hundred Chinese high school students for a week-long Chinese simulation of the Chinese legislative congress. Where they come together and discuss issues that may be of concern to Chinese citizens and they put forth proposals to address these issues. Students work in teams over the course of the week or 10 days that they're at the summer program. Their proposals are actually reviewed by actual members of the Chinese legislative congress. Agency "B" sponsored the summer and they

> were now looking to invite US colleges and universities to China to essentially conduct a college fair at the end of this week-long, 10-day-long program.

The campaign to attract US university participation in the camps was effective; several colleges took part. Verisopht described the summer interaction and his institution's decision to take part in the summer events.

> To have some relationships that are similar to the ones that we have with many domestic CBOs,[27] we would do workshops for the groups of students that they have—on the admission process, on essay writing, on presenting our institution— without any sort of expectations attached to that. I have done a trip for Agency "B". All of these have been the format that I described. They would invite us to what is like a college summer camp that they organize. Students are paying a fee to participate in college camp organized in either Beijing or Shanghai. They were there for several weeks and they were a part of classes, or workshops, or presentations that bring clarity to the admission process essentially. We were part of a group of maybe 10 US institutions in 2011 invited by Agency "B" to help with their college camp in Beijing and Shanghai. We spent 10 days, about five days in each city, doing work with their students.

The camp, one of the many Agency "B" services which connected the agency and its clients to universities, provided direct access to a group of strong students interested in studying abroad and able to pay the fees. The organization had the endorsement of famous officials. It was not-for-profit. It gave the appearance of transparency. The benefits to a university trying to diversify its class or to attract a larger international population were many. The students were well prepared and impressive. What was not perhaps foreseeable was how university participation in the camp might be construed, or how participation might be used to imply a working relationship that was closer than the universities wished. Although some universities might have welcomed a strong, implicit collaboration, others were skeptical.

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[27] Community-based organization.

Tristan Meliodas saw the organization as a group of "education concierges," people who helped students achieve their goals, rather than as agents, which category he saw as more pejorative. He said that in addition to participating in summer camps, he spoke via webinar to Agency "B" schools. When asked why he worked with an organization that potentially used his presence and his participation in webinars as part of its advertising, Meliodas said that he was able to access more students in less-visited parts of China and that he was more comfortable with Agency "B" than he had been with some others. He noted that some alumni and alumnae, who posed as representatives of the university, were more likely to create ethical issues. Agency "B" was a way to align with a more reputable organization because there was more accountability; the agency did not work with "rogue individuals." Asked more closely about whether he was worried that the message to students would be that they had to work with Agency "B" in order to get into his school, he replied:

> What's interesting is I did worry that that might happen, but it hasn't and the reality is it may be, because we gave a little part of ourselves to Agency "B" let's just be honest, but we didn't give all of it. We still go to China four times a year, and typically those four times of the year are without Agency "B", not connected to Agency "B". Our work and efforts with Agency "B" means a trip here and there. It means working with students from Agency "B" schools, because the schools are contacting us . . . there is something to be gained from the connection that we can make, and as simple as the concierge service, "Can you just introduce me to . . . ? Can we engage about . . . ?"
>
> Some of the work that we have done has been as simple as engaging people and trying to learn more about the landscape, figure out where can we go in Western China, where are their students? Besides going to Chengdu and to Chongqing, or can we go somewhere else to Yan'an, can we go to Kunming? We've actually gotten a lot of information from just making those connections.

Meliodas believed that student perception would not be that students had to align themselves with Agency "B" to gain access to his institution, because he was careful to include more independent travel which did not involve Agency "B". He saw Agency "B"

work as an added opportunity for his institution to gain access to the best students. Although NACAC representatives conceded that increased dependence on agents in general could narrow the pool of students and effectively prevent access for some, Meliodas felt that access was increased because Agency "B" and organizations like it opened doors in smaller cities. He also saw the organization as the most transparent.

Frederick Verisopht, on the other hand, had severed his school's relationship with Agency "B" because he had been led to believe that the organization was nonprofit but had concluded that it was not, and he was bothered by the misrepresentation.

> Agency "B" presents themselves as a nonprofit organization that is pretty focused on students or bringing clarity to the admission process. At least that's what we knew when we attended the camp, and it became clear that they are very vertically integrated. They have very different services, so I guess before attending the camp we didn't know exactly what all the scope was. I had more concern after attending the camp. We realized, okay, they have this other sort of operation that looks more for-profit to me than nonprofit. Just little things that we learned along the way about how the students were treated, how many of them were paying to be part of the camp.

What was not readily transparent was the existence of services which had different functions and different fee structures. Despite his caution, Verisopht was not alone in feeling misled, although he seemed to be one of the few who readily became aware of the implications of working with agency programs. Many of the university participants did not view themselves as working with agents but, implicitly, they had made an agreement. In partaking of programs in which their presence was used to attract more students, universities advertently or inadvertently gave a stamp of approval to those programs and tacitly encouraged students to sign on.

Agency "B" initially offered to pay the transportation costs from the United States to China and back for institutions which agreed to attend the summer camp initially. It

was a savvy way for Agency "B" to ensure university participation. For the university, it was a free ticket to China, if it accepted the offer. In subsequent years, Agency "B" covered only room and board, according to some participants. Covering transportation costs, however, implied a close working relationship which could signal to students that admission to a US university was more likely if they signed up for an Agency "B" program. Room and board might not have the same implication if representatives live and dine with the students. Whether or not institutions accepted the airfare, there was an implication that they had.

Verisopht stopped attending the camps when he discovered that a close collaborative connection was implied through posters and ads which suggested that students had been admitted to his institution because he had a close connection with the agency. Like many others, he had not initially considered this sort of participation as working with an agent. In fact, when other colleges and universities participating in the summer camp were asked if they worked with agents, their answer was never affirmative, even when they had attended such camps. Some, like Verisopht, pulled back when they realized that participation implied endorsement.

Some university administrators began wondering whether the collaboration had other negative implications. Drusilla Fawley raised a concern about the sorts of students who were being cultivated and the sorts who were left out:

> I couldn't understand how they financially supported themselves. Meaning, understand, I never had to pay them anything. I went to the trip, I think I paid a registration fee for their conference or something in Shanghai, but it, I couldn't figure out, and so my mind leapt to, they must be charging the student in some fashion that, I think in my mind, wasn't sitting well with access and opportunity.

In this agency model, the student is the one who is charged for services and not the university. To offset this criticism, Agency "B" sponsored some American students to attend the camps in a program that evolved with Cynric Wessex's expertise. Some of the sponsored students could not afford transportation, and received travel subsidies, or even a full scholarship. Following an American model in which less-advantaged students were encouraged to take part in a program normally reserved for those who could afford attendance, Agency "B" agreed to expand its program to include opportunities for more US students, thereby addressing the access issue. This move not only enriched the program but won the organization a lot of good will and credibility. Charlotte Guest, an administrator at a state institution which uses agents, wryly commented on this arrangement: "Right, and then they have the shield of untouchability, so they can be perceived as having more integrity than organizations that are being paid by post-secondary organizations."

In this model, however, there is a hidden charge for the university. Agencies offer services to a university free of charge, which can be seen as a benefit to the university. Agencies then can capitalize on the "collaboration" by advertising it, as Agency "B" had done with Melodias's webinars. The advertisement heralds, implicitly or explicitly, a special relationship with that university so that the agency can attract even more fee-paying students. The student then can be led to believe that the university has given a stamp of approval to the agency, or works closely with the agency. Implied university endorsement of the organization results from the organization's decision to use the university in advertisements. This can carry a risk for the agency, however. Although some institutions might relish the free advertisement, others—particularly the

most elite institutions—might sever their ties with the agency so as not to alienate students who are not affiliated with the agency. There are other risks as well. IACAC, which does not allow double-dipping, has chosen a subtle interpretation of the ban; it considers such publicity the equivalent of double-dipping.[28] In the case of Agency "B", the students will have been charged a fee by the agency, but also the colleges, which will have paid in kind by providing publicity for the agency. One IACAC official explained:

> IACAC took the stance that there's enough of an implied connection . . . essentially it could appear to be double-dipping, so we felt that until the website changed we were unwilling to support their candidacy [for membership]—this was the entire board's decision.

The leadership at the time was very concerned about the growing power of agents. It is not certain that future leaders in IACAC will have as nuanced or as strong an approach, particularly since the membership changes.

Advertising, is, of course, potentially beneficial to both sides. Those that partook knew that the organization gained visibility by showcasing institutions which "worked" with them, but they too gained visibility among applicants. Some institutions, particularly elite schools, chose not to participate precisely because they did not want to give tacit endorsement or ever imply that students had to work with certain organizations

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[28] IACAC board policies include the following under general membership policies:
"Members and the institutions and organizations they represent are forbidden from the practice of 'double dipping.'
"a. The term 'double dipping' refers to the practice of receiving financial compensation from two (or more) stakeholders with potentially conflicting objectives (i.e. receiving a fee from both a college and a prospective student).
"b. The mission of International ACAC is to foster interaction between institutions and counselors. The goal is to create a community in which counselors can connect directly with higher education institutions so that those counselors can be equipped with knowledge that will help them provide unbiased information to students. It has been determined that organizations that market or recruit on behalf of institutions and provide college advising services to students do not align with our goals and mission." (IACAC, 2015, pp. 32–33)

to enjoy visibility—and viability. At least one school, however, felt that Agency "B" was the organization with the most emphasis on quality and preferred to be affiliated with Agency "B" to ensure an applicant pool which they felt they could trust a little more. This, too, benefits both the university and the agency. Agency "B" and Agency "A" seem to be trying to corner the market by affiliating themselves with certain institutions and creating a certain association.

It has been a hallmark of many agencies, including smaller ones, to make implicit or explicit connections with certain institutions. Regarding the two agencies that are the focus of this report, paid or unpaid invitations to summer programs, and subsequent advertising of "collaboration" through the dissemination of photographs, as Drusilla Fawley and Cyren Blair both mentioned, created the impression of a close working relationship. Yet, not all universities see the connections as a benefit. In one instance, when two admission officers from highly elite institutions refused to hold a presentation at an Agency "B"–run school, Agency "B" cajoled and harassed the school at which the event was held and tried to convince the administration to cancel the presentation so that the officers would be forced to find a new venue. When the host school refused, Agency "B" approached the officers and asked them if they could videotape the presentation. When the officers refused, but suggested that Agency "B" simply bring their students to the presentation, Agency "B" refused by firmly informing the officers that they were accustomed to dealing with professors and did not normally deign to collaborate with admission officers.

Agency "B" is not, of course, alone in using a college name to leverage its brand; CBOs in the US often do the same. Fawley saw some similarities:

> There's always a name allusion—even with CBOs, who can they say they've got the top-dog schools, and view that as a way to get more students to participate in their program. We've been very careful to make sure that it doesn't tell students who are not part of that program, they can't participate in something else with us. We'll see more organizations trying to figure out how to corral students into their organizations so they can get Gates funding, they can get Lumina funding, they can get state and county and city funding. These CBOs, because they live and breathe on those grants and funding, and part of that is getting more kids in your program which over time says, the message starts to become, if you're in our program, we're better connected than the other program, therefore you might have a greater chance at getting into the school you want. I think we'll see more and more of that. Look at the proliferation of CBOs in the last 10 years.

One difference is that the CBOs are not-for- profit, and they serve the underserved, whereas the Chinese organizations that are part of this study are for-profit and serve people who have a financial advantage. In both instances, however, there is a perception that there is pressure on students to align themselves with an organization lest they suffer in the admission process.

The arrangement in which students paid a fee and some universities paid by lending their name, or having it appropriated, for advertising led to allegations of the sort of double-dipping previously described by John Blifil, an IACAC Board member, in the previous chapter. Other questions regarding practices arose because some divisions of Agency "B" charged the student and others charged the university. In discussing some of Agency "B's" practices, Ambrosius described a very complex system in which tertiary institutions were treated differently depending on reputation and degree of selectivity.

> There's the double-dipping, of course, which is most common there. The highly selective institutions operate differently. The less selective ones will often pay a commission. You've got revenue coming from both directions. Obviously, the student's being charged. Clearly, there's that angle there. The conflict with the high end is more with the school-based programs. I think there's less overlap. They're pretty discreet in terms of the traditional agenting for less selective institutions at this point. But then the high end, very expensive independent

> counseling, when you run expensive independent counseling and you also run a school, it's just a natural thing that your profit center is—you're going to feed people to the expensive independent counseling. We know that, for instance, in China, since you're talking about Agency "B" and Agency "A", that there is a country where it's not uncommon for third parties to do both types of advising. That is, to advise on a commission basis and to refer students to schools that are paying commissions to the agent, and also to advise students on a non-commissioned basis, meaning to help students gain admission to, say, Yale or UCLA or Brown or somewhere like that. Those functions, the commissioned-based versus not commissioned-based recruitment and advisement often happen within the same organization under the same umbrella simultaneously for different students.

Agency services: the development of new models and the perception of benefits

Agency "B" tried to develop other services to develop superior skills in students which would prepare them for the best tertiary institutions. Wessex spoke about some other projects which were being developed; one was an external examination which would supplement the SAT and ACT so as to help US universities make distinctions among high-scoring applicants. The UK had expressed interest in this sort of examination, and one of the universities had used the exam. However, because the UK admission process is more reliant on the results of external examinations than the US admission process, which tends to be more qualitative, such a scheme seemed to be more helpful for UK admission. It could be appealing in the United States as well, perhaps after a massive advertising campaign of the sort launched by Cambridge Pre-U when it introduced its new British curriculum featuring more challenging A-level courses. An agency which develops an examination, prepares students for it, advises them on college admission, and then verifies results might raise suspicion.

Another project was to develop an interviewing process in which students would be interviewed and videotaped, much as a company called InitialView does currently. The idea was that if tertiary institutions could not handle the interviewing, an

interviewing service could be created. It was not clear who was to pay for the interview, the student or the institution, but both options can raise questions.

Melodias believed, like Wessex, that the organization was doing its best to develop both good practices and new techniques. Melodias worked with Agency "B" on the external examination to which Wessex had alluded, as well as on other areas such as teaching and curriculum. He firmly believed that Agency "B" was trying hard to develop a good test so that it could present the perfect product to the consumer—in this case, the US university. The student in this scenario seemed to be a commodity to be manufactured and bartered, however.

> Agency "B" was most interested in trying to figure out a way to communicate better the ability of their students, even beyond if you look at some way beyond A-levels or IB—whatever the curriculum was that was being utilized. I think they were just trying to find a way to better communicate the abilities of their students, and another iteration—a great idea being boiled up in the committee that I was on worked a little bit on. We were more focused on the SAT, and helping them, realize it, revise it, adjust it, change it. They were trying to find ways to help their students succeed in the admission process, the selection process and the way that was happening, relative to what they were doing or through high school curriculum preparation, interviews, and testing, measurements, ways to communicate best, better along with all other assessments, how strong the student is from this particular place in China.

In this model, universities and a corporation worked together to create the perfect student, put it[29] through a quality-assurance test, and package and present it. Each student would have its own variations which the university qua consumer would select. One interlocutor said that the British had described specifications for the perfect student, so it was natural to assume that American universities would do the same. Agency "B" was trying to develop a service attractive to top universities.

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[29] Use of the neuter is intentional.

One is left with the impression that all these efforts are not about education. Melodias believed that there was a lot of "goal orientation" in the way the company was run and that they tried to "pad and manage success." Nevertheless, he believed that his institution was the beneficiary of some talented individuals.

There are other projects, one being the formation of schools to serve certain populations. This is a venture which Agency "B" is considering. Whatever the initial reasons for partnerships with national public schools, Agency "B"'s current goal is to create its own schools, a comment which was confirmed by representatives of an Agency "B" branch office,[30] as well as by Wessex. Such a service would benefit a student who intended to study abroad but also a university which looked for an assurance that students were prepared to handle the US curriculum taught in English.

Part of the motivation for this new goal is that China decided to roll out a law regulating international divisions run by third parties in national schools. Interlocutors have speculated that the reason for the new rule is that integrity and transparency, which seems to come into question among the Chinese, will improve and that international divisions will not use, or be perceived as using, government resources. One counselor thought that students were not completing the government curriculum because they were concentrating on satisfying requirements for foreign certificates. Others posited more nationalist motives for the separation. The new ruling is apparently being introduced gradually, and it is unclear if there will be exceptions. International divisions will no longer be divisions, but if they want to continue to exist, they must exist as private schools not associated with national schools. They will have to be located on another

[30] Informal (unrecorded) conversation with Agency "B" officers, November 2015.

campus and they will have to have their own name; they cannot parasitize the national school name or its physical plant.

Some international divisions are in the process of becoming independent schools. This could be an opportunity, however; Agency "B" has reported that it is partnering with a rigorous and well-known US magnet school in creating a new school; its branding, according to one account, will associate it with its US counterpart. Branding will undoubtedly attract US institutions; perceptions of the alignment with a top US secondary school remain to be seen.

Both Ambrosius and Xi He wondered how this new development could occur, unless another party offered to underwrite the expense by donations of money, or land, or facilities. They also wondered what the agenda of all the underwriters would be. The model Agency "B" had adopted up until the announcement of the new law, however, bore similarities to the system adopted by Agency "A". How the new for-profit model of international schools will affect students' understanding of education, and how these schools will interact with tertiary institutions abroad remains to be seen; there are similar models in other countries. How the college counseling and admission functions of agencies develop and expand while the new educational model grows, and how perceptions change, will be subjects for future study.

Summary of findings and supplemental observations

It is important to reiterate that there are no meaningful data from the principals of either of the agencies. Principals from the Chinese-based offices of both agencies did not respond to requests for interviews, despite introductions which were made by individuals

who knew the principals. As these organizations are normally eager to work with and align themselves with top universities, their reticence seemed odd.

Principals from the American offices of one of the organizations agreed to an interview but refused to allow the conversation to be recorded, although note taking was permitted. As both organizations are scrutinized not only because of their tax status but because some tertiary institutions have questions about integrity, it would seem that they should have welcomed a formal interview. The US–based office of Agency "B" was able to present some innovative programs which Agency "B" had developed. A conversation about their perspectives on the nature of their relationship with students and universities might have given another and more nuanced perspective. Since the only data available from the principals was a refusal of data, the summary of the data and the analysis come only from those who provided it.

I introduced this study with the topic which launched the discussion on the role of the agent: the potential conflicts in commission-based agents. Commission-based agents are typically paid 10 to 15% of the cost of first-year tuition (information obtained in interviews with various institutions and organizations in this study; Waxman-Lenz, 2012) for each student who enrolls in a particular institution. The practice has invited discussion because of the potential for abuses and because of the student's interests (NACAC, 2010; NAICU, 2010).[31]

[31] For institutions of higher education conversant with this method of recruiting international students, this practice has generated its own set of issues, such as cost-benefit if students transfer after the first year. Some have suggested that the fees be spread over four years in case the student should transfer to another institution.

Agency “A” and Agency “B” circumvented some of these issues by charging the student and by receiving a form of compensation in its advertising of affiliation with specific institutions of higher learning. The students who paid for counseling services had expectations. From individuals who work, or worked, with secondary school students as teachers and counselors, we learned from Daniel von Blumenthal, Bower O’Bliss, Thomas Gradgrind, and Merlin Ambrosius that there was an expectation on the part of clients who were paying that there would be extensive help in the production of essays and teacher recommendations. Although these individuals refused to write essays and recommendations, only Gradgrind said that management supported his decision. Refusal to cooperate with ghost writing often meant that counselors were sent to smaller cities.

Five school employees who work, or worked, directly or indirectly with both Agency “A” and/or Agency “B” referenced some level of administrative fraud. They discussed misrepresentation, for example, which occurred when graduates or former employees of well-known tertiary institutions implied that they were official representatives of those universities. They brought up transcript embellishments, missed class time, poor resources, and misrepresentation of college acceptances.

Five school representatives and one US educational officer discussed the exorbitant fee structure, the expectation of both families and employers that consultants deliver results, and the competition that led to greater pressure to plagiarize applications. One school official could not understand why a separate, private branch of college counselors existed even when students were in an international section. There were implicit and explicit fears voiced by secondary school representatives and government

representatives that students felt compelled to pay the extra fees to such a branch out of fear that they would not receive good counseling or help if they did not participate.

Three university representatives referenced the use of college names in advertising both by Agency "A" and Agency "B" after a college had participated in a program or visited a school associated with an agency, implying an association or even a kind of articulation agreement with certain institutions. The advertising of names is not, perhaps, unusual, but there was misrepresentation of the nature of the relationship. IACAC representatives argued that unauthorized use of a college name could be interpreted as double-dipping since the university was lending its name to the advertising. NACAC representatives referenced complaints about double-dipping on the part of other agencies, a practice which was hard to police. Double-dipping is not permitted by IACAC and, at the time of this writing, is under examination by NACAC, which is considering the proper definition of double-dipping.[32] Two college representatives, in a discussion of smaller agency models, discussed relationships that could work but referenced problems faced by branch campuses when an agency hired by, say, a state school with several campuses referred students only to the flagship campuses because they could more easily convince students to attend and then pocket the commission.

Two college representatives who worked with Agency "B" spoke favorably about Agency "B", but one of them stressed the need to be vigilant, and the other was frustrated at the lack of transparency categorized as a "cultural difference." Representatives from

[32] For example, does double-dipping constitute 1) payment to an agent by student and institution for the same services, or 2) an agency receiving income from students for admission-related services in one of its branches but also receiving income from tertiary institutions for admission-related services in another of its branches, or 3) both (conversation with Sam Gangee of NACAC, May 2016)

NACAC and the College Board provided a balanced view of agency practices, seeing both benefits and disadvantages to the organizations. NACAC representatives, however, spoke of problems inherent in agencies such as Agency "B" leveraging affiliations with higher education institutions, and what that meant for student perceptions about the need to enlist agency help in the college process.

The composite picture of the two agencies was that although both organizations had done much to promote cultural exchange and disseminate information, the bottom line was profit, even at the expense of integrity, a result which is not surprising (Altbach, 2013, p. 15). As Charlotte Guest, a university representative, said, "It's all smoke and mirrors. It's remarkable. If some of these students, or organizations, would put as much effort into actual academic integrity, can you imagine how well these students would do?"

Some on the US side asked whether the integrity issue represented a difference in cultural norms. Yet the impression that all the Chinese interlocutors—school employees and former agency employees who worked or who had worked directly or indirectly with Agency "A", Agency "B", or other agencies—gave was that they were at least as concerned as their US counterparts about ethical standards in admission, and that they shared the same apprehensions.

When Fanny Dashwood was approached by Agency "A" to consider the merits of Agency "A"'s starting a transcript verification business, she was eager to hear the proposal. She had had a positive impression of Agency "A" and therefore did not see a conflict in working with a company that verified transcripts and that might have an interest in undermining a competitor, so long as there was no evidence of previous

wrongdoing. And yet, it seems questionable that an organization which delivers curricula, reports grades, and engages in college counseling should also verify transcripts. Even if Agency "A" did not see this as a conflict, why were US higher education administrators willing to entertain the idea?

The main "cultural differences" which were apparent did not seem to be cultural differences at all. They were the usual differences one might expect to find between for-profit entities and not-for-profit entities. As one American official stated, "There's some information asymmetry involved in using agents when they have a financial incentive to steer people to certain areas."

Cultural relativism

Consider the issue of cultural relativism. This is an issue that is being addressed herein only because Western respondents raised it continually. Western respondents, both US university participants and school participants who worked with Agency "A" and Agency "B" and referenced cultural norms believed that cultural differences played a role in the questionable—to Western eyes—actions of students and parents when it came to admission. They felt that these cultural norms governed the way the Chinese viewed the admission process. They felt that the Chinese thought it acceptable to have paid agents produce applications. The claim that Westerners and Chinese differ in the realm of ethics exists among some businessmen (Feldman, 2013, pp. 14–15). Yet the very notion was raised only by Westerners and at times it seemed that the term was not a way of understanding others but rather of justifying Westerners' willingness to overlook conflicts of interest

Cultural differences were more likely to be found in subtleties. When Cynric Wessex said that he felt frustrated that the details of the company budget were kept from him, he thought the practice a cultural difference. When Daniel von Blumenthal realized that he and his boss had to discuss issues indirectly through insinuation and suggestion rather than direct confrontation, this was a cultural difference. Transparency, or lack thereof, was an issue brought up by many; this, too, seemed to be cultural. The same criticism occurred recently in the Anbang bid to buy Starwood. Anbang was criticized for "its unusually opaque corporate structure" (de la Merced & Picker, 2016). Reliance on a middleman and reluctance to be transparent seem to be cultural; the ethical behavior regarding the application process, often criticized by interlocutors, did not.

To be sure, there are many dishonest individuals, but no culture has a monopoly on that. Digory Kirke spoke of financial aid scams. Drusilla Fawley summarized the scenario in speaking generally about agents.

> A student pays the agent, that same agent is paid by an institution, and then the conflict is, that agent wants to get that student into the institution that's going to pay them a finder's fee, if you will. Then, that institution may actually give that student a scholarship, and that agent not only has charged the student but may also take a percentage of that scholarship each year for the next four years.

There are many parents who want their only child to get ahead at any cost. The one-child policy, in which the child becomes the source of support for the future, may be a contributing factor to the interest in education as a means for advancement. An application process which has the expectation that the applicant will adhere to some honor code must seem naïve. It must seem to invite cheating.

No individual who was a part of this study, however, defended cheating. Westerners asked whether they were imposing Western values on the East but, in fact,

while some business practices may have differed, values seemed to be far closer than people assumed. Conversations with Chinese educators suggested that they were concerned about not only dishonorable behavior but the reflection that had on their country. Chinese principals in two of the schools visited, one of which worked with Agency "A" and the other with Agency "B", had limited or eliminated their relationship with the agencies, partially because they did not feel the agencies were committed to providing the excellence in education which they expected. There was a deeply rooted respect for education and educators that is perhaps unparalleled in the West. This respect for education and self-improvement is historical (Chan & Uttal, 1988). One former agency employee thought that even those who expected agents to produce their applications did not like the practice but felt that in order to compete with less able classmates, they had to use an agent as a safeguard.

Yet many of my respondents from the West expressed a firm conviction that what we were seeing was a cultural difference in attitudes toward cheating. In China, they said, this was the way of doing business, and it was condoned. One higher education representative presented as proof of the acceptance of cheating that it was so widespread that government helicopters flew above buildings in which students were taking the *gao kao* to ensure that there was no cheating. The helicopters, however, only signaled that cheating was not a practice that was condoned.

Ambrosius felt that the code of conduct was situational; there were instances in which cheating was condoned, albeit tacitly. Authorities were responsible for preventing dishonesty, such as cheating on the *gao kao*. If they did not, the blame

was as much on them as it was on the culprits. This once again raises the question of the responsibility of tertiary institutions in these matters when they know the risks.

The reaction in China among the participants, however, indicated that there was not so wide a chasm between East and West in perceptions of ethical behavior regarding college applications. In a few instances, as I prepared to speak to Chinese educators, their colleagues—not originally a part of this study—stepped forward and asked if they too could share their stories. They were concerned about integrity and wanted their tales told. They were appalled at the practices of agencies and were eager to see them stopped.

The comprador

One difference between East and West, however, might be in the reliance on the middleman, or comprador, who historically negotiated between two parties, particularly between Chinese and foreigners in what Steven Feldman calls a "triadic relation" (Feldman, 2013, p. 457). This role was important during different periods but took on a significance as China advanced toward and retreated from the West (Feldman, 2013, p. 97). The middleman helped to negotiate. Seen as part of this tradition, agents can be seen as a natural business development within China.

Guanxi, a web of connections and relationships, helped to determine behavior (Feldman, 2013, pp. 222–26). Feldman sees this system as "network capitalism" (Feldman, 2013, p. 222). At its best, *guanxi*, when applied to the relationship between agents and higher education, could result in effective recruiting efforts. At its worst, it could result in conflicts of interest and corruption.[33] The agencies which form part of this

[33] The Sanlu melamine-tainted milk scandal is often referenced as the extreme (Feldman, 2013). It does not follow, however, that such instances of corruption are unique to one country.

study were instrumental in promoting cultural understanding within education and in helping to introduce US universities to the Chinese educational system, and Chinese students and families to the US educational system. There were instances, however, in which practices resulted in heightened expectations, such as the use of university presence in advertising and in outright misrepresentation. The growth of the agent industry undoubtedly escalated the pressure on outcomes.

The Chinese government found that agency involvement in national schools created issues. There were some attempts on the part of the Chinese government at regulation of international programs in secondary schools, one of which was the privatization of the international programs and their separation from public high schools. Although the reasons for these regulations are not entirely clear, separation meant that the taxpayer was not subsidizing the international wings of the secondary schools because, after all, despite the tuition charge, the students used public resources. The separation and the insistence that the international wing not borrow the name of the public school possibly would result in an effort to create a strong educational institution rather than a cram school preparing students for AP examinations.

Many Chinese educators who had worked with agencies expressed concern about the growth of the business, which had proven to be lucrative, and the deleterious outcomes of the competition. Erlang Shen and Xi He felt that both the quality of education and students' relationship toward their education had been compromised. Feng Yi was skeptical of close interaction. Other educators deplored the agent functions outside the school context as well. According to observations made both by school employees and by EducationUSA representatives, including Lin Dai-yu, Wenchang

Wang, and Kui Xing, students and families went to several agencies to ensure their success in the admission process. Lin Dai-yu had been lured by a company that "wanted to do the right thing" by educating the student, but which had suffered as a business as a result.

Kui Xing added that many parents and students wanted to "do the right thing" and to "show the real part of themselves," but feared that the pressure to succeed caused families to succumb to less acceptable practices. Digory Kirke, a counselor at a Chinese school, corroborated this statement. Philip Altbach recounts some of those practices, which included altered and fake documents, forged essays, and sham recommendations. Students who were honest were disadvantaged (Altbach, 2013, pp. 16–17). The end result was cynicism and mistrust.

Wenchang Wang verbalized the fears apparent in statements made by many of the educators: "Maybe some of the consultants may not put their students' interests at the top, not the top priority right?"

Views of higher education on market forces and profit

Universities are not immune to the pressures reported by the Chinese. Elaine Peerless, an administrator at a highly selective institution on the East Coast, reported that many enrollment managers worried about keeping their jobs. In addition, higher education institutions worry not only about *US News & World Report* rankings but about global rankings and global recognition, as an AIRC member said in defense of her institution's use of agents at an IACAC meeting. A poor ranking can negatively affect the number of applicants and the yield. Yet the focus on both enrollment and rankings as a means to revenue reduces the student to a source of income instead of a source of

promise for the future (Natale & Doran, 2011). Perhaps because of a national climate favorable to and respectful of business, or perhaps because of issues of survival, colleges have been willing to work with third parties just because they trust someone they have met. The activities in which they refused to participate when Stanley Kaplan was the host are activities which they will embrace when another third party is the host, if the result is enrollments. When asked about the appearance of conflict, they equivocate.

Gawain Morgause, a NACAC officer who worked in a university, said admission officers found themselves in a difficult position. If they objected to partnering with agents to increase applications and yield, they had three choices. They could try to influence a mindset change, they could "suck it up," or they could lose their job. Henry Sowerberry, however, blamed NACAC:

> I don't blame agents. They're trying to make a buck. I don't blame students. They have to do whatever it takes to get into college. I don't even blame colleges here in the US for working with agents because they're just doing what they think they need to do to survive on a financial model. I do blame NACAC as an organization for saying we define this as college admission counseling because that's not what it is.

Yet NACAC simply represents the voice of the membership. Are colleges, therefore, and to a smaller degree private secondary schools with foreign populations blame-free? For agencies to flourish, higher education must rely on them. The ethical dilemmas seem to be a stateside creation. Third parties, in the words of John Blifil, might be there to make a profit, but their proliferation is due to US tertiary institutions. As organizations, their business models were not culturally different, except in some smaller areas, such as emphasis on loyalty (Irwin, 2012, p. 19).

An American official working on educational exchange said that the Chinese government was just as concerned about the consequences of poor outcomes as the US

State Department, not only from an ethical point of view but from a practical one as well. They wanted their citizens to have a successful experience overseas and did not want to face the fallout that resulted from situations such as the "poster case of Dickinson State" (see Public Disclosure Notice on Dickinson State University, 2012). Chinese government officials had asked US diplomats what could be done to avoid this kind of situation. They did not want their citizens "to spend thousands of dollars to not obtain an education because of agents and others that somehow distorted the process." Blame here was as much on the host institution in the United States as it was on the agents who misrepresented the experience.

Perceptions of educators on the effects of agency activity on students

Gradgrind had observed that students accept the system with which they are presented, since they have nothing to which they can compare it. He argued that they do not feel the effects of commercialization. Yet the testimony of the Chinese interlocutors presented above suggests that the commercial aspects of the enterprise were obvious. Kirke shared the following story to illustrate the reasons he discouraged agency interaction:

> Like Agency A, for example, they have a whole consortium of schools that they wish to work with. What they do . . . they will run their own debate, competition, that looks like it's official nationwide, but it's only for schools that they contract specifically with to run college admissions. They hire the judges, they control who wins, who loses. They tailor other experiences abroad. So, "Let's go off and do something in Africa. Let's go off and do something there." But they are oftentimes, for these kids that I've talked to that come back from these things, just photo ops. They're not actually meaningful engagement abroad. But you'll get the application as an admissions officer and you're thinking, "Wow, this kid's engaged. He's looking at poverty in Africa compared to poverty in China. He's looking at this and that. He's a debate champion for the country." But is he a debate champion because he actually won the competition or because he paid a premium to be one of the short list of winners for a certain competition?

One Chinese educator who had worked at an Agency "A"–affiliated institution pointed out that many programs became devoid of educational significance for students. They engaged in those programs only because agencies attempted to feed on their anxieties about a supposed checklist for college admission. There was little explanation as to why an activity might be educationally significant. This distorted preparation for overseas study. Feng Yi felt that Agency "A" did not have enough time for students and knew neither them nor the curriculum well enough. Students needed attention. The lack of care and attention distorted their view about the purpose of their education.

Kirke, despite years of observations on the proliferation of agents, nevertheless felt optimistic that new legislation in China regarding the separation of international divisions from national schools might effect positive change. He said that some of the proposed changes were designed to add more dimensions to admission processes within China but that such legislation would have a positive outcome for the college process overall.

EducationUSA exists to promote US higher education. As a service under the auspices of the State Department, it does not condone agents, particularly commission- and incentive-based agents—as the Department of Commerce does—because its role, according to one employee, is to promote ethical policies. According to its website, it "promotes U.S. higher education to students around the world by offering accurate, comprehensive, and current information about opportunities to study at accredited postsecondary institutions in the United States" (https://educationusa.state.gov/educationusa-policies). EducationUSA does not align

itself with any agency and could not comment on specific agencies. Nonetheless, it offered a glimpse into the general issues, and its view summarizes many of the observations made by those who worked with or alongside Agency "A" and Agency "B". An American official working on educational exchange saw the proliferation of agents as contributing to commercialization in education:

> Based on our own research, we saw that Chinese students and their parents are paying between six to seven thousand dollars on average to have agents complete their applications for them. Sometimes even plagiarizing [forging] transcripts, writing essays, and letters of recommendations to help improve a student's chance in getting into a highly selective institution. That has created a billion-dollar industry, a multimillion-dollar industry in China. Companies that do a lot of test prep, they also have agent arms that get involved in this process. We remain concerned about that, again, for the potential for fraud, for the potential of Chinese students and parents being ripped off by these agencies. On the other end of it, the problem of students who get into a school that they're really not qualified for and not being successful in that experience. If they have a bad experience in the United States because they would like to go a school that wasn't their best fit or they weren't prepared to go and they fail, or they have to return to China, that's a lost opportunity. We don't see that as a win for that person, for that individual or family. Whereas if they'll go through the process of identifying what are their needs, their goals, what is their academic ability to find a school that fits, they'll have a much better chance at having a successful academic experience in the United States and having a more positive view of the United States at the end of their studies.

CHAPTER 5: CONCLUSION

Cui bono?

This study examines the services offered by two educational agencies in China and their interactions with US higher education institutions with the aim of better understanding the outcomes of agency involvement in the admission process. The data gathered from the interlocutors suggest that while there are some benefits to the interactions, there are dangers because the conflicts of interest are not only blatant but threaten to mar the perceptions educational institutions, agencies, and students have of one another. There have been some positive outcomes, such as the introduction of US higher education to families for whom this is a new concept, but there have been serious consequences to the way students are viewed by both agencies and higher education—as commodities, a product to be bartered and traded.

In the two cases under consideration, although staff members tried to counteract or soften some of those views, many were uncomfortable with the services they felt under pressure to provide, such as composing an essay or otherwise misrepresenting a student. Some tertiary institutions, however, felt Agency "A" and Agency "B" were different from other agencies because of their attempts to forge alliances with some institutions of higher learning, or because their interactions were more managed. Both Agency "A" and Agency "B" were useful as conduits and consultants. Some on the secondary side felt that the alliances and interactions were carefully orchestrated by the agencies to create an aura of credibility. Just as secondary schools discovered that they might be better served by managing their own international curricula, however, so tertiary institutions might

consider whether they are better served managing their own recruiting by cultivating direct relationships with schools and students.

The interactions of universities and agencies have grown and evolved to meet the needs of both universities and the students they seek to attract. Yet despite some refinements in practices and interactions, they remain fraught with conflicts of interest: e.g., the implication, through advertising, that an agency has an exclusive relationship with certain universities, or the implication that professional organizations or universities have given their stamp of approval, even when there is none.[34] The pressures on competing agencies are to produce results both in terms of acceptances and in terms of scores and grades. Although many agencies, including Agency "A" and Agency "B", have provided some good and necessary services and helped to foment intercultural understanding through some of their programs, the data the two cases provided have revealed some of these negative outcomes. The issues mirrored those raised in the discussion of commission-based agents, which are at the heart of the debate in professional admission circles in the United States (Ballinger et al., 2013).

The HEA (section 487a) bans agent use in the US, meaning that we seem to hold a double standard if we allow use of agents abroad. We have not learned how to regulate agents, and regulation seems difficult to achieve. Despite the American International Recruitment Council's attempts, a good way to regulate does not seem to have been developed, and that may be at the heart of this issue. There are tertiary institutions, notably Green River Community College and some others included in this study, which have successfully and responsibly worked with agents as outsourced admission

[34] Examples and discussion of such advertising occur on pp. 80-81, 84, 97, 118, 121-24, 130–31, and 137.

representatives. Their success appears to come from the time and care they devote to the relationship (Ballinger et al., 2013, p. 44, *Green River Community College Case Study*; conversation with Charlotte Guest and Abraham van Helsing, December 2016). Curiously, few follow their example. There are many thoughtful enrollment managers who have employed agents. Although many have reported abuses, it does not follow that all agencies engage in questionable practices, nor does it follow that the practice is inherently unethical. If the situation were so straightforward, there would be no need for examination of the practices. There is nevertheless an inherent conflict of interest, just as there is when a drug company sponsors a study on the efficacy of a drug—even if the drug company is honest. Perhaps the question to ask is if there is a reasonable way to regulate and best serve the student instead of stamping certificates of approval or creating agent honor codes or hiring fourth parties to verify the third parties, given the inherent potential for abuses and the questions which arise about perceptions of education. China has a history of using middlemen in transactions with the external world; it may be that we should look to China to ask how best to regulate the practice and how to resolve the conflict.

Abraham Van Helsing, a state university employee, said that many university personnel worried about commercialization in the process. He had come to the conclusion that "with careful training and a close, consistent working relationship between an agent and an admissions office, the situation could be ameliorated." Hiring agents who were trained by an admission office and acted as an extension of that office circumvented the concern about commercialization, but admission offices still had to be cautious since many agents outsourced university representation to yet other

agents. Charlotte Guest had decided that in order to avoid the potential dangers of commercialization, she had to track agency-delivered students' success, both in academics and in perceived fit. A few interlocutors referenced the Green River Community College success story (Ballinger et al., 2013, p. 44) as an example of agent work which has not led to commercialization. Two pilot-study participants offered a nuanced understanding and well-developed model for a good working relationship with agents as outsourced admission representatives, yet the data suggest that these experiences were unique.

In that same report, however, there is a case study of a mid-sized institution which had signed agreements with 40 agents and initially had little or no oversight of the agents (Ballinger, 2013, p. 43). The conclusions drawn from the data suggest that not all agencies or branches of agencies work with higher education institutions, and that even when they do, the experiences of Van Helsing, Guest, and Green River Community College are exceptions.

Many of the current and former employees of each of the two agencies in this study are dedicated to both students and education. University representatives who were thoughtful about the potential conflicts also interacted effectively and provided good experiences for the students. Melodias demonstrated ways in which he felt he had successfully avoided the appearance of exclusivity and conflict.

The data, however, may indicate more negative long-term outcomes in the relationships than positive ones. Though not all universities saw the two agencies in this study as controversial, professional organizations such as IACAC had examined their relationship with the agencies, indicating that there was some activity being questioned.

Agencies which offer so many services are in danger of creating inherent conflicts of interest. One example was posed by Gangee in consideration of what constitutes double-dipping.[35] Another was posed by the question of the creation of the transcript-verification service by Agency "A", which has private clients and produces its own transcripts. Yet another was the VIP service: extra college counseling for a charge, even if the student is at a school with an Agency "A" college counselor. A student might feel an obligation to sign up for the extra services in order to get a fair evaluation. A tertiary institution might feel that an applicant is given an unfair advantage if he or she pays more money for an additional service.

If Educational Testing Service were to develop a clientele of students whom they tutored and advised, they would surely be met with disapprobation. One might say that the view of what constitutes a conflict is a cultural difference, except that Chang'e, who is Chinese, found the practice hard to understand. It is hard to believe, moreover, that foreign agencies who interact with US institutions so closely, have a presence in the United States, and work hard to form relationships with institutions are not knowledgeable of the cultural mores of the United States. It is not unlikely that they are also aware that US institutions are willing to overlook these issues and to deny the existence of conflict.

Although one positive outcome of agency interaction is that universities can attract certain types of students, many employees reported pressure to misrepresent the student-client to ensure a certain outcome. Some universities felt that both organizations inflated their relationships with universities by using them in advertising in such a way

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[35] See n. 14 on p. 52.

that there were misleading insinuations about chances of acceptance. Some Chinese high school employees felt that the organizations were shortchanging students in their education by emphasizing high scores at the expense of instruction. The potential for questionable activity is great, hence State Department hesitation and reaction to the use of agents and the caution urged by professional organizations (Ballinger et al., 2013, p. 23; Heaney, 2009). That the State Department does not support agent activity because of the diplomatic issues created by misrepresentation indicates that the issues emanating from agent use are widespread.

One outcome which was perhaps not as readily obvious from the data was the role of the university. If there are ethical issues and conflicts of interest, they are not unilateral. If there are negative outcomes from agencies, universities have a role in that they allow practices to continue. Many tertiary institutions nevertheless promote work with agencies, hence the need for NACAC scrutiny. Agents might be motivated by a desire to promote education, but they are also motivated by profit. This often seems also true of educational institutions which are under pressure to meet enrollment goals or tuition targets. As one senior administrator at a highly selective university was quoted as saying, "We want to complain about fraud, but we turn a blind eye to it depending on how tuition-dependent we are" (Redden, 2012). The issue, then, lies not only with the agent but also with the institutions that ignore or equivocate about practices that may not be beneficial in the long run to either the student or the institution.

One might ask whether the concept of culturally relative ethics was a convenient Western equivocation and excuse to ignore agency practices which are normally met with disapproval. The view voiced by tertiary institutions in the United States that the Chinese

had a different attitude toward ethics and conflicts of interest seemed condescending, as if to imply that the Chinese had less refined standards. It also seemed self-serving: a rationalization for ignoring questionable practices.

Logically, it does not seem plausible that the Chinese, or the people of any other society which seeks to survive, condone and promote cheating. Perhaps those with money are eager to use their funds to get ahead. Perhaps ethics is Thrasymachean (and therefore Western)—defined by those with power. It is hard to accept, however, that those who cannot afford third parties applaud and approve of the actions of their wealthier countrymen. The implication that the Chinese have a different attitude toward cheating is not only condescending; it is logically unlikely. The commentary about differences in ethical standards seems to be a case of the proverbial pot calling the kettle black.

Another issue of potential concern to a university is the messaging it might create when students see that universities and agencies are aligned, giving the impression that a student has to work through an agency to be noticed by certain US universities. This puts pressure on a student to work through an agent lest he or she fail in the quest for a spot in a university abroad. Both the university and the agent create that impression. The appearance of such alignments is a cause for concern not just in China but elsewhere.

The effect on the college admission process can be ultimately damaging, both in terms of public relations and in terms of the community an admission office might wish to shape. Equity comes into question. A less wealthy but equally worthy group of students is overlooked if universities rely on agencies to deliver customers. The international population comes from one economic class, which does not diversify a

campus and does not send a positive message to less affluent students. There is a danger that the perception will be that those with wealth find a way to buy their admission, which could further create the impression that higher education officials are either corrupt or naïve, and that wealth rather than merit determines fate. Or even worse, the situation creates the impression that wealth is the same as merit. One may argue this was always the case in the US; preparatory schools were a form of buying one's way into college (Karabel, 2005). This is, of course, not a justification.

Finally, a question can arise in interactions with institutions of higher learning when the role of the agent is not that of middleman but of manufacturer. The agent is in the tradition of middlemen, who were a guild created to facilitate transactions between China and foreign entities. Education was another area that required an intermediary when the number of students in China seeking an education, both secondary and tertiary, outside of their country grew.[36] The middleman, according to James Wrenn, a professor emeritus of East Asian studies at Brown University, was a time-honored way for Chinese to work with foreigners. Yet the role of the agent has evolved. Beyond the middleman role, agents have begun to manufacture the student by manufacturing applications and manufacturing an experience or activity which is intellectual in appearance only. Agents have produced the applications universities have been seeking, or the students with the scores that universities covet, or the profile that universities have sought. If a student is created to meet the specs—namely, a specific set of scores and a list of activities—the emphasis is no longer on either education or the student. The student is manufactured

[36] James Wrenn, Professor Emeritus of East Asian Studies at Brown University, offered this explanation of the development of agencies.

and thus is a commodity. The process is not about the educational journey or even about the self-discovery in the application process but about the destination.

Wrenn explained that in any business model in China, a company might ask what the product was that was needed and would then go about producing it (personal communication, March 2015). An agency might use this model by analogy. If colleges wanted excellent students with strong abilities in different subject areas, the company's role would be to produce such students. If a highly selective British institution sought students with four As on A-levels, the company would deliver such students. If the US wanted a student with scores of five on AP examinations, the company would find students who could achieve that goal and help them to get there. If they wanted, in addition, students with an interest in community service, the company would help create opportunities. Any educational company's role was to get students to master the assessment tests which were required. In the eyes of the company, it was doing an excellent job in delivering a product. What may produce some confusion is that admission decisions at many competitive institutions are made by a qualitative and not a quantitative evaluation, even though the profile of an entering class is presented through quantitative measures. Optimal benefits of the educational environment are more likely to be realized if the student and the institution are good fits for one another, which requires a qualitative analysis of the application.

The services of agencies have developed because they have filled a market demand. The interactions have consequences, some beneficial and some potentially harmful, the latter of which calls for more vigilance and more direct interaction on the part of the university.

Agencies help to fill a void. Many agency employees are interested in providing good services and helping to educate students. They aid students and families in understanding a foreign system, help some secondary schools implement curricula, create cultural-exchange programs, and assist tertiary institutions navigate a new culture. They want to provide a product. They want to be successful. Agency "A" and Agency "B", in particular, seem to try to corner the market by affiliating themselves with high-profile institutions, secondary and tertiary, and by creating a certain brand association. They deliver a curriculum in which students are focused on successful testing outcomes. One is left wondering about the place of questioning and reflection. Since curriculum preparation, interviews, testing, and other assessments are the measures by which a student is judged, the role of agencies is to train the student to ensure a successful outcome in college admission. Successful test outcomes and placement results, however the agencies help students achieve that goal, increase their business success and their visibility, and prevent smaller outfits from competing. The students become commodities in the agency race to emerge as the best agency. The agents are brokers and manufacturers of students, not the educators they claim to be.

Educational organizations, such as the College Board in the United States, want middlemen who can help implement a curriculum and negotiate teacher training and other services related to the success of the new system. They work with government officials to help ensure integrity and with schools and agencies to deliver a good product. They, too, have an interest in increasing their market share. Unlike the agencies in this study, however, they limit themselves to development and delivery of curriculum,

as well as testing to measure results. They do not include for-profit divisions which present conflicts.

In medicine, if a researcher is paid by a drug company to confirm the efficacy of a drug, there is a conflict of interest—irrespective of the level of integrity of either the researcher or the drug company. This is why reputable medical journals demand a transparent accounting of the sources of funding for the research they publish. If the College Board were to start a division which advised students for a fee in addition to creating and administering tests to those students, educators might find the practice questionable for the same reasons. Why, then, do colleges agree even to entertain the possibility of a verification service[37] created by a third party provider which accepts payment from students for advice?

Secondary schools in China typically do not have international sections, but those which have been able to add such a section have required the help of an agency to act as a consultant. Erlang Shen saw the initial benefits of agency help in delivery of curricula but not in a longstanding relationship.[38] When the agency played the role of consultant, in other words, it was a useful service but then outlived its usefulness. Two counselors suggested that some secondary school personnel saw in an agency relationship an opportunity to leverage their positions at name-brand schools to supplement their meager salaries by extra tutoring and advising, and to prepare for future employment opportunities. This, too, is a conflict.

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[37] See p. 117.
[38] See pp. 82 and 113 for discussion.

Institutions of higher learning in the United States seek diversity, they seek larger applicant pools, they seek enrollments, they seek fee-paying customers.[39] Their bottom line, however, seems to be survival and generation of income through tuition. Owing to the number and diversity and perceived hierarchy of higher education options in the United States, many institutions often struggle for enrollments (Altbach, 2013, p. 13), or enrollments of a certain kind to meet the needs of the institution in terms of special programs or in terms of revenue.

In the college admission process, US tertiary institutions have relied on a system of checks and balances both within the application, such as evidence of promise and achievement (comparison of a pattern of grades, teacher references, external examination results, and students' self-presentation), along with fidelity of school reports (consistency and accuracy of a school's representation of students' abilities compared to external examination results and performance in college). With an elusive third party involved in so many parts of the process, it is hard to build an understanding with a school. Dale Gough of the American Association of Collegiate Registrars and Admission Officers was quoted in an *Inside Higher Ed* article as saying:

> There are a lot of institutions that are quite happy dealing with agents. They're blissful in their ignorance. They don't want to consider issues like, are the records we're getting—if we're getting any records at all—are they legitimate, are they accurate, or have they been verified? I think a lot of institutions don't really want to know the answer to that question. (Redden, 2012)

Higher education's increasing reliance—as suggested by the creation of the NACAC commission on the use of agents—on third parties who do not have firsthand

[39] We may ask if a university can claim the benefits of internationalization and diversity if most of its international population is from one country.

knowledge of students' academic promise has left open the possibility of misrepresentation without consequences, at worst, and a greater possibility that the student is not an appropriate fit for the colleges which are recommended. Institutions have seemed willing to eschew traditional methods of recruitment and return to a model in which admission is more of a sales force—to use the words of the Report of the Commission on International Recruitment (Ballinger et al., 2013, p. 9)—than a professional extension of the university. Is this good for the student? Ultimately, if the student is unhappy or not inspired by the college experience, is it good for the receiving institution? Universities seem to ignore this concern, or to equivocate on the conflicts. These considerations may be exacerbated by agents, but ultimately higher education has created the agent and the agency.

Where is the student in this picture, and where is education? Although the student voice is not a part of this study, it is necessary to consider the actions of educators on student development. If a student can hire a servant to produce an application, and if the receiving university is happy to accept such a student, what is the message the student gets? That plagiarism is acceptable if it is not caught? That they can retain the services of third parties to help write papers? If a student can buy an application essay, will the student then buy essays for his or her classes after matriculation, or hire a service to do the work? What becomes of the relationship between the student and his or her professors? What is the student's attitude toward education? There is dwindling concern about transforming the student into a scholar or a learner who has ideas and who

questions (Molesworth et al., 2009; Natale & Doran, 2011; Tilak, 2008). This has implications for students' transformation into citizens (Tilak, 2008).[40]

In all of this discussion, the student has been discussed in the capitalist vocabulary of markets, customers, and numbers, as well as employment and infusion of foreign funds into the economy. This language may have been created to satisfy some of the so-called stakeholders. But language often influences thought. Students have ceased to be students and have become enrollment figures or "deposits," or sources of income or even providers of "texture" on campus. Their special individual characteristics, the discovery of which the US higher education admission system had prided itself on, was no longer as pronounced. A production-line mentality to the preparation of students has developed.

In many conversations with both agency employees and university officials, absent was an emphasis on ideas, joy in learning, and education as a journey. Many were eager to educate students and to bring out the best in them, but the themes which recurred most often were ethics, money, profit, and commercialization. The themes that were absent were ideas and intellectualism. One might ask if their students were embarking on an educational journey with a jaundiced view of education and those who traffic in it.

Implications for further research

This study focuses on the services of two multi-service agencies and the perceptions of those who interact with the agencies, but it raises many other questions. Although agency practices point to the dangers of third party influence, to the conflicts of interest, and to the potential harm to students, more extensive study is warranted.

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[40] If students are transformed, they might actually have the very impact that educators and statesmen claim to seek: in being transformed, they might help transform their communities. But that is the subject of another study.

There are models of interactions which appear to have more benefits than disadvantages. The NACAC Commission Report included some best practices, as did AIRC (Ballinger, 2013; Northup et al., n.d.). These practices and their effectiveness should be studied more closely.

In addition, the effect of social and political changes of the past two to three decades on attitudes toward education in China, particularly education abroad, warrants continual study. The limited space in local universities has surely created a context for agency growth, as has the hope placed in one child. While some of this context is unique to China, some cross-cultural studies of third parties in other countries could be beneficial in understanding this phenomenon. Multiservice organizations exist in other countries, including the United States. The reaction to those organizations does not seem to be so severe as the reaction to the organizations in China. Perhaps, as Drusilla Fawley hinted, multi-service agencies are becoming more accepted. A study of these organizations and the students who use them might increase understanding of their effects on students' views of education.

Does the interface between agencies and universities, or agencies and students, change campus culture? Do they shape administrative units, such as admission offices, in the university? To what extent does the outsourcing of recruiting render admission offices unnecessary? A study of the changes in admission practices, and the effects of such changes on policy, would be warranted.

Finally, the student voice is absent in this study, as is the voice of the families who aspire to send their children abroad. A comparison of students who have worked with agencies and students who have not worked with agencies might explore similarities

and attitudes toward access to education. Does work with third parties affect the ethos of campus? How does it affect student perception of higher education? Does it affect student-teacher relationships? An example cited by Gawain, a NACAC administrator who spoke of a secondary institution in the United States in which all interactions between students or parents with faculty had to go through an off-campus intermediary, portends another development. Also missing is the voice of the parents: what are their reasons for turning to agents?

The importance of such a study is to keep in focus that which must be nurtured and cherished: education and the student.

APPENDIX A: SOLICITATION OF PARTICIPANTS

Invitation to Participate

Dear Colleague,

My name is Panetha Nychis Ott. I am a doctoral student in the Graduate School of Education (GSE) at the University of Pennsylvania, where I am conducting research on the role of agents in United States college admission. I also direct international admission at Brown University.

I am currently beginning data collection for my dissertation by exploring the role and structure of agencies, and how they interact with universities. The faculty advisors for my dissertation are Dr. Eric Kaplan, Senior Fellow and Director of the Executive Doctorate in Higher Education Management (University of Pennsylvania, Executive Doctorate Program, Graduate School of Education, 3700 Walnut Street, Philadelphia, PA 19104); Dr. Laura Perna, chair of the Higher Education Division of the GSE (same address); and Dr. Jenny Rickard, Vice President for Enrollment, University of Puget Sound (1500 North Warner Street, Tacoma, WA 98416).

I send this letter as an introduction in the hope that I may meet or speak with you or a member of your staff who might be willing to participate in this study by sharing thoughts and perspectives with me in an interview of approximately one hour. The interview can be conducted on a day and at a time and place that is most convenient for you. Your responses will be completely confidential. No single respondent will be identified. You will remain anonymous. Participation in this study is completely voluntary. I am happy to share with you the summary findings of this study.

If you would be willing to participate in this study, please contact me via email (panetha@gse.penn.edu) or by phone at 401.368.8312. I will send you a consent form which you may return to me via electronic mail or facsimile, or give to me if we meet in person. I am grateful to you for your time and consideration.

Yours sincerely,

Panetha Theodosia Nychis Ott

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APPENDIX B: CONSENT FORM

Principal Investigator: Panetha Nychis Ott, Graduate School of Education, 3700 Walnut Street, Philadelphia, PA, 215.898.5670, panetha@gse.upenn.edu

Emergency Contact: Study Contact: Panetha Ott, 3 Angell Court, Providence, RI 02906, panetha@gse.upenn.edu, 401.368.8312.

You are being invited to participate in a dissertation research study conducted by Panetha Nychis Ott. The faculty sponsors on this project are Eric Kaplan, EdD, and Laura Perna, PhD, from the Graduate School of Education at the University of Pennsylvania, and Jennifer Rickard, EdD, from the University of Puget Sound.
You were selected as a possible participant in this study because of your knowledge of the interactions among agencies, universities, educational organizations, or students. Your participation is voluntary and your decision whether or not to participate will not adversely affect your relationship with constituents with whom you interact. If you decide to participate or not to participate, there will be no loss of benefits to which you are otherwise entitled. Before you make a decision, you will need to know the purpose of the study, the possible risks and benefits of being in the study, and what you will have to do if decide to participate. The research team is going to talk with you about the study and give you this consent document to read. You do not have to make a decision now.

If you do not understand what you are reading, do not sign it. Please ask the researcher. If you decide to participate, you will be asked to sign this form and a copy

will be given to you. Keep this form; in it you will find contact information and answers to questions about the study. You may ask to have this form read to you.

What is the purpose of the study?

To explore the interactions of multiservice agencies, universities, professional educational organizations, and students.

Why was I asked to participate in the study?

You are being asked to join this study because you have been involved in some way with the college admission process.

How long will I be in the study? How many other people will be in the study?

The study will take place over a period of 10 months. This means that for the next 10 months, we will ask you to spend one to two hours.

If you volunteer to participate in this study, you will be asked to participate in an interview session with Panetha Nychis Ott. The interview may take place in person, via Skype, or by telephone. The interview will be audio-recorded and transcribed at a later date. The interview will last one hour. During the interview, you will be prompted for information about your perceptions of your role in the college admission process.

Potential Risks and Discomforts

This study poses no foreseeable risks or discomforts.

Potential Benefits to Subjects and/or to Society

Findings deriving from this project may help us better understand the needs of both students and universities, and may help give us better insights into our work as college admission counselors.

Payment for Participation

You will not receive payment for your participation.

Confidentiality

Interviews will be audio-recorded with your consent. I will take notes if consent is not provided to audio-record interviews. Audio files and notes will be stored in a secure, locked location (e.g., my office or my home). Participants will be asked to review interview transcripts for accuracy. I will not attribute interview responses to identifiable individuals unless I am given permission by the participant. Any information that is obtained in connection with this study and that can be identified with you will remain confidential and will be disclosed only with your permission or as required by law. I will take every step to protect your identity by not using your name or other personal descriptors that may compromise your anonymity. You will be referred to as a "(former or current) education representative," unless consent is provided to use the name of your workplace. You have the right to review the audio recordings of your participation and to edit them in whole or in part. Only Panetha Nychis Ott and her faculty advisors will have access to the audio recording files and transcripts. Audio recording files will be stored in a locked cabinet until the end of this project, at which point they will be destroyed. Interview transcripts and audio recordings will be filed based on pseudonyms. Interview transcripts and field notes will be coded early on in the process so that any personal identifiers (name, affiliation, personal descriptors, etc.) are removed.

Participation and Withdrawal

You can choose whether to be in this study or not. If you volunteer to be in this study, you may withdraw at any time without consequences of any kind. You may also refuse to answer any questions you do not want to answer and still remain in the study.

Identification of Investigators

If you have any questions or concerns about the research, please feel free to contact: Eric Kaplan, EdD, Laura Perna, PhD, Jenny Rickard, EdD, or Panetha Nychis Ott at University of Pennsylvania, Executive Doctorate Program, Graduate School of Education, 3700 Walnut Street, Philadelphia, PA 19104, or panetha@gse.upenn.edu.

Rights of Research Participant

You may withdraw your consent at any time and discontinue participation without penalty. You are not waiving any legal claims, rights, or remedies because of your participation in this research study.

I understand the procedures described above. My questions have been answered to my satisfaction, and I agree to participate in this study. I have been informed of the content of this form.

_____	_____	_____
Name of Subject	Signature of Subject (optional)	Date

In my judgment, the subject is voluntarily and knowingly giving informed consent and possesses the legal capacity to give informed consent to participate in this research study.

_____	_____	_____
Name of Investigator	Signature of Investigator	Date

APPENDIX C: INTERVIEW QUESTIONS FOR INDIVIDUAL PARTICIPANTS

For agents/former agents/agency employees

- Please describe your role with students

  with secondary schools

  with colleges and universities

- What services do (did) colleges and universities expect of you, and how were you trained?
- What are your perceptions of these services?

In your experience, how does the use of agents influence college admission?

For counselors

- In your role as a counselor, please describe your experience with these agencies.
- What services do colleges and universities expect of agents/agencies, in your view?
- What are your perceptions of the services offered?
- How does the use of agents influence college admission?

For tertiary institutions

- In your role as an admission professional, please describe your experience with these agencies (or with agents).
- What services do colleges and universities expect of this agency, and how are agents trained?
- What are your perceptions of the services offered?

- What proportion of your international population comes through agencies/agents?
- Do you rely on EducationUSA centers? If not, why not?
- Does the quest to secure enrollments change the mission of land-grant universities?
- How have matriculants recruited by agents changed campus culture?
- How does the use of agents/agencies influence college admission?

For professional organizations

- In your role as a member of _____ organization, what is your experience with agents/agencies?
- What services do colleges and universities expect of agents, and how does this affect your organization?
- What are your perceptions of the services offered?
- How does the use of agents influence college admission?
- What are the trends in the use of agents since 2000?

For government agencies

- In your role as a member of the Department of _____, what is your experience with agents?
- How does the government view agents in the college admission process?
- What are your perceptions of the services offered?

APPENDIX D: PARTIAL LIST OF ACRONYMS

AACRAO—American Association of Collegiate Registrars and Admission Officers

AIRC—American International Recruitment Council

AP—Advanced Placement

CIS—Council of International Schools

HEA—Higher Education Act

IACAC—International Association for College Admission Counseling
(formerly OACAC)

IBO—International Baccalaureate Organization

IIE—International Institute of Education

OACAC—Overseas Association for College Admission Counseling (now IACAC)

NACAC—National Association for College Admission Counseling

SPGP—Statement of Principles of Good Practice

TOEFL—Test of English as a Foreign Language

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