

Welcome. I am Rachel Rubin, Director of International Student & Scholar Services in OGS. I want to thank you for making time to attend this advanced training on international student issues.

Our international students are a very important part of our global university and they are operating in an increasingly tense and uncertain climate. It is a climate in which traditional norms and expectations are changing.

These students come to Georgetown gambling on the benefits of a U.S. education. They have left their families, their support network, and often their language to embark on an educational and professional journey that begins on our campus. They are quite brave if you think about it.

However, they are subject to a massive regulatory system of oversight, restrictions and scrutiny. This combined with unfamiliar cultural norms, values, and expectations can be very challenging for both the students themselves and for all of us who support them.

Today's session is designed to acknowledge some of myths we often hear circulating in campus conversations in order to ensure that we all present the most accurate and helpful information for their ultimate success on the Hilltop.

Agenda

- Myths & misconceptions
- Scenarios in context
- Resources

GEORGETOWN
UNIVERSITY

To that end, I want introduce the OGS International Student Advisors who are with me today:

Sarah Bunker

Dylan Gaffney

Lindsay Kirwan,.

Stacy Williams

Danielle Valles : You may also know her from her role as an international scholar advisor.

They all have master's degree, speak at least one foreign language, have lived and/or studies abroad, have a DSO or designated school Official, or ARO certification from the U.S Government to work in the department of Homeland Security's SEVIS database.

Each advisor has a caseloads of 400-600 international students in F-1 and J-1 status, including those students who stay for one year of practical training post graduation. Danielle and Sarah also work with the alumni who have stayed on in the US to take advantage of the additional 2 year STEM OPT extension. You can view the caseload for each advisor on our office website: internationalservices.Georgetown.edu

Topics

- International identity vs. International experience @ GU
- Off-campus authorizations
- F-1/J-1 implications for new programs

GEORGETOWN
UNIVERSITY

Today, we want to focus on some common myths and misconceptions that surround Georgetown's international student community, affect their engagement in all the training and internship opportunities that the DMV has to offer and could restrict their participation in new programs across the University.

International @ GU

identity vs. experience

GEORGETOWN
UNIVERSITY

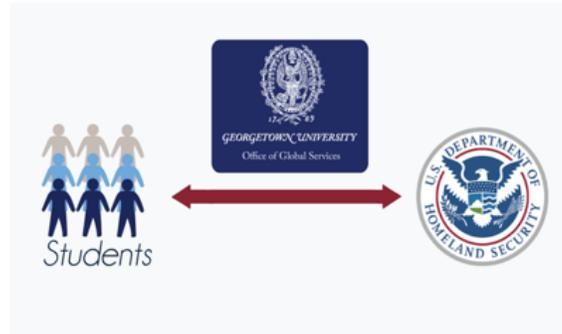
International at Georgetown is a strange and complex concept. We have truly global Hoyas who are American citizens but have grown up all over the world. Many of them identify as international. We have children of Ambassadors and spouses of H-1B temporary workers. We have asylum seekers who are unable to return to their home countries for fear of persecution. We have individuals with TPS, Temporary Protected Status because their countries have suffered national disasters or protracted conflict. Some students come without any legal status at all. Georgetown welcomes each and every one of these students.

Myth:

OGS is the one-stop international shop

Reality:

IS Advisors
serve students
in F-1 and J-1
status

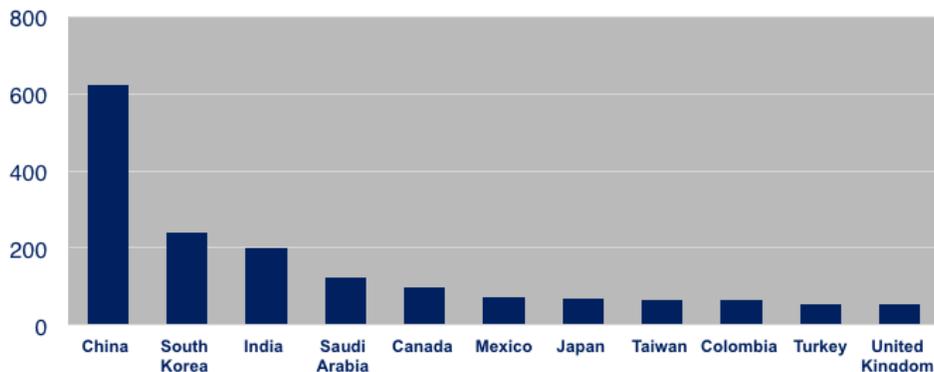


GEORGETOWN
UNIVERSITY

But these are not the students served by OGS. Each of these groups has a complex set of regulations governing its status and generally has its own sponsor or support system. The US immigration system has 185 different types of visas that can bring foreign visitors to the United States. Several of these categories allow part- or full-time study 'incidental' to the person's primary purpose for being in the United States. Only two of these categories are used by Georgetown to sponsor students for full time study: F-1 and J-1 status. The rules governing F and J status are complex. Essentially, our jobs are the product of the immense regulatory structure behind F-1 and J-1 status. Federal compliance isn't what brought us to this field, but it's a huge part of our daily life.

Our job is to serve as liaisons between this school, the student and the U.S. government, ensuring both individual and institutional compliance with increasingly complex rules. We advise on managing the restrictions, exploiting the opportunities, and mitigating the risks inherent to being a visitor to our country in this moment. We also provide support in adjusting to cultural norms and expectations as well as navigating the formal and informal structures that define life in the United States.

OGS 2017-18 Statistics



GEORGETOWN
UNIVERSITY

With this in mind, you'll realize that these F-1/J-1 statistics don't capture the full magnitude of Georgetown's international profile. We're fortunate enough to not have suffered overall enrollment declines in the Trump context, but there are some causes for concern with the numbers for particular nationalities, such as South Korea, Saudi Arabia, and China (plateau). The Institute for International Education (IIE) attributes some of that decline to the seemingly hostile immigration climate in the United States in comparison to other viable options around the world. The Office of the University Registrar would have the most complete statistics on non-U.S. citizen enrollment.

Every GU department, program, office,
and group should have global sensibility.



GEORGETOWN
UNIVERSITY

All of this means that we provide a specialized service to a particular profile of students, but to consider us a one-stop international shop understates the responsibility of each entity on this campus to operate with attentiveness and sensitivity to the experience of international students. As much as we love helping our students navigate all aspects of life in the United States, we aren't experts in everything. We rely on our partners around campus to support international students with career counseling, an understanding of healthcare and health insurance, etc. No department should operate within a silo; we must all play to each other's strengths and develop best practices for leveraging Georgetown's massive infrastructure in support of each student. The International Focus Committee was convened to inform the efforts of diverse partners and ensure consistency in referrals.

Myth: International students
feel welcome at Georgetown

Reality:

- Sometimes
- Years of focus group feedback
- Certain profiles face unique challenges



GEORGETOWN
UNIVERSITY

Even before the IFC, OGS was listening to the experiences of our students. It's not always pretty, and the political attacks on their perceived character and their concrete benefits hasn't helped. We've always heard that international students feel a lack of community, but they don't want more programming from us (now, all we have the bandwidth for is orientation); rather, they want both programs within their academic departments and University-wide programs that expose them to people and professional networks other than their classmates. Owen Agho in the Graduate School has made great strides in this area, and OGS collaboration with many of the career centers last year helped bring about new online professional development modules. We have made some headway in working with Dr. Winkler Prins to deliver clearer health insurance and healthcare guidance, and now have a dedicated advisor in OGS to support students with basic tax questions: But it's clear that healthcare, taxation and career resources are three areas of frustration at the University.

What is in your toolkit?

When students share with you feelings of...

- Isolation from the larger community
- Vulnerability in the face of political rhetoric against foreigners
- Confusion toward U.S. & GU cultural norms and expectations
- Frustration with pace of English language discussions and volume of reading

GEORGETOWN
UNIVERSITY

Within the program:

Are faculty learning how to pronounce student names?

Are faculty using jargon or making references to popular culture that excludes international students?

Are there social programming and network events put on by the department?

Are students using office hours – do they need to be more directly encouraged?

Are you giving students time to raise their hands and participate in class?

Within Schools:

Gradgov programming efforts

Clubs, intramural teams,

Campus resources:

OGS

CAPS

ARC

Writing Center

Wellness wheel

LEP

Student Affairs

Myth: F-1 Status = J-1 Status

Reality: F-1 ≠ J-1

- DHS vs. DoS
- Oversight & reporting
- On-campus employment



GEORGETOWN
UNIVERSITY

The large majority of our students are F-1s; while the percentage of students who come in J-1 status is small, the group is overseen by the Department of State and come as part of a larger cultural and educational diplomatic objective known as the Exchange Visitor Program (EVP), which aims to strengthen America's reputation abroad. Whereas the U.S. government prioritizes plain-old DHS compliance for F-1 Students, J-1 programs must also provide robust cultural activities and pastoral care to their participants.

There are also wider reporting requirements for J-1 EVs, whether in the case of an incident that affects the student's health or well-being, or in closer oversight of on- and off-campus training and employment experiences. Many of these students will have 'Two-Year Home Country Physical Presence Requirement', meaning they must spend time at home (and spread the joy of their time here) before they can return to the United States in a more permanent immigration status. Whereas an F-1 can work on-campus without authorization, J-1 EVs cannot, which is easy to forget. So it's not only important to know about our F-1/J-1 populations, but also to distinguish between them. They have different requirements and different benefits. We have a website dedicated to the special features of the EVP.

Myth: Only exchange students are EVs

Reality:

Degree students who receive majority GU or outside funding may also choose to come to the United States as J-1 EVs

Institutional compliance priority: Exchange agreement validity

GEORGETOWN
UNIVERSITY

The most common basis for J-1 status is an agreement between Georgetown and a foreign institution. However, some funding sponsors, such as foreign governments, require their beneficiaries to come to the United States as J-1 EVs. In fact, any students admitted to a full-time program who can establish that the majority of their funding support are from a non-personal, non-family source can choose J-1 status. This means that funded PhDs are eligible, but the only ones who generally submit themselves to the extra requirements are those who want to bring a spouse, as work authorization is available for J-2 dependents.

Exchange agreements are a vital matter of institutional compliance. Agreements must be valid at the time we begin receiving immigration document requests (March 15 in the spring; October 15 in the fall) and throughout the duration of the academic program. For example: If an agreement with University of Sydney for a year-long undergraduate exchange is not valid through the Spring 2020 semester on March 15, 2019, OGS cannot issue immigration documents to any Sydney students for Fall 2019 enrollment.

It is important to know that Georgetown as a University agrees to support the Department of State's diplomatic mission through EV status. When a department allows a J-1 EV to enroll, they become a party to that mission and are responsible for the well being and overall experience of the Exchange

Visitor at Georgetown and in the United States.

Off-campus authorizations & Increased scrutiny

GEORGETOWN
UNIVERSITY

The DC context is a crucial element of Georgetown's attractiveness, but F-1/J-1 participation in these experiences is becoming more and more risky. Off-campus experiences are more and more likely to negatively impact a student in future encounters with the U.S. government. Any work performed while an F-1/J-1 student is in the United States requires prior authorization before participating in an orientation, let alone rendering any services.

Federal regulations do not evolve as quickly as our country's rapidly-innovating educational and professional environments. Remote work and entrepreneurial activities are increasingly common in today's economy, and so is work at third party sites through staffing agencies or consultancies. These non-traditional environments attract greater scrutiny from DHS officials, which students should be prepared to confront. In the context of tightening interpretation, please understand that IS Advisors provide guidance based on existing best practices at time of consultation. We've learned to take nothing from granted and to be suspicious of DHS at every turn, but we're also reluctant to sound the alarm bells before we see concrete changes.

It is important to remember that the government sees F-1 and J-1 off-campus authorizations (CPT, OPT, STEM OPT and AT) as a benefit of the status – not a right. They are opportunities to implement the knowledge and skills built in the classroom. That's why you'll hear us use the word 'training' much more than

'employment'.

Scenario: Internship

A student expresses interest in enrolling in your program's internship course.

What should you consider?

GEORGETOWN
UNIVERSITY

We realize that it's difficult for you to identify who is F-1 and J-1, let alone to distinguish between the two. However, you serve as a critical filter that helps protect a students' lawful presence in the United States and their access to future benefits. Your baseline knowledge is that authorization is required for all off-campus opportunities, regardless of whether or not the student will be paid. You also know that authorization only exists for opportunities directly related to the student's major field of study (i.e. no bartending or babysitting). We aren't academic experts, so we rely on you to attest to this direct relationship when you sign an OGS authorization request form. It also means that undergraduates must declare a major before they are eligible. For authorizations like F-1 CPT and J-1 AT that don't require USCIS adjudication, the student and the University are exposed to even greater levels of scrutiny, conferring even greater responsibility upon you to vet the opportunity. We want to know when a student has a negative off-campus experience so that we can protect the student and improve our processes in hopes of preventing such outcomes in the future.



Questions?

Ask us!

GEORGETOWN
UNIVERSITY

If you don't know whether a student is F-1/J-1, please ask us! We are always happy to contextualize what you may be hearing from a student.

Myth: Georgetown offers 'CPT courses'

Reality: CPT is an authorization, not a course

- Closely scrutinized by USCIS
- Integral to the program's academic curriculum
- Position offer required for enrollment
- Maximum three CPT authorizations per degree program

GEORGETOWN
UNIVERSITY

Curricular Practical Training, or CPT, is an F-1 off-campus authorization for opportunities that are integral to the student's academic curriculum. The most common operationalization of this regulatory requirement is the student's enrollment in an 'internship course'. We shouldn't refer to this as 'CPT courses' because this makes them sound like they exist only for this transactional purpose rather than as a fundamental part of your program that:

- Is open to all students, domestic and international
- Carries credit
- Has a faculty supervisor
- Has clear course deliverables that merit academic credit
- Requires a position offer in order to participate

Some departments/programs are using an independent study course number for this. If that course meets all the criteria listed above, it is eligible for the CPT authorization. If not, we should sit down together and talk about it.

Independent study courses, according to the Graduate School, are meant for one-offs, where the program does not have enough students interested in the subject to offer a course. That makes it very hard to argue that the internship is integral to the field of study. We are going through our records for programs with independent studies to determine whether there are enough students using the independent study to justify the establishment of an internship

courses.

Other courses that may require CPT authorization for F-1 Students are those that have an experiential component like a capstone that requires a project with an investment bank, or a nursing practicum, etc.

Scenario: Developing a course

F-1 students in your program are clamoring for an 'internship course' to allow easier access to off-campus authorizations.

Before the program moves forward, what considerations should you make?

GEORGETOWN
UNIVERSITY

Are internships integral to the curriculum?
What kind of deliverables must be required?
How many credits should the class carry?
What about the added financial burden for these students?
Can we just use an independent study course?
Who will be the faculty supervisor? What is considered faculty?
How comfortable are you signing off on these experiences?
If you have J-1 EV Students, are you willing to do the evaluations after each training experience?

Scenario: Last-minute opportunity

An F-1 student approaches you next week with an exciting offer to begin an unpaid internship on November 10.

How do you advise the student?

GEORGETOWN
UNIVERSITY

Having talked so much about these internship courses, you're realizing that the add/drop deadline serves as a de facto barrier to authorization. In these situations, we instruct the student not to 'take the blame' for the inaccessibility of authorization, but to portray it as a fact of life in this context. We tell students that many organizations will be willing to wait for their preferred candidate, especially when they can speak transparently and precisely about their status. Unauthorized work is the most common immigration violation among F-1 and J-1 Students, and we want to do everything possible to protect our students from inadvertently working without authorization. You are indispensable partners in managing these students' expectations and helping them plan carefully.

Myth:

International organizations
& embassies are exempt from
F-1/J-1 authorization requirements

Reality:

- Students are subject to same authorization requirements as at any other employer/site
- Special F-1 IO authorization infrequently used
- Employers often misadvise students



GEORGETOWN
UNIVERSITY

Again, it is the student's presence in the United States that makes authorization necessary. The consequences for an organization that employs a student without authorization are minimal compared to the implications for the student, so these places aren't overly careful in the relevant guidance they give to their preferred candidates. Their hiring cycles are also often inconsistent with the meticulous planning required to take advantage of work authorization. There is a special F-1 IO authorization, but CPT and OPT are much more frequently used for these positions, as the IO authorization requires an offer letter before a three-month application process with USCIS. This authorization also isn't available for any multilateral; the eligible organizations are listed in the International Organization Immunities Act of 1945. Embassies are neither IOs nor foreign territory; they're just like any other employer.

Scenario: Volunteering

An F-1 student discloses to you that they are volunteering this semester.

What follow questions might you ask them?

GEORGETOWN
UNIVERSITY

We hear this one all the time. However, in this context, volunteering (which doesn't require authorization) is an activity that neither requires nor builds academic and professional skills. It is defined as charitable or humanitarian work. If an opportunity doesn't match this description, it requires authorization.

Implications for academic programs

GEORGETOWN
UNIVERSITY

The push toward academic innovation both at Georgetown and in wider academic circles is often hard to reconcile with immigration regulations that are 20 years behind the times.

Furthermore, the language of academia does not always translate easily into the Department of Homeland Security guidance and regulation. It takes strong collaboration between OGS and program developers to work through these issues so that international students can safely participate, can get the approval for post-completion training experiences and feel that their time at Georgetown has met their expectations. Let's look at a few examples.

Myth:

We can get our program
'STEM - Certified'

Reality:

F-1 regulations incentivize
study in STEM fields

- Department of Education (DoE)
 - Classification of Instructional Programs (CIP) Code
- Immigration & Customs Enforcement (ICE) designates STEM-eligible codes
- OGS has no control or role in determining CIP Codes

GEORGETOWN
UNIVERSITY

We often hear developers of new programs say that they want to get their program STEM-certified. The government does not refer to "STEM Certification" and does not require any special or additional type of certification for programs in science, technology, engineering, or math. There appear to be non-governmental certifications that are becoming industry standards, but they are not the basis of an F-1 Student's eligibility for a 24-Month STEM OPT Extension after their first 12-month OPT authorization period. The government uses the language "STEM OPT Extension Eligibility." A student is eligible for the 24-month extension if the student's CIP Code is listed on the DHS website and the student's has a paid offer that meets the special requirements for this additional period of authorization (all described in detail on our website). We play no role in assigning a program's CIP Code, we simply implement that code as determined by the University's academic authorities. Ellen Eck in the Graduate School and Tammi Damas in the Provost's office are good contacts to learn more about the process. There is some uncertainty under the current administration about the future of benefits such as the 24-Month OPT STEM extension, but there's isn't enough information available to make concrete predictions.

Myth: The beauty of interdisciplinary curricula

Reality:

- U.S. immigration system rewards intense disciplinary focus
- F-1 authorizations: OPT & CPT
- Employment-based status: H-1B Specialty Occupation



GEORGETOWN
UNIVERSITY

We hear a great deal about the benefits of interdisciplinary academic programs today. And while they may be the wave of the future, they also present unique challenges for F-1 and J-1 Students. The U.S. government allows practical training only in direct relation to a student's major field of study. Interdisciplinary majors are not as clearly defined; by definition, there is more than one focus. Government regulations are at least 20 years behind modern academic innovation and the lack of clarity exposes the student to a government adjudicator's often under-informed discretion. F-1 and J-1 Students in these programs may require more career support and sometimes even an experienced immigration attorney in order to help them secure benefits that are often taken for granted. Some international students wish to remain in the United States after exhausting their F-1/J-1 benefits. The H-1B is the most common employment-based visa. It requires a job offer in a specialty occupation: This means that the job description must be a perfect match to the candidate's degree. Finding jobs that *require* multi-disciplinary degrees is more challenging than finding jobs that require disciplinary degrees. Companies and their legal counsel must work harder to form the arguments that will get USCIS approval of an H-1B for alumni of multidisciplinary program.

Scenario: Developing programs

Your department intends to offer a new degree program and hopes to recruit an initial cohort with a heavily international profile.

What might your target applicants be thinking about?

GEORGETOWN
UNIVERSITY

Everything we've just discussed: (1) Curricular opportunities off-campus; (2) STEM-eligibility; and (3) Eventual compatibility with the 'specialty occupation' criteria will be on the minds of international applicants.

Myth:

International students
don't have tax obligations

Reality:

It's complicated!

- Tax treaty benefits
- (Non)resident for tax purposes
- SSN vs. ITIN

GEORGETOWN
UNIVERSITY

Taxes are extremely complicated for international students. We tell our advisees that they're in the same boat as we are; we don't understand, either! Nonetheless, this is a stressful part of life in the United States. OGS now has a dedicated advisor for tax issues. While Darius is not a tax specialist, he has undergone some training and can guide students to helpful resources more easily than the rest of us. The Tax Department within University Financial Affairs is not equipped to respond to the individual inquiries of our international community. Some countries have tax treaties that limit the amount the IRS can tax from income or a scholarship. Other countries do not. Some students are exempt from Social Security and Medicare taxes and others are not. Some students' tax status changes in the middle of their studies. Some students need an ITIN rather than an SSN. In addition to Darius's advising, we do offer a Tax Questionnaire and FAQs to help parse a student's situation, and we have Glacier Tax Prep, a free tax software we offer to nonresidents for tax purposes. A student who has held F-1/J-1 status for more than five years is now a resident for tax purposes and should use TurboTax like the rest of us! We're also working to add a tax video to our orientation and advising repertoire.

Myth:

Alumni don't have access to
GU services

Reality:

F-1/J-1 students participating
in post-completion training
opportunities are still
sponsored by GU

GEORGETOWN
UNIVERSITY

Because F-1/J-1 post-completion authorizations can extend students' status in the United States, IS Advisors remain attentive to their needs during this time. We retain access to their SEVIS records and support them with individualized advising, general notices and reminders, and planning for the transition that follows the exhaustion of their F-1/J-1 benefits. Despite the BAHA policies restricting access to long-term benefits and the persistent attacks on international students, especially the Chinese, our post-completion training numbers are growing, and we spend much energy supporting this group as they confront new challenges.



When to contact OGS

GEORGETOWN
UNIVERSITY

Questions about new programs (and structural changes)

Student adjustment issues

Drop/Withdrawal

Early completion

LoA/Return

Resources

<https://internationalservices.georgetown.edu/departments>

<https://globalservices.georgetown.edu/contactus>

<https://internationalservices.georgetown.edu/when-to-contact-OGS>

<https://internationalservices.georgetown.edu/j1exchangevisitorprogram>

GEORGETOWN
UNIVERSITY

Questions?

Would your colleagues benefit from a session like this?

We are happy to visit your department for a customized immigration training.



GEORGETOWN UNIVERSITY