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MEMORANDUM

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To: International Education Program Administrators

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- 1) Los Angeles Schools Raided by Homeland Security

On March 11, the [LA Times](#) and the [Wall Street Journal](#) reported that Homeland Security Investigations had raided four schools in the Los Angeles, California area. According to the news stories, although the schools had enrolled 1500 students, mostly Korean and Chinese, and generated as much as \$6 million a year in purported tuition payments, only three students were found in a single English language class and one student in a religion class (he was praying for a good lawyer). Most students were living in Texas, Nevada and Hawaii.

Three individuals were taken into custody and face a 21 count indictment including conspiracy to commit visa fraud, money laundering, and other immigration offenses. The four schools are: Prodee University in the Los Angeles Koreatown neighborhood, and three affiliated schools:

Walter Jay M.D. Institute, American College of Forensic Studies, both in L.A., and Likie Fashion and Technology College in Alhambra, California.

Rachel Canty, Deputy Director of SEVP, was quoted as noting that more than three quarters of some nine thousand certified schools have fewer than 50 international students which makes it more challenging to comply with regulations and that “... We have a lot of mom and pop schools”. The articles did not reveal how Homeland Security was prioritizing its enforcement or how it turned up leads on Prodee University.

As a result of the raid SEVP released “A message for International students enrolled at Prodee University/Neo-America Language School and its affiliated schools” which advised that SEVP had terminated the PDSO and DSO certification for the four schools, although their administrative offices would remain open. “Students may continue to attend classes as normal or transfer schools, if they wish. Nonimmigrant students must maintain their nonimmigrant student status.” SEVP contact data was provided for further information. The message may be found [here](#).

2) Appeals Court to Hear DACA/DAPA Injunction Arguments

According to the *New York Times* (among others) of March 24th, the 5th Circuit Court of Appeals in New Orleans will hear arguments on April 17, as to whether the temporary hold by the Federal District Court in Brownsville, Texas on the new DACA/DAPA Executive Action rules will be allowed to stand. The administration had filed an emergency motion in the appeals court in order to expedite a decision on the District Court action. A separate motion in the District Court to lift the injunction remains pending.

3) Nebraska Service Center Stakeholder Call Answers

On March 30, AILA released unofficial answers to questions from the March 12, Nebraska Service Center stakeholder engagement call on students, schools and other issued.

A couple of the more interesting issues follow:

A student ... [who will soon graduate]...is doing a Study Abroad in Europe for last semester. She cannot apply for OPT because, even though she is enrolled full-time, she is not physically present. Is this correct?

RESPONSE: 8 CFR 214.2(f)(10) granting eligibility for OPT also includes students who are enrolled in a study abroad program as long as the student spent at least one full time term enrolled in the qualifying institution in the US before going to study abroad. Follow up question noted that an I-94 is required and a student outside the US will not have one and NSC explained that in that case the

application should simply include an explanation of the student's study abroad program and eligibility.

...

Students applying for the 17-month STEM extension are now being asked by the Service Center to provide proof of employment during their original 12 months of OPT. We are now telling students to include this information in their applications, but we are unclear about what documentation they are required to provide. Could you provide more guidance on the minimum documentation students would need to provide to show proof of employment? Will letters from employers suffice, or do they need to also include copies of all previous pay stubs and W-2 forms if they already include the letters? Also, some had not yet received their W-2 forms when asked to provide those, so is this only optional or required? Are you looking for any additional information (i.e. proof of employment during initial 12 months; periods of unemployment)?

RESPONSE: The minimum documents required are an I-20 with start dates completed by the DSO, employment confirmation letters should include start date, number of hours which should average 20/week. W-2s and paystubs can be helpful.

4) SEVP Releases 2015 International Student Data, and Launches Interactive Mapping Tool

On March 25th SEVP released its quarterly “SEVIS BY THE NUMBERS”. As a part of this edition, users can now review all the numbers by a nifty “interactive mapping tool”. According to the news release, a few of the highlights are:

Based on data extracted from SEVIS Feb. 6, 1.13 million international students, using an F (academic) or M (vocational) visa, were enrolled at nearly 8,979 U.S. schools. This marked a 14.18 percent increase in international students when compared to January 2014 data. The number of certified schools remained relatively static, increasing just more than one percent, during the same time period.

Seventy-six percent of all international students were from Asia. The top 10 countries of citizenship for international students included: China, India, South Korea, Saudi Arabia, Canada, Japan, Vietnam, Taiwan, Mexico and Brazil.

In February, only 30 SEVP-certified schools had more than 5,000 international students enrolled. The University of Southern California, Purdue University, Columbia University, the University of Illinois and New York University ranked one through five among U.S. schools with the most international students. More than 10,000 international students were enrolled at each of these schools.

Thirty-seven percent of international students studying in the United States, equating to more than 400,000 individuals, were enrolled in STEM (science, technology, engineering and mathematics) coursework in February. Eighty-six percent of international students pursuing STEM studies were from Asia.

The February report includes a special section about women pursuing STEM studies. In the past five years, the total number of female international students studying STEM fields increased more than 68 percent, from 76,638 in February 2010 to 128,807 in February 2015. Sixty-two percent of these female international students were from China and India. Also since 2010, the number of female international students pursuing STEM-focused master's degrees increased 114 percent. Thirty-four percent of all female students pursuing STEM studies were enrolled at schools in California, New York and Texas.

Other key points from the report include: 76 percent of SEVP-certified schools had between zero and 50 international students; 73 percent of international students were enrolled in bachelor's, master's or doctoral programs; and California, New York and Florida had the most SEVP-certified schools. A school must be SEVP-certified before it can enroll international students who are in the United States on a student visa.

The full report can be found [here](#).

5) The Relativity of "A" Numbers

The Nebraska Service Center has issued "Unofficial Answers to Questions" from its January 15, 2013 Stakeholder Engagement Call. Among the issues addressed was a common question regarding the relationship between A#s issued by USCIS for F-1 EADs, and for J-1 Waivers, with permanent file A#s. NSC responded:

Response: The A#s assigned to F-1s, there are 130 million of them, are system generated A#s that

facilitate the production of practical training documents. They are not used to connect to permanent resident benefits. The student A#s are specifically for very narrow process. Green cards are not issued using the F-1 A#. J-1s may apply for a waiver and be issued a regular A# early, and then they wait months or years to file for AOS but they should use that J-1 Waiver assigned number. Anyone who has an old non-OPT/CPT A# should provide it because when there are multiple regular A#s an officer is required to review all of the A files' information so providing the numbers up front can save time.

6) California Service Center Open House

The California Service Center will be holding an Open House on June 11, 2015 including a round table and open forum sessions addressing family based, employment based, and student based immigration issues. USCIS officials will address customer service concerns and provide facility tours. The invitation by CSC may be found [here](#).

7) NAFSA Department of State Virtual Brownbags

NAFSA has announced that it will hold two virtual brown bags with the US Department of State during the month of April. On April 2, from 3:00-4:00pm, the session will be with the Office of Private Sector Exchange Administration Academic and Government Programs Unit. The second, on April 15, features the Office of Designation Academic and Government Program Unit and will provide a discussion of the new exchange visitor regulations. Consult the NAFSA website for details.

8) IETS' SEVIS 2015 Roadmap Webinar Summary

IETS-International Education Training Services has published a summary of the February 20, "SEVIS 2015 Roadmap Webinar". The summary sets forth, on a monthly basis, just what SEVP is planning to release during each month. The summary may be found on the IETS website at <http://ietstraining.com/> or by email to iets@ietstraining.com.

Many thanks for your comments, your suggestions and your confidence in us, and for referring your students, scholars and faculty members.

Please let us know if you have any questions, or if you would like copies of any of the materials covered.

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