

IOWA STATE UNIVERSITY

Internal Audit Report

Executive Summary

International Education Services

June 23, 2004

Report Distribution

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Introduction

The mission of International Education Services (IES) is to support and promote the internationalization of ISU. IES is organized into the following areas that provide services pertaining to this mission:

- International Students and Scholars – Advisers working in this area assist international students and scholars with maintenance of their immigration status, U.S. employment regulations, and provide support with social, cultural, financial, and personal concerns.
- Administration Coordination – The main responsibility for this area is compliance with federal SEVIS (Student and Exchange Visitor Information System) regulations. This area is also responsible for federal and state income tax responsibilities of non-U.S. citizens, financial aid, health insurance and health care, financial and other nonacademic services for sponsored students and the agencies which support them, temporary employment visas, and permanent residence issues.
- Study Abroad Center (SAC) – The SAC creates and administers study abroad programs, and prepares students and program leaders to go abroad by providing central administrative support and information about health, safety, travel, cultural, and financial issues. It delivers these services through individual advising, predeparture orientation, workshops, and handbooks for students and program leaders.
- International Services Coordination – This area encompasses internal budgetary responsibility for study abroad programming, administration of international awards to faculty and staff through the Faculty Senate and Study Abroad and Exchange Advisory Committee, and administration of certain study abroad programs.

Currently, IES reports jointly to the Office of the Vice President for Student Affairs and the Office of the Provost.

Scope and Objectives

The scope of the audit included activities related to SEVIS compliance and the Study Abroad Center. Audit fieldwork tests were designed to accomplish the following objectives:

- To verify that processes are in place to comply with federal regulations pertaining to F and J visa holders
- To verify that access controls have been implemented for information systems
- To verify that involved parties are protected from study abroad risk exposures

Observations

Based on our audit work, it appears that IES has taken reasonable steps to protect students, faculty/staff, and the institution from study abroad exposures.

The Detailed Observations and Management's Action Plans section of this report describes the following areas in which improvements can be made:

1. Security of information resources
2. Processing of student and scholar events
3. Management of study abroad risks

Management's Action Plans

We discussed with management our audit observations and recommendations for remedial action. We then assisted management in developing their action plans and establishing target dates for implementation.

For the reported observations, management's responsibility is to take appropriate action, and Internal Audit's responsibility is to monitor the status of implementation. Internal Audit will, therefore, initiate a follow-up review in September 2004. At that time, we will ask management to provide documentation describing the actions implemented or, alternatively, their acceptance of the risks of not taking action.

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Internal Audit Report
Detailed Observations and Management's Action Plans
International Education Services
June 23, 2004

Observation 1: Security of Information Resources

Access controls are designed to limit or detect access to computer programs, data, equipment, and facilities in order to protect these resources from unauthorized modification, loss, or disclosure. Access controls include physical controls, such as keeping computers in locked rooms to limit physical access, and logical controls, such as user identifications and passwords that restrict the access of legitimate users to specific systems, programs, and files.

Our review of access controls related to international student/scholar information systems identified the following areas for improvement:

- A. Establishment of accountability for actions within information systems. Our review indicated that staff members have shared logon identifications (IDs) and passwords used to perform tasks in SEVIS real-time mode. This practice is inconsistent with the federal regulations governing the safeguarding of SEVIS logon IDs and passwords.
- B. Documentation of a password policy and communication of the policy to applicable system users. No internal password policy had been established.
- C. Establishment of policies and procedures for granting, periodically reviewing, and revoking access to information systems. Existing policies and procedures did not fully address these topics.

Management's Action Plan

- A. We will communicate to all staff members that at no time and under no circumstances are SEVIS and any other logon IDs and passwords to be shared with anyone. We will instruct each staff member with access to SEVIS to reset his/her current password, and any other passwords that may have been compromised.

A staff member with an authorized need to access SEVIS in real-time mode will utilize his/her own logon ID and password to perform the necessary action. A second individual will review the action for appropriateness and accuracy.

- B. We will create, document, communicate, and enforce a password policy. The password policy will include the following topics:
 - Purpose and scope of policy
 - Specific password requirements/standards
 - Guidelines for strong passwords
 - Password safeguarding suggestions

- C. We will institute and adhere to policies and procedures for granting, periodically reviewing, and revoking access to international student/scholar information systems. Documentation will include the following components:
- How access to information resources is requested
 - How revocation of access is accomplished
 - Who is responsible for granting and revoking access
 - What criteria (e.g., job responsibilities) are taken into consideration when granting access
 - A listing of authorized users and the types of access (read, update, delete, etc.) granted to each user
 - A plan for periodically reviewing access authorizations to determine whether they remain appropriate

Target date for implementation

- A. Implemented
- B. Implemented
- C. September 1, 2004

Follow-up contact: Todd Holcomb and Ellen Rasmussen

Observation 2: Processing of Student and Scholar Events

One responsibility of advisors within IES is to assist international students and scholars with maintenance of their immigration status. Students typically meet with an advisor to initiate the processing of various "events" that affect their immigration status, e.g., change of educational level or application for optional practical training. To process certain student/scholar events in batch mode, the following steps occur:

1. The advisor fills out a "SEVIS Reporting Form," attaches it to the student/scholar's paper file, and places it in his/her outbox.
2. The program assistant or secretary, depending on the student/scholar's visa type, retrieves the file from the advisor's outbox, and performs the necessary data entry to fsaATLAS. fsaATLAS is a purchased software application primarily used to perform SEVIS batch upload/download tasks.

We noted the following concerns in this step of the process related to the accountability for entries:

- To perform data entry for which a form is created, the program assistant or secretary signs in to fsaATLAS with a user identification affiliated with a specific advisor so that the advisor's name prints on the signature line of the form.
 - The user identifications and passwords for forms creation are shared by the program assistant and secretary.
3. The program coordinator transmits the data from fsaATLAS to SEVIS using a batch interface. SEVIS validates the uploaded events, performs processing, and creates a compressed file for later retrieval by IES.
 4. The next business day the program coordinator downloads the compressed file from SEVIS.
 5. The program assistant or secretary prints any immigration forms contained in the file.

6. Immigration forms are proofread by a clerk and given to the respective advisor, who reviews and signs the forms. The clerk e-mails student/scholars for whom forms were created to notify them that the forms are ready for pickup.
7. The program assistant adds the event data to other IES databases, as necessary.

The efficiency and effectiveness of the batch transmittal process, and accountability for entries can be improved by:

- Each advisor performing data entry in fsaATLAS utilizing his/her own user identifications and passwords
- Secondary review of data entry before submitting a batch to SEVIS
- Each advisor downloading and printing forms he/she initiated
- Each advisor updating other information resources, as necessary

Management's Action Plan

We will assign the following responsibilities to advisors:

- Data entry of advisor-initiated events in fsaATLAS
- Downloading and printing immigration forms resulting from these events
- Updating other necessary information resources with the event data

Advisors will be given access to fsaATLAS appropriate to their job duties, and will be trained how to use the system.

The secondary review of data entry prior to submitting a batch to SEVIS will be performed by the advisors' supervisor. Events initiated by this supervisor will be reviewed by another individual to ensure appropriate segregation of duties.

Target date for completion

Action began immediately. Action to be completed by July 1, 2004.

Follow-up contact: Todd Holcomb and Ellen Rasmussen

Observation 3: Management of Study Abroad Risks

Operating study abroad programs presents many potential risk exposures, such as the serious injury or death of a participant from an accident, or the threat of crime, violence, or terrorism in a country of study.

Because the health and safety of program participants is a primary concern when operating study abroad programs, the following mechanisms have been implemented to manage study abroad risk exposures:

- Study Abroad Center advising and predeparture orientation
- Participant and program director handbooks developed by the Study Abroad Center
- The Study Abroad and Exchange Advisory Committee, which is composed of members from each of ISU's colleges and the director of the Study Abroad Center, and is responsible for approving study abroad programs

- The Study Abroad Risk Management Committee, which is composed of the director of International Education Services, the director of the Study Abroad Center, the Vice President for Student Affairs, the Vice Provost for Undergraduate Programs, the chair of the Study Abroad and Exchange Advisory Committee, ISU's risk manager, and ISU's associate counsel. This committee is responsible for evaluating study abroad risk exposures and determining whether to cancel programs when conditions become risky.

Our review of study abroad documentation related to managing risk exposures identified the following observations:

- A. Program directors are required to complete a "Group Study Abroad Program Approval Form" for each study abroad/exchange program. The form includes program director qualifications, travel itinerary, program goals and objectives, and budget information, and is reviewed by the Study Abroad and Exchange Advisory Committee.

We noted that program directors are not required to comment on the "Group Study Abroad Program Approval Form" about health and safety issues specific to the program's location or activities. The program director's indication of health and safety issues could give the Study Abroad and Exchange Advisory Committee another view of potential risk exposures to be used in its determination of program approval.

- B. The Study Abroad Center has created a student handbook for study abroad participants. The handbook covers such topics as trip preparation, rights and responsibilities, rules and regulations, and emergency information.

We noted that the student handbook does not provide instructions for participants to get assistance if they face discrimination or harassment from within the group while studying abroad. In addition, the program director handbook does not discuss the appropriate steps to be taken if a participant reports an instance of discrimination or harassment. Without documented procedures to guide study abroad participants, situations of this nature may not be handled in an appropriate, consistent, and timely manner.

Management's Action Plan

- A. The "Group Study Abroad Program Approval Form" is in the process of being revised and the new form will include a section for program directors to comment on risk exposures relevant to the program's location and activities.
- B. We will create a process for handling allegations made by study abroad participants of discrimination and harassment from within the group. The process will be documented in the student and program director handbooks. Further, we will review our protocol for handling non-emergency incidents involving discrimination and harassment to help ensure that charges are handled in an expedient manner that is consistent with university policy.

Target date for completion

- A. Implemented
- B. Implemented

Follow-up contact: Trevor Nelson