Florida Gulf Coast University Board of Trustees  
June 21, 2011

SUBJECT: International Services – Incoming Students Audit

PROPOSED BOARD ACTION

Accept the internal audit report of International Services - Incoming Students provided to President Wilson Bradshaw, Associate Provost & Associate Vice-President Paul Snyder, and Director of International Services Elaine Hozdik on May 3, 2011.

BACKGROUND INFORMATION

The FGCU International Services Office (ISO) provides services to international students engaged in a full course of academic study and to “exchange visitors” studying at FGCU for a maximum of two semesters. With regard to both types of international students, the ISO is responsible for maintaining records required by the United States Citizenship and Immigration Service and reporting to the federal Student Exchange Visitor Information System. In addition to reporting and compliance services, the ISO provides assistance and support to international students in the successful completion of their academic studies at FGCU.

This audit was part of the 2010 - 2011 internal audit plan approved by the FGCU Board of Trustees at its September 21, 2010 meeting.


Prepared by: Director of Internal Audit Carol Slade

Legal Review by: General Counsel Vee Leonard  (May 2, 2011)

Submitted by: President Wilson G. Bradshaw
INTEROFFICE MEMORANDUM

To: Dr. Paul Snyder, Associate Provost & Associate Vice-President
   Elaine Hozdik, Director, International Services

Cc: Dr. Wilson Bradshaw, President
    Susan Evans, Chief of Staff

From: Carol Slade, CPA, CIA
      Director of Internal Audit

Date: May 3, 2011

Subject: Audit of International Services - Incoming Students (FINAL REPORT)

Please see the attached final audit report of International Services – Incoming Students. It includes the management response. The report is dated April 28, 2011, which is the date Internal Audit received the management response from the Director of International Services.

Vee Leonard, General Counsel, completed a legal review of the audit report. The audit was performed with the assistance of Jena May, Accountant, and reviewed by Deborah McEwan, Internal Auditor.
Florida Gulf Coast University
International Services Audit – Incoming Students
Internal Audit Report
Report Date: April 28, 2011
INTERNATIONAL SERVICES AUDIT – INCOMING STUDENTS

EXECUTIVE SUMMARY

This report presents the results of a limited-scope audit of Fall 2010 semester services provided by the International Services Office (ISO) to entering international students. International students are those holding F-1 and J-1 visas. Students holding F-1 visas are engaged in a full course of academic study at Florida Gulf Coast University (FGCU). Students holding J-1 visas are exchange visitors who may study at FGCU for a maximum of two (2) semesters.

As part of FGCU’s Strategic Plan for 2010-2015, one of the academic goals is to increase the number of students from abroad studying at FGCU. Specifically, the number of F visa students will rise by 5% over the next three (3) years. The ISO will play a critical role in the successful achievement of this goal.

The audit included a review of the federally required reporting of certain student information into the Student Exchange Visitor Information System (SEVIS), a national database maintained by the Department of Homeland Security. SEVIS provides users with access to current information regarding nonimmigrant foreign students and exchange visitors.

As indicated below under OPINION, it appeared that the ISO maintained the student records required by the United States Citizenship and Immigration Service (USCIS) and reported with substantial accuracy to SEVIS. The Office also appeared to provide valuable services to entering students holding F-1 and J-1 visas. Although currently a small department, the staff was knowledgeable about requirements for international students and enthusiastic about serving them.

In general, the audit observations indicate that certain reporting between the ISO and other units within the University could be strengthened to ensure that international student information is current and correct throughout the University. Four (4) recommendations that begin on page 5 are included to address these observations.

OPINION

In our opinion, the International Services Office (ISO) maintained the student records required by the United States Citizenship and Immigration Service (USCIS) and reported with substantial accuracy to the Student Exchange Visitor Information System (SEVIS). The ISO appeared to provide valuable services to entering students holding F-1 and J-1 visas.
This limited-scope audit was conducted in accordance with the International Standards for the Professional Practice of Internal Auditing, issued by the Institute of Internal Auditors. The audit procedures provided a reasonable basis for our opinion and the following reportable observations and recommendations.

OBJECTIVES

The objective for this limited-scope audit was to determine that the International Services Office (ISO) operated in accordance with U.S. immigration requirements and any applicable University policies and procedures. This included determining if entering students holding F-1 and J-1 visas had the required United States Citizenship and Immigration Services (USCIS) documents on file.

In addition, the ISO’s internal and external reporting of information about these students was reviewed for accuracy and compliance. Included in external reporting were entries to the Student Exchange Visitor Information System (SEVIS) maintained by the Department of Homeland Security.

BACKGROUND

This is the first internal audit of International Services since the inception of the University. The audit was a result of management input from the annual risk assessment and is considered a routine audit in the approved fiscal year 2011 Internal Audit Plan.

The ISO is led by Ms. Elaine Hozdik, Director. Ms. Hozdik reports to Dr. Paul Snyder, Associate Vice-President and Associate Provost. In addition to the Director, the ISO staff includes an Assistant Director, an Office Manager and a Coordinator who is currently being hired.

The ISO’s Pre-Arrival Guide explains that, “The International Services Office offers cross-cultural adjustment information, immigration advice, and assistance to students to become successfully integrated into the university’s academic and social life.” It provides “information regarding compliance with immigration regulations and procedures and about opportunities such as campus employment, travel, school transfer and practical training.”

As part of its assistance in acclimating entering international students to FGCU, the ISO provides an Eagle International Ambassador Program that matches incoming international students with American students already attending FGCU.
Among ISO's most important responsibilities are ensuring that F-1 and J-1 visa students are in compliance with all applicable immigration standards. For instance, ISO staff members track the status of all student visas to assist international students in completing their academic programs within allowable time limits. They maintain copies of all required documents students needed to be admitted to the United States and FGCU. The ISO staff requires entering students to attend an International Orientation program that reviews the wide range of requirements international students must meet as well as available FGCU services that will help them.

As examples of the documentation that the ISO staff obtains, they ensure that every international student has the applicable I-20 form, Certificate of Eligibility for Nonimmigrant (F-1 visa) or DS-2019 form for Nonimmigrant (J-1 visa) as well as documentation of adequate financial resources for their stay. As required by Florida Board of Governors regulation, staff will also review international students' records for approved health insurance policies that must be in force throughout their stay.

The ISO must report certain immigration and academic events for F-1 and J-1 students to SEVIS. SEVIS is an internet-based database system that is maintained by the Department of Homeland Security. Its purpose is to provide users with access to accurate and current information regarding nonimmigrant foreign students and exchange visitors.

Not audited at this time, but in addition to its functions with regard to incoming international students, the ISO provides information for students, faculty and staff who are studying or traveling abroad. FGCU students participate in a variety of study abroad programs. The ISO hosts information sessions and a Study Abroad Fair for students interested in studying abroad as part of their academic studies. In addition to serving students, the ISO offers faculty and staff information regarding international opportunities that are available for teaching, research, exchange and professional development.

Study abroad programs, an important topic, will be a subject for a future Internal Audit limited scope audit.

**SCOPE** End of Fieldwork was March 23, 2011

Our scope was limited to the population of 127 F-1 and J-1 students enrolled at Florida Gulf Coast University during the Fall 2010 semester.

A judgmental sample of thirty-two (32) F-1 students and four (4) J-1 students was drawn from the population. Overall the sample represented 28% of the total population. The thirty-two (32) F-1 students represented 30% of all enrolled F-1 students for the Fall 2010 semester and the four (4) J-1 students represented 21% of the comparable J-1 student population.
OBSERVATIONS & RECOMMENDATIONS

1. Reporting Observation

CRITERIA: The ISO provided Internal Audit with a report of all its Fall 2010 F-1 and J-1 students. Using Banner student data, the Office of Institutional Research and Analysis (OIRA) created the report for ISO that was provided to Internal Audit. OIRA reports the University’s official student data whenever it is needed. Official student data is obtained from Banner. For the University to operate effectively, all University offices have an obligation to ensure that data related to their operations is correct for use by OIRA.

CONDITION: Our sample of thirty-six (36) international students from this report included four (4) students that were listed as F-1 students on the report but whose documentation in the ISO files indicated that they were Permanent Residents. Copies of their Permanent Resident cards were in the four (4) students’ files.

Because we were told by ISO staff that visa status changes have to be made through the Office of the Registrar, during March 2011 we met with the Senior Officer for Registration to verify that proper change in immigration status documentation was submitted and processed. Three (3) of four (4) students were coded in Banner as Permanent Resident students. All three (3) of these students had the necessary documentation in their Registrar’s files to support their change in status from F-1 students to Permanent Residents.

One (1) other student was still coded in Banner as an F-1 student. The Registrar’s Office did not have a copy of the Change of Immigration Status form in the student’s file. The Change of Immigration Status form is provided to the student by ISO staff. Without such authorization, the Registrar’s Office was unaware of the need for a change in visa type. Depending upon circumstances, the ISO staff sometimes sends this form interoffice to the Registrar’s Office and sometimes the student is responsible for taking the form from the ISO to the Registrar’s Office.

CONSEQUENCE: The ISO used the reports from OIRA as working tools to support their operations. However, the ISO staff did not report back to Institutional Research or its designee about any incorrect data. Without feedback from the operating departments that can determine the accuracy of its data, OIRA may wrongly report University student data. Reporting correct data is essential to the University for many reasons including funding and reputation.

Reporting Recommendation

As ISO staff review reports from OIRA for their own operating purposes, they may see data that does not correspond with their records. If they report any differences back to the Associate Provost/Vice-President of Institutional Performance or his designee, they will improve internal and external reporting. Accurate reporting is essential to the University.
Management Response

When ISO staff become aware of any discrepancies in data information between records maintained in the ISO office and FGCU institutional student data reports received from the OIRA, these discrepancies will be reported to the Office of the Registrar for resolution. The review of these reports will generally occur at the beginning of each academic term (fall, spring and summer) when these reports are used for SEVIS verification and reporting and may occur on other occasions as necessary. When ISO is made aware that a student in F or J status has successfully changed immigration status or adjusted to Permanent Resident status, ISO staff will advise the student to complete the Change of Immigration Status and Florida Residency Status for Tuition Purposes form, then submit it directly to the Registrar’s Office via campus mail. The student will also be advised to submit original evidence of the change of status to the Registrar in accordance with Registrar requirements. ISO will confirm status change made by Registrar in Banner.

The ISO will continue to take proactive actions to remind other offices (especially Graduate Studies and Undergraduate Admissions) of the need to accurately report current immigration status of students in the Banner system.

Person Responsible for Implementation: Assistant Director
Implementation Date: December 2011
Form: Change of Immigration Status and Florida Residency Status for Tuition Purposes (Appendix A)

2. Orientation Form Observation

CRITERIA: International Services policy, as stated in the International Student Admission Guide, requires “all newly admitted international students to attend the International Student Orientation.” As part of the orientation process, a student enters certain required information into an ISO access database and acquires a Personal Data Form that includes the information entered. At the bottom of the form, the student signs to affirm that “Your signature confirms you have attended the FGCU International Student Orientation, received immigration regulations and insurance information and have provided the items above as current and accurate.” ISO retains the signed form as verification of attendance.

CONDITION: Our review of International Student Orientation attendance for the thirty-six (36) students in our sample disclosed that three (3) of the students did not appear in the ISO access database. Upon inquiry of ISO staff, they provided us with paper copies of the students' Personal Data Forms. These three (3) students had not signed their statements at the bottom of
the forms. Instead, the Assistant Director of ISO, who presents the International Student Orientation program, had signed the forms.

We were told by ISO staff that, at International Student Orientation, students may complete Personal Data Forms at another location and then submit them to ISO. At times students fail to sign their Personal Data Forms. The ISO Assistant Director signs his name to confirm that the students completed the document processing and attended the International Student Orientation.

CONSEQUENCE: The staff member’s signature is an indication of the student’s attendance at the Orientation. However, the staff member’s signature does not signify that the information on the form is correct nor does it conclusively signify that the student actually attended the Orientation.

Orientation Form Recommendation

International Services staff has suggested that they might add a line to the orientation database form so that both the student and staff instructor sign. A staff instructor signature line would be the optimum addition to the existing internal control over this process. An improvement to the control, but not as strong as the one suggested by ISO staff, would be to follow up with the student and have them come in to sign the form after the orientation day. This would involve some monitoring by someone in ISO to ensure that all the missing signatures were obtained.

Management Response

All new international students will be required to personally sign and date the Personal Data Form upon completion of the International Student Orientation. A signature and date line has been added to the Personal Data Form for the staff member and will be signed by the ISO staff only upon the student’s completion of the International Student Orientation and signature on this form. The Personal Data Form is completed and submitted electronically. ISO prints this form in preparation for review and signatures by student and staff member.

Person Responsible for Implementation: Assistant Director
Implementation Date: December 2011
Form: Personal Data Form (Appendix B)

3. On-line (Distance Education) Course Limitation Observation

CRITERIA: Title 8, Section 214.2(6)(G) of the Federal Code of Regulations (FCR) states that, “For F-1 students enrolled in classes for credit or classroom hours, no more than the equivalent of one (1) class or three (3) credits per session, term, semester, trimester, or quarter may be counted toward the full course of study requirement if the class is taken on-line or through distance education and does not require the student’s physical attendance for classes, examination or other purposes integral to completion of the class.”
FCR Section 214.2(6)(B) defines a full course of study as "...at least twelve semester...hours of instruction per academic term..." FCR Section 214.2(5) states that "an F-1 student is admitted for duration of status. Duration of status is defined as the time during which an F-1 student is pursuing a full course study at an educational institution approved by the Service for attendance by foreign students, or engaging in authorized practical training following completion of studies."

CONDITION: During Fall 2010 two (2) students in the test sample of thirty-six (36) exceeded the maximum allowable three (3) credit hours of on-line or distance learning (virtual courses) allowed as part of meeting the twelve (12) hour requirement for full-time enrollment. Student “A” was enrolled for nine (9) credits of on-line (virtual) courses out of a total of fifteen (15) credits for the term. Student “B” was enrolled for twelve (12) credits of on-line (virtual) courses out of a total of fifteen (15) credits for the term.

These two (2) students were not in compliance with the regulation that requires they take no more than one (1) course or three (3) distance learning credit hours per term to be counted toward their full course of study requirement. They therefore did not meet the full course of study requirement.

Students were informed of the distance-learning regulation at the International Student Orientation at the start of the semester. Academic advisors were reminded of the regulation by e-mail. However, ISO staff told us that, because academic advising is decentralized and there is no “director” of advisors, it is difficult for them to be sure that they have reached all current advisors.

Although lists of international students are sent to academic advisors before the start of each term, many international (and other) students do not see advisors before registering after their first terms at FGCU. The ISO told us that there is currently no way to electronically ensure that an international student does not enroll in more than three (3) distance learning credit hours out of the required twelve (12) credit hours for a full course load.

CONSEQUENCE: Failing to meet the full course of study requirement jeopardizes the students’ ability to successfully meet the duration of status test specified in FCR Sec. 214.2(f)(5). If a student has not maintained a full course of study as required by the USCIS, reinstatement to student status may be needed. A “reinstatement to student status” means that the student may be required to return to his home country and reapply for a student visa. However, the University has some discretion in addressing inadvertent non-compliance with this regulation.

On-line (Distance Education) Course Limitation Recommendation

The Director of International Services or the Associate Provost may consider obtaining from Human Resources, at least at the start of each academic year, a report that lists all current academic advisors. With the most current list of advisors, the ISO staff will know that all
advisors have been reminded of the Federal requirement that limits enrollment in on-line or distance education courses to three (3) credit hours per semester.

To address all those international students who register without going through advisors, the ISO staff may ask the Associate Provost, just before the end of drop/add each semester, for a report that provides a list of the courses in which each international student is enrolled. There is a field in the Banner database that indicates, for each course, whether it is distance learning (i.e., virtual/on-line) or not. Such a report would allow the Assistant Director to quickly assess whether or not a student was taking more than one 3-credit distance learning course for the semester. If the review occurs before the end of the drop/add period, the student can correct an out-of-compliance condition without penalty.

Management Response

ISO has confirmed that the OIRA can create a report to show all F/J students taking distance learning courses. This report will be requested and reviewed by ISO prior to the start of each academic term and again in the first week of each academic term. However, report information will not necessarily be accurate until the end of each term’s registration which will result in high probability that any students who are over their distance learning limits will be unable to change their academic schedules to meet the distance learning limitations. ISO has consulted the Registrar to explore development of a pre-emptive measure using Banner to limit (using “holds”) international student registration to the specified number of distance learning courses each registration term. This option will be further discussed and tested for viability this summer.

ISO will continue to use proactive efforts to inform students of this distance learning course limitation through orientation, bulletins on the ISO website, and a direct email each semester will be sent to all F/J students approximately one month and two weeks ahead of registration commencements for each term. In addition, ISO will issue an email to all Academic Advisors (based on a list obtained by Human Resources and verified with the Academic Advising Council) reminding them of, and reinforcing the restrictions and guidelines for, distance learning courses for international students on F/J visas.

People Responsible for Implementation: Assistant Director, Director
Implementation Date: December 2011

4. Change in Major Observation

CRITERIA: We were told by ISO staff that international students are instructed that it is the student’s responsibility to report to International Services when they change a major in the Registrar’s Office. The ISO staff relies upon the students to inform them of changes made in the Registrar’s Office, like a change in major or a change of residency status.
CONDITION: During our review we noted one (1) student holding an F-1 visa who requested a change in major with the Office of the Registrar during May, 2010. Upon inquiry the ISO staff stated that the student had not notified the ISO of this change. When our inquiry brought the change of major to the ISO’s attention, and after verification by the student, the SEVIS change was made. The students are sometimes unreliable in sharing this type of information with the ISO.

CONSEQUENCE: Therefore, the ISO was unable to update the information in SEVIS within twenty-one (21) days of the change date for a student’s academic status or personal information, as specified in the Fact Sheet: SEVIS Reporting Requirements for Designated School Officials. The possibility exists that a change in major will never be posted to SEVIS.

Change in Major Recommendation

The OIRA may provide ISO at least once a semester a report that would disclose any changes in major made by an F-1 or J-1 student from the date of the last report until the date of the current report. This data can be extracted from the Banner student data base. ISO can use this report as a monitoring tool to contact students about any changes, so that any necessary changes may be made in SEVIS. The report may not provide for reporting within 21 days, but it would ensure that all changes were reported at least once a semester.

Management Response

ISO will request a report from OIRA each academic term that shows a comparison of previous and current semester majors for all F/J students. This information will be compared with ISO immigration records for accuracy. Any students with changed majors that were not previously reported to the ISO will be contacted to address appropriate immigration reporting and processing. As a proactive measure the ISO will consult with the Academic Advising Council on ways to ensure that ISO is informed of changes to international students’ majors which may include adding a signature line for ISO on the Request to Change Major/Catalog Year form and other methods of notification to ISO.

People Responsible for Implementation: Assistant Director, Director
Implementation Date: December 2011

Audit Performed by: Carol Slade, Audit Director, and Jena May, Accountant
Audit Reviewed by: Deborah McEwan, Internal Auditor
Appendix A

Change of Immigration Status

And Florida Residency Status for Tuition Purposes

Change of status occurs when a foreign national with a non-immigrant visa status changes to another non-immigrant visa/status category or to legal permanent residency. In accordance with the Guidelines of Florida Residency for Tuition Purposes, a student’s change of immigration status may also trigger a change of residency status for tuition purposes. Students are assessed tuition and fees based on these guidelines and a change of immigration status may result in a change of residency classification for tuition and fee purposes as the student continues enrollment at Florida Gulf Coast University. Students who are reclassified based on residency will be assessed tuition and fees according to the new classification, which may be different from previous rates. Upon receiving approval notification of a change of status request the student has filed with the United States Citizenship and Immigration Services, the International Services Office will take the following action:

- Copies of documentation evidencing visa/status reclassification will be retained in ISO student files
- Student is advised to complete and sign this Change of Immigration Status and FL Residency for Tuition Purposes
- Designated School Official (DSO) completes the ISO Office use section on this form
- DSO updates in SEVIS (if necessary) to reflect change of status in accordance with regulatory requirement
- The FGCU Office of the Registrar will receive by campus mail a hard copy of this form as notification of student status change
- Student must submit the original documents evidencing change of status to the FGCU Office of the Registrar and the Registrar’s Office Residency Reclassification form
- ISO will confirm residency status change with the Registrar’s Office via Banner

I understand this information and am aware of its impact on my student enrollment at Florida Gulf Coast University.

_________________________                      ____________________________                      ____________________________
Student Signature:                      Last Name, Given Name                      Date

**ISO Use Only:** COS final on: ___________ from: ___________ to ___________ (Immigration/Visa status)

COS processed in SEVIS by DSO: ___________ on ___________.

**Registrar’s Office Use Only:** Current Residency Status Changed to

Residency reclassification updated by: ____________________________

Banner Records updated by: ____________________________ on ___________.

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# Personal Data Form

## Document Processing Appointment

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## Personal Data

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1. We must see your original documents (I-20, Passport, I-94 card, Proof of Insurance) for processing and photocopying during document processing appointment.
2. Sign and date your I-20 (item #11) if not already completed
3. Complete "Orientation Evaluation" and submit at your document processing appointment.
4. If you are transferring to FGCU from another US school provide name of school:

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<th>DOCUMENT</th>
<th>COPIED RETURNED</th>
<th>NOTES</th>
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| 1. Current I-20  
  - Review and Process  
  - DSO signature and date  
  - Student signature and date | | |
| 2. Current Passport  
  - Photo Page  
  - Visa Page | | |
| 3. I-94 Card  
  - Current entry/visa stamp | | |
| 4. Other Immigration Documents | | |
| 5. Proof of Health Insurance  
  - Personal Insurance Waiver (effective Dates to )  
  - FGCU Policy (effective Dates to ) | | |
| 6. Class Schedule For This Semester  
  - # of credit hours enrolled | | |
| 7. US SS# or ITIN# Documents: | | |
| 8. FNIF Form: Completed: | | |

*For Office Use Only*

Your signature confirms you have attended the International Student Orientation, received immigration regulation information and provided the items listed above and believe them to be current and accurate.

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<th>ISO Staff Signature</th>
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