

Office of International Programs

Audit Report # 21-106

January 11, 2021



The University of Texas at El Paso
Office of Auditing and Consulting

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January 11, 2021

Dr. Heather Wilson
President, The University of Texas at El Paso
Administration Building, Suite 500
El Paso, Texas 79968

Dear Dr. Wilson:

The Office of Auditing and Consulting Services has completed a limited - scope audit of the Office of International Programs. During the audit, we identified strengths in departmental procedures. In particular, the department leverages software capabilities to better serve students while complying with federal regulations.

We appreciate the cooperation and assistance provided by the Office of International Programs staff during our audit.

Sincerely,

A handwritten signature in blue ink that reads 'Lori Wertz'.

Lori Wertz
Chief Audit Executive

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EXECUTIVE SUMMARY

The Office of Auditing and Consulting Services has completed a limited scope audit of the Office of International Programs.

During the audit we noted the following:

- Processes were streamlined to serve students online during the pandemic
- No exceptions noted in the testing of SEVIS (Student and Exchange Visitor Information System) data integrity, student visa monitoring, and compliance.

Based on audit work performed, we conclude that the Office of International Programs personnel conducts operations in a control conscious environment, with an emphasis on student information privacy.

BACKGROUND

The Office of International Programs and Study Abroad (OIP) supports UTEP's mission by assisting international students and scholars. This includes providing guidance and services so students can maintain their non-immigrant status. They also coordinate efforts with academic departments to help students reach their academic goals. OIP is also responsible for reporting to federal agencies on behalf of the University.

For Fall 2020, OIP processed and monitored 1,467 student cases. There are two major types of visas available to UTEP students: F-1 (Academic or Language Students) and J-1 (Exchange Visitors). F-1 visas are only available to students, while J-1 visas may be issued to other types of exchange visitors such as international professors, researchers, scholars, or interns. The majority of UTEP international students who need a visa to study do so in F-1 status.

F-1 status provide students with the opportunity to participate in practical training. Curricular Practical Training (CPT) is conducted while the student is actively working on degree completion. Optional Practical Training (OPT) typically occurs after degree completion. Similar to CPT and OPT, J-1 visa students have the opportunity to participate in Academic Training (AT). The latter provides employment authorization so students can gain practical experience related to their field of study. These programs also require monitoring from the Office of International Programs.

AUDIT OBJECTIVES

The objectives of the audit were to determine whether:

- student data is accurately reported in SEVIS,
- student visa requirements are monitored, and
- compliance requirements for J visas, CPT and OPT are fulfilled.

SCOPE AND METHODOLOGY

The audit was conducted in accordance with the *International Standards for the Professional Practice of Internal Auditing* and the authoritative guidelines of the *International Professional Practice Framework* issued by the Institute of Internal Auditors.

The audit criteria used for testing was the Code of Federal Regulations (CFR):

- 8 CFR §214- Nonimmigrant Classes (F visas)
- 22 CFR §62- Exchange Visitor Program (J visas)

The audit scope included international students and scholars active as of Fall 2020.

RANKING CRITERIA

All findings in this report are ranked based on an assessment of applicable qualitative, operational control and quantitative risk factors, as well as the probability of a negative outcome occurring if the risk is not adequately mitigated. The criteria for the rankings are as follows:

Priority	An issue identified by an internal audit that, if not addressed timely, could directly impact achievement of a strategic or important operational objective of a UT institution or the UT System as a whole.
High	A finding identified by internal audit considered to have a medium to high probability of adverse effects to the UT institution either as a whole or to a significant college/school/unit level.
Medium	A finding identified by internal audit considered to have a low to medium probability of adverse effects to the UT institution either as a whole or to a college/school/unit level.
Low	A finding identified by internal audit considered to have minimal probability of adverse effects to the UT institution either as a whole or to a college/school/unit level.

AUDIT RESULTS

A. SEVIS Data Integrity

The Student and Exchange Visitor Information System (SEVIS) is a web-based system for maintaining information on international nonimmigrant students and exchange visitors in the United States. The Office of International Programs (OIP) is responsible for reporting current information from nonimmigrant students and exchange visitors continually during their course of stay in the United States.

OIP uses *Sunapsis* as a tool to report information to SEVIS. Sunapsis is an application used to manage international student information as well as to establish controls over compliance. More information about Sunapsis can be found in [Appendix A](#).

Testing results show that OIP designed and implemented controls to prevent material errors in student data entered in SEVIS.

B. Student Visa Monitoring

OIP is required to monitor students and assist them in maintaining visa status. Auditors tested the implementation of monitoring controls in the areas of enrollment, CPT (curriculum practical training), OPT (optional practical training), and J scholars employed at the University.

The Office of International Programs has implemented monitoring controls that help ensure compliance with student visa regulations.

C. Compliance

Compliance requirements for F and J visas are set forth by 8 CFR §214 *Nonimmigrant Classes* and 22 CFR §62 *Exchange Visitor Program*. Auditors performed detail testing of the key provisions as follows:

- Student full-time enrollment (or valid exception)
- Academic training requirements for J-visa students who work at the University
- CPT and OPT

In addition, auditors confirmed that OIP conducts training to ensure students are aware of their responsibilities to maintain status.

Based on audit testing, OIP processes and documentation comply with federal regulations for students and exchange visitors mentioned above.

CONCLUSION

Based on the results of audit procedures performed, we conclude that the Office of International Programs (OIP) implemented controls to ensure student data is accurately reported in SEVIS. OIP also monitored student and exchange visitor records to avoid instances of non-compliance. Cases managed by OIP are in compliance with the requirements of J visas, CPT and OPT.

We wish to thank the management and staff of the Office of International Programs for their assistance and cooperation provided throughout the audit.

APPENDIX A: GLOSSARY

CPT: Curricular practical training is an alternative work/study, internship, cooperative education or other type of required internship or practicum that a sponsoring employer offers through agreements with a student's school. Must relate directly to the student's major area of study and be an integral part of the school's established curriculum.

OPT: Optional Practical Training is temporary employment that is directly related to an F-1 student's major area of study. Eligible students can apply to receive up to 12 months of OPT employment authorization before completing their academic studies (pre-completion) and/or after completing their academic studies (post-completion).

SEVIS: The Student and Exchange Visitor Information System is the web-based system that the U.S. Department of Homeland Security (DHS) uses to maintain information regarding:

- Student and Exchange Visitor Program (SEVP)-certified schools.
- F-1 and M-1 students studying in the United States (and their F-2 and M-2 dependents).
- U.S. Department of State-designated Exchange Visitor Program sponsors.
- J-1 visa Exchange Visitor Program participants (and their J-2 dependents).

Sunapsis: Visa case management application used by the Office of International Programs and Study Abroad (OIP) to perform a variety of functions to support international students and scholars including; data entry, report generation, SEVIS data uploads and downloads, and visa management. With Sunapsis, OIP can maintain SEVIS compliance, work more effectively to attract and retain international students and scholars, and increase productivity and service across all areas of responsibility.