



# Student and Exchange Visitor Program (SEVP)

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Audit Report No. R2408 | *April 4, 2024*



## Executive Summary

### Audit Objective

To provide assurance as to the adequacy and effectiveness of controls over the University’s processes related to the Student and Exchange Visitor Program.

### Controls and Strengths

- Staff within the International Students and Scholars Office (ISSO) have the credentials and years of relative experience to manage the SEVP program.
- UTD contracts with Indiana University for use of their third-party vendor system, sunapsis, which is the current industry leader in Student and Exchange Visitor Information System (SEVIS) support. In addition, single-sign-on controls were incorporated into the sunapsis system during the audit.
- The [ISSO website](#) provides detailed guidance and information for visa students/visitors and external stakeholders.
- UTD’s automated insurance enrollment process ensures that visa holder students are insured in medical and accident insurance as required per [22 CFR 62.14 \(Exchange and Visitor Program - Insurance\)](#) and [UTS 186, Student Health Insurance Requirements for International Students](#).
- A memorandum of understanding (MOU) agreement exists between the ISSO and the Office of Information Technology (OIT) for sunapsis service and support.

### Overall Conclusion

Overall, the controls over the University’s processes related to the Student and Exchange Visitor Program are effective to ensure compliance with federal regulations; however, recommended improvements to the compliance program can help provide additional controls.

### Observations by Risk Level

Management has reviewed the observations and has provided responses and anticipated implementation dates. Detailed information is included in the attached report.

Recommendation	Risk Level	Management’s Implementation Date
1. Comply with Campus Employment Regulations	High	March 31, 2024
2. Document the Compliance Program	Medium	January 31, 2025
3. Ensure Compliance with Records Retention Policies	Low	December 31, 2025

*For details about the audit and methodology, explanation of risk levels, and report distribution, please see Appendices A, B, and C, respectively, in the attached report.*



## Detailed Audit Results

Observation	Risk Level/Effect	Recommendation <sup>1</sup>
<b>1. Comply with Campus Employment Regulations</b>		<b>High Risk</b>
<p>ACS conducted testing to determine if UTD complies with selected SEVP requirements. 8 CFR 214.2(f)(9), <i>Employment</i><sup>2</sup>, states that students authorized to work on campus must not work more than 20 hours a week while school is in session. Two F-1 visa students tested worked more than the 20-hour limit in one week tested, and there are no exceptions to the rule. This information was shared with the Primary Designated School Official for investigation and disposition.</p>	<p>Without proper controls or monitoring in place, students could be in violation of their immigration status. If a student does not follow these requirements, they could be considered “out-of-status” and may be subject to deportation.</p>	<p>ISSO should work to create a university-wide task force comprised of campus leaders within the offices of the University Career Center, Human Resources, and other areas on campus that employ international students and employees. The task force should develop processes to mitigate the risks of noncompliance.</p>
<p><b>Management’s Action Plan:</b> Responsibility for compliance related to employment of foreign nationals does not rest with the ISSO, but with Human Resources (HR) (for employees) and the University Career Center (UCC) (for student employees and interns). However, the ISSO accepts this recommendation to convene a task force and facilitate conversations to support them in their development of processes to mitigate risks of noncompliance. By March 31, 2024, the ISSO will invite relevant stakeholders to create a task force. The task force will self-identify priorities and timelines for process developments which will occur after that date.</p> <p><b>Responsible Party Name and Title:</b> Josephine Vitta, Senior Director</p> <p><b>Estimated Date of Implementation:</b> March 31, 2024</p>		

<sup>1</sup> See Appendix B on page 9 for definitions of observation risk rankings. Minimal risk observations were communicated to management separately.

<sup>2</sup> <https://www.ice.gov/sevis/schools/reg>



Observation	Risk Level/Effect	Recommendation <sup>1</sup>
<b>2. Document the Compliance Program</b>		<b>Medium Risk</b>
<p>Compliance program documentation and risk management plans are designed to document a compliance program’s risk assessment processes, monitoring, training, and reporting procedures that help ensure instances of noncompliance are minimized.</p> <p>The ISSO does not have a formally documented compliance program for SEVP and other immigration regulations. Also, a periodic risk assessment is not being conducted to help identify the highest risks and controls may not be in place to help mitigate against them. Higher risks, such as the 20-hour rule issue noted above, are not being monitored on a university-wide basis.</p> <p>Formally documenting a compliance program for SEVP and other immigration regulations will help identify guidance that can be shared university-wide with international students and employees who assist in these processes and may help prevent any instances of noncompliance.</p>	<p>Without a documented compliance program for SEVP and other immigration regulations, risks may not be identified or monitored, and instances of non-compliance could increase.</p>	<p>ISSO should formally document a compliance program for SEVP and other immigration regulations and include the following:</p> <ul style="list-style-type: none"> <li>• Periodic risk assessment</li> <li>• Controls to mitigate risks</li> <li>• Monitoring procedures for key (high) risks</li> <li>• Training</li> <li>• Reporting</li> </ul> <p>Documenting a formal compliance program will help to identify risks, ensure that controls are in place to mitigate the risks, and affirm that monitoring is occurring. If high risks are identified, then the ISSO should work with Institutional Compliance to ensure appropriate reporting to the Chief Compliance Officer is in place.</p>



Observation	Risk Level/Effect	Recommendation <sup>1</sup>
<p><b>Management’s Action Plan:</b> The ISSO accepts the recommendation. ISSO internal compliance activities are extensive, but not cohesively or comprehensively documented. There is a high reliance on individuals with institutional knowledge. The ISSO will systematically document our SEVIS and immigration compliance program and establish the infrastructure for annual review and revision. ISSO will reach out to Institutional Compliance if high risks are identified.</p> <p><b>Responsible Party Name and Title:</b> Josephine Vitta, Senior Director</p> <p><b>Estimated Date of Implementation:</b> January 31, 2025</p>		
<p><b>3. Ensure Compliance with Records Retention Policies</b></p>		<p><b>Low Risk</b></p>
<p>Federal and state laws require compliance with records retention regulations to ensure that records are created, maintained, and available for public use. The UT Dallas Office of Legal Affairs has a <a href="#">records retention schedule</a> that includes requirements for both paper and electronic storage and when to dispose of the records.</p> <p>The ISSO has not disposed of certain electronic records that are maintained in the sunapsis system.</p>	<p>Without processes in place to dispose of records as required by regulations, the University may be subject to legal liability.</p>	<p>Without processes in place to dispose of records as required by regulations, the University may be subject to legal liability.</p>
<p><b>Management’s Action Plan:</b> The ISSO accepts this recommendation. The ISSO only utilizes digital records stored within Sunapsis. The ISSO has been aware of the need for records disposal. However, digital files have not been disposed in accordance to the records retention schedule. The ISSO will work with the OIT Enterprise Application Support (EAS) team which supports the Sunapsis application to dispose of records that have exceeded their retention period, and to establish a process to dispose of records annually.</p>		



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Observation	Risk Level/Effect	Recommendation <sup>1</sup>
<p><b>Responsible Party Name and Title:</b> Sarah Ku, Director of Immigration Services</p> <p><b>Estimated Date of Implementation:</b> December 31, 2024</p>		

## Overall Conclusion

Overall, the controls over the University's processes related to the Student and Exchange Visitor Program are effective to ensure compliance with federal regulations; however, recommended improvements to the compliance program can help provide additional controls.



## Appendix A: Information Related to the Audit

### Background

The Student and Exchange Visitor Program (SEVP) is part of the National Security Investigations Division and acts as a bridge for government organizations that have an interest in information on nonimmigrants whose primary reason for coming to the United States is to be students. On behalf of the Department of Homeland Security (DHS), SEVP manages schools, nonimmigrant students in the F and M visa classifications and their dependents. The Department of State (DoS) manages Exchange Visitor Programs, nonimmigrant exchange visitors in the J visa classification and their dependents. Both SEVP and DoS use the Student and Exchange Visitor Information System (SEVIS) to track and monitor schools; exchange visitor programs; and F, M, and J nonimmigrants while they visit the United States and participate in the U.S. education system.

SEVIS tracks and monitors nonimmigrant students and exchange visitors. SEVIS also provides a mechanism for student and exchange visitor status violators to be identified so that appropriate enforcement is taken (i.e., denial of admission, denial of benefits or removal from the United States).<sup>3</sup> To assist in this process, UTD uses a program created by Indiana University (IU) called sunapsis. sunapsis is a case management tool for international students as well as an online portal for international students and scholars to submit information and check the status of requests.

The International Students and Scholars Office (ISSO) ensures compliance with SEVP and serves the University's international students, scholars and visitors, campus units, and university administration by providing immigration services, programming, advocacy, and outreach.<sup>4</sup> The Office is led by the Senior Director of the International Center, who is also the University's Primary Designated School Official for SEVIS. The International Center reports to the Dean of Graduate Education and Vice Provost for Global Engagement, who reports to the Provost.

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<sup>3</sup> <https://www.ice.gov/sevis>

<sup>4</sup> <https://isso.utdallas.edu/>



## Objective

To provide assurance as to the adequacy and effectiveness of controls over the University’s processes related to the Student and Exchange Visitor Program.

## Scope

The scope of the audit was FY2022 through FY2023. Fieldwork was conducted from April 15, 2022, and the audit concluded on February 7, 2024.

## Methodology

The audit was conducted in conformance with the Institute of Internal Auditors’ *International Standards for the Professional Practice of Internal Auditing*. Additionally, we conducted the audit in accordance with generally accepted government auditing standards (GAGAS). Both standards are required by the Texas Internal Auditing Act, and they require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives. The Office of Audit and Consulting Services is independent per both standards for internal auditors.

Our audit methodology included interviews, observations of processes, reviews of documentation, and testing. The following table outlines our audit procedures and overall controls assessment for each of the audit area objectives performed.

Audit Area	Methodology	Observations Related to the Audit Area
Gaining an Understanding of ISSO Operations	Gained an understanding of operations by interviewing key responsible parties and reviewing policies, procedures, and other related documentation as necessary.	Observation #2, 3





Audit Area	Methodology	Observations Related to the Audit Area
	Performed a risk assessment to identify areas of high risk within operations, and focused audit procedures on those risks.	
Compliance	Determined compliance with selected F-1 and J-1 SEVIS requirements.	Observation #1
Information Technology & Security	Assessed the effectiveness of controls over SEVIS and sunapsis system access and the security of SEVIS data external to these systems.	None
Memorandum of Understanding (MOU)	Determined compliance with the terms of the MOU agreement between the ISSO and the Office of Information Technology (OIT).	None
Vendor Assessment	Reviewed the vendor assessment process for sunapsis by interviewing the Chief Information Security Officer and observing related documentation.	None

### Follow-up Procedures

Though management is responsible for implementing the course of action outlined in the response, we will follow up on the status of implementation subsequent to the anticipated implementation dates. Requests for extension to the implementation dates may require approval from the UT Dallas Audit Committee. This process will help enhance accountability and ensure that timely action is taken to address the observations.



## Appendix B: Observation Risk Rankings

Audit observations are ranked according to the following definitions, consistent with UT System Audit Office guidance.

Risk Level	Definition
<b>Priority</b>	If not addressed immediately, a priority observation has a significant probability to directly impact the achievement of a strategic or important operational objective of UT Dallas or the UT System as a whole. These observations are reported to and tracked by the UT System Audit, Compliance, and Risk Management Committee (ACRMC).
<b>High</b>	High-risk observations are considered to be substantially undesirable and pose a high probability of adverse effects to UT Dallas either as a whole or to a division/school/department level.
<b>Medium</b>	Medium-risk observations are considered to have a moderate probability of adverse effects to UT Dallas either as a whole or to a division/school/department level.
<b>Low</b>	Low-risk observations are considered to have a low probability of adverse effects to UT Dallas either as a whole or to a division/school/department level.
<b>Minimal</b>	Some recommendations made during an audit are considered of minimal risk, and the observations are verbally shared with management during the audit or at the concluding meeting.



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## Appendix C: Report Submission and Distribution

We thank the ISSO management and staff for their support, courtesy, and cooperation provided throughout this audit.

Respectfully Submitted,

DocuSigned by:  
  
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Toni Stephens, CPA, CIA, CRMA, Chief Audit Executive

### ***Distribution List***

*Members and ex-officio members of the UT Dallas Institutional Audit Committee*

#### *Responsible Vice President*

Dr. Inga Musselman, Vice President for Academic Affairs and Provost

#### *Persons Responsible for Implementing Recommendations:*

Ms. Josephine Vitta, Director of the International Students and Scholars Office

#### *Other Interested Parties*

Dr. Juan Gonzalez, Dean of Graduate Education and Vice Provost for Global Engagement

#### *External Parties*

- The University of Texas System Audit Office
- Legislative Budget Board
- Governor's Office
- State Auditor's Office

#### *Engagement Team*

Project Leader: Rob Hopkins, CFE, Audit Manager

Staff: Dora Vasquez, CFE, Internal Auditor III (retired at end of audit)