

Understanding the Student and Exchange Visitor Information System (SEVIS)

Achieving compliance with SEVIS requires establishing, on a very tight schedule, systems to track international students and share data about them with the INS

By **Patty Croom** and **Kathy Bellows**

What do Kofi Anan, Margaret Thatcher, and Gerhard Schroeder all have in common? They all came to the United States as international students. International exchange, over the past three decades, has had a significant impact on leaders all over the world. Indeed, the events and hostilities in the last year highlight the need for increased understanding among countries and cultures and appreciation of our differences. Increasingly, institutions are internationalizing their campuses through language requirements, study abroad, area studies, and the enrollment of large numbers of international students. In 2000–01, U.S. colleges and universities enrolled 547,857 international students.¹ International students play an important role on our campuses, and we need to be able to admit, enroll, and support them in ways that work within our institutional requirements and in line with federal laws and regulations.

Beginning January 2003, every institution that admits international students or hosts exchange visitors and scholars will need to share demographic, academic, and immigration-related information electronically with the Immigration and Naturalization Service (INS). This new system, called SEVIS (Student and Exchange Visitor Infor-

mation System), was envisioned in legislation in the mid-1990s. However, the federal government significantly accelerated the timeline for national rollout of this system after the tragic events of September 11, 2001.

SEVIS requires a major change in process, organizational relationships, and data interfaces on campus.

On most campuses, the primary responsibility for immigration-related expertise and for supporting this population resides with each institution's international student office. In the past, these offices have typically had limited central information technology support. SEVIS will force these offices and information technology centers to develop relationships — on a tight schedule — to construct systems handling reporting and data interfaces for their institutions to be SEVIS-compliant. According to the proposed regulation published May 16, 2002, institutions that are not compliant by January 30, 2003, can no longer issue the docu-

ments needed to bring international students and scholars to their campuses. Such an outcome is unacceptable for most institutions.

Required Processing

Most international students wishing to study in the United States do so by obtaining an F visa at a U.S. consulate overseas. When a student is admitted to an institution, the institution prepares an INS Form I-20: Certificate of Eligibility, and mails the form to the student abroad. Typically, this is done on a typewriter or using stand-alone software separate from the institution's student data pool. The student then takes this document to a U.S. embassy or consulate and applies for a visa. If the visa is issued, the student may enter the United States and commence studies. A parallel process serves short-term exchange visitors and visiting scholars, who arrive using a J visa category. To date, this process with the INS has been entirely manual.

Once in the United States, students must abide by certain regulations, such as pursuing a full-time course of study. Adherence to these regulations is monitored by each institution. Such monitoring has generally been carried out manually by international student offices, sometimes using paper reports

from the institution's student information system (SIS). Over the past decade, information has only been reported to the INS when specifically requested. SEVIS, however, will change this process significantly.

Once SEVIS is operational, the institution will enter the newly admitted student's demographic data and academic information, including intended field of study, into the SEVIS database, either directly through a secured Web interface or through a daily data transmission to the INS. SEVIS will perform basic validation, assign a SEVIS ID number to the admitted student, update its own database, and download an I-20 document in PDF format, including a bar code, for the institution to print and mail to the student. The student will still take this paper document to the consulate or embassy to apply for a visa.² Eventually, embassies, consulates, and ports of entry will all have access to SEVIS information for use in their processing.

Section 641 of the Illegal Immigration Reform And Immigrant Responsibility Act (IIRIRA) of 1996, the USA PATRIOT Act of 2001, and the Enhanced Border Security and Visa Entry Reform Act of 2002 provide statutory

authority for the initial collection and on-going reporting of key international student data. By the time this article is published, the elements to be tracked and frequency for tracking should be final, and schools should refer to the actual regulations for details. At this point, the following types of data are to be shared with INS:

- Information required on Form I-20 and IAP-66,³ such as name, country of birth, country of residence, country of citizenship, date of birth, field of study, financial support requirements, intended field of study, and degree objectives.
- Enrollment at the school or commencement of a program, or failure to enroll or begin a program. Confirmation of international student registration must be reconfirmed each semester.
- Falling below a full course of study without prior authorization.
- Name and address changes for student or dependents.
- Changes in major.
- Changes in dependents.
- Standard procedural changes per immigration rules, such as extensions of stay, practical training, reduced course loads, and so forth.

These data are to be sent to INS on an on-going and timely basis, within 10 to 21 days of the institution knowing of the change (actual timing pending final regulations).

This type of data tracking represents an entirely new set of relationships between the higher education community and the INS. Title IV institutions have long transmitted financial aid data to the Department of Education and thus have in place the requisite infrastructure, support mechanisms, and relationships.⁴ SEVIS, however, is entirely new. Not only are we creating new technical exchanges of data, but we are doing this on a highly accelerated schedule, concurrent

with significant regulatory change.

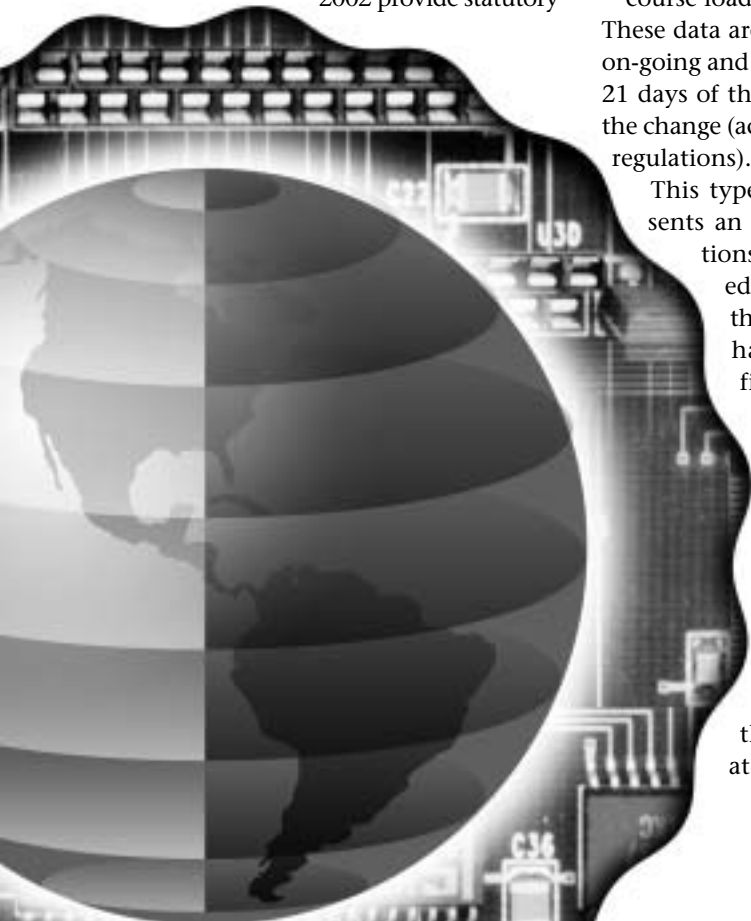
IT organizations must understand that "SEVIS-compliant" does not mean just another simple data transmission; it requires a major change in process, organizational relationships, and data interfaces on campus. In some cases, portions of the data to be collected have never before been recorded electronically. In others, gathering the necessary data will require combining data from two or three existing campus information systems.

The SEVIS system requires institutions to report not only student data, but also information on visiting scholars, including researchers and professors, who make an important contribution to the intellectual environment on many campuses. Some scholars' data may be stored in the institution's human resource or student information systems. Other scholars' information may not be in any institutional information system. In any case, institutions must report the start-of-program and other data changes to the INS for this entire population.

Furthermore, the system will need to gather information for international students attending English as a Second Language (ESL) programs on campus; these academic programs may have their own processes and systems. Thus, data must be gathered from admissions, registrar, human resource, and possibly other systems to comply with SEVIS. The need to combine and integrate data from multiple systems makes this an even more challenging project.

Another difference between SEVIS and other transmissions is the role certain individuals play in this process. By regulation, the data may only be forwarded to the INS through one of its Designated School Officials (DSO), in the case of F visa students, or Responsible Officer (RO), in the case of J visa students and scholars. Typically, this function will fall to the international student office, though admissions office staff, registrars, and/or ESL teaching staff may also play this role at some institutions.

Even if fully automated transmissions are planned, the DSO or RO will typically



need to review the information before forwarding to the INS. For instance, since enrollment changes may be made on a continual basis, the DSO will want to verify that a student has intentionally and permanently dropped below full-time enrollment, perhaps by contacting the student, before sending this change to the INS. Systems and processes will need to support this function.

It will be critical to avoid inaccurate data reporting. Consider a student who on Friday drops one course, intending to later add another in its place. That evening, either through error or lack of DSO review, the system transmits this data to SEVIS, indicating that the student is less than full-time. The student is now officially considered "out of status." The student travels to Canada for the weekend and tries to reenter the United States on Sunday. Since ports of entry will also have access to SEVIS data, the student may not be able to reenter the United States. This scenario shows why it will be necessary to have processes in place to prevent such a situation.

Finally, note that institutions that are not in compliance by January 30, 2003, may lose their authorization to generate I-20s and IAP-66s, and thus be unable to bring international students and visitors to campus. Such an outcome will be viewed as financially, academically, and politically unacceptable on today's college campuses.

Implementation Options

SEVIS is designed as an Internet-based application. Institutions with small numbers of international students will likely choose to enter data directly into SEVIS through a secured Web interface provided by the INS and its prime contractor, Electronic Data Systems (EDS). This method will require institutions to re-key information from other information sources into SEVIS for all of the SEVIS forms and events noted above. The INS will authorize a limited number of individuals on a campus as SEVIS users.

For schools with large numbers of international students and scholars, the INS, through EDS, is creating a batch interface option. Batch transfers



may come only from authorized institutions and will be secured using digital certificates. Schools will send data in prescribed formats using XML. The INS will receive the data, edit it, and update the SEVIS database. SEVIS will then return a packet of information to the school using XML. When requested by the institution, the transmission will also include PDF documents for printing I-20 or IAP-66 forms, ready for DSO or RO signature.

Institutions using the batch interface may still use the interactive mode for certain functions or emergency requests. In such cases, however, the institution will need to also update its local database to stay synchronized with SEVIS.

Institutions with more than a few hundred students should evaluate whether to use batch or interactive mode and, if batch, whether to buy a commercial package or build one in-house. A few vendors now specialize in SEVIS-compliant software to support

the international student office. Some enterprise resource planning (ERP) vendors are currently enhancing their systems to supply the information required by SEVIS. Schools using ERP software should discuss SEVIS plans directly with their vendors. Working with a vendor may still entail considerable effort in-house, including augmenting the package to meet their needs. Those buying a package will also need to build interfaces to existing systems.

Institutions should be moving expeditiously to assess their current systems, decide which offices need to be included in this effort, and determine the best SEVIS strategy for their campuses.

Challenges

The INS is pursuing an extremely aggressive implementation schedule for the SEVIS system. Under the best of circumstances, this is a challenging project, given the new communication links and interfaces required internally, the new technology and relationships with the INS, the concurrent regulatory changes, and the high visibility of this project as one of several national antiterrorism-based initiatives.

Information technology leaders should ensure that they

- Contact the international student office staff to determine what has been done so far, determine requirements, and develop project plans with them as required.
- Stay abreast of current status of the SEVIS project, as information printed in this article could change. (The EDUCAUSE Web site has a good list of references: <http://www.educause.edu/issues/sevis.html>).
- Identify all the stakeholders on campus and ensure that they are informed about the coming changes and how they will be affected. Beyond the international student office, this may include the registrar, admissions office, human resources, general counsel, graduate school, college and department personnel, and even senior management, possibly up to and including the board of trustees, who may need to make budgetary decisions.

- Together with functional units, determine the best technical strategy to meet the institution's needs.
- Assist the international student office and other offices to determine the data needs, design reports or systems to support them, develop systems (if required), and help ensure that manual and automated processes are in place to make SEVIS work effectively on campus.

Summary

We are at a unique point in our history. Our world is forever changed by the events of September 11, and our institutions, processes, and systems now need to reflect these realities. SEVIS provides a major challenge for the INS and higher education alike, one that will require intense effort and cooperation to succeed. This system alone will not keep our nation safe from potential terrorists. However, ensuring the continuity of international exchange will assist in creating and broadening the

global understanding that can help prevent terrorism by attacking its root cause, rather than treating its symptoms. By implementing SEVIS, higher education is helping to ensure that international exchange remains an integral part of our campuses. *e*

Endnotes

1. "Open Doors on the Web," Institute of International Education, http://www.opendoorsweb.org/2001%20Files/layout_1.htm, retrieved June 2002.
2. To fund SEVIS on a recurring basis, international students may also be required to pay a fee of up to \$95 to apply for or obtain a visa. Just how this system of payment will work is still being negotiated, but institutions are unlikely to be involved directly in fee collection. Thus, at this point it appears the fee handling will not have a significant impact on how SEVIS operates. See the INS Web site: <http://www.ins.usdoj.gov/graphics/services/tempbenefits/sevisfee.htm>.
3. The IAP-66 serves the same purpose as the I-20 for those seeking entry using a J visa category. The Department of

State, which administers the J visa program, is in the process of replacing the IAP-66 with a new form, DS-2019, concurrent with SEVIS implementation.

4. Title IV of the Higher Education Act authorizes institutions to provide federal financial funding to students with limited income to pay for tuition and other related expenses.

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