"Shadow Market": A Historical Analysis of the Rise of the Private College Admissions

Counseling Industry

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Abstract:

Recent controversies in the world of the private college admissions industry such as Operation Varsity Blues have led to increased scrutiny on independent education consultants. The shadowy, often-opaque college admissions industry has led to conversations about whether or not the process of college admissions is as equitable as institutions would have the public believe. The aim of this paper is to examine historical factors in the rise of the modern private college admissions industry and argue that key factors and decisions by institutions, economic cycles, and shifts in society are responsible for creating the modern-day private college admissions industry. By interviewing admissions counselors to gain insight on their backgrounds, analyzing primary data and industry reports, this research paper attempts to create a historical lens through which the current private admissions counseling industry can be analyzed. Finally, suggestions for future pathways toward equity and access in the industry are provided.

Table of Contents

Introduction	3
Literature Review	4
Research Design	9
Findings & Discussion	11
Conclusion	17
Works Cited	19

Introduction

In 2019, Felicity Huffman received a 14-day federal prison sentence for her role in a college admissions scandal (Taylor 2020). Over 50 people were charged in connection to a college admissions "ring" where wealthy people were accused of using their resources, lies, and bribes to pave the way for their children to elite institutions. Ms. Huffman herself paid \$15,000 to inflate her daughter's SAT test score, even colluding with an SAT test proctor who corrected her daughter's answers after the exam. While the Huffman case is notable for the amount of money involved and the brazenness of the cheating, the case is an extreme example of the lack of oversight and regulation within the college admissions industry.

It comes without surprise then that the demand for private college admissions counselors has increased dramatically within recent decades: the membership in the Independent Educational Consultants Association has trebled between 1996 to 2006 (Cohen 2006). The aim of this paper is to create a historical analysis of how the modern-day private college admissions industry came to be and argue for the historical roots of this industry. The "private college admissions industry" mentioned previously refers to a shadow market of private admissions counselors and private test preparation industries that are unregulated and decentralized, as opposed to school-provided guidance counselors and test preparation resources provided and administered by the College Board or within schools, respectively. Subsidiary questions that will be addressed are: Who are the major actors within this industry—smaller networks of college admissions counselors and local test prep industries or larger, more complex associations? How much regulatory oversight do lawmakers have over this industry? What in recent history has led to the sudden boom in private college admissions counselors?

This is a conceptual paper that will analyze the current situation through a causal lens. I draw on existing work in the field through dissertations, articles, and industry reports in order to create a framework through which to analyze the modern-day situation. In addition, I will hopefully be able to base my research on interviews of high school college admissions counselors to understand from a qualitative perspective how the admissions industry arose. I look chiefly along the lines of policy changes by elite institutions (namely through the financial aid offices) and changing socioeconomic trends in America in the 90s and early 2000s. Finally, I provide a pathway for future research and identify areas that may improve the equity of college admissions processes.

Literature Review

In "Toward a Theory of College Selection: A Model of College Search and Choice Behavior", Chapman proposes a behavioral theory of how students apply to and select colleges. Chapman separates the college selection process into at least 3 different phases: *search*, *application*, and *choice*. For instance, during the *search* phase, students are actively looking for information about colleges and college alternatives. Chapman describes how possible "knowledgeable others" may provide consultation, which include teachers, guidance counselors, family members and relatives, friends, alumni, or acquaintances (Chapman 1986). It is important to note that no reference to a private college admissions consultant is enumerated here, though Chapman does mention how students are expected to write to colleges to request catalogs and brochures. Even at this nascent stage in the modern college admissions industry, Chapman notes how finding a mix of "right" attributes is an intensely individual and "complex" process (Chapman 1986). Notably, Chapman focuses mostly on the *search* phase of the framework, though it seems that more recent discourse has centered around *application* to a few select institution.

Chapman explains that the model is an organizing framework for college selection, as it is assumed every student progresses through the stages in order. College admissions counselors, as agents exogenous to a student's internal decision-making process, may relate to each phase within college choice theory to provide value to clients. This is well-supported in the rest of the literature: Ishop seeks to study and understand how students choose topics for college application essays and the multimillion-dollar industry that has sprung up around the college application. Ishop describes students' emotions as "angst and confusion" (Ishop 2008). One key factor undergirding Ishop's argument is the fundamentally opaque nature of holistic college admissions. As the author describes, "the nature of 'being qualified' continues to change" at elite institutions as test scores rise across the board and students seek to differentiate themselves instead on basis of writing ability, resumes, and letters of recommendation (Ishop 2008). Ishop describes how important the admissions officer reading the essay is: "the value of the essay then can only be affirmed within the context of the admissions process" (Ishop 2008). This seems to lend credence to an idea that admissions officers possess asymmetric information about what distinguishes a stellar essay from a poor example.

To fill this knowledge gap, students often turn to guidance counselors and English teachers, but Ishop cites Cohen of IvyWise who suggests that high school officials are overtaxed and unable to adequately address all the essay-writing needs of a growing and idverse population of students (Ishop 2008). As such, students and families are more likely to turn to the assistance of private consultants or seek information from popular media to inform their essay-writing process. This industry is well-developed as of the early 2000s: Cohen describes that private consultants have provided service to more than 58,000, or 22% of the 260,000 high school students admitted to private institutions in 2005, offering services that range from \$150 to over \$33,000 for a comprehensive planning packages (Ishop 2008). Ishop treats the college essay as an asymmetric information problem. Students and parents are left with a high-stakes knowledge gap that traditional resources like high school counselors and English teachers are unable to bridge.

Not much information is given by Ishop on the historical origins of this gap, though the cited examples do seem to suggest a rapidly expanding market for private admissions counselors who cater to confused and anxious clients. McDonough, Korn, and Yamasaki characterize the college counseling industry in 1997 as an expanding industry driven by profit. To this end, the author identify four factors that fed the growth and drove demand for the private college counselor industry: 1) colleges' priorities on admissions marketing in response to anticipated enrollment declines, 2) increased competition for limited seats, 3) public high schools abdicating responsibility for college advice and reprioritizing guidance counselors, and 4) commodification of insider college knowledge.

McDonough, Korn, and Yamasaki argue that the main point of contact of most high schoolers in America to the college application process is the school-issued guidance counselor. The authors point to the shift in focus of public school guidance counselors to addressing social and health issues such as pregnancy, drug use, and suicide prevention among the student body rather than providing advice for college counselors. Additionally, the high student-to-counselor ratio of 740:1 contributes to what McDonough, Korn, and Yamasaki call the "divestment of college advisement" (McDonough, Korn, and Yamasaki 1997). The authors associate the use of private admissions counselors with Caucasian, wealthy, coastal, and generally privileged students. They additionally conclude three trends among students who employ counselors: 1) they generally know how to seek advice in their school and extracurricular lives, 2) are from

privileged families, and 3) exhibit different college application behaviors such as more resilience to tuition and financial aid packages and higher average number of college applications.

In a more recent report for NACAC in 2005, McDonough examines the role of high school counseling more broadly. At the center of the transition from the 1950s college-going culture (only 20% of high school graduates went on to attend college) to the modern day (65%), both high school applicants and college admissions officers seem to be "hedging their bets"—students by filing larger numbers of applications to cope with decreasing admissions odds, while colleges are attempting to boost yield rates through early admissions programs (McDonough 2005). McDonough claims that improved counseling will most significantly impact college access for low-income, rural and urban students, and students of color. However, there is a distinction between helping students prepare for college "as opposed to simply disseminating information" (McDonough 2005); McDonough views college counseling as an intentional action.

To that end, McDonough traces the rise of counseling to 1950s prep schools (Smith 2014 cites McDonough in tracing the growth of private counselors). Prep school counselors grew as college admissions offices faced rising application rates and "prep school heads could no longer call admissions offices and 'place' their students into a small number of elite colleges" (McDonough 2005). In contrast, public school counselors have other responsibilities including sexual and mental health and drug use. The rise of private college counselors is due to college admissions becoming a "complex, high risk, and stressful task" (McDonough 2005). Independent consultants provide access to specialized knowledge, coach on tests and essays, and "hand-hold" students through the admissions process, spending more time with college-bound students than any other type of school officer (McDonough 2005). These resources are most likely only available to students and parents of high SES, as parents pay tens of thousands of dollars for counseling programs focused only on college admissions (McDonough 2005). Notably, McDonough laments that the privatized and costly nature of hiring consultants "precludes access by lower SES college aspirants who arguably need it most" (McDonough 2005).

McDonough turns attention next to professional organizations of counselors—namely, NACAC, regional ACACs, The College Board, and college advising training programs and workshops. The author decries that there is "so little overlap between college counselors and all other school counselors", pointing to the worsening gap in responsibilities between a private

admissions counselor and the typical duties of a public high school guidance counselors. McDonough ultimately concludes that this division is detrimental to everyone involved.

Robinson and Roksa use the Educational Longitudinal Dataset in order to examine how high school counselors affect the college-going process. The authors position the ELD within the framework of a "college-going culture", characterized as "college-linking resources and college opportunity structures of high schools that promote college enrollment" (Robinson and Roksa 2016). College-going culture is measured by proxy using measures such as average case load for counselors, hours spent advising students on college counseling and resources such as financial aid, number of college fairs, and college course options (Robinson and Roksa 2016). The authors note a lack of strong, significant effects in college-going status based on SES, urbanicity, and diversity. Robinson and Roksa suggest that this is because policy and attention focus on schools on either extreme (very high or low college-going culture) but tend to neglect the schools with medium levels of sending students to 4-year institutions. While the lack of significant effects in the Educational Longitudinal Dataset were attributed to high amounts of error, the study seems to point that among modern students the impact of high school counselors "diminishes after considering other sources of information" (Robinson and Roksa 2016). No discussion of the potential impact of private counselors or admissions officers from universities was given.

The key question that Smith analyzes is whether or not these counselors have the "secret formula" or wield undue influence over college admissions offices in order to secure admissions for students (Smith 2014). Smith situates these consultants within a larger "shadow education" industry that exists outside of schools and "largely benefit advantaged students" (Smith 2014). Ultimately, Smith sees that private admissions counselors are "just a small piece of a much larger whole"; within the context of social reproduction theory, Smith argues that private counselors are not universally or even typically predatory, but act as agents that may provide a slim chance at upward social mobility for the economically disadvantaged (Smith 2014).

Smith claims that while college is a perennially popular option for high schoolers, "the vast majority of colleges aren't very competitive ... despite the hyped-up national discourse on higher education" (Smith 2014). Of approximately 2,000 4-year institutions, only about 55 colleges regularly admit fewer than 30% of applicants in 2013 (Smith 2014). However, the most selective colleges—namely elite institutions—have become more selective, largely due to behaviors of the college admissions offices themselves. Smith claims that dropping college

yields since at least the early 2000s have led to admissions offices becoming "commercialized and entrepreneurial" as colleges spend on marketing and branding campaigns. This contributes to 2 types of "commodification": of the applicants (by treating them as obtainable objects) and of college knowledge (as information to be bought and sold) (Smith 2014). These market trends have created demand for providers of that knowledge, and Smith claims that independent education consultants capitalize upon this information and market gap.

Most of Stern's and Briggs' work centers around identifying contemporary problems in the college admissions process that necessitates change by college admissions offices. Stern and Briggs describe 4 distinct trends that admissions offices deem worthy of attention: 1) changing K-12 curricula from changing economic conditions, 2) high attrition levels at 4-year universities, 3) changing high school graduation requirements, and 4) new types of high schools (such as charter schools and home-school programs). Stern and Briggs mention the 5 most important factors in traditional college admissions: 1) high school GPA, 2) test scores, 3) high-school coursework/transcript, 4) any college-level coursework, and 5) class rank. The authors contend that reforms in high school education led to the movement away from traditional class structures and toward project-based learning, internships, and interdisciplinary classes that complicate evaluation of college applicants by admissions officers.

Tremblay traces the development of graduate coursework in college counseling, specifically as applied to certificate programs targeting professional, private college counselor affiliated with bodies like NACAC and the College Board. One of Tremblay's research subquestions explicitly attempts to answer what steps and reasons led to the creation of graduate school programs, situating Tremblay's research closest to my mine among the examined literature. Tremblay identities 4 primary professional groups providing college counseling services to high school students: high school counselors, college admissions professionals, college access professionals, and finally independent consultants (Tremblay 2014). Tremblay identifies the beginning of college counseling graduate programs as July 1991 as both Long Island University and UC Riverside announced vocational courses specifically pertaining to college admissions counseling (Tremblay 2014). This has grown to 42 full school counseling preparation programs as of 2010 (Tremblay 2014). Tremblay describes 2 major actors in the advocacy for and expansion of continuing education programs: NACAC and The College Board, both of which will be represented in the case interviews.

Research Design

I am collecting data using a *historical methods* research framework in order to generate a historical analysis of the rise of the modern private college admissions industry. This method relies on primary and secondary sources in the form of news articles, written testimony, industry reports, and prior research as a source of both qualitative and quantitative data supporting my argument. I will also be conducting expert interviews of private college admissions counselors, which will be conducted in conjunction with Nicholas Brennan. By relying on a variety of historical primary and secondary source documents as well as testimonials from private admissions counselors, I hope to triangulate the historical origins of the private college admissions industry. I will also engage in source criticism that evaluates the validity and biases of primary and secondary sources.

In terms of theoretical framework, I have chosen to approach this problem through the lens of *college choice theory*, proposed by Randall Chapman. Under college choice theory, students' behavior and decisions are governed by 3 stages: search, application, and choice. This framework translates well to the responsibilities of modern private admissions counselors. More details on Chapman's college choice theory are described in the literature review section.

Rather than relying on an unstructured format to conduct qualitative research interviews, I will be relying on semi-structured, in-depth interviews. Due to the inherently flexible nature of a semi-structured interview, I will have the latitude to include or exclude certain questions based on interview flow and other indicators. To that end, interviewees will be asked preset open-ended questions that are specified in the interview guide in the Appendix, separated into 3 broad categories: Students and Parents, Colleges and High Schools, and History and Industry. These correspond to the research subquestions that feed into my understanding of the growth of the modern college admissions counseling industry: 1) What social or economic factors generated demand for private admissions counseling services by students and parents? 2) What policy decisions made by colleges and high schools contributed to the modern private college counseling industry? 3) What push or pull factors led private admissions counselors into the counseling space?

Students and Parents	Colleges and High Schools	History and Industry
What are the demographics of students you typically advise? Has that changed over the years?	How would you characterize the jobs of high school guidance counselors? College admissions officers?	How did you get your start in the industry? What kind of skills do you possess that make you an effective counselor?
Which schools are the most popular among your clients? Which schools are the least popular? Are there any big movers or trends?	What decisions made by high schools affect your job?	What is the fee structure of your business?
What factors affect demand for your services among students and parents?	Have there been any changes to your relationship to college admissions officers? If so, when?	How do you grow your business? Where do you see this industry in 10 years? 20 years?
What are the most common desires among clients? What are their most common fears?	What was the single most significant policy change that a college made in your history as a counselor? How did it affect your job?	What barriers to entry exist in the college counseling industry?
What are the most challenging parts of an application for a student? For a parent?	How might a college improve its popularity among your clients?	How would you characterize the regional and college counseling industries? Who are the major actors?
What goes into a student's "profile"? Have any factors become more or less relevant over the years?	What criteria do you use to match students and colleges?	Are you part of any professional organizations? If so, what role do they play?
		Do you face more or less competition now than when you first started your job?

Because part of my research relies on human participants in the form of expert interviews, care must be taken to preserve ethical conduct through the process of research. The ethical values I intend to uphold are those of beneficence, non-malfeasance, fidelity and trust within the interviewer-interviewee relationship, preservation of personal dignity, and autonomy in decision-making and privacy of personal information (Kapp 2006). For all interviewed subjects, the following requirements must be satisfied: 1) Physical and psychological risks to participants are minimized; 2) Informed consent are obtained and documented appropriately; 3) Confidentiality provisions, if required or requested, are upheld; 4) The right to not participate or withdraw participation at any time without penalty is sustained. To avoid mischaracterization of interviewee responses, all interviews are conducted in conjunction with a partner and recorded with appropriate consent. Recordings, if obtained, are not to be shared publicly over any medium without appropriate consent.

Additional research was drawn from academic journals and data collected from the websites of selective universities. Data analysis and graph generation were all conducted in R using standard packages with code available upon request. Industry reports from IBISWorld, the

Harvard Graduate School of Education, and Oliver Wyman were also consulted to triangulate the reasons behind the rise of the college admissions industry.

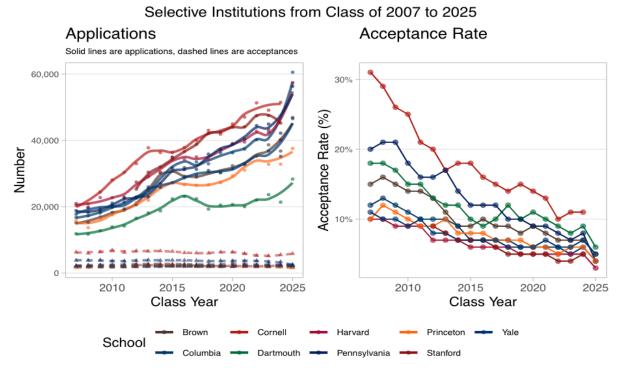
Findings & Discussion

From research conducted through interviews and compiling primary source documents, we attempt to answer the 3 research subquestions mentioned previously: 1) What social or economic factors generated demand for private admissions counseling services by students and parents? 2) What policy decisions made by colleges and high schools contributed to the modern private college counseling industry? 3) What push or pull factors led private admissions counselors into the counseling space? No single factor or movement has caused the private admissions industry to develop within the recent decades; instead, a variety of concurrent and often intersectional trends have created opportune circumstances to drive demand for private counseling services.

For parents and students, the story is that of increasing complexity and confusion when it comes to applying to college, exacerbated by forces that make it easier and more necessary to apply to ever-increasing numbers of colleges. In context of Chapman's college choice theory framework, counselors are increasingly focusing on the *application* and to a lesser extent *search* phases of the college choice process while the *choice* phase is relatively neglected. The 3 key factors that have driven parents and students to private college counseling services are:

• Students apply to more colleges now than ever. More students are now playing the "numbers game" and submitting record numbers of college applications per student. The growth and dominance of platforms like the Common App and the Coalition App, in addition to smaller consortium application systems like the University of California system, have made applying to colleges easier than ever. A natural consequence of increasing applications for a limited number of spots at elite institutions is falling acceptance rates at top schools, leading to growing anxiety over securing a spot at any given university as mentioned by all 3 interviewees. This leads to a positive feedback cycle as students apply to more institutions the next cycle in order to compensate for lower acceptance rates, as well as demand for services to maximize acceptance chances. Another consequence of increasing applications per student is the growing role of college

counselors as a manager of academic, emotional, and career well-being for the student. Two interviewees mentioned explicitly that long-lasting relationships with students allows counselors to advise not only college choices during the *search* phase but also advise on internship opportunities and post-graduate career pathways for students. This may prove invaluable to high school students who have not settled yet on a definitive academic or career track.



lvyCoach 2021, lvyWise 2021, Stanford 2021, Columbia 2021, Cornell 2021

Applications to selective institutions (Stanford and Ivy League shown above) have grown nearly continuously since the mid-2000s, reaching record levels during the COVID-19 pandemic. Despite growing demand for selective institutions, the number of available seats has remained stagnant for the past 2 decades, leading to plummeting acceptance rates.

• Despite lower acceptance rates, selective institutions are seen as more desirable.

Selective, out-of-state schools are increasingly seen as a necessity for social mobility and social signaling among parents and students, precluding alternatives such as community colleges and even in-state public institutions. Students who in previous years may have applied to a few regional schools are peer-pressured into striving for selective institutions that often put strain on their high school experience, peer relationships, familial relationships, and financial ability. As one interviewee mentioned, students and parents know of "only 25 universities", implied to be the top-ranking universities in the country.

College counselors are perceived as a way to maximize chances of admission to these selective institutions; the conscious choice to not hire a college counselor is seen as handicapping a child's chances relative to their peers. More research into the social phenomenon

"Fast-changing" admissions policies and growing numbers of students applying from first-generation college-going households means parents are often unable to uncomfortable offering direct advice about college to their children. According to Chapman's college choice theory, college counselors provide guidance to clients across all 3 stages of college choice: from search (counselors provide students with information about colleges based on academic background, financial needs, geographic location, and cultural fit), to application (counselors help with the application process by choosing an application set, crafting and editing essays, and providing emotional support for parents and students alike), and finally with choice (counselors recommend which admitted schools to attend using experience and past clients and alumni) (Chapman 1986).

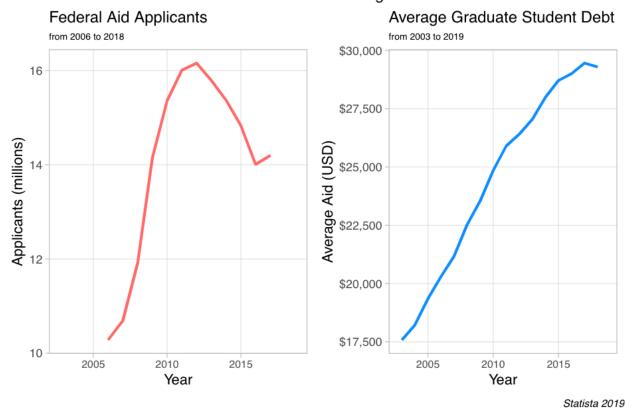
For institutions like high schools and colleges, growing competition for a fewer number of positions have led to a gap in college access that has not been filled by high schools or admissions officers from universities. The 3 key factors in institutional changes that have led to increased demand for private college counseling services are:

• Increasingly impersonal guidance counseling in high schools. As mentioned by McDonough, Robinson and Roksa, and supported by personal testimony in one of the interviews, diminishing time spent on personalized college counseling in most high schools have created a market gap for targeted, individualized college advice. The current state of guidance counseling in high schools has trended poorly over the past decades as a result of poor public school funding and redistribution of guidance counselor attention on social issues. It is a mathematical impossibility for the current number of guidance counselors to provide high quality services along the *search*, *application*, and *choice* phases of college application to every student under their purview. However, differences exist between private high school counselors and public counterparts in terms of college

counseling resources. Private school guidance counselors reported 56% of their time was spent on college admissions counseling activities, while public school counselors reported only 22% of their time was spent doing the same (Avery, Howell, Page 2014). Private admissions counselors have filled in this gap for upper- and upper-middle class students, a demographic that already holds several systemic advantages over lower-income families and those from weaker college-going high school cultures (Bryan et al. 2017).

- Holistic admissions policies instituted by elite colleges and universities. Elite institutions have increasingly moved toward "holistic admissions" policies that factor in a multitude of criteria such as standardized test scores, high school grades, awards and achievements, community service, and essay-writing (Ishop 2008). Schools have also begun to consider racial, ethnic, and socioeconomic backgrounds to build more diverse and inclusive first-year classes. However, holistic admissions has also increased confusion among potential applicants who are unsure of how to best present themselves in a college application. This confusion over "black-box" admissions as mentioned by an interviewee leads students to request services from the private sector. Some counselors have turned away promising students as "they don't need [the counselors'] services", underlining an asymmetric information gap between college admissions and students who may have a poor understanding of their own qualifications. Private admissions counselors provide the most utility in accurately and precisely adjudicating a potential applicant's candidacy relative to past and current applicants to a certain institution.
- More generous financial aid policies by colleges and government policies. The Higher Education Act of 1965 paved the way for the federal government to issue more student debt, financing college education for millions of high school graduates. Average federal aid has increased from \$3,437 to \$12,455 per student from 1965 to 2010 measured in real dollars as a direct result of the Higher Education Act of 1965 (Dynarski and Scott-Clayton 2013), and growing student debt in the US indicates that students are more and more tolerant of using loans to finance high education.

Financial Aid of U.S. Undergraduates



The number of federal aid applicants has increased since the mid-200s, though it has leveled off in recent years. The average student debt of recent undergraduates has increased by nearly 70% from 2003 to 2019, reflecting both increasing tuition costs and reliance on debt to finance higher education.

Finally, a combination of structural factors inherent to the college counseling industry and economic trends have made college counseling an increasingly popular career choice for professionals. The 3 key factors and trends in the nature of the college counseling industry that has made a lucrative field for individuals seeking to enter are:

• Overwhelming demand for college counseling services has created a demand shock.

Due to the factors mentioned previously, demand for college counseling services has vastly outpaced supply, as college counselors for the most part can only take on a limited number of clients at any given time. This limit on supply, coupled with increasing frustration among parents and students applying for colleges, has created a demand shock within the college counseling industry and generates 2 effects: 1) increasing prices and 2) increased number of professionals entering the counseling space.

- Few barriers of entry allow professionals to make lateral career moves. Despite the existence of professional associations like HECA, IECA, and NACAC, no widely agreed-upon licensing or accreditation barriers of entry exist for college counselors in the US. In fact, of the interviewees, only one was affiliated with a professional organization (though all have had some informal contact or awareness of the associations). College counselors themselves are organized mostly into small business units, either as sole proprietorships or rudimentary partnerships that has led most observers to characterize the industry as a "cottage industry" with a highly decentralized structure. College counselors may come from unorthodox backgrounds unconnected to higher education or secondary school counseling, as evidenced by the diverse professional history of the interviewees (healthcare, business, and law).
- The recession-proof nature of college counseling has increased desirability for college counseling for the past 20 years. Recessions in the modern Internet age have increased the desirability for jobs that require high-level cognitive and people skills, both of which are skills that are valued within the college counseling industry. The decentralized, cottage-industry nature of independent consultants facilitates career changes during periods of economic downturn, as demand for colleges remains relatively constant even during recessions. The increasingly popular view among upper-middle and upper class applicants that college counseling is a "necessity rather than a luxury" supports the private admissions counseling industry's status as a recession-proof career move.

Potential limitations stem mostly from the small sample size of qualitative research interviews conducted over the span of the engagement. Ideally, I would interview a larger sample size of at least 15-20 consultants from various regions across the country. In addition, coding responses by clientele, fee structure, and professional background would offer even more clarity regarding the industry as a whole. Male counselors also are a large research gap and a target area for further investigation.

Conclusion

From my analysis and interviews with independent education consultants, one thing is absolutely clear to me—that the majority of private admissions counselors are attempting to provide a well-meaning service. Interviewees regularly remarked on the limitations of their services, stressing terms like "match", "fit", and "enjoyability" over concepts like "elite", "cutthroat", and "at-all-costs". That is not to say there are not systemic issues within the private college counseling industry. However, to me, the media portrayal of controversies like Operation Varsity Blues draws attention away from these underlying issues, focusing on sordid tales of underhanded parents and cheating scandals rather than on questions of access, student mental health, and the increasing opacity of college admissions. College counseling as an industry does not appear to be waning anytime soon and is projected to reach \$2B in America by 2025 (Hiner 2020). Grappling with the issues brought up by the private admissions counseling industry's rapid growth as a shadow market is a necessary step for regulators, colleges, private citizens, and counselors.

One way to increase access is to increase the amount of resources decided to college counseling in high schools across America. Lower-income students and students exposed to weaker college-going cultures may benefit from more holistic college admissions processes, though access remains the larger challenge. The key seems to be supporting and expanding the counseling infrastructure already inherent in schools. According to Avery, Howell, and Page, just adding an additional guidance counselor can lead to 10 percentage-point increase in four-year college enrollment (Avery, Howell, Page 2014).

Additionally, while plummeting acceptance rates cannot be blamed on a single causative factor, an obvious solution would be for universities to increase the number of seats per incoming class. This is not a novel nor is it a universally applicable idea—Pew points out that most universities in the US actually are not overwhelmingly selective with <10% acceptance rates (DeSilver 2020). These extremely competitive schools account for just 3.4% of the institutions in a study of 1,364 schools, and more than half of the schools sampled admitted more students than they turned away. However, in general, admission rates have fallen about 10% in 15 years from 2002 to 2017. Recent demand shocks due to the COVID-19 pandemic and test-optional policies may only exacerbate this trend in the future. It is time for selective institutions to consider ways to expand supply gradually to keep pace with increasing applications.

From the perspective of the admissions counselors in the industry, it may be time to institute more stringent quality controls, accreditation procedures, and licensing for counselors, similar to those in other areas of education. Though supply of counselors seems to be low, college counseling is a rapidly-growing field characterized by ease of entry for a professional with high emotional intelligence and a college degree. However, a college counselor is not simply responsible for understanding and matching different college admissions profiles, but also counseling students' mental health during a high-stress and anxiety-inducing experience; providing feedback to students; and navigating the ethics of providing a for-profit service to increase chances of admission rather than guaranteeing admission. Though NACAC, IECA, and HECA all strongly condemn lapses in judgment by unscrupulous college counselors, stricter standards through credentials, continuing education courses, and licensing may be a necessary solution. Professionalization of the college counselor may also have added benefits in addressing information asymmetry between applicants and admissions offices, reducing market inefficiencies within a regional and national college counseling market, and correcting mass misinformation and negative public sentiment about college counselors.

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