

Ethical International Recruitment:

How certification helps safeguard
the rights of foreign-educated
health professionals



Alliance for ETHICAL
INTERNATIONAL
RECRUITMENT *Practices*
A division of TruMerit™



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Foreword

In today's global health landscape, the migration of health professionals is not merely a trend, it is a strategic response to critical workforce shortages. As countries increasingly rely on foreign-educated health professionals (FEHPs) to sustain their health systems, the ethical dimensions of international recruitment have never been more vital.

TruMerit (formerly CGFNS International) has long championed the rights of migrating health professionals through its stewardship of the Alliance for Ethical International Recruitment Practices. For over a decade, TruMerit has overseen the certification of international health recruiters under the Alliance's [Health Care Code for Ethical International Recruitment and Employment Practices](#). This Code sets forth best practices for ethical, fair, and transparent recruitment, and it is regularly updated to reflect evolving global standards and safeguard the rights of immigrant health care workers.

To ensure the Code remains relevant and effective, TruMerit surveys FEHPs directly. This past year's findings are both affirming and instructive: health professionals working with Certified Ethical Recruiters report high satisfaction, feel no undue pressure, understand their contracts, and are aware of their rights. These outcomes are not incidental; they are the result of a rigorous certification process and a deep commitment to ethical practice.

Our survey shows that migrating health professionals who work with Certified Ethical Recruiters are highly satisfied with their recruitment experience.

This report takes a broader view than previous editions, situating survey findings within the larger context of international recruitment ethics. It underscores the importance of mechanisms—like the Code and certification program—that ensure safe and effective migration. As migration continues to be a global workforce

strategy, we believe the Alliance's model should serve as a blueprint for other nations seeking to uphold the dignity and rights of health professionals.

Ethical recruitment is not just a policy. It is a promise—that those who care for others will be treated with fairness, transparency, and respect. This report is a testament to that promise and to the transformative impact of certification in shaping a more just and sustainable global health workforce.

Peter Preziosi, PhD, RN, CAE

President & Chief Executive Officer

TruMerit (formerly CGFNS International)



Main Findings

Within the ever-changing global health landscape, international recruitment has become a prevalent tactic in addressing shortages of skilled healthcare professionals and mitigating strain on health systems worldwide. The Alliance for Ethical International Recruitment Practices works to advance the fair and ethical treatment of foreign-educated health professionals (FEHPs) who are recruited for employment in the United States by certifying recruiters that adhere to its code of ethics. Its certification program has a tangible effect on the recruitment journeys of health professionals, as evidenced by direct responses from FEHPs to a certification survey—a vital component of a rigorous application process. Working with Certified Ethical Recruiters and addressing various facets of recruitment practices rooted in fairness and transparency, the survey allows the Alliance to monitor progress in areas of both success and ethical concern as well as understand the demographics of FEHPs migrating to the U.S.

Since 2020, the Alliance has conducted **25 surveys** involving **12,275 respondents** and more than **17 recruitment organizations**.

The 2024 survey yielded the following →



SURVEY SNAPSHOT



FEHPs responded.



58%

From the
Philippines.



27%

From the
Kenya, Nigeria,
Ghana, Nepal.

13

Recruitment
organizations
involved

90%

Had a positive or very
positive recruitment
experience.

82%

Agreed that their
recruiter regularly
communicated with
them and addressed
their concerns.
(68% strongly agreed)

>97%

Received a copy
of their contract and
time to review it.

92%

Reported no
pressure to sign
the contract.

91%

Knew their pay rate
before arriving
in the U.S.

72%

Knew in advance the
location of their new job.

One-third

of respondents did not know
the fee they would be charged
if they left their contract early.



Introduction

A marked increase in instability in the global environment—crises driven by armed conflict, economic stagnation and regression, climate change, and widening social inequity—has indisputable and far-reaching effects on our communities. The landscape of global health and its workforce is likewise feeling those effects.

Within the last few years, we've seen a drastic shift in the healthcare workforce. Despite a growing global demand for skilled professionals across the allied health professions, there is a distinct undersupply threatening the quality and sustainability of health systems worldwide. For example, while there is a projection of overall growth in the nursing profession through the end of the decade, the World Health Organization (WHO) still estimates a global shortfall of 4.1 million nurses by the year 2030.¹ This chronic shortage of nurses and other health professionals was further aggravated by the onset of the global COVID-19 pandemic.

The nature of this public health emergency puts intense strain not only on health systems but on individual clinicians as well. With burnout and systemic overwhelm driving many longtime health workers out of the profession or to pursue opportunities away from the bedside, retention has become an area of great concern. Migration is thus a ready solution for addressing these issues, including critical gaps in provision of care. Health systems, especially in high-income countries with the resources to do so, are turning to international workforce candidates to address these challenges and supplement domestic workforce pipelines.

Though the worst of the pandemic's effects have passed, other factors that drive migration of nurses and other health professionals have not. Economic gain is a significant driving factor, drawing health workers from lower-income countries seeking more robust pay to utilize their skills in higher-income countries. This phenomenon is particularly notable in the Global South (e.g., Africa, Central and South America). For some, this kind of migration is less of a choice and more of a necessity due to domestic governmental, fiscal, or infrastructural constraints that greatly limit employment opportunities for qualified health professionals.

In support of the career mobility of health workers and the strengthening of health systems globally through international recruitment, WHO has established the Global Code of Practice on the International Recruitment of Health Personnel. The Global Code establishes and promotes voluntary principles and practices for ethical international recruitment of health workers, keeping the rights, obligations, and expectations of source countries, destination countries, and migrant health workers at the forefront. WHO Member States are also encouraged to use the Global Code as a guide and reference when establishing institutional frameworks for international healthcare recruitment and formulating bilateral agreements between countries to address their needs.

TruMerit's Alliance for Ethical International Recruitment Practices works to ensure that all U.S.-bound FEHPs are recruited fairly, ethically, and with transparency.

As the United States is a prominent destination country for migrating health professionals, ethics in international healthcare recruitment is imperative. The Alliance for Ethical International Recruitment Practices, a division of TruMerit, works to ensure that all foreign-educated health professionals (FEHPs) are recruited fairly, ethically, and with transparency for employment in the United

States. Its Health Care Code for Ethical International Recruitment and Employment Practices lays out best practices for the ethical recruitment of FEHPs to protect the rights of migrant health workers. The Code also reflects current best practices in the international recruitment landscape, having been a resource for WHO while establishing its Global Code of Practice.

¹ "State of the World's Nursing Report 2025." World Health Organization—Chief Nurse Office (CNO) and Health Workforce (HWF), 12 May 2025 www.who.int/publications/i/item/9789240110236.



Alliance certification

The tenets of the Code address key ethical issue areas present in the recruitment process, relating to the rights of FEHPs and responsibilities of recruiters and employers. As such, the Alliance maintains a certification program that allows international recruitment firms that actively recruit healthcare professionals to the U.S. to be recognized for their commitment to fair, ethical, and transparent recruitment practices. In completing the application process, recruiters must demonstrate their compliance with the Code. But the Alliance also directly engages FEHPs for insight into their experiences with their recruiters through a survey, among other tools.

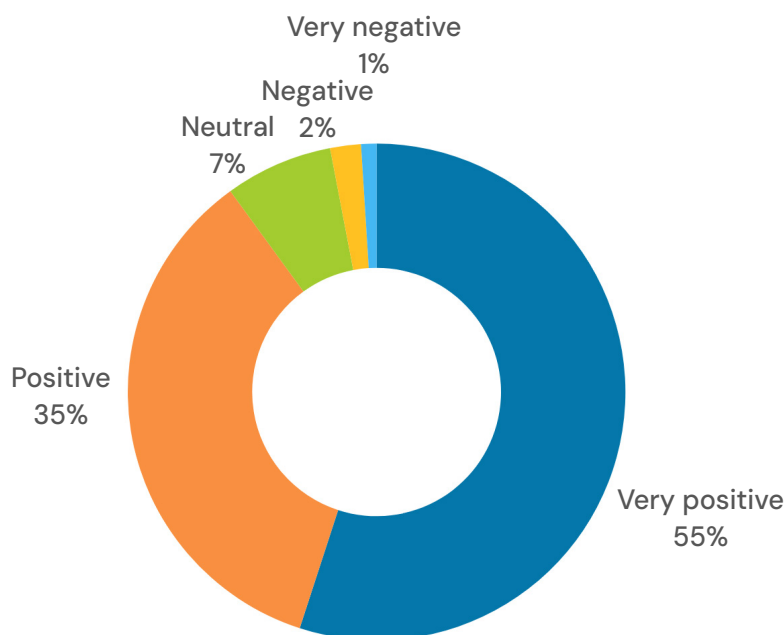
The certification survey was introduced in 2020 and provides an opportunity to examine data on key recruitment issues from FEHPs recruited by currently Alliance-certified firms and those seeking certification. The survey data is used to assess the impact of ethical recruitment practices (as defined by the Code), monitor progress in areas of both success and ethical concern, and understand the demographics of FEHPs migrating to the U.S. to work with Certified Ethical Recruiters (CERs).

Candidate satisfaction and overall experience

Satisfaction metrics

Overall satisfaction with Alliance Certified Ethical Recruiters remains high, with 90% of survey respondents indicating a positive or very positive experience. While this is a decrease of two percentage points from 2023, this loss was anticipated, given persisting delays and increased costs in the U.S. immigration process. This overall rate of positive experience remains a testament to the work of the Certified Ethical Recruiters in their adherence to the Code and the impact of transparent policies.

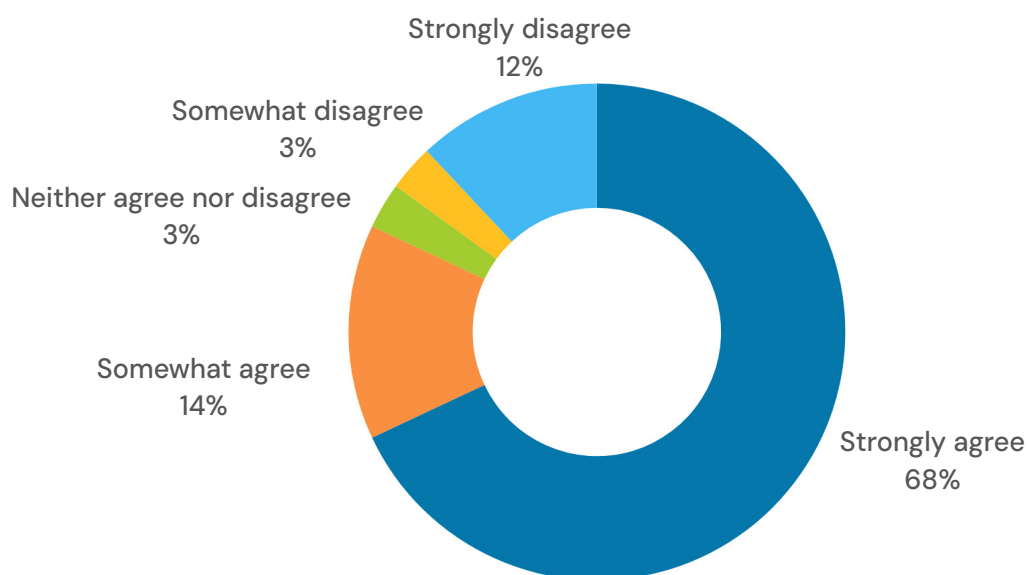
Overall, how would you rate your experience with your firm? (2024)



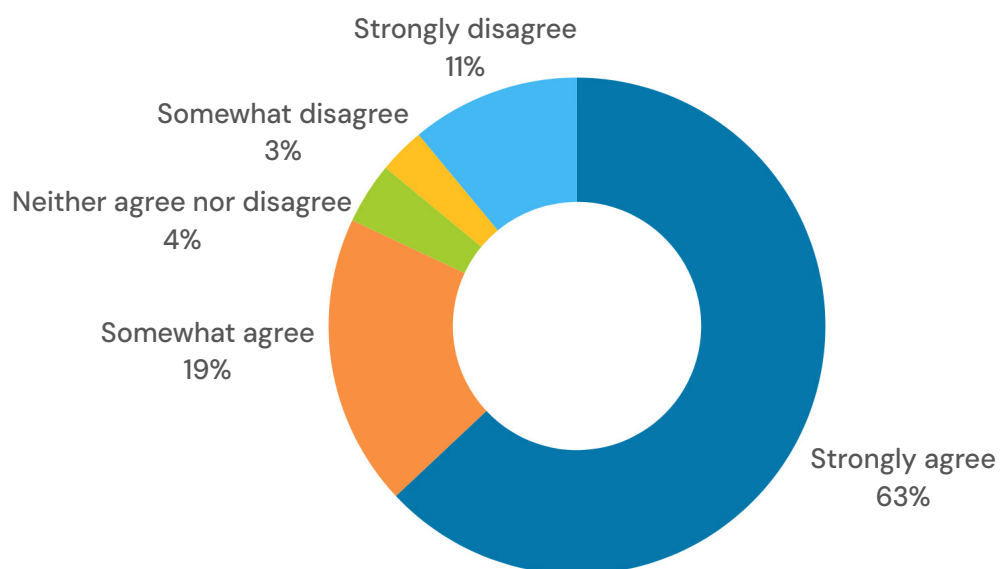
Complaints and concerns

When asked if they were dissatisfied with anything about their firm, most respondents indicated that they were completely satisfied with their experience with their recruiter. However, this does not discredit any reported points of dissatisfaction. In the past year, most comments were made about the frequency of communication with the recruiter, how they addressed concerns raised, and the clarity and accuracy of recruiter advertisement of services. While the total respondents stating their dissatisfaction in these areas remains low (less than 15%), these are key areas to watch as the Alliance collects more data in future surveys and in other correspondence with health professionals.

My recruiter communicated with me regularly and addressed any concerns raised. (2024)



My recruiter advertised their services clearly and accurately. (2024)





Issue areas in ethical international recruitment

The certification survey asks several questions to capture insight into areas of ethical concern during the international recruitment process. Responses are utilized by the Alliance to compare documented practices in a recruiter's employment agreement and other documentation to the self-reported experiences of the FEHPs they engage with to assess alignment.

Contract review

As with any form of employment, healthcare professionals sign a contract or employment agreement as part of their recruitment process. In a direct recruitment model, the FEHP signs this contract directly with a specific healthcare provider, with recruitment managed solely by the provider or facilitated by a placement firm that assists during the migration process and acts in a "matchmaking" capacity. Alternately, in a staffing model, the recruitment or staffing agency itself is the employer of the FEHP and assigns them to work in a healthcare facility.

Regardless of the recruitment model, such an agreement is not something to enter into lightly, especially with the added layer of working in an entirely new country. The FEHP should be provided adequate time to review their contract and determine if the employment and its terms are the right fit. Bad actors will often rush their candidates or pressure them to sign, which can lead not only to misunderstanding of the employment agreement but oftentimes to a compromised ability to combat unfair working conditions down the road.

Nearly all survey participants responded favorably to questions regarding their contract review process.

Overall, in our certification survey, responses around contract review have remained overwhelmingly positive. In 2024, 97% of respondents said that they had received a copy of their contract (or offer letter), which marks an increase of one percentage point from 2023. The Code requires that an FEHP be provided with a copy of their contract and be allowed 30 days to review and seek counsel on the

agreement, and 98% of respondents indicated that they had time to review their contract (or offer letter) before signing in both 2023 and 2024. And, in response to a new question added in 2024, "Did you feel pressured to sign your contract before you were ready?" 92% of respondents said they did not feel pressured to sign before they were comfortable doing so.

Results re: contract review (2022-24)

	2024		2023		2022	
	Yes	No	Yes	No	Yes	No
Did you receive a copy of your contract (or offer letter)?	97%	3%	96%	4%	97%	3%
Did you have time to review your contract (or offer letter) before signing?	98%	2%	98%	2%	98%	2%
Did you feel pressured to sign your contract before you were ready? (Newly added in 2024)	8%	92%	N/A	N/A	N/A	N/A



Document withholding

With many international healthcare recruiters providing a full-service model complete with immigration assistance, the FEHP must place a significant amount of trust in their recruiter to handle sensitive information and documentation. While many recruiters act with professionalism and care in this area, there have been reports in various areas of the world of recruiters taking and withholding important documentation (e.g., passports, identity documents) from health professionals, usually as leverage to keep them trapped in that employment arrangement. Though it is less common to encounter such practices in the United States, the Alliance Code still requires that no documents be withheld from the FEHP at any time during the recruitment process.

Responses from the survey around document withholding have improved considerably. Ninety percent of respondents indicated that no documents were withheld by their recruiter in 2023. This increased to 95% of respondents in 2024. This positive progression speaks to prospective and current CER compliance with the Code's provision, setting themselves apart as trustworthy partners in the healthcare recruitment and employment space.

Results re: document withholding (2022-24)

	2024		2023		2022	
	Yes	No	Yes	No	Yes	No
Were any documents (e.g., passports) withheld?	5%	95%	10%	90%	5%	95%

Wage and location awareness

Whether recruiting under a direct or staffing model, transparency around the employment and what it entails is a key ethical issue as the recruiter communicates with the FEHP. The Code requires Certified Ethical Recruiters to transparently communicate the nature of the employment offered as soon, and with as much specificity, as possible. Notable among these details are wages and the workplace location, which have a direct and profound effect on the FEHP's orientation to their new life in the United States.

If a migrating individual is unaware of their final workplace location prior to entering the country, there is potential for confusion as the FEHP plans for their initial arrival, both logistically and financially. Additionally, there is opportunity for those who operate under a staffing model to change the intended workplace location, possibly without express consent from the health professional. To combat this, recruiters certified by the Alliance must identify the geographic location of the future worksite at the time of recruitment if that information is known. If it is not known, this must be clearly disclosed. This level of transparency allows for the FEHP to acknowledge the future worksite or provide their express consent in writing that the location is unknown prior to their travel to the U.S., thus mitigating confusion.

Wages are equally important in planning for migration. When paired with the location of work, they allow FEHPs to more fully understand the balance between their compensation and the cost of living in their designated area of the U.S. It is likewise important for the recruiter to transparently communicate the wage for employment, so the FEHP is aware of how it aligns with applicable prevailing wage requirements as well as wage and hour laws.



The responses received regarding wage and location awareness have varied in recent certification surveys. In 2023, only 46% of respondents indicated that they knew in which state their job would be located prior to arrival in the U.S. This markedly increased to 72% in 2024.

From 2023 to 2024, the proportion of respondents who knew where their job would be located rose from under half to almost three-quarters.

Alternately, knowledge of wage prior to arrival decreased from 96% in 2023 to 91% in 2024. These changes can be better explained with new data on where respondents are in the process, as those still located in their home countries are more likely to be in the early stages of the recruitment process and awaiting this information from their recruiter at the time of survey. Administrative delays and longer timelines

for visa processing may also contribute to reduced information for those respondents further along the recruitment pipeline.

Regardless of outside factors, instances when an FEHP arrives in the U.S. without a determined location, workplace, or wage are rare in cases of FEHPs working with Alliance Certified Ethical Recruiters.

Results re: wage/location awareness (2022-24)

	2024		2023		2022	
	Yes	No	Yes	No	Yes	No
Did you know your hourly wage prior to arrival?	91%	9%	96%	4%	94%	6%
Did you know the state in which your job would be located?	72%	28%	46%	53%	95%	5%

Breach fees

With any kind of contract, there is an expectation that financial responsibilities for both parties are clearly disclosed. This is also true for employment agreements between foreign-educated health professionals and the recruitment firms or staffing agencies bringing them to the United States to work. Most international healthcare recruiters cover most, if not all, of the upfront costs of bringing FEHPs into the country and ensuring they are prepared for their position. This can include credentialing and licensure fees, English language proficiency training, immigration processing, travel to the U.S., introductory accommodations, clinical and cultural orientation, and more. In exchange for this significant investment, the FEHP agrees to work for the designated employer for a contracted term (usually 2–3 years). Should the FEHP breach their contract prior to its completion, many recruiters utilize early termination or breach fees to recoup invested costs.

In this scenario, there is a significant difference in financial power between the two parties. A bad actor may seek breach fees to recoup not only the upfront costs associated with recruitment but also additional compensation that can easily become excessive and punitive. The Code states that breach fees (also referred to as damages) should never be used for punitive purposes. The fees themselves are required to be prorated, and recruiters should rely on good faith and reasonableness in any pursuit of them. This expectation, paired with transparent communication about the financial consequences of a contract breach, ensures a better experience for the health professional.

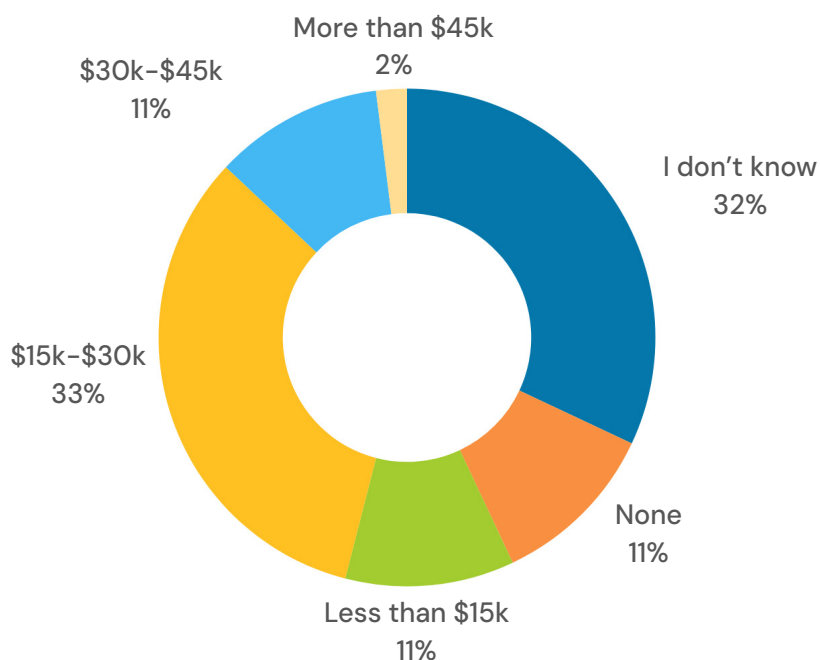


In previous iterations of the certification survey, the most common answer regarding early termination or breach fees was that respondents did not know the fee for breaching their contract within the first year. In 2023, this was the case for 34% of respondents, with a drop of 2 percentage points in 2024.

A recent change by the Philippine Overseas Employment Administration (POEA) may be a contributing factor, as the agency will not be approving contracts with liquidated damages going forward. This has led many firms to remove pre-determined damages amounts from their contracts. While Alliance staff has seen this issue during contract reviews, the general impact on breach fees has not been as far-reaching when examining survey data. Survey responses show a growing awareness of breach fee amounts, which points to contract clarity and more transparent communication with the recruiter as opposed to a more systemic move away from breach fees.

Those reporting a \$15,000–\$30,000 fee made up 33% of total respondents in 2024, up 15 percentage points from 2023. Conversely, 11% of total respondents reported a \$30,000–\$45,000 fee, which is down by 11 percentage points from 2023.

First year reported breach fees (2024)



Both the decline in reports of breach fees higher than \$30,000 and the increase in the number of FEHPs who are aware of these fees are promising. The Alliance recognizes that recruitment firms and staffing agencies dedicate substantial financial resources to bringing healthcare professionals into the U.S. to work. But it also recognizes that the choice of a foreign-educated health professional to migrate for work comes with a significant financial burden as well, which must be taken into account.



Alliance awareness

Apart from the certification for ethical international recruitment practices, the Alliance also provides resources for FEHPs to ensure they are aware of their rights during the migration and employment process and provides a channel for them to report any ethical misconduct they experience with their recruitment firm. Any complaints are handled with care, with an accompanying remediation process pertaining to those recruiters who are Alliance-certified.

In the interest of the well-being of FEHPs in the migration journey, there is a need to increase awareness of the Alliance. Forty-one percent of respondents indicated awareness of the Alliance before receiving the certification survey in 2024, down from 46% in 2023. While the large increase in total responses in 2024 may contribute to this shift, there is room for growth and a need for new approaches to make more FEHPs aware of the Alliance going forward.

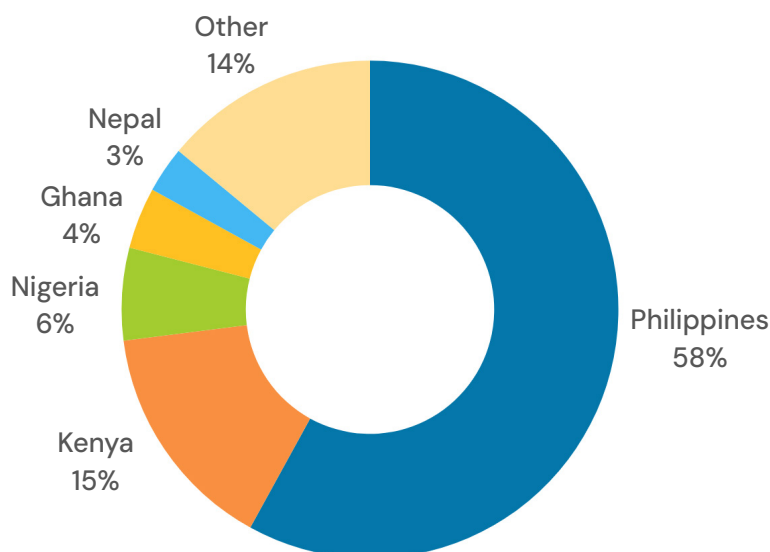
Results re: Alliance awareness (2022-24)

	2024		2023		2022	
	Yes	No	Yes	No	Yes	No
Were you aware of the Alliance prior to this survey?	41%	59%	46%	53%	45%	55%

Demographic breakdown

Despite a 120% increase in respondents to our survey, the top countries of initial professional education remain mostly unchanged from previous years. Filipino-educated health professionals made up 58% of total respondents, up from 45% in 2023. In total, respondents from the Philippines, Kenya, Nigeria, Ghana, and Nepal made up 85% of all responses.

Top countries for initial education (2022-2024)

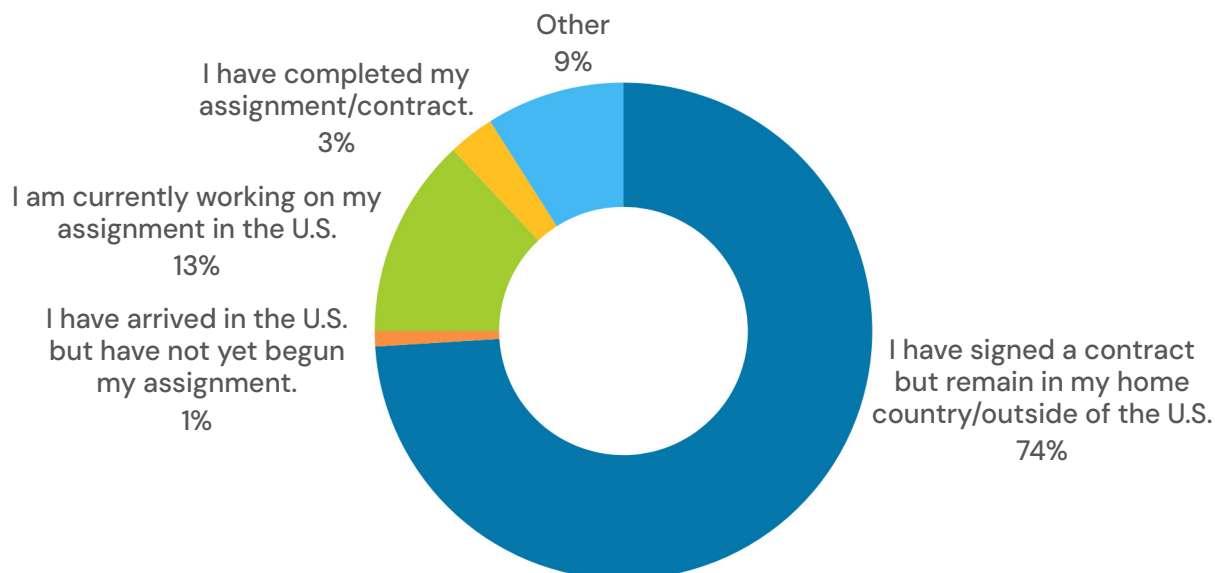


The gender breakdown has remained consistent year over year. Overall, 75% of respondents were female, 24% were male, and 1% selected "other" or declined to answer.



In 2022, a new question was added to the survey: “Where are you in the recruitment process with your firm?” The addition of this question provides better insight into information gaps—for example, the 74% of total respondents still located in their home countries may have been awaiting additional information from their recruiter, as they were in the early stages of the recruitment process.

Where are you in the recruitment process with your firm? (2024)





Conclusion

With international healthcare recruitment remaining a prevalent practice in the ever-changing global health landscape, safeguarding the rights and well-being of health professionals crossing borders is a responsibility that cannot be ignored. These individuals need to know that the recruiters and employers engaging them to work do so with ethics, fairness, and transparency top of mind. The Alliance's Certified Ethical Recruiters are upholding that standard in practice. The Alliance hopes that other recruiters in the U.S. will follow their example, effectively setting a market standard of excellence by committing to the Alliance Code and the ethical practices it upholds.

Likewise, the Alliance's certification scheme can serve as a model for healthcare recruiters in other countries, as the World Health Organization has acknowledged the Alliance Code to be aligned with its Global Code of Practice on the International Recruitment of Health Personnel.

The proof of the positive impact of the Alliance's certification is clear not only in examining the recruitment landscape at large but also the population it affects the most: the foreign-educated health professional. Several key takeaways from this report support this:

- 1. Clear and transparent recruitment practices benefit foreign-educated health professionals.**

The more transparent recruiters are with their employment agreements (including wages, workplace location, job description, and time to review and consider contracts) and the clearer they are in their overall communication and expectations, the more equipped a health professional is to embark on the journey of migration for healthcare employment. This information is key in their decision-making, and a proactive and ethical recruiter understands and respects this in their recruitment practices.

- 2. Awareness of the Alliance and its resources benefits foreign-educated health professionals.**

Outside of the Certified Ethical Recruiter Program, the Alliance is a resource for any FEHP in their migration journey. From guiding FEHPs through the process of working in the United States as a health professional educated abroad to reviewing contract guidelines to the reporting and remediation process available to those working with CERs, the Alliance is consistently positioned to support migrating FEHPs. In the future, the Alliance will increase awareness and knowledge of these resources.

- 3. Certification with the Alliance helps safeguard the rights of foreign-educated professionals and is a reliable predictor of that outcome.**

A majority of respondents to the certification survey indicate a positive recruitment experience when working with a Certified Ethical Recruiter, and the reasoning why is clear. The data show that CERs are attentive to the needs of FEHPs and hold themselves to a higher standard when it comes to ethical best practices in the recruitment process. Their adherence to the Alliance Code and the certification earned because of it not only sets them apart in the recruitment landscape but marks them as leaders in addressing the rights of FEHPs on their migration journey.



Appendix

The Alliance: History and mission

The Alliance for Ethical International Recruitment Practices (the Alliance) is a division of TruMerit (formerly CGFNS International Inc.). In line with TruMerit's aim to be a gateway to a world-class workforce delivering transformative healthcare across the globe, the Alliance works to ensure that all foreign-educated health professionals are recruited fairly, ethically, and with transparency for employment in the United States.

In 2008, a group of stakeholders across the healthcare sector came together to write and release [The Voluntary Code of Ethical Conduct for the Recruitment of Foreign-Educated Nurses to the United States](#). They aimed to establish ethical guidelines for recruiting foreign-educated nurses to the U.S.—to protect their rights, promote transparency and accountability in recruitment practices, and minimize potential harm to the nurses' home countries caused by health worker migration. The Alliance was established shortly after to oversee the implementation of the Voluntary Code, with an Advisory Board (Board of Governors at the time) chosen to reflect the multi-stakeholder nature of its origins as well as international healthcare recruitment as a whole.

TruMerit (at the time CGFNS International, Inc.) acquired the Alliance in 2014, and in 2017, the first edition of the [Health Care Code for Ethical International Recruitment and Employment Practices](#) (the Code) was launched. Utilizing the current (4th edition) of the Code (now applicable to nurses and other allied health professions) to steer its efforts, the Alliance works in three main ways:

1. Providing resources to inform and empower migrating health professionals to make informed career decisions.
2. Sharing research on changes, challenges, and successes in the recruitment landscape.
3. Certifying recruiters who pass a rigorous application process and prove their practices are compliant with the Health Care Code for Ethical International Recruitment and Employment Practices.

Alliance certification

The Alliance Certification program allows international recruitment firms that actively recruit healthcare professionals to the U.S. to be recognized for their commitment to fair, ethical, and transparent recruitment practices. In completing the application process, recruiters must demonstrate their compliance with the Alliance Health Care Code for Ethical International Recruitment and Employment Practices (Code).

To become an Alliance Certified Ethical Recruiter (CER), recruitment firms must have been actively recruiting foreign-educated health professionals (FEHPs) to the U.S. for at least one year and must complete a three-step process:

1. **Application:** The recruiter submits an application, attesting to abiding by each provision of the Code and demonstrating compliance by providing copies of recruitment materials, standard employment agreements/contracts, and other supporting documents.
2. **Survey:** The Alliance disseminates a survey conducted among all FEHPs recruited by the firm over the past three years, allowing them to share their experiences with the recruitment firm.
3. **Public Comment Period:** Other individuals or organizations have the opportunity to share information or concerns they might have about the recruitment firm seeking certification.