



September 20, 2021

U.S. Senator Jon Tester
Chairman
Senate Committee on Veterans' Affairs
412 Russell Senate Office Building
Washington, DC 20510

U.S. Senator Jerry Moran
Ranking Member
Senate Committee on Veterans' Affairs
412 Russell Senate Office Building
Washington, DC 20510

U.S. Representative Mark Takano
Chairman
House Committee on Veterans' Affairs
B-234 Longworth House Office Building
Washington, DC 20515

U.S. Representative Mike Bost
Ranking Member
House Committee on Veterans' Affairs
B-234 Longworth House Office Building
Washington, DC 20515

VIA EMAIL

Dear Chairman Tester, Chairman Takano, Ranking Member Moran, and Ranking Member Bost,

I write today on behalf of NAFSA: Association of International Educators regarding legislation enacted by Congress last year and this year in support of U.S. veterans' education benefits, the Isakson Roe Act (Pub.L. 116-315), and the THRIVE Act (Pub.L. 117-16), that omit language explicitly allowing U.S. institutions of higher education to use incentive compensation when recruiting international students. This omission suggests that U.S. higher education institutions that use incentive compensation to recruit international students—a practice permitted under Title IV of the Higher Education Act—risk being disapproved for GI Bill benefits. On September 14, 2021, the U.S. Department of Veterans' Affairs (VA) distributed an internal policy advisory to this effect, stating the use of incentivized recruitment of international students "is no longer approved for educational facilities receiving educational benefits from VA after August 1, 2021." We understand that the committees are aware of this omission and are working to enact a legislative fix. We appreciate this, and urge swift action to do so, as U.S. colleges and universities wish to remain in compliance.

The United States is in a global competition for international student talent. Universities around the world regularly contract with third-party, commission-based agents to assist with international student recruitment. According to a recent survey by the American International Recruitment Council and the National Association for College Admission Counseling, 49 percent of U.S. institutions of higher education responding to the survey partner with such

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Association

Executive Director and CEO

Esther D. Brimmer, DPhil

agencies.¹ Use of commissioned agents by U.S. colleges and universities in international student recruitment is also endorsed by the U.S. Departments of State and Commerce. In fact, the Department of Commerce offers programs and services to connect and match U.S. institutions to agents worldwide.

U.S. colleges and universities hosted more than one million international students during the 2019-2020 academic year. NAFSA has estimated their financial contribution to the U.S. economy at \$38.7 billion, which in turn supports nearly 416,000 jobs nationwide.² However, in recent years, the number of new international students enrolling in U.S. higher education institutions has been in decline, dropping 11 percent from fall 2016 through fall 2019. In the fall of 2020, due to the effects of the COVID-19 pandemic, new enrollments plummeted a further 43 percent; when looking only at the number of new students physically on campus, the decline was 72 percent.³ With a restriction in place barring use of incentive-based agents in overseas recruitment of international students, U.S. colleges and universities will struggle greatly to reverse this decline. This restriction also runs counter to the Biden administration's recently issued [*Joint Statement of Principles in Support of International Education*](#) led by the Departments of State and Education, which emphasizes "the U.S. government's commitment to support key facets of international education, in partnership with U.S. higher education institutions."⁴

Again, we appreciate the committees' recognition of the omission. We urge swift action to enact the necessary legislative fix that will restore the ability of U.S. colleges and universities to compete for international student talent on equal footing with its global competitors.

Sincerely,

[Signature Redacted]

Esther D. Brimmer, DPhil
Executive Director & CEO
NAFSA: Association of International Educators

¹ <https://www.airc-education.org/news-and-updates/airc-nacac-survey-provides-insights-into-institution-agency-partnerships>

² <http://www.nafsa.org/economicvalue>

³ <https://www.iie.org/Research-and-Insights/Open-Doors/Fall-International-Enrollments-Snapshot-Reports>

⁴ https://educationusa.state.gov/sites/default/files/intl_ed_joint_statement.pdf