CSIET REPORT ON APPLICATION OF AGREED-UPON PROCEDURES
(Note to Reviewer – All reports must maintain the numbering system provided in the template materials.)

2020-2021 NON-US BASED F-1 RECRUITMENT AGENCIES
(July 1, 2020)

To the Management and Board of Directors
[INSERT Agency NAME HERE]

We have performed the procedures included in the Secondary School Student Compliance Review Procedures. These procedures were agreed to by the management of (Agency) solely to assist you in your assertion of compliance with CSIET’s Model Standards during the current Agency year (July 1, 2020 to June 30, 2021). This agreed-upon procedures review was performed in accordance with procedures established by the CSIET Board of Directors. The sufficiency of these procedures is solely the responsibility of the specified users of the report. Consequently, we make no representation regarding the sufficiency of the procedures described below either for the purpose for which this report has been requested or for any other purpose.

From the Agency’s listing of international student participants who are attending secondary school in the United States during the 2020-2021 academic year, we randomly selected a statistically valid representative sample of [INSERT NUMBER OF SAMPLE SIZE HERE] Agency participant files for testing. In connection with those files:

*All numbers must be entered using typed font. No handwritten entries will be accepted. Reviewers, please state Agency NAME and SAMPLE SIZE above!

A. We confirmed that [INSERT Agency NAME HERE] (the “Agency”) is designated as a bona-fide non-US based international student recruitment Agency, organized under local law under the appropriate jurisdiction of relevant authorities in the home country. We reviewed appropriate documentation to determine the bona fides.

1. We read Agency literature to determine that the Agency has committed to a training process, as determined by the partner school, for initial and continued education about the school and admissions process. We inquired of Agency personnel and were informed that all officers, employees, representatives, agents and volunteers acting on their behalf are adequately trained and supervised.

We determined in our testing of the corresponding files that _____ out of _____ local and regional organizational representatives who have placed or supervised students (from the student sample) during the year beginning (agreed upon date) participated in training sessions.

(Reviewers note – reviewers should provide the actual number of files tested, not just a statement that “all” were in compliance.)

2. We reviewed all training materials utilized by the Agency in training of officers, employees, representatives, agents and volunteers to determine whether they comply with CSIET Model Standard 1C. We found that all training materials reviewed were complete, comprehensive, and in compliance with CSIET Model Standard
3. We have reviewed the most recent financial review or financial statements, and have determined that the Agency is capable of discharging its financial responsibilities to all participants.

4. We read contract terms, handbooks, surveys and training content and have determined that the Agency has terms and policies in place to protect the interest of students (and natural parents).

   1. We determined in our testing of signed contracts that _____ out of _____ contained adequate terms of agreement between the Agency and natural parents.
   2. We determined in our testing of corresponding files that _____ out of _____ contained documentation of distribution of the program handbook to students and natural parents.
   3. We determined in our testing of corresponding files that _____ out of _____ contained documentation of distribution of surveys of students and natural parents.

(Reviewer note – reviewers should provide the actual number of files tested, not just a statement that “all” were in compliance.)

5. We reviewed the Agency’s website and verified the existence of a clear process for the submission and adjudication of complaints.

6. We read Agency literature, including the Agency website and program handbook. We have reviewed contracts and promotional materials provided to prospective students and their natural families to determine that they are compliant with CSIET Model Standard 1E.

   We determined in our testing of the corresponding files that _____ out of _____ signed contracts contain adequate terms and conditions that adequately express the agency’s obligation to “adhere to local and international law wherever and whenever applicable.”

(Reviewers note – reviewers should provide the actual number of files tested, not just a statement that “all” were in compliance.)

Additionally, we reviewed relevant complaints files. Based on the review we have determined that the Agency has no outstanding judgements or complaints.

7. We reviewed applicable documentation in the sample population to ensure that the Agency accurately discloses U.S partner agencies, sub-agents and educational institutions with whom they have a documented business relationship. (Reviewers note: Specifically, agencies must disclose to students/natural families the names of the partner agencies, sub-agents and schools.)

   We determined in our testing of the corresponding files that _____ out of _____ contained evidence that the Agency has provided accurate disclosure.

(Reviewers note – reviewers should provide the actual number of files tested, not just a statement that “all” were in compliance.)
8. We reviewed applicable documentation in the sample population to ensure that Agencies disclose their ownership, governance and organizational structure in an accurate and detailed manner.

We determined in our testing of the corresponding files that _____ out of _____ contained evidence that the Agency has provided accurate and detailed disclosure.

(Reviewers note – reviewers should provide the actual number of files tested, not just a statement that “all” were in compliance.)

9. We reviewed applicable documentation in the sample population to ensure that the nature of the partnership between the agency and US partner institution is clearly stated in the form of a contract or written agreement.

We determined in our testing of the corresponding files that _____ out of _____ contracts/agreements contained evidence of a clear statement of the nature of the partnership.

(Reviewers note – reviewers should provide the actual number of files tested, not just a statement that “all” were in compliance.)

10. We reviewed applicable documentation in the sample population to ensure that written contracts/agreements between the agency and school:

10.1. Are signed by both parties;
10.2. Display all itemized fee schedules;
10.3. Display refund policies and other policies as applicable by law; and

*Such contracts/agreements avoid any misrepresentation and do not make promises or guarantees that cannot be met.

We determined in our testing of the corresponding files that _____ out of _____ contracts/agreements met the above criteria.

(Reviewers note – reviewers should provide the actual number of files tested, not just a statement that “all” were in compliance.)

11. We reviewed applicable documentation in the sample population to ensure that written contracts/agreements between the agency and student/natural parents:

11.1. Are signed by both parties;
11.2. Indicate that the agency does not collect commissions based on financial aid or scholarship;
11.3. Stipulate confidentiality and the limits therein, as guaranteed by privacy laws;
11.4. Display all itemized fee schedules;
11.5. Display refund policies and other policies as applicable by law; and

*Such contracts/agreements avoid any misrepresentation and do not make promises or guarantees that cannot be met.

We determined in our testing of the corresponding files that _____ out of _____ contracts/agreements met the above criteria.
12. We reviewed applicable documentation (financial statements, grades, transcripts, teacher recommendations, English language testing and any other documentation/scores used for the purpose of admissions) in the sample population to ensure that the Agency stands by the veracity of documentation.

*Such documentation must be signed by school representatives, doctors, bank officials, etc.*

We determined in our testing that _____ out of _____ of the corresponding files were in compliance with the above criteria.

13. We reviewed applicable documentation in the sample population to ensure that the Agency fully discloses the practice of collecting payments/fees/commissions.

We determined in our testing that _____ out of _____ of the corresponding files were in compliance with the above criteria.

14. We reviewed applicable documentation in the sample population to ensure that the Agency does not recruit on the sole basis of athletic skill/ability.

We determined in our testing that _____ out of _____ of the corresponding files were in compliance with the above criteria.

15. We reviewed applicable documentation in the sample population to ensure that the Agency secured written, student-specific acceptance from the DSO (Designated School Official), PDSO (Principal Designated School Official), school principal or other designated responsible school administrator prior to the international student’s departure from his or her home country.

We determined in our testing that _____ out of _____ of the corresponding files were in compliance with the above criteria.

16. We reviewed applicable documentation in the sample population to ensure that the Agency trains its recruitment personnel (including, but not limited to, employees, sub-agents, independent contractors, etc.)
consultants and franchisees) annually in relevant standards, practices, procedures and content areas. Recommended resources include:

16.1. The US secondary school education system;
   16.1.1. Principles of Good Practice (NAIS, NAFSA, TABS);
   16.1.2. Enrollment Management
   16.1.3. Practices (EMA, AISAP);
   16.1.4. CSIET Standards for Long Term International Student Exchange Programs;
16.2. US Regulatory Requirements (SEVP);

We determined in our testing that _____ out of _____ of the corresponding files were in compliance with the above criteria.

(Reviewers note – reviewers should provide the actual number of files tested, not just a statement that “all” were in compliance.)

17. We reviewed Agency policy to determine that the agency shall respond in a timely and appropriate fashion to complaints received from international students, natural parents, schools or others concerned with the program and its quality.

We found that program policy was complete, comprehensive, and in compliance with CSIET Model Standard 3B.

18. We reviewed contract/agreements to determine that the agency’s partners (including, but not limited to sub-agents, independent contractors, consultants and franchisees) are aware of their accountability to the provisions of CSIET’s Model Standards.

We found that all signed, partner agreements clearly stipulate the terms of adherence to CSIET’s Model Standards.

19. We reviewed applicable documentation to determine that the Agency collaborates with US-based agencies and schools that operate in a manner consistent with CSIET Standards for Long Term International Student Exchange Programs.

We confirmed that the Agency:

   19.1. Partners with a US based CSIET certified CSIET organization; or
   19.2. Has a translated copy of CSIET Standards for Long Term International Student Exchange Programs, available for review by home based personnel.

20. We reviewed applicable documentation to determine that the agency partners with US schools that operate in a manner consistent with CSIET Standards for Long Term International Student Exchange Programs.

We confirmed that the Agency:

   20.1. Includes Section 4 of CSIET’s Model School Policy and individual school information among the Agency’s staff training materials; and
20.2. Has a translated copy of CSIET’s Model School Policy, available for review by home based personnel.

No exceptions were noted as a result of applying this procedure.

This report is intended solely for the use of the management of the Agency and the Council on Standards for International Educational Travel and should not be used by those who have not agreed to the procedures and taken responsibility for the sufficiency of the procedures for their purposes.

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Additional guidance provided by the CSIET Board of Directors

**Sampling and Reports** – The number of files of participants examined by reviewers varies widely. Based on review, it appears that an average of 10% sampling (with a cap of 125 files) is a reasonable and appropriate sample. For very small Agencies, this can make the sample so limited as to have no validity. In those cases, individual reviewers might wish to increase the sample size to a minimum level of 20 files (or all participants if fewer than 20) which should provide statistically valid results. Further, some reviewers find it useful to review slightly higher numbers of files. This might only be necessary where a pattern of problems exists and it is necessary to “pull additional files” to validate a particular finding.