Grinnell College-Office of International Student Affairs (OISA) External Review

FINAL REPORT—submitted on November 17, 2011

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The review began with on-campus meetings and interviews on Sunday, September 18 through Tuesday, September 20, 2011. After careful review of the well-prepared "self-study" documents, and consideration of the many conversations that took place with faculty, staff, and students during the three days on campus, we developed this report.

Our process involved each team member summarizing his/her notes from the meetings each of us attended. We then compiled the notes into a master document to see our common observations, commendations, and recommendations. Through conference calls, we were able to consolidate our content into four key areas: **(1) Mission & Goals, (2) Regulatory, (3) Programming and (4) Administrative Structures & Operations**. In each area, we present our observations, commendations, and recommendations. As a result, there is some repetition because some issues permeate through more than one area. We believe, however, that the benefits of leaving the repeated topics in the document outweigh removing them. In the end, we agreed that this document represented our sense of the status of Grinnell College's Office of International Student Affairs (OISA) at this moment in time.

It is important for you to know that we were very impressed with OISA. Grinnell is fortunate to have such a committed and experienced team working in OISA. Many members of the Grinnell community recognize and appreciate OISA's contributions that go well beyond the scope of immigration-related processes and SEVIS compliance. The OISA team engages in a volume of activity that is quite remarkable, especially for a team of its size. We hope that our report will help the Division of Student Affairs (DSA) and the Office of International Student Affairs enhance its already exceptional work.

We are excited about the possibilities outlined in our recommendations. We believe that exploration of our suggestion and ideas may allow DSA and OISA to think further about the valuable contributions OISA can make to further "internationalize" the Grinnell community.

It was an honor for us to learn so much about Grinnell's Office of International Student Affairs. We hope our work will be valuable to you as you identify next steps, develop your vision for the future, and establish plans for implementation. Best wishes as you take this to the next stage.

Respectfully submitted on behalf of the entire Review Team,
~Kathy Foley-Giorgio
Associate Dean/Director of International Student & Scholar Services, Middlebury College

MISSION & GOALS

Mission: OISA supports the educational experience of international and global nomad students and scholars, and collaborates with partners on campus and off to advance awareness of global perspective.

Goals:

1) Assist and advocate for international and global nomad students as they transition to life and learning at Grinnell College and in the U.S.A. – from their initial admission, preparation and arrival, through their commencement and beyond;
2) Maintain the College's SEVIS (Student and Exchange Visitor System) records, support institutional compliance with other government regulations that impact international students and scholars, and teach students and scholars about their legal rights and responsibilities to help them remain in lawful status;
3) Extend the opportunity for cross-cultural exchange through our Host Family Friendship Program and International Speakers Bureau, as well as through our support of the International Student Organization and other student-led initiatives;
4) Initiate, build and maintain networks across campus that support Grinnell's institutional values of social justice and global perspectives.

Observations:

1. **Leadership and Best Practices**: Both on campus and beyond, OISA is a leader among its peers.

   a) OISA's approach to supporting students, the range of programming and support available, as well as the spirit with which the office pursues its work, together make OISA a leader within the small, residential liberal arts sector and beyond. In keeping with DSA's vision of being a national leader, OISA carries out many of the field of international education's "best practice" approaches.

   b) Karen has provided visible leadership via her role within NAFSA: Association of International Educators in establishing *The Liberal Arts Institutions: Small Residential Institutional Interest Group* to provide a forum for discussing issues that are unique to this type of institution.

2. **Student Learning & Development and Personal Attention**: Colleagues in OISA appear to "intentionally foster and proactively promote student learning and development" in the Grinnell residential liberal arts community, which places an emphasis on self-governance and personal responsibility.

   a) In developing programs and providing support, OISA aims to "meet the students where they are." OISA teaches them about their visa responsibilities and about the many resources on campus, and provides over-arching guidance with the expectation of individual responsibility for carrying out specific steps in a given process as the international students move through their four years.

   b) While the personal attention given to students is laudable, there may be too much focus placed on the interpersonal rather than the institutional presence of OISA in terms of supporting colleagues (staff and faculty) in their work with international students.

3. **Change in Scope**: Grinnell's international student population has increased significantly during the past 10 years, including the diversity within the international population (regions of the world, majors, socio-economic status, etc.) OISA has had to respond to this increase in volume and diversity and has done an effective job doing so despite only modest increases in staff time dedicated to this work.

4. **Mission Statement/Prioritization and Clarification of Goals –** Further clarification may be useful.

   a) **The Mission (and Goal 2) refers to "scholars," almost as an afterthought.** OISA may want to elaborate on its purpose and goals with regard to the scholar population more specifically. Although scholars are a small portion of Grinnell's international population, each segment requires unique attention and understanding of the specific regulatory issues for that category of exchange visitors. The scholar work demands a considerable amount of expertise to address appropriately. Based on its name, it is not clear that OISA works with scholars.

   b) **Goal 1:** It is not clear what the meaning and implications of the mission statement's idea that OISA intends to assist international students from admission to commencement "and beyond". We think this refers to OISA's involvement with alumni with regard to regulatory issues and post-graduation SEVIS updates and transactions. It could also mean that OISA intends to maintain continuing institutional bonds with our international graduates. Since the school needs and wants to foster relations with its alumni body, OISA may want to play a larger role with this effort. It would be relevant for OISA to define this goal more specifically and clarify its scope.

   c) **Goal 2:** In considering future plans for OISA, it is important to consider the prioritization within the stated goals. The importance of the regulatory compliance aspects of their area seemed to be "taken for granted." However, without Karen's and Brenda's detailed attention to that body of work, Grinnell's international efforts to enroll and hire international students and scholars would be in jeopardy. It is also essential for OISA, the VP of DSA, and the Dean of Advising to identify the amount of time spent on each goal and whether that is in keeping with the overarching aims of the area, and how new initiatives might fit into the staff's portfolio of work.

   d) **Goal 3:** OISA produces a significant amount of programming to achieve this goal, and successfully contributes to the internationalization of the campus and the community. OISA may want to confirm the importance of this goal in relation to the other goals since these initiatives require considerable effort and investment of time and resources.

   e) **Goal 4:** This goal seems to be too broad in its scope and does not specifically include either the campus-wide educational component of OISA or emphasize the office's role in the internationalization of campus. Individuals on campus pointed out the offices' outstanding commitment to promoting global awareness. However, we could not easily identify concrete ways in which OISA fosters or pursues social justice goals through specific programs/activities.

Commendations:

1. **The OISA staff is widely perceived by students, faculty, and staff to be highly responsive, competent, effective, and dedicated.** This is the overall impression we received of OISA through our conversations with members of the campus community. We commend the OISA staff for the tremendous work it has done to earn this reputation.

2. **OISA staff members offer an exceptional level of personal attention through their work.** We received repeated comments regarding the outstanding level of hard work and personal service provided by the OISA staff. Faculty, staff members, and international students noted that OISA staff

members are open, available, and helpful at all times. Students frequently praised the time and attention taken by OISA staff members to meet individually with each new international student. Most students take advantage of this opportunity, with the result that OISA staff members really know Grinnell's international students. Students also appreciated being able stop by OISA for assistance at any time. They expressed a sense of feeling strongly supported by OISA. Staff and faculty noted the ease with which they can reach and work with OISA staff members. The OISA staff clearly makes the office a personal and comfortable place.

3. **OISA demonstrates an exceptional commitment to promoting global awareness.** We received repeated and consistent feedback regarding this sentiment. Campus community members, including international students who participate in these activities, commented favorably on such OISA initiatives as the host family program, the International Food Bazaar, and the Speakers' Bureau program. OISA is viewed as an essential element of the campus's effort to provide an "international education." It contributes to numerous related programs, such as the Center for International Studies, the Rosenfield program, and Mosaic. OISA and its staff are viewed as supportive by other members of the campus community who are working to foster campus internationalization.

4. **OISA collaborates effectively with many individuals and departments across campus, such as Admissions, Accounting, the Dean's office, and other offices in the Student Affairs Division.** These collaborative efforts were widely praised by students, staff, and faculty. IPOP was mentioned as a positive opportunity for collaboration by faculty and staff from such diverse areas as Athletics, Intercultural Engagement and Leadership, and the Faulconer Gallery. It was noted that while many of OISA's collaborations which relate specifically to students are apparent to all, OISA collaborates significantly in other ways which are less visible to the campus as a whole. Examples include the regulatory assistance OISA provides to and for the language assistants and visiting international scholars. These collaborations are highly appreciated by those involved.

<u>**Recommendations**</u>:

1. **By increasing collaboration with and education of College faculty and staff, OISA could ensure that colleagues will be better prepared to educate and support international students themselves.**

   This is a common theme among many of our recommendations in this section. The review team strongly believes that all areas of campus should provide excellent, appropriate services to all students, including international students. OISA's educational efforts should include providing staff and faculty with information and training related to international student-specific issues, global awareness, and cross-cultural sensitivity. In addition, some of OISA's practices may help other colleagues enhance their interactions with and support of all Grinnell's students.

2. **OISA may want to increase communication with and help educate colleagues across campus.**

   Colleagues in other areas could be empowered to take on a greater role with international students (i.e., OISA does not need to implement all initiatives and programs for international students itself but could, instead, support other areas of campus in pursuing initiatives to support international students; OISA does this in some ways already, and could initiate additional ways of approaching it.). To that end, OISA might not need to create new venues to achieve this, but might be able to expand existing channels of communication or increase its involvement in established programs. Ideas include:

a) It would be valuable for OISA to focus significant attention, in the near future and annually, on supporting faculty and staff with regard to advising international students. All faculty should be educated regarding issues specific to international students.

b) It would be beneficial for OISA to share stories about its activities and accomplishments with the Communications office so the College can capitalize on the ways OISA is successfully helping to promote and celebrate internationalization on campus and in the community.

c) OISA could collaborate energetically with the Career Development Office to take advantage of current opportunities, demands, and needs to improve career-related resources and services for international students. Recommendations in this area may also be forthcoming from the Strategic Planning task force on post-graduation success.

d) Other campus offices, particularly Division of Student Affairs professional staff and student staff, could be informally involved with international students during IPOP and subsequent events during NSO and the academic year. Such informal contact would allow international students to get to know these staff members and students; to become familiar with their roles; and to view them less as authorities to be avoided and more as sources of information, education, and support.

3. **OISA could develop more explicit ways to raise attention about international <u>scholars</u> (short-term visitors and professors) and OISA's role with them as well as their value to the institution.**

a) If internationalization of the campus (across all sectors) is an institutional priority, it may be as simple as adding the term "scholars" to the office name to demonstrate this commitment.

b) Consider having OISA (Karen) be a liaison for international faculty/staff into the Grinnell and local community since she and the OISA team already do this so well. Initial meetings with international scholars, including H-1B visa holders, might help them know the institution values them/their identity as an international colleague, even if the mechanics of the visa-related processes continue to be outsourced to a law firm through the Treasurer's office. The details of this could be discussed and worked out based on what would be most effective at Grinnell. Most institutions either have separate offices for students and scholars (if volumes are high in both populations) or they have one office that serves as a hub for the international population, even if the visa work is not being handled directly by that office.

c) Develop written policy for the pursuit of H-1B and Lawful Permanent Resident (LPR) status. It is great that both visa options are supported institutionally and funded by Grinnell; it would be useful to outline the related procedures, including the involvement of the law firm. This is important so that the policy and process are documented should current staff incumbents leave.

d) Continue to work with the Center for International Studies to develop ways to build off faculty member expertise with international topics and research interests and combine that with "lived" experiences of international students, staff, visiting scholars, and faculty to create new and visible venues for celebrating the global perspectives that exist on campus.

4. **OISA could increase the academic focus of its programming and advocate for resources to support international student needs in other areas of the College.**

For example, OISA could collaborate with ARC or the Writing/Reading Lab to assess the reading and writing support needs of international students. While OISA and ARC provide excellent academic support for international students, the College would be well-served by having at least one staff

member across the Writing/Reading labs with an expertise in English as a Second Language (ESL) or experience working with multi-lingual learners. We recommend that OISA continue its assessment and collaborative prevention efforts regarding the disproportionate percentage of international students who are charged with academic dishonesty. This may involve the further education of students around these issues and addressing root causes and circumstances that lead to violations.

5. **It would make sense for OISA to make supporting diversity an explicit part of its mission.**

   International students and internationalism in general are important aspects of Grinnell's diversity. This appears to be both obvious and taken for granted by the campus community, which would be enriched by a greater attention to and celebration of the ways in which international students enhance Grinnell's diversity. OISA should continue to play a key role in finding meaningful ways to engage the diversity within this population. OISA could collaborate with the Diversity & Inclusion team to think creatively about ways to further integrate and engage these issues in the work of those involved with student life and with those who value this aspect and value of the Grinnell community.

REGULATORY

Observations:

1. **OISA's regulatory responsibilities in SEVIS (Student & Exchange Visitor Information System) and beyond require year-round, detailed attention and activity.**

   a) OISA's service to students begins upon admission and extends beyond graduation to transferring students' SEVIS records to graduate schools and also helping students obtained Optional Practical Training (OPT) employment authorizations. Students on OPT remain under the regulatory oversight of OISA after graduation for up to a year, or 2+ years for some STEM (Science, Technology, Engineering, and Math) majors. OISA is required to make routine updates to records and assist alumni with their visa transitions to graduate school or other visa categories when OPT expires. As such, OISA is involved in the full life cycle of an international student.

   b) We perceive that much of OISA's work is in the regulatory arena, but the volume of such work is only indirectly measured or assessed. Our sense of the percentage of time dedicated to these issues was obtained primarily through the formal job descriptions of OISA staff. It is difficult to calculate the time involved in initiating and maintaining SEVIS records as well as updating information about regulatory issues internally and on the Web. In addition, staying informed about regulatory changes and their implications may not have visible or tangible results, yet it is necessary. With other competing priorities, it can be difficult to dedicate time to this important aspect of the work.

   c) Work appears to be split between Brenda and Karen, with Karen doing the higher level functions of verifying financial capacity for visa document issuance, visa regulations, and institutional policies, and Brenda maintaining the SEVIS system and student follow-up on regulatory issues. Hanna mentioned that she would be willing to take on regulatory work herself, but it was not clear what tasks or holes she would be covering or whether this would be the best use of her skills.

   d) In the binder, OISA has taken the time to document complex regulatory information, as well as policies and procedures. However, OISA's internal processes and the staffing and structure to fulfill its regulatory functions are not as clear. (This point will be discussed further under Operations/Administration with regard to establishing a sustainable staffing model.).

2. **The visa document issuance activities of OISA are initiated by several different sources.**

   a) The visa document issuance activities are initiated by several different sources. OISA gets 'cases' from Admissions (international students—usually on F-visas, from CIS (visiting scholars— usually on J-visas), and from individual faculty or departments who engage J-1 visitors; and from the Dean's Office and/or Jim Mulholland (term-appointed faculty who need J visas). Current staff incumbents know to contact each other when an international hire occurs. Jim Mulholland explained that when it is less clear which office should handle a case, *ad hoc* meetings take place to determine the course of action. We wonder if the mechanisms of coordination between the many offices are adequate to identify cases that could be overlooked or require unusual attention.

   b) There is an effective working relationship between Admissions and OISA in terms of the issuance of I-20 documents for new international students to obtain their visas. However, there may be some duplication of effort occurring in the review of the I-20 application and financial documents. Given the current staffing level in OISA, it may make good sense to leave the process as is, with an Admissions colleague serving as the front-line contact to newly-admitted students. However, if the staffing changes in either office (additions or departures), it may make sense to re-evaluate this process to determine if any efficiencies can be realized.

3. **There is a need for OISA to share information about visa regulations and their implications in the lives of students and scholars to a broader audience at Grinnell.**

   For example, the need for greater communication between the Career Development Office and OISA became quite apparent in our discussions, and both offices seemed eager to work in this direction. Especially relevant is the need to ensure that CDO has a clear understanding of the additional hurdles international students face in securing post-graduation career opportunities as well as being aware of the procedures and policies pre-completion off-campus employment and internship experiences. International students indicated a concern about career advice and expressed a desire to have CDO do more and have OISA play a part in educating the students and CDO about these issues.

4. **OISA is functioning well with regard to regulatory concerns, however, the staff will need to invest time in preparing for future anticipated changes to SEVIS (Student & Exchange Visitor Information System).**

   With the advent of SEVIS II (the next generation of SEVIS—expected to be initially rolled out in 2012-13), all business processes related to I-20 (and DS2019) – issuance will need to be analyzed and redefined, and OISA's role in the visa process re-established. This will require significant thought and attention, while also sustaining the current level of regulatory oversight and action.

Commendations:

1. **OISA does an excellent job of educating students about their visa situation and responsibilities.** The OISA staff provides timely regulatory and other information to students, prospective students, and graduates– so that they have adequate time to review the information and act on it. The success of these tasks derives from a number of well-defined good practices:

   a) Using IPOP (International Pre-Orientation Program) as an effective means for new international students to gain an initial understanding of their visa- and SEVIS-related responsibilities.

b) Offering a senior information session early in the Fall Term that proves to be effective in getting seniors to plan ahead with regards to their immigration documents and job-search processes.

c) There appears to be good collaboration between OISA, Accounting, and the Center for International Studies (CIS) with regard to various aspects of immigration requirements for scholars and faculty for whom OISA issues visa-related documents (J exchange visitors).

d) One-on-one connections with students seem to enable OISA to identify student's particular regulatory (among other) concerns. We commend OISA for the availability and accessibility of its staff members.

2. **Grinnell supports the professional development of the OISA staff, and the staff take advantage of the opportunities available to them.** The regular participation of OISA staff in the NAFSA conferences shows the dedication of these staff to their continued professional development and to remaining current with the law. This also demonstrates Grinnell's commitment to ensuring that the staff receive the training and support they need to carry out their roles and ensure institutional compliance with regard to these regulatory issues.

Recommendations:

1. **Continue to have OISA issue visa documents for scholars (J exchange visitors).** The limited volume of cases combined with the complexity involved in understanding the visa regulations for this category make it clear that it should remain with OISA given their expertise with regard to non-immigrant visa regulations and their expertise with regard to SEVIS (Student & Exchange Visitor Information System). A few ideas to enhance current approaches include:

a) Evaluate whether current approaches to J-scholars (professors, short-term scholars) are adequate. Consider talking with current scholars and colleagues on campus who are involved with them to identify what works well and what could be improved.

b) Develop clear documentation with regard to policies and processes with regard to scholars.

2. **Make collaborating with the Career Development Office (CDO) a priority.** These two offices should pursue opportunities to work together in identifying and communicating about the ways visa regulatory issues affect an international students options and the ways certain academic choices may impact the students' future pursuits and the limitations that arise because of their visa status. Some possible concrete suggestions are:

a) Educate CDO about the citizenship limitations of certain fellowships, internships or job opportunities, so that they can communicate it to the international students who seek their services. (For example, international students described receiving information about opportunities that did not clearly disclose that only U.S. citizens were eligible.)

b) Help CDO establish frameworks to advise international students who want to pursue graduate school and funding, to help students identify career options that are open to non-US citizens, or to assist international students who want to successfully navigate a return to their home culture or another country and secure employment.

c) Create "pathways" documents for students/advisors to consider different avenues international students can pursue to include study abroad, pre-professional tracks, pursuing internships, etc.

3. **Consider different approaches to enhance the ways OISA contacts and engages students with regard to regulatory issues.** Below are a few suggestions for doing so.

   a) OISA could offer drop-in times (or open office hours), which may achieve two purposes—(1) greater staff efficiency in completing work, and (2) more flexible access to OISA for students who are less inclined to seek out help or make appointments.

   b) In the spirit of encouraging self-reliance, we suggest that OISA guide students to submit their own Optional Practical Training (OPT) applications to USCIS, once OISA's part of the process is complete. This would be in keeping with the practice of many other schools. It would slightly reduce OISA's involvement in the process, yet it would teach students how to manage their own immigration-related interactions with the government directly and would remind them that it is their responsibility. If having access to the OPT Employment Authorization Document (EAD) is important to OISA, students could use the OISA office address and give signed permission for OISA to open the mail and copy the document. Alternatively, OISA could require the students to use their own mailing address (or that of a family member/friend if they do not have a U.S. mailing address immediately after Grinnell) and then ask the student to scan OISA a copy of the document along with the information that needs to be updated in SEVIS (address, employer, etc.). This updating could be done via an on-line form on the Web.

   c) OISA could solicit student input with regard to the best ways to keep them informed about their visa-related responsibilities in a timely way. This might include alerting students to the visa-related "touch points" in their Grinnell career, and brainstorming ideas for the best ways to keep them informed and reminded. (International students we spoke with remember learning about visa responsibilities during IPOP, which they greatly appreciated. However, they felt less informed as they progressed in their time at Grinnell, often when the information was most needed as they made decisions about their futures. It is unclear whether the new senior meeting is adequate in conveying final year and post-graduation information, or if there are other regulatory information needs during sophomore and junior years as well.)

4. **Establish a detailed overview with regard to the ways international students, scholars and faculty are supported at Grinnell.** This may include a chart that identifies the offices involved in each category (students, scholars, faculty) and the visa types associated with each, who leads the process for that category, and who else is involved along the way.

   a) We recommend that OISA and the pertinent offices develop a "system" or mechanism to identify issues and regularize the information flow between them, especially given the need to establish and maintain contact and information on regulatory issues between several offices on campus. This may also be used to keep the offices involved in visa processing up to date with regard to visa regulation changes. Such a system could identify and resolve possible duplication of efforts between offices (such as Admissions and OISA with regard to the review of student financial documents); it could also raise awareness about the fact that staffing changes in one office may affect OISA (as well as other offices).

   b) Create a well-defined system to identify cases that could potentially be overlooked due to the current division of labor regarding visa processing. This might involve a greater involvement of OISA in terms of initial connection with international students, scholars, faculty and staff who will come to work or study at Grinnell and then linking them to the appropriate offices on campus. Because of the division of labor with regard to visa-related case management, it is important to have a way to identify and track cases that may not fit perfectly into the existing structure.

5. **OISA will need to focus attention on SEVIS II in 2012 if the government adheres to its proposed timeline for roll-out of the next generation of the Student Exchange Visitor Information System.**

   As such, Karen/Brenda will need to have the ability to dedicate time to revamping all business processes that relate to SEVIS document issuance and maintenance, and develop informational tools to educate international students about the process, which rather than being initiated in SEVIS by the institution will be initiated by the students on their own prior to coming to school. SEVIS changes may present a good opportunity for the office to look at all types of services provided by the office that could be moved to on-line self-service.

PROGRAMMING

<u>**Observations:**</u>

1. **From the interviews with staff, students, and faculty, it is clear that Grinnell students get a high level of personal service from OISA.** This is also shown by the data on number of individual visits to the office per year and the practice by Brenda, Hanna, and Karen to meet with all newly enrolled international students in their first term.

2. **OISA engages in a lot of collaboration with many other departments and units on campus for its programming.** These include (but are not limited to) Admissions, the Academic Resource Centers, academic departments, the Center for International Studies, Off-Campus Study, Center for Religion, Spirituality & Social Justice, and Career Development. Such collaboration is visible and appreciated.

3. **The host family program has served both to integrate international/global nomad students into the local community and to "internationalize" the local community.** In a sense, this program is a form of diversity training, in that it sensitizes local citizens to the differences that come from growing up outside the U.S. It is also an opportunity for international students to learn about U.S. families.

4. **It is unclear if OISA's programming is meeting the needs of all international students.** We wonder whether some of OISA's programming may be driven by particularly vocal students-- those capable of expressing specific interests and desires—or by particular student groups, such as ISO. Without a broad-based needs assessment, it is unclear if some international students' needs are not being met. Our conversations did not reveal any particular areas of concern, other than what we are recommending in the various sections of this report.

<u>**Commendations:**</u>

1. **OISA provides a robust array of programs throughout the year.** There are a wide-range of offerings aimed at achieving a number of goals related to the office's primary responsibilities. The sheer amount of programming is astounding: MOSAIC, ISO Food Bazaar, the Fischlowitz fellowships, the Gallery of Flags, the ISO Cultural evening, intercultural training sessions for Grinnell College staff, Cultural Speakers Bureau, Japan disaster relief project, Senior Dinner, potluck meals, retreats, work with the Center for International Studies, etc. Programming for students who remain on campus during Fall, Winter, and Spring breaks is appreciated but requires significant investment of time and resources. It is impressive that all of these activities are accomplished by merely 2.75 FTEs.

2. **The IPOP is recognized across campus—by many constituents, not simply international students and global nomads—as an excellent way of introducing students to Grinnell College, integrating them into the community, and preparing them for the issues (academic and regulatory) that they will face during their four years.** IPOP does a good job in educating students about their visa and their responsibilities. The students liked that they received a document folder that indicated documents to keep forever, documents to take to Social Security, etc. Athletics mentioned that their involvement with IPOP resulted in increased enrollment by international students in wellness classes, which was a very positive outcome. Shortening IPOP and integrating IPOP into the NSO programming was a great idea.

3. **The Host Family Program is well developed, with an established volunteer leadership team to engage hosts more fully in the program and to help with program management.** OISA provides students/families with contact information before arrival on campus, and then the students/hosts are matched during IPOP. The use of skits to convey key issues to students and families sounded like an effective approach. (It is worth noting that one student who greatly appreciates the host program commented that students have "a mental inhibition about incorporating families into their Grinnell life," such as introducing the family to their friends, or inviting hosts to events on campus. It may be that OISA could take steps to help students consider this in their involvement with their families.)

4. **OISA's efforts at making itself present and in collaborating to develop coordinated programs with other campus offices is impressive.** Particular offices where this is going well include: Residence Life and NSO, Admissions, SHACS, CIS, and the Dean's office.

5. **The Grinnell community is very positive about what is being done by OISA on the Grinnell campus and beyond**.

6. **OISA's has reduced its direct support of ISO in the past two years, which is appropriate and positive.** Limiting OISA's involvement with ISO to Michael's role in an advisory capacity makes it similar to other campus groups and increases student responsibility for their own organization.

Recommendations:

1. **Identify effective ways to evaluate OISA's current programming efforts.** It would be helpful for OISA to learn more about "assessment tools" and create mechanisms that help it assess the value of different kinds of programming, particularly since some programs require significant amount of staff time and effort. Data that might be useful to collect would be: learning goals for programs and whether they are met, who and how many students participate in specific programs, time invested in planning and running the program, and student satisfaction with specific programs, etc. This might help OISA identify its priorities and use resources most effectively.

2. **Lead DSA, and the rest of the campus community, in celebrating international students' contributions on campus and in addressing issues that affect the international students in a holistic way. As a whole, the campus needs more "intentional incorporation" of international student needs and perspectives into its programs.** Grinnell's sense of itself as a diverse community needs to include and reflect the international students' experiences and perspectives. The College also needs to recognize that international students play a key role in the institution's efforts to "internationalize" the campus. OISA could help DSA engage in conversations about these topics and identify any student life issues affecting international students that need to be addressed. Addressing such issues would enhance the Grinnell experience for *all* students, just as the "universal access" approach of ADA provides better access to buildings for all, while also meeting the needs of those

with disabilities. OISA/DSA could coordinate these efforts with the Office of Diversity and Inclusion.

OISA could also extend its leadership role in pursuing "intentional programming" with regard to international student needs and perspectives. Some possible ways include working with:

a) Off-Campus Study: Consider finding ways to link soon-to-be study abroad students and study abroad returnees with international students and other students on campus.
b) Alumni and Development: Consider ways that alumni could partner with Grinnell "host families" or could be fundraisers to support international student needs.
c) Faculty and Academic Resource Centers: Analyze the reading and writing services needed by international students.
d) Faculty Advisers of Students: Hold information sessions for advisers on limitations posed to international students by the major declaration, practical training (CPT or OPT), and paid internships. Provide roundtable discussions with faculty about career-related topics in their fields.
e) CDO: Develop more joint programming as outlined in other sections of this report.
f) ISO: Support students' interest in exploring peer-mentoring opportunities or consider enhancing existing peer leadership roles to incorporate more on-going mentoring relationships for international students.
g) Other recommendations related to specific OISA programs include:
    o MOSAIC should have a wider distribution throughout the campus and the community, including on-line distribution (to reduce costs).
    o Consider offering summer information sessions for families that are considering being part of the host family program to help generate information and expand pool of hosts.
    o Create more joint programming with CRSSJ during IPOP. (Like Athletics, involvement with IPOP may generate future contact with the office and its programs.) Bring back the small group tour through the CRSSJ during IPOP in recognition of the connection between religion and culture for many international students.
    o Consider expanding the involvement of other student affairs colleagues in IPOP. This might include Safety & Security, RCLs and SAs, and so on.
    o Consider developing additional ways for faculty/staff to engage with international students. This may include building off current successes (host family program; winter break activities) or pursuing new avenues (such as helping connect international students with international faculty from their region of the world or who do research about/in that region or with language departments that match their linguistic background; or informal dinner connections with faculty/staff "buddies" for students and faculty/staff who don't have host families but would welcome informal connections outside the classroom.).

ADMINISTRATIVE STRUCTURE & OPERATIONS

Observations:

1. **SCOPE of OISA's RESPONSIBILITIES:** As part of the Division of Student Affairs (DSA), OISA is actively engaged in the life of the College and supports students in numerous ways both directly and behind-the-scenes. OISA provides much more than the core function of regulatory oversight and institutional SEVIS compliance responsibilities. OISA expends considerable effort to provide programs and support to international students and scholars. OISA also collaborates with others on campus and in town to create opportunities for international students to engage with the local community. The year-round nature of OISA's work is taxing for staff.

2. **PERCEPTION of OISA/OISA Staff Members:** Based on the people with whom we spoke, OISA is well regarded by faculty and staff colleagues, supervisors, and students. OISA is accessible, professional, productive, innovative, and collaborative. Students appreciate OISA's efforts from time of admission through graduation. Effective relationships have been established across campus between OISA and other campus offices. All staff members work well together and take their jobs seriously. We heard high praise for Karen, Brenda, Hanna, and OISA in terms of availability and scope of responsibilities. Students, who had worked with both Karen and Brenda, commended both of them on their wonderful personalities, their willingness to help students, and their outstanding work. Karen, in particular, has an excellent relationship with faculty and staff across the institution. Many staff members who have worked with OISA praised Karen's "energy, compassion, and commitment." It seems as though Karen has made a conscientious effort to integrate and better coordinate OISA and its activities within the broader campus framework. Faculty and staff respect Karen and her approach in leading OISA as we heard throughout our meetings and interviews time and time again. In observing Karen's commitment and involvement in many different projects/roles, many colleagues and students on campus wondered, "when does Karen sleep?" This made us curious as to whether the current workload and expectations are sustainable over time.

3. **STAFFING SIZE & STRUCTURE:** For a population of approximately 200 international students/scholars, OISA currently has a permanent staffing model of 2.5 FTEs (full time equivalents) in the form of:

   a. Assistant Dean of Students/Director of OISA (1 FTE—with considerable time focused on non-OISA specific responsibilities),
   b. Technical Assistant II (1 FTE—functioning more as a SEVIS Coordinator/International Student Advisor based on level of responsibility),
   c. International & Academic Advisor (approximately .50 FTE—focused on academic advising and providing some OISA program support),

   and, these 2.5 permanent FTEs are assisted by:

   d. a non-permanent RLC-Collaborative Enrichment Position (.25 FTE) focused on supporting ISO and OISA community outreach programming.

   While this appears to be a significant commitment of resources, we think it would be useful to review the nature of the staff roles and the scope of OISA responsibilities given the current demands and future goals and expectations of OISA. (See Recommendations for more details.)

As international student enrollment and regulatory demands have increased during the past decade, OISA has been doing more without a comparable increase in resources. While staffing associated with OISA has grown over time (Brenda's role bumped up to year-round and Hanna's role now has a dedicated focus of assisting OISA with certain programs), it has not actually been an increase in FTEs, but rather a recognition that in Brenda's case, a full year of hours was being worked despite the position being a less-than-full-time role, and the job description for the Advisor role was more deliberately defined as having OISA-associated functions. The CEP role throughout the last decade has been an addition of staff time, however, it is not permanent, and it varies based on RLC interests.

SEVIS regulatory responsibilities seem to be a significant part of Brenda's work, making her a key source of knowledge for students and other administrators at the College. Such level of responsibility may not be apparent to the casual observer who sees Brenda's official employee classification as "Technical Assistant II". It appears that the position's job responsibilities have outgrown its job classification. Yet, this is not adequately perceived because Brenda has met the job's increasing demands. Given Brenda's level of responsibility, it is difficult to understand exactly why her position is non-exempt. This classification may not take into account that she is interpreting federal regulations, applying them to individual cases, and is making numerous decisions that impact the functioning of the office and students' visa statuses on a daily basis. In addition, the non-exempt status may limit Brenda's ability to fully integrate into such "overtime" activities as the ISO Food Bazaar or some other aspects of OISA programming. Currently, there may not be an appropriate recognition of the scope and responsibility in this role. (See Recommendations for more details.)

4. **SYSTEMS:** OISA has done an effective job of recording its actions and documenting its policies and protocols, for the most part. Some additional observations with regard to Systems, include:

    a) There appears to be a lot of photocopying of documents in the office and in admissions. We wonder whether the introduction of *Image Now* will improve this or will simply shift from copying to scanning. It is unclear if photocopying is done by staff or if it could be done by student workers.
    b) OISA mails OPT applications for students. This could be handled by the individual students, which would be in keeping with the premise of teaching students to be responsible for their own visa concerns.
    c) OISA could expand its use of existing data as it appears that there is limited use of Datatel or ODS reporting systems. This could help facilitate and/or could better inform their work. It would allow for a deeper understanding of the international student population and their experience with regard to participation in activities, academic pursuits, sports, etc. It might also highlight some of the challenges and struggles they face, and the areas in which their participation is at a disproportional rate.

5. **SCOPE OF ROLES within Student Affairs:** OISA's institutional position in Student Affairs makes sense—given the primary focus is on students and supporting them to make the most of their experience at Grinnell. However, we observed that there are many ways that OISA staff support DSA work, yet "shared" roles make it difficult to determine the amount of human resources designated to support the international populations. In addition, the individuals in these roles may have difficulty identifying and tending to competing priorities and may not feel satisfied with their results.

For example, it is valuable to have someone like Hanna who bridges the two realms and serves as a link between both offices. However, we wonder whether there is a way to assess if her tasks are truly divided evenly between both offices or if she dedicates more time toward one area versus the other and/or if it differs at different times of the year, and whether there are any concerns with this. Our

observations made us pose the question as to whether the responsibilities of the Academic and International Advisor are really more about "academic advising" principles being applied to an international student case or whether the nature of the advising is more specifically "international." Karen's role as a Student Affairs dean seems to imply that she shares a number of responsibilities that are evenly distributed across Student Affairs personnel. While this may be organizationally sensible and justifiable, it may be useful to assess how these tasks detract from her focus on OISA affairs. In these two examples, we observed that dual appointments or shared responsibilities with other offices translate into OISA having in practice less than its official 2.75 FTE staff positions.

Commendations:

1. **Grinnell is fortunate to have such a committed team within OISA.** In particular, Karen's leadership and Brenda's professional commitment to the expanding scope of her role, and their sense of teamwork together clearly shine. Karen has a passion for the work she does that goes beyond a typical approach that a worker might have for his/her professional role. She also has actively provided significant leadership and support to the DSA through her participation on numerous committees/standing meetings, and by helping guide DSA as an Assistant Dean. She also serves the College by being part of the "on call" emergency response rotation one week per month.

2. **Brenda has transitioned successfully to her full-time, year-round role.** She continues to fulfill administrative responsibilities for OISA while also taking on considerable responsibility for Student & Exchange Visitor Information System (SEVIS) functions of the office. While Brenda is in a non-exempt job, it is good to see that DSO/OISA supports Brenda's participation in regional and national NAFSA conferences and other venues for professional development. The institution is obligated to ensure that Designated School Officials (DSOs) are trained and adequately supported in carrying out their duties. Grinnell needs to stay attuned to this as Brenda's role expands.

3. **Faculty and staff regard Hanna as an effective advisor, especially with regard to time management skill building.** Having an advisor who dedicates time to supporting international students (with a particular eye to their needs and the implications that various visa regulations have on their choices/plans) is a benefit to OISA, international students and Language Assistants.

4. **OISA's ability to rely upon an RLC (Michael), whose 10-hour per week CEP is committed to OISA, is a bonus.** The fact that this year's RLC is a returnee means the RLC provides support to OISA on a deeper level. Through this position, OISA actively supports ISO, the Speaker's Bureau, and other student initiatives. The RLC in OISA also has provided the opportunity to examine the nature of the work with those projects and identify ways to approach them more effectively in the future by establishing guidelines and process documents. The challenge with it, however, is that the transient nature of the RLC role and the incumbent's interest in OISA may mean that the structure and support are not sustainable.

   (While we commend the use of an RLC to assist OISA with student-related programming, we also question whether the involvement of the RLC in ISO activities is an appropriate arrangement. We wonder if ISO, as a student organization, should be more independent and autonomous and whether OISA should "own" certain campus-wide events or projects—particularly those that have high value to the community as a whole and are not only for students such as Food Bazaar. If so, OISA could solicit ISO's co-sponsorship and support and not consider the event to be more of a student activity.)

5. **OISA has made a concerted effort to document processes.** For this review, OISA documented their processes, policies, and programs. In particular, OISA achieved a long-standing goal of documenting internal processes with regard to Language Assistants and identifying who is

responsible for specific steps of the process. Record retention is good in that OISA has a policy and the staff purge files accordingly.

6. **Given the unique combination of goals that OISA has among its peers in DSA, the ability of all staff members in OISA to remain positive, enthusiastic, and dedicated to the overall mission is truly impressive.** Our sense is that OISA is a very lively and active office, located in the center of campus to give it visibility and presence. OISA achieves a tremendous amount of success with a very small staff. There is a high-level of collaboration, openness and respect between the different staff members working in the OISA.

Recommendations:

1. **Consider renaming the office so that it reflects the full scope of responsibilities, including the scholar work.** If OISA is to continue supporting visiting international scholars, this should be recognized, valued College-wide, and reflected in OISA's name (possibly International Student & Scholar Affairs). This may also prompt consideration of whether OISA would take on a more direct role with international faculty and staff in terms of serving as a contact point upon arrival and as a liaison to other offices on campus. While the LPR and H-1B work would still be coordinated through the Treasurer's office and outsourced, it would allow Grinnell to tap the experience and knowledge of OISA staff and apply it to a population that is important to the institution and for whom the connection may be appreciated. There also may be ways to connect international faculty with international students who desire mentoring from faculty and peers.

2. **Explore and establish a more sustainable staffing structure to support vast range of regulatory, advising, and programmatic responsibilities.** The OISA staffing structure appears to give greater weight to the advising aspects of the OISA mission/goals versus the regulatory requirements. There may be a lack of appreciation of the level of responsibility involved with handling SEVIS procedures and regulatory advising by having a Technical Assistant (hourly worker) focus on those duties.

   a) **Consider reclassifying Brenda's position to reflect its actual required accountability, mental demands, knowledge and skills, and working conditions.** From our conversations, it appears that Brenda's position has outgrown its title and aspects of its description, and needs to be updated to more accurately reflect the vast services she provides to both the office as well as to the students. Being a SEVIS Designated School Official (DSO) is a significant responsibility that requires judgment and involves carrying out responsibilities to ensure institutional compliance with federal regulations. In the field of international education, individuals with a similar set of duties typically are exempt employees with a title of *SEVIS Coordinator* or *International Student Advisor*. Now would be a good time to re-examine the role/title and determine the most effective staffing arrangement for OISA going forward. Brenda's role relies on integral involvement with SEVIS data, application of regulations both in the work she does for the institution and in advising students, and so on. It may be worth considering whether this role should be altered to reflect the level of autonomy, decision-making, and responsibility. As such, it may make sense to elevate Brenda's role to that of SEVIS Coordinator (an exempt position). A change to "exempt" status would be in keeping with the level of responsibility she has and in recognition of the expectation that she participate in programming outside the usual 8 a.m.-5 p.m. schedule.

   b) **Consider adding a shared administrative staff role to help DSA/OISA (0.8-1.0 FTE).** Given the excessively high demands on both Karen and Brenda's time, perhaps there needs to be a new frontline person hired to be split between Joyce's and Karen's areas. This position could assume some of Brenda's administrative duties, and offer support to the Advising area in that some of the

administrative position's hours could help Joyce and Hanna in responding to the needs of the diverse Grinnell student population. Adding administrative support for OISA and Advising could free up time on the International and Academic Advisor's plate to be able to offer additional advising time to other Grinnell students while also allowing room for Brenda to be more involved with programming. An additional administrative staff member would be able to assist OISA with some programming logistics or could enable Brenda to take on more if she were relieved of some administrative responsibilities. A new administrative staff member may also be able to assist the Advising team with its important work, and allow the team to reach more students, especially those in groups that have been identified as needing additional support. This additional staff member would help OISA more effectively respond to the burden of the SEVIS regulatory demands and anticipated changes with SEVIS II. It also could create space for Brenda to either manage a student intern (on-campus leadership opportunity for a student, but with the challenge of reliability and continuity) or take on responsibility for some programming? (Brenda and others mentioned that she's functioning above an administrative role. She still handles OISA administrative tasks that she could hand off if there were additional support.)

c) **Determine how to best address program support, given the non-permanent nature of the RLC-CEP arrangement.** Given the changing nature of the CEP assignments, OISA needs to think carefully about sustainable support for its programs. If an RLC does not choose OISA in the future, OISA needs to consider what changes will need to be made or how to provide the support in a different form. Would a student intern be able to provide that type of support or does it require a staff member? Does a current staff member have room to take on this responsibility? Would the addition of an administrative position allow Brenda, in a new SEVIS Coordinator role to take on more programmatic oversight (if she has the skill set to do so)? It appears that Hanna's strength is advising and that she supports OISA programming in more of a project-based way versus ownership for a particular OISA program. It may be useful to consider expanding Hanna's advising role to a broader group of students and determine the best way to support DSA/OISA programming needs in a more sustainable way through other staffing arrangements, leaving Hanna to focus on advising since she is recognized as an effective advisor.

d) **Consider the goals of joint OISA/ISO activities and determine if there are programs that could be supported in another way.** It would be healthy for OISA to evaluate the programming it does with ISO and also the role it plays with the student organization. In terms of programming, OISA might think about what are the goals? who are the activities supporting? who is benefitting and why? Does ISO function like other student organizations or does it have a privileged status with the support of an office/staff? It may be that OISA could provide more advisory support versus having a hands-on role, which might allow staff to focus on other OISA priorities.

3. **Consider establishing "Drop In" times or scheduling appointments versus allowing students to stop by any time.** Given the volume of work undertaken by OISA staff, it might be useful to consider using "drop in" time or appointments for students to come at designated times to avoid routine interruption of staff members' work. International students indicated that it is difficult for them to ask for or seek out help, so it may be useful to advertise and promote drop-in hours as a way to get questions answered or get guidance about where to turn for help. A student suggested the idea of "after hours" drop-in times or appointments, which could be offered through flexible scheduling.)

4. **Dedicate time to develop policies/practices to further the pursuit of electronic records.** OISA has established policies with regard to recordkeeping and purging of hard-copy files. As Grinnell offers the ability to move to "electronic recordkeeping," OISA should dedicate time to this endeavor, which may offer a more efficient way to manage data. There may be opportunities to pursue this in the near future.

5. **Determine the most effective ways to reach students (who receive a high volume of email).**

   a) For example, the weekly FYI email blast may be too frequent based on the amount of emails students receive. It may be more effective to send out email announcements on an as-needed basis when there is critical information that international students need to know.
   b) Explore a Web-based scheduling system so there is less back and forth with students to arrange appointment times. There may even be an option to allow students to "sign up" for a time on line.
   c) Consider exploring more on-line student service items through P-Web or other sources.

6. **Continue to support the development of the OISA staff and consider offering additional support to maintain and enhance their professional development.**

   a) Continue to support staff members' attendance at NAFSA: Association of International Educators regional and annual conferences, and other related training venues.
   b) Devote resources for professional development travel abroad to understand better the countries and cultures of Grinnell's most numerous international populations.

7. **Dedicate more time to training and development of faculty and other campus colleagues on issues related to the international student/scholar experience.** This would be an effective way to use resources so that many colleagues on campus understand the issues and can provide their services and support in a way that takes into account the unique needs and perspectives of the international population. Ideas include:

   a) Faculty members would benefit from more information about the role that OISA plays in facilitating the ability to bring international visitors sponsored by faculty to Grinnell. This may involve information sharing at a faculty meeting or through Department Chairs meetings about issues related to bringing an international visitor to campus.
   b) Faculty also need more information about the regulatory issues that affect international students when they declare a major, apply for a paid internship, or attempt to extend their visa through "optional practical training" after graduation. It is fair to say that most faculty do *not* understand that when an international student declares a major, this decision directly affects the kind of internship or post-graduate training the student may pursue.
   c) There was an interest in training sessions for faculty about Academic Honesty as it relates to international students. It would also be good to be explicit with international students about what that entails in *all* courses, not just in Tutorials. It might be useful to involve Writing Lab, too.
   d) The Career Development Office (CDO) expressed an interest in developing closer ties with OISA and creating more comprehensive approaches to supporting international students in the process. OISA could help facilitate this by offering trainings to CDO and collaborating on the development of specific content for sessions and workshops.
   e) OISA could collaborate with Residential Life and be more involved in the training of RLCs to educate them about particular international student needs and culturally-based frameworks that may impact residential living. It would also be good to involve the SAs in learning more about the particular nuances of the international student visa limitations so that they are aware of it when advising students.

8. **OISA may want to analyze and think about how much the staff is "doing" for students versus educating students to do for themselves.** While it appears that progress has been made in this regard, it might be useful for OISA to continue to assess their work by considering what tasks are taking most of their time, what are producing the greatest results in terms of the office's mission and priorities, and which activities are most efficient in terms of amount of resources invested for the

desired outcomes. From there, OISA could evaluate whether to continue with certain projects or responsibilities, or to come up with more efficient approaches, or to replace certain activities with new ones that may be more in keeping with their goals, given their current resources. While some activities may be ones they enjoy, it may be that the OISA staff needs to identify core responsibilities and how their remaining time will be best spent.

On a related note, it sounds like OISA still plays a role with tax filing. While OISA has transitioned out of the business of doing taxes for students (with volunteers), it sounds like OISA may be more involved in the process than at some other schools. It may be possible to shift some of the focus on taxes from OISA to the Controller's Office/Tax Manager. It may be useful to examine the current structure and processes to determine if there is a more appropriate alignment of responsibility with regard to the need for tax compliance in terms of both the institution and the international students.

CONCLUSION

This report identifies the many observations, commendations and recommendations gathered through our review of written and Web-based materials, and in our conversations with an extensive array of representatives from the Grinnell College community during an "external" review of the Office of International Student Affairs (OISA). We applaud OISA and its effective and dedicated team for their efforts to make OISA a leader in the field of international education. The Review Team hopes that our report will be a useful tool in determining the best ways to proceed as you plan for the future.

In our study of OISA, we observed that the support OISA gives to international students appears to be a great model for student support and retention. At the same time, we wondered if other student populations could benefit from similar efforts. It may be that OISA could work with DSA colleagues to think carefully about the best ways to meet the needs of a diverse student population. Many of the approaches pursued by OISA may also be usefully applied in other areas of the College in working with first-generation college students (for whom Grinnell may be a new culture), and/or with other under-represented groups of students and groups for whom retention is a concern for Grinnell.

In this spirit, we urge the Division of Student Affairs (and OISA) to strive to make Grinnell a place where all students, including international students, are appreciated for who they are, understand how to tap Grinnell's many available resources, have good relationships with at least one student affairs staff member and with faculty, engage in the life of the College and/or with the local or global community, and have the opportunity to effectively plan for their future after Grinnell. The idea, as expressed through many of our recommendations, is to enhance all areas of the College in supporting international (and other) students, and in celebrating them and the various ways they meaningfully contribute to our global community and to internationalization efforts on campus. Karen Edwards and the OISA team can play a key role in helping to build upon current successes to make further progress toward this goal. At this moment in time, we envision that Grinnell College is ready—and has the capacity—to do so.