Top Priority Issues Addressed in "Discussion of Trends & Issues with SEVP Director Lou Farrell"

NAFSA Annual Conference 2016

1. Schools face challenges in structuring CPT programs without guidance

   - Can SEVP develop CPT guidance, with high stakeholder participation, and preserving and expanding important experiential learning opportunities for students?

   - For example, 75-mile limit hinted at in employment guidance should be revisited.

   - Can SEVP keep the community apprised of the status of that guidance development?

2. Educational programs are dynamic and the trend towards nontraditional programs is increasing

   - Thank you for your *Stakeholder Issues Response Report (2015)* and your detailed response to our suggestion that SEVP accommodate and facilitate modern and innovative educational programs.

   - We recognize the difficulty of addressing each of the many kinds of innovations (as SEVP noted) and suggest that SEVP initially provide guidance facilitating or at least allowing executive and intermittent residency programs.

   - Also, please consider using commuter student rules and leave of absence rules in innovative ways to facilitate these programs.

3. SEVIS batch development process

   - The vast majority of international students are hosted by institutions who use batch processes, so please give more attention to this fact and allow more lead time for vendors to prepare for SEVIS changes.

   - We appreciate SEVP's implementation of onsite meetings for developers.

   - At least a four-week period before release is necessary for vendors to design and release schema freeze.

   - Provide at least one month period for schools to implement any new SEVIS release.

   - Allow SEVIS-required confirmations in batch (such as the "confirm session date" check box for sessions of more than 183 days) so that DSOs are not required to handle such processes in RTI.

4. Data interchange between SEVIS and other government systems needs improvement

   - Can SEVP, like NAFSA, encourage agency partners to utilize SEVIS information more effectively and communicate regularly with them about this?

- An important focus is OPT data interchange with USCIS and CBP systems (many students on OPT are unnecessarily required to undergo secondary inspection when returning to the U.S. from travel abroad, apparently because SEVIS does not show accurate OPT information).

5. Improve SRC consistency in response times and guidance given to schools and students

- Some SRC adjudicators respond quickly and consistently, but others do not.

- Please focus on training to improve consistency.

- Publish expected processing times for request types.

- Indicate the regulatory basis (specific, not general) for guidance or decisions.

6. DSO and school responsibility in I-983 training plan process

- Guidance is needed for DSOs concerning their role and responsibilities.

- Clarify that DSOs are not required to evaluate employer-employee relationships, quality of employers' training programs, etc. If DSOs are required to analyze and evaluate these, then DHS should give DSOs the authority to approve OPT as they do CPT.

7. School certification issues

- Provide guidance addressing changes to a school's business structures, such as change of ownership and school or campus "spinoffs."

- Provide guidance on developing non-traditional programs, since school business decisions often revolve around this (see also #2 above).

8. SEVP and SEVIS initiatives, academic calendar, and planning

- Please consider the most common academic calendar when implementing new initiatives that require extensive efforts on the parts of schools and DSOs or that may be disruptive to their office/business practices.

- Providing a "roadmap" of planned SEVIS changes, such as in the form of a quarterly newsletter, would be especially helpful to DSOs and their institutions so that they may plan ahead.

- When issuing final guidance, please provide a future implementation date so that DSOs and schools have ample time to adjust institutional policies and practices and inform their stakeholders.

9. Improving I-17 update process

- Thank you for reducing backlogs and processing times.

- Smooth the I-17 update process and lessen burdens on both the SEVP and schools by providing thorough information in advance about required documents and information, the adjudication process and timeline, and how to seek reconsideration or appeal a decision (for example, on the Study in the States web site).

10. Informing stakeholders through webinars and the Study in the States web site

- Thank you for providing webinars for stakeholders and continuing to improve the Study in the States (SitS) web site.

- In order to make the webinars more informative and focused on high priority stakeholder concerns, please publish the slides or a topical outline in advance and allow submission of questions in advance.

- Consider offering each webinar at twice, which will provide more opportunities for stakeholders to participate and may help reduce bandwidth problems by reducing the number of participants on each webinar.

- The SitS information on STEM OPT was particularly helpful, and we suggest providing more straightforward and detailed guidance like this.

- We recognize the difficulty providing guidance in brief form but also ensuring that it is complete and accurate and suggest that you seek or at least allow feedback about guidance from SitS users.

11. Thank you for this valuable engagement

- Thank you for this valuable engagement between SEVP and stakeholders. We appreciate your serious approach to it and your careful consideration of our recommendations. We hope to conduct a similar meeting with you in 2017.