

**THE UNIVERSITY OF KANSAS
UNIVERSITY SENATE INTERNATIONAL AFFAIRS COMMITTEE
2018-2019 REPORT**

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INTRODUCTION

The University Senate assigned the International Affairs Committee with the following Standing and Specific Charges to focus on for the Academic Year 2018-2019.

FY2019 Standing Charges:

1. Work with the Student Senate DEI Committee to exchange ideas and plan for coordinated outreach and effective communication with international students. Develop relationships with the leadership of international student organizations as well as international student senators.
2. Continue to review and as needed make recommendations on how the University may better accommodate access of International Student's to supportive services.
3. Hear reports on strategic planning and activities from IP units, suggest changes or new directions, and facilitate collaboration among faculty and administrative units.
4. As needed review and provide input on new policies that relate to international research and teaching.
5. As needed review and provide input on new policies that relate to international studies, research, and teaching, received from SenEx.

FY2019 Specific Charges:

1. Compare international enrollment at similar institutions with and without programs similar to Shorelight.
2. Explore federal changes to visa document requirements and graduate admissions to professional schools are an area.
3. Examine the effects of the new smoking policy on international students.

The Committee spent most of the year exploring the three Specific Charges. The Committee met every two weeks, starting from September 20, 2018. The Committee's efforts to connect with the Student Senate DEI Committee on the Standing Charge # 1 did not realize as the leadership at DEI Committee underwent several changes over the year. This report outlines the Committee's findings and recommendations on the three Specific Charges and Standing Charge # 3.

REPORT ON SPECIFIC CHARGES

SPECIFIC CHARGE ONE: Compare international enrollment at similar institutions with and without programs similar to Shorelight.

In 2014, the University of Kansas entered into a partnership with Shorelight Education to develop a pathway program for the recruitment of international students for undergraduate and graduate programs.¹ Due to multiple factors, in the recent years the international student enrollment at KU has not been satisfactory. This raises the question whether our peer institutions have also been facing a similar situation. In response, the University Senate charged this Committee with studying this issue and advising the University Senate on any necessary response.

To respond to this charge, the Committee has specifically considered the following questions:

1. How has the international enrollment at KU fluctuated since 2014?
2. How has the international enrollment at similar institutions with pathway programs fluctuated during the same period?
3. What is the current nature of the landscape of pathway programs in the US?
4. What strategies could be adopted to address these concerns?

I. SUMMARY OF RECOMMENDATIONS

Due to the unpredictable nature of the context of international student recruitment, the Committee believes that it is neither a desirable nor a sustainable strategy to rely primarily on a pathway program partnership for international enrollment at KU. Based on input from the Pathway Program representatives, representatives from peer universities, and KU International Affairs (KUIA), the International Affairs Committee recommends that: (a) the University establish realistic standards and goals for the number and diversity of international undergraduate enrollment for next five years and revisit and review these standards/goals on a regular basis; (b) ensure the newly established goal of an annual intake of 250 new international undergraduate students by Shorelight Education is met on an annual basis; (c) simultaneously pursue direct recruitment of international students through International Admissions office at KUIA; (d) establish clear goals for international enrollment based on direct recruitment for next

¹ <https://today.ku.edu/2014/02/20/new-ku-academic-accelerator-program-will-provide-enriched-option-international-students2>

five years; and (e) provide sufficient and consistent financial and personnel infrastructure for the International Admissions office to sustain direct recruitment initiatives.

II. BACKGROUND AND FINDINGS

A. International enrollment at KU since 2014

To draw comparisons between international enrollment at KU and peer institutions with pathway programs, the Committee first examined undergraduate enrollment data at KU since fall 2014, the year in which the first group of pathway program students arrived at KU. International enrollment through the pathway program by Shorelight has been inconsistent since 2014.

Enrollment Trend: Fall 2014 - Fall 2018					
	Fall 2014	Fall 2015	Fall 2016	Fall 2017	Fall 2018
Shorelight	56	176	120	83	125
KU Direct	370	264	250	189	185
Total	426	440	370	272	310

This rise in the numbers in fall 2018 Shorelight enrollments may be attributed to the fact that KBOR Scholarships were made available to recruit first-year pathway program students in that year. During this time, international enrollment through direct recruitment, which did not have access to the scholarship opportunities at the time, remained stable as compared to fall 2017. In fall 2018, the new KBOR scholarship incentive was extended to the direct recruitment population of first-year applicants, and fall 2019 direct application numbers from international undergraduate prospective students have increased already by 77% for first-year students for this point in cycle. The numbers leading up to and including the fall 2018 enrollment data indicate that the consistent majority of international undergraduate enrollment at KU has been from KU's direct recruitment efforts. Current admissions data for fall 2019 seem to indicate that strong investment in the direct recruitment effort for new first-year students by the university can have a significantly positive impact. The total international undergraduate enrollment at KU Lawrence campus has been approximately 6.2% - 6.7% of the total undergraduate enrollment for the period of 2014 -2018.²

International enrollment across US universities declined over the last several years due to recent policies, practices, and politics at the national level. This situation makes the original 2014 Shorelight partnership goal to double the number of international students

² https://oirp.ku.edu/interactive_factbook/enrollment

at KU quite unrealistic. However, KUIA has worked effectively so far to overcome the national declines; international undergraduate enrollment for Fall 2018 is 49 % higher than it was in the Fall of 2008 (growing from 799 to 1,189 students). Even more importantly, international student enrollment overall has grown by 21 percent since 2008.

The Committee does not have enough information to speculate on the reasons for the fluctuations in the international enrollment, and the research literature on this topic is inconclusive. It is widely recognized, however, as a national phenomenon, international student numbers across mid-West institutions have been in decline over the past two years. It should also be noted that intensive English enrollments across the nation have also declined precipitously – with significant declines attributed to the decline in sponsored intensive English students from Saudi Arabia and Brazil (two populations that have had dramatic impact on KU’s international enrollment numbers over the years). However, this current climate does not mean that KU could/should not pursue a vigorous recruitment of international students.

The Committee did not examine whether enrollment numbers by Shorelight were based on specific targets set in advance or the fluctuations in numbers were ever reviewed/discussed with Shorelight. Nevertheless, data reflect that the university apparently relies on Shorelight to provide close to half of our international enrollment.

KUIA provided the Committee with projections for international admissions for fall 2019 (data for direct and Shorelight performance over the past 5 years) (see Appendix 1). Data show a dramatic direct recruitment growth in applications for fall 2019. Notably, the fall 2019 cycle does not reflect Shorelight’s impact yet as they do not begin applications in earnest until May/June; thus, these data are attributed to KU’s internal/direct recruitment efforts. With a very limited carry-forward funding available for this year, KUIA has worked on the direct recruitment front, establishing full-time KU representation in India, China, and Latin America. The results are now getting realized (for example, Indian undergrad apps have tripled over last year. This demonstrates that such investment can pay off and help insulate KU from the ebbs and flows associated with KU’ partnership business with Shorelight. KUIA has developed a 5-year draft international strategic recruitment plan now, which is in the process of implementation and continual refinement. The Committee believes that sustaining these efforts through core investment in KU’s direct recruitment efforts is critical for future growth in international enrollment.

B. International enrollment at peer universities with pathway programs

To collect data on international enrollment at peer universities with pathway programs, the Committee first contacted representatives of Shorelight Education, INTO, Navitas, KAPLAN, and Study Group and requested information on the following:

- (a) International undergraduate enrollment through their pathway program for their partner universities for each fall semester since 2014 (Because Shorelight started its program with KU in 2014, this specific time period was selected for comparison).
- (b) The two most common nationalities of these students for each year.
- (c) The total international enrollment at these partner universities for the same period.
- (d) The two most common nationalities of the total international enrollment for the same period.

The Committee received unwilling responses from these institutions. Representatives from Navitas and Study Group had phone conversations with the Committee Chair Dr. Silva regarding their pathway program models and success but declined to provide specific information on their partner universities or the number of students they recruit for those institutions for the period the Committee was studying. The Committee then contacted the Office of International Programs in selected universities which have partnerships with the above-mentioned pathway providers. The selected institutions are public universities with attributes similar to KU in terms of student population numbers and academic disciplines. These universities include:

- (a) *Shorelight partners*: University of Central Florida; Louisiana State University; University of South Carolina; University of Illinois-Chicago; Auburn University.
- (b) *INTO partners*: Colorado State University; Illinois State University; Saint Louis University; University of Alabama-Birmingham.
- (c) *Study Group partners*: Baylor University; Texas A & M University-Corpus Christi; University of Vermont; West Virginia University.
- (d) *Navitas partners*: University of Idaho; Florida Atlantic University; University of Massachusetts- Boston; University of New Hampshire.
- (e) *KAPLAN partners*: Arizona State University; University of Tulsa-Oklahoma; Northwestern University.

The representatives from the universities that are underlined above responded with some useful data; others either declined to provide any data or never responded.

(1) Universities with partnerships with Shorelight

Dr. Katherine Lang, the Executive Director for Regional Operations of Shorelight Education, provided data on the total international enrollment for 2016 of 14 partner universities (see Table 1). Clarification on the number or what percentage of those numbers were based on recruitment by Shorelight was not provided. For 2016, the public universities with student population numbers like KU had international student populations of 5.2 % to 11.3% of their total student population, and 2.4% - 5.5% of their

total undergraduate student enrollment. Since KU has maintained international enrollment approximately at 6.5% of its total undergraduate enrollment for the last five years, KU performs comparatively better than the peer universities in partnership with Shorelight.

The University of Illinois-Chicago started their pathway program with Shorelight in fall 2017. Shorelight recruited 31.6% and 55.2% of the total international undergraduate enrollment of UIC in 2017 and 2018 respectively (see Table 2). The University of South Carolina-Columbia began their partnership with Shorelight in 2015 with 28 students (1.7% of total international enrollment). Shorelight-recruited numbers grew gradually to 223 by 2018, which is 11.8% of the total international enrollment at USC (Table 3). Both institutions seem to maintain a track of direct recruitment of international students while working with Shorelight and recruit over 50% of their international undergraduates directly. USC seem to have a very successful direct recruitment drive that consistently grew over time to close to 1600 students (88% of total international enrollment) in 2018. For both institutions, most of their students come from China and India, reflecting challenges related to the recruitment of diverse students from abroad.

The data provided by UIC and USC indicate that Shorelight recruited comparatively more students for both institutions over time than for KU (twice or more than the number recruited for KU). Data indicate that Shorelight has the capacity and space to increase its portion of international enrollment at KU. While KU's direct recruitment efforts slowed down, these two peer institutions seemed to aggressively develop their direct recruitment capacities. It should be added, however, that both institutions have allowed Shorelight to develop graduate programs for them and offer access to both graduate programs in business and engineering, as well as hospitality management. Graduate options were not successful at KU, and we are at capacity in the areas where Shorelight feels there is strong market potential (electrical and computer engineering, our MBA program, et cetera). Factoring this into account, KU's performance may not be as different from USC and UIC.

(2) Universities with partnerships with INTO

The Colorado State University started their pathway program with INTO in 2013 with 54 students (8% of total international enrollment). While the enrollment numbers via INTO stayed close to 60 – 70 students/year, the university maintained a rigorous drive to directly recruit international students, which grew from 425 students in 2010 to 998 students in 2018 (see Table 4). CSU also seems to look for a diverse body of international students in both direct recruiting and through pathway program, and to venture beyond the usual markets of China, India, and South Korea.

Illinois State University started their pathway program with INTO in fall 2018 with 55 students and has recruited 85 students for fall 2019, which they consider as ‘exceeded expectations’.³ No information on the total international enrollment, ISU’s direct recruitment, and the diversity of student population was provided, and so it is difficult to contextualize these pathway enrollment numbers at ISU. The comment ‘exceeded expectations’ likely mean that ISU has set a specific goal for pathway-based enrollment between 55 -85 students/year.

These data suggest that both CSU and ISU set certain enrollment goals for pathway programs and continue to grow their direct recruitment in diverse geographical areas.

(3) Universities with partnerships with Study Group

Baylor University launched their pathway program with Study Group in fall 2018. The first intake is comprised of 23 students, all from China. Their target for pathway enrollment is approximately 50 -75 students/ academic year and to limit students from one nationality to just 50% to ensure ‘the campus diversity and for pedagogical reasons within the pathway classrooms’.⁴ For 2018, Baylor’s international undergraduate population was 486 students, which is 3.4% of the total undergraduate enrollment. The international enrollment (both undergraduate and graduate) has remained relatively flat around 4% of the total student population for over the past five years. Baylor has set a goal of 7.5% of international enrollment (undergraduate + graduate) by 2023-24.

Baylor’s goal of 7.5% for international enrollment is over what KU has maintained for the fast five years (6.5% of total undergraduate enrollment). Baylor intends to keep its pathway enrollment around 10% of their total international enrollment. Study Group, Baylor’s pathway provider, intends to increase student numbers to 200 students per year for each of their partner intuitions.⁵ Such an attempt would increase Baylor’s pathway enrollment to about 20% of its international enrollment. Baylor is likely to rely on its direct recruitment efforts for 90% of its international enrollment.

³ Dr. Luis Canales, Director of the Office of International Studies and Programs, Illinois State University, personal communication to Dr. Kapila D. Silva, 25 January / 11 February 2019.

⁴ Dr. Jeffery Hamilton, Vice Provost for Global engagement, Baylor University, personal communication to Dr. Kapila D. Silva, 25 January 2019.

⁵ Dr. Emily Williams Knight, Managing Director (Higher Education) for North America, Study Group, Personal communication with Dr. Kapila Silva, 23 January 2019.

(4) Study on high growth universities conducted by Shorelight Education

Dr. Katherine Lang of Shorelight Education sent the Committee a study that they conducted in 2017 on ‘high growth’ universities in international student enrollment within 1-2 years (See Appendix 3 for the report). These universities experienced a minimum of 50% growth from 2014 to 2016 in international enrollment and without any pathway provider. The findings indicate that the growth is typically driven by one or two countries and, in some cases, one city in that country. China, India, and Saudi Arabia are the primary countries for international enrollment. Nepal and Kuwait have been identified as countries that have great potential for international enrollment. Some universities have focused recruitment efforts on specific countries and cities and partnerships with in-country recruiting agencies. Another finding is that majority of these universities offer a form of conditional admission or ‘American Language and Culture’ program. Some universities have program attributes that are designed to attract specific type of students. These include: executive style learning, rolling start dates, and scholarships offerings that give in-state tuition to international students. The Committee believes that KU should consider some of these strategies to grow both its pathway recruitment and direct recruitment and recommends this as an area of inquiry for next year as KU International Affairs has been engaged in many of these activities and their development over the course of this academic year (scholarship leveraging, rolling start dates for the intensive English program, as well as executive and on-line education initiatives).

(5) Summary of the Findings

The information that the Committee gathered is limited to draw an effective comparison and strong inferences. However, data indicate that KU has maintained international enrollment approximately at 6.5% of its total undergraduate enrollment for the last five years and thus performs comparatively better than the peer universities that are in partnership with Shorelight. Nevertheless, the Committee believes that KU could set a higher goal for total international enrollment to be competitive in the near future. Furthermore, KU seems to depend on pathway enrollment to fulfill close to 50% of KU’s new international freshmen and transfer enrollment (graduate and non-degree international enrollment are independent of the Shorelight initiative), while other universities work on growing enrollment through direct recruitment concurrently with pathway programs. This number seems to range from 50% - 90% of their annual total international enrollment in some institutions. Our peer institutions likely also set specific enrollment targets for their pathway providers. It is important to note that in January 2019, KU established a 250 annual student enrollment expectation for Shorelight to adhere to. The data show that Shorelight has the capacity to increase pathway enrollment

for KU as it does for other partner universities and the fall 2018 increase shows that the scholarship leveraging is of significant value to achieving growth.

C. The context of international student recruitment and pathway programs

Since this specific charge given to the Committee entails pathway programs similar to Shorelight, some understanding of the landscape of pathway programs in the US was necessary as it provides a context to interpret the data gathered and to provide sensible conclusions and recommendations.

The landscape of international student recruitment depends on multiple factors, including US visa policies, economic situations of respective countries, the nature of competition from higher education institutions in the US and in other countries, and the perception international students have of specific US locations and universities. These unpredictable dynamics are then complicated when for-profit pathway program providers are added into the scene. The competition among such providers vying for a limited pool of international students who could afford education in the US and elsewhere is a critical factor that determines the success of pathway programs. As each provider make efforts to grow their business by growing the partnerships with universities, it is questionable whether a provider has the capacity to deliver their promises to all their partner institutions.⁶ The information the Committee gathered reveals that most providers focus on a limited number of countries – China, India, Saudi Arabia, and South Korea – for recruitment. These ‘markets’ may be at the point of saturation. In addition, a provider’s reliance on such a limited number of countries does not help KU to achieve a body of international student population that represent a greater cultural, gender, and disciplinary diversity. International students and their parents based their decisions on the rankings of universities and academic programs/units as well as on name recognition of institutions and cities and locations on the east coast and west coast of the US, in addition to program/living costs.

⁶ Elizabeth Redden, ‘Overview of the third-party pathway program landscape’, *Inside Higher ED*, 19 June 2018, available at: <https://www.insidehighered.com/news/2018/06/19/overview-third-party-pathway-program-landscape>; Elizabeth Redden, ‘More colleges hire corporate partners for international student pathway programs, with mixed results’, *Inside Higher Ed*, 19 June 2018, available at: <https://www.insidehighered.com/news/2018/06/19/more-colleges-hire-corporate-partners-international-student-pathway-programs-mixed>; Elizabeth Redden, ‘Corporate pathway providers shake up international student landscape and up ante on compensation for agents’, *Inside Higher Ed*, 20 June 2018, available at: <https://www.insidehighered.com/news/2018/06/20/corporate-pathway-providers-shake-international-student-landscape-and-ante>; Elizabeth Redden, Personal communication with Dr. Kapila Silva, 26 November 2018.

The Committee found that pathway providers are aware of these issues. The representatives of two of the providers⁷ mentioned how certain universities have unattainable goals for international recruitment that disregards the unpredictable nature of the landscape of international student recruitment. They particularly encourage their partner institutions to set specific and realistic objectives for them to achieve in terms of number and diversity of students to be recruited on yearly basis so that they could utilize their resources and infrastructure efficiently.

III. CONCLUSIONS AND RECOMMENDATIONS

Because of the unpredictable, dynamic and competitive nature of the terrain of both international recruitment and pathway programs, the Committee questions the wisdom of relying on a single pathway provider for sustainable international recruitment. The Committee strongly believes that the capacity of KU International Affairs should be strengthened in the direct recruitment of international students. The Committee has concluded that KU should develop realistic goals for international enrollment for a specific period and work closely with Shorelight and the KU International Affairs to achieve these goals.

The Committee, therefore, recommends the following:

1. The University provide sufficient and consistent financial and personnel infrastructure for International Affairs to sustain direct recruitment initiatives.

In order for KU International Affairs to pursue direct recruitment of international students, the necessary resources should be made available. Until recently, such resources were available, albeit on a limited scale. The Committee believes that the resources provided should be **substantial, long-term, and reliable to pursue and sustain** the set recruitment aims and to establish the necessary domestic/institutional and global infrastructure for the purpose.

2. The University should ensure Shorelight meets the 250-student annual enrollment goal that have been established for the pathway program for next five years.

As mentioned above, benefits from a partnership with a pathway program provider depend on, among other factors, having specific, realistic, and measurable targets

⁷ Dr. Emily Williams Knight, Managing Director (Higher Education) for North America, Study Group, Personal communication with Dr. Kapila Silva, 23 January 2019; Dr. Paul Joey, Director of University Partnerships, NAVITAS; Personal communication with Dr. Kapila Silva, 01 November 2018.

given to the provider to attain. The goal of 250 is realistic and achievable, and ensures the viability of the partnership. The specific enrollment goal should be reviewed periodically and adjusted appropriately.

3. The University should simultaneously invest in its direct recruitment of international students through the KU Office of International Affairs to fulfill the goals for international enrollment through direct recruitment for the next five years.

The Committee believes that it is neither a desirable nor a sustainable strategy to rely primarily on a pathway program partnership to recruit international students for KU. Pursuing two concurrent approaches, one through the pathway program and the other through direct recruitment, will help to maintain consistency in the number of international enrollments, increase diversity of international student population, and mitigate any limitations the pathway program may face as well as unexpected fluctuations of enrollment via the pathway program. Based on the information we gathered, the Committee finds that other universities with pathway programs also follow this strategy. The experience, expertise, and infrastructure are in place within International Affairs under the auspices of the International Admissions office. The efforts of this office need to be supported through the allocation of funds to enhance recruitment. The Committee further recommends that the specific and realistic targets for direct recruitment that have been established should be supported. We understand that International Admissions has developed a 5-year strategic recruitment plan for implementation and recommend that IAC review outcomes of this plan under its specific charges for 2019-2020.

SPECIFIC CHARGE TWO: Explore federal changes to visa document requirements and graduate admissions to professional schools.

Due to certain changes to federal visa requirements for international graduate students that were introduced in 2016, the university can no longer issue a Form I-20 (“Certificate of Eligibility for Nonimmigrant Student Status”)⁸ to graduate students who are admitted on a provisional basis; a Form I-20 can only be issued to those who are granted regular admission. In the past, a number of graduate programs, particularly at the professional schools, had relied on their ability to admit students provisionally when an applicant did not satisfy certain Graduate Studies regular admission criteria⁹ but was able to provide other evidence of potential for academic success. As of 2016, this is no longer possible with respect to international students, although domestic applicants to graduate programs are not subject to the federal visa requirements and may still be admitted provisionally.

In April 2018, the KU School of Business raised concerns to the Office of International Programs that these changes, together with a lack of flexibility in the current Graduate Studies’ admissions standards, have weakened the School’s ability to admit international graduate students. In response, the University Senate charged this Committee with studying this issue and advising the University Senate on any necessary response.

To respond to this charge, the Committee has specifically considered the following questions:

- 1. How have the changes to the federal visa regulations affected graduate admissions to KU professional schools?**
- 2. What policy changes should be adopted to address these concerns?**

I. SUMMARY OF RECOMMENDATIONS

The Committee believes that the current Graduate Studies’ admissions policies have had the following negative effects on graduate programs at KU:

- Lower international enrollments & declining competitiveness
- Inequitable impact on international students
- Reduced revenue & lower program credentials
- Reduced diversity & global preparedness for all students

Based on input from the Office of International Programs, the Dean of Graduate Studies, and representatives from five graduate and professional schools, the International Affairs Committee (the “Committee”) recommends that the Graduate Studies’ minimum standards for regular, non-provisional admissions be amended to permit the Dean, Chair, Director, or

⁸ A Form I-20 is required for international students seeking an F-1 visa for entry into the United States.

⁹Graduate Studies Policy: Admission to Graduate Study, <http://policy.ku.edu/graduate-studies/admission-to-graduate-study> (last visited Nov. 2, 2018).

other similar authority of the relevant department or School to waive one or more of those standards.

II. BACKGROUND

A. KU Graduate Studies Admissions Standards.

The KU Office of Graduate Studies establishes minimum admission criteria that apply to most departments and programs in most professional schools at KU and in the College of Liberal Arts and Sciences (the “College”).¹⁰ The Graduate Studies’ admissions policy does not include alternative criteria for regular admission or provide a process for granting exceptions to the criteria, although “departments and programs may be more selective” and may establish admissions criteria that exceed the Graduate Studies’ minimum standards.¹¹ The Graduate Studies’ admissions policy does, however, include separate criteria for “regular admission” and for “provisional admission,” which may be granted in the event the applicant is deficient based on one or more of the standards for regular admission.

After a student admitted provisionally completes one semester of graduate study, the College, or the student’s department or School, as applicable, will determine whether the student has met the requirements of regular admission. If the student has met that standard, the student may request that Graduate Studies approve a change of status from provisional to regular status.¹²

Before 2016, KU graduate and professional schools could admit international students provisionally and still issue them a Form I-20.¹³ No change to the I-20 was needed if the student’s status at KU changed from provisional to regular status.

B. Grounds for Provisional Admission; Reliance on Provisional Admission.

One of the most common reasons for an applicant to be provisionally admitted is an undergraduate GPA below 3.0. Graduate students may also be admitted provisionally due to inadequate English proficiency. As an alternative to provisional admission, applicants who have English scores below the minimum may in exceptional cases be granted regular graduate admission following a case by case review.¹⁴

¹⁰Graduate Studies Policy: Admission to Graduate Study, <http://policy.ku.edu/graduate-studies/admission-to-graduate-study> (last visited Nov. 2, 2018). Admissions criteria for the School of Law, for example, is independent of the College’s admissions policy.

¹¹Graduate Studies Policy: Admission to Graduate Study, <http://policy.ku.edu/graduate-studies/admission-to-graduate-study> (last visited Nov. 2, 2018).

¹²Graduate Studies Policy: Admission to Graduate Study, <http://policy.ku.edu/graduate-studies/admission-to-graduate-study> (last visited Nov. 2, 2018).

¹³ The students covered by the 2016 guidance are “F-1 postsecondary students.” SEVP Policy Guidance, p. 1 & note 1.

¹⁴ Graduate Studies Policy: English Proficiency Requirements for Admission to Graduate Study, <https://graduate.ku.edu/english-proficiency-requirements> (last visited Oct. 22, 2018).

A number of graduate programs, particularly at the professional schools, have relied on their ability to admit graduate students provisionally when an applicant did not satisfy some element of the Graduate Studies' regular admission criteria but was able to provide other evidence of potential for academic success.

In several cases, the KU School of Business had also sought authorization from the Dean of Graduate Studies to extend regular admission to applicants who did not satisfy all of the minimum admissions criteria of the Office of Graduate Studies but who, in the view of the School of Business admissions committee, satisfied the School of Business's standards for admission based on prior professional or academic experience.¹⁵ According to information provided to the Committee, Graduate Studies has been unwilling to relax these minimum standards, which were established in consideration of the minimum standards necessary for success in a Ph.D. program, even though many of the graduate and professional programs offer a range of Masters' programs where the standards that would apply to Ph.D. candidates may be less relevant. Therefore, provisional admission has been the only alternative route for graduate admission in these exceptional cases.

C. 2016 Changes to Federal Visa Requirements Limit Admissions Flexibility

In March 2016, U.S. Immigration and Customs Enforcement issued new policy guidance stating that international students seeking F-1 status must meet the standards for regular admission and that provisional admission is not sufficient to allow universities to issue the Form I-20.¹⁶

However, if the institution's regular admissions criteria clearly permit deviations from particular requirements or provide a process for waivers from those requirements, then a regular admission on such an alternative basis would still permit the institution to issue a Form I-20 under the new guidance.

The new federal regulations also have implications for graduate students who enroll in ESL courses as a "pathway" to a degree program. In the past, the University could admit the graduate student provisionally and then issue them a Form I-20 (i.e. a "degree I-20") to study ESL temporarily. Since July 2016, ESL students must be issued either a "pathway I-20," if they plan to transition to a degree program, or an "ESL I-20" if they are only intending to study English. If the student is subsequently admitted to a graduate degree program, it is

¹⁵ With regard to English proficiency, the current Graduate Studies admissions requirements already permit the Dean of Graduate Studies and the Applied English Center to grant an exception for a student to be granted regular admission instead of provisional admission. *See id.*

¹⁶ SEVP Policy Guidance S13.1: Conditional Admission, July 13, 2016 (interpreting the Form I-20, "Certificate of Eligibility for Nonimmigrant Status," issuance regulation for prospective F-1 and M-1 students" (8 CFR 214.3(k)), <https://www.ice.gov/sites/default/files/documents/Document/2016/sevp-PGS131.pdf>. *See also* "F-1 postsecondary students." SEVP Policy Guidance S7.2: Pathway Programs for Reasons of English Proficiency," at § 3.3. The students covered by the 2016 guidance are graduate students seeking F-1 or M-1 visas. *See also id.* at p. 1 & note 1. According to KU's Office of International Programs (L. Vanahill), ninety percent of KU's international students have F-1 status.

currently possible for their initial I-20 to be amended to reflect their status in the new program. This issue does not arise for international undergraduate applicants, as undergraduate admissions requirements do not require evidence of a particular English proficiency level.

D. Evidence of Impact of Federal Policy change on Graduate & Professional Schools

On October 1, 2018, the Committee invited Chuck Olcese, Director of International Support Services, and Lynne Vanahill, Associate Director of International Support Services, to explain to the Committee the background of this issue and the scope of the federal visa requirement changes.

1. School of Business: Experience & Perspectives on Provisional Admission

At that meeting, Dee Steinle, Executive Director of MBA and MSB Programs, School of Business, and Melissa Birch, Co-Director, Center for Global Business Studies, School of Business, spoke to the Committee about the challenges this policy has presented for School of Business graduate admissions, in particular, for international student admissions. Professor Charlie Bankart, Associate Vice Provost, KU International Affairs, also attended. The School of Business expressed concerns that, if not resolved, declining international student admissions may prevent the KU School of Business from maintaining its current ranking.

2. Other Schools' Experience & Perspectives on Provisional Admission

During Fall 2018, the Committee invited the following faculty and staff responsible for graduate student admissions in other Schools to explain whether the new federal policy has had or is likely to have an impact on their admissions decisions and to learn what recommendations, if any, they may have for the Committee:

- Professor Mahbub Rashid, Associate Dean for Graduate Studies, School of Architecture & Design
- Professor Alfred Ho, Professor, School of Public Administration
- Professor Steven Hugh White, Chair, Department of Curriculum & Teaching, School of Education
- Professor Tien-Tsung Lee, Associate Dean for Graduate Studies, School of Journalism

Professor Rashid (School of Architecture) indicated that a high percentage of international students applying to their programs end up going to other institutions because of KU Graduate Studies' strict regulations.

Professor White (School of Education) explained that the number of applications from international students has significantly diminished. Applicants who would be otherwise admitted per the high quality of their application materials (goal statement, sample of

writing), have to be rejected because of their low undergraduate GPA, in spite of good grades at the master's level, and often due to the difficulty of taking the TOEFL due to great distance of test locations.

Professor Ho (School of Public Administration) too confirmed that the current restrictions have impacted their enrollment. The percentages of international students in the Urban Planning program went from 20-30% in the 2017-2018 academic year to zero in Fall 2018, and the Public Administration program has experienced a similar impact. Just as Professor White mentioned earlier, Professor Ho said low GRE scores are not necessarily reflective of students' success; that is, students with low GRE scores may still succeed. Professor Ho is also of the opinion that we might be taking the risk of losing students to other schools.

Professor Lee admitted that the School of Journalism has not yet run into issues of International master or PhD students with provisional admission, although they have run into issues of recruitment due the political climate.

Several of the faculty representatives also raised concerns regarding the weight given to GPA and to the GRE, specifically:

- **Grade Inflation.** Grade inflation is far less common outside the U.S. and therefore low GPAs may in fact reflect average or even high performance in the country of origin.¹⁷
- **GRE Predictive Power.** Professor White mentioned some inadequacies of the GRE in that there is no data evidence that GRE correlates with performance at the PhD level, and that more weight should be given to writing, since this is directly related to students' ability to write a dissertation. Professor Lee noted that the School of Journalism does not require the GRE. The Committee has not confirmed how many of the other KU schools require the GRE.

Option of Temporary J-1 Study

Professor Lee posed the question of what other KU programs offer classes overseas, since these students would not have the same visa requirements to come to the US. Professor Harper Ho (Law School, committee member) suggested the option of students coming on a J-1 visa for temporary studies. This would allow students to come without the same requirements and would provide both them and KU with information on whether they would fit well with a program. Professor Gonzalez-Bueno (School of Education, committee member) wondered if this kind of overseas program could be established with the University

¹⁷ "The first major update in seven years of a database on US grade inflation has found that grades continue to rise and that A is the most common grade earned at all kinds of colleges." (*Times Higher Education*. Retrieved on February 12, 2019); "Why is there so much grade inflation in the USA? Is there no standardised testing for whatever tests are used to establish the grades used for undergraduate admissions? This system would make it very hard for Dutch students to gain admission to American universities, because getting the maximum average grade is virtually unheard of." (*Academia*. Retrieved on February 12, 2019).

of Costa Rica, with which KU has a well-established partnership. However, these options may present too great an uncertainty to many international students.

III. COMMITTEE CONCLUSIONS

Based on the evidence presented to the Committee, the Committee believes that the current Graduate Studies' admissions policies have had the effect of preventing many KU graduate programs from recruiting and admitting qualified international students, with significant indirect effects on these programs and on the University.

- **Lower International Enrollments; Declining Competitiveness.** Although additional data may be needed to confirm the Committee's findings, the information provided to the Committee indicates that for some departments, the inability to grant regular admission status in exceptional cases has reduced the level of international graduate student admissions and weakened KU's ability to competitively recruit international applicants, particularly to professional programs.
- **Inequitable Impact.**
 - While provisional admission may still be granted to domestic students (or international students who do not need F-1 sponsorship) under the current Graduate Studies standards, this flexibility is not available for international students under the changes to the federal government's visa requirements. The result is an unjustifiable disparity between the treatment of otherwise similar domestic and international students.
 - There is a further disparity between international undergraduate and graduate students due to the lack of an English proficiency requirement for undergraduate admissions; this disparity is due to federal visa requirements for F-1 and J-1 visa holders. Flexible regular admissions standards for graduate students would address this disparity.
 - The Committee also notes that undergraduate admissions standards for Board of Regents institutions permit variation in how applicants may satisfy the Board of Regents standards.¹⁸
- **Reduced Revenue & Program Credentials.** For a number of KU departments and programs, a continued decline in international graduate applications and enrollments has direct negative effects. International students are an important source of revenue and a reduced applicant pool reduces the selectivity of admissions. Reduced selectivity and lower enrollments can lower the ranking of KU programs relative to their peers.
- **Reduced Diversity & Global Preparedness.** Maintaining strong cohorts of international students is also essential to the globalized educational environment KU

¹⁸ https://www.kansasregents.org/qualified_admissions.

hopes to provide all of its students and particularly to those in graduate and professional programs.

The Committee has concluded that professional schools and certain graduate programs that prepare graduates for professional careers are particularly affected by these changes, as their applicants are often able to provide evidence of professional preparation that is appropriate for their chosen degree program, even though it may not meet traditional admissions criteria. There may also be circumstances in which an applicant to a Ph.D. program also demonstrates a clear potential for success even though his or her prior academic record may not fully satisfy the stated admission criteria.

IV. RECOMMENDATIONS

Under the current federal visa requirements, Universities have full authority to establish their own admissions standards, including the standards for exemptions or waivers from those standards. If a specific department or School has adopted an admissions policy that permits exceptions or waivers in exceptional cases, then applicants can be granted regular admission directly, which will permit the University to issue a degree I-20 rather than a provisional I-20, consistent with federal requirements.

The faculty who presented to the Committee agreed that the individual Schools should be given greater autonomy in admission decisions and the responsibility to closely guide provisionally admitted students into a regularly admitted status and eventual graduation.

The Committee recommends that the Graduate Studies' minimum standards for regular, non-provisional graduate admissions be amended as set forth below to permit deviations from those standards in exceptional cases:

- 1. The Committee recommends that the University Senate urge Graduate Studies to amend its admissions policy to insert the following language as the third paragraph under the current section of the Graduate Study Admissions Policy related to "Regular Admission:"**

"Applicants who meet the minimum bachelor's degree requirement above but who do not meet all of the standards for regular admission set forth here may be granted regular admission in exceptional circumstances by written petition to the Dean, Chair, Director, or other similar authority of the relevant department or School indicating the basis for the petition and any alternative evidence of academic preparation the applicant believes the department or School should consider."

With regard to Recommendation 1, the Committee recognizes that adopting the proposed amendment may create the potential for inconsistent application across Departments and Schools. While the Committee believes the greater need is for flexibility in admissions, the Committee recommends that if the University Senate or Graduate Studies believes there is a need for additional oversight to ensure greater consistency, then the following sentence should be added to the above paragraph:

“The policies regarding alternative evidence of academic preparation each department or school may consider when reviewing petitions for regular admission shall be established by such Department or School in consultation with the Dean of Graduate Studies.”

- 2. The current standards for regular admission already provide that “[i]n exceptional cases, persons not holding bachelor’s degrees may be admitted if they are academically well prepared. In these cases, the Dean of Graduate Studies reviews the student’s academic background before the student is admitted.” The Committee recommends that the final sentence be amended to read:**

“In these cases, the Dean of Graduate Studies reviews the student’s academic background before the student is admitted, taking into consideration any recommendation of the student’s prospective department or program.”¹⁹

The Committee believes that the current Graduate Studies’ English Proficiency Requirements for Admission to Graduate Study are already adequate to address cases where the applicant’s deficiency relates solely to English proficiency. These requirements offer three acceptable means of verifying English proficiency for purposes of graduate admission, including through petition to the Dean of Graduate Studies by “the department, with written support from the appropriate School or College.”²⁰

- 3. As the Committee has not had opportunity to consult the Dean of Graduate Studies in preparing its recommendations, input from the Dean of Graduate Studies should be obtained before any adoption of the above recommendations. The Committee notes that changes to the admissions criteria for certain professional schools may also require the approval of an external accrediting body, but that the Committee has not investigated the process that would be necessary to approve or implement its recommendations. The Committee believes that individual departments or Schools are best suited to determine how to align their admissions policies with the relevant accreditation standards.**

¹⁹ This language offers important flexibility, including in cases involving applicants who due to circumstances beyond their control cannot obtain or provide transcripts but where the applicant’s subsequent professional experience or other background offer sufficient evidence of academic preparation. One such case was raised to the Committee by the KU School of Business.

²⁰ Graduate Studies Policy: English Proficiency Requirements for Admission to Graduate Study, <https://graduate.ku.edu/english-proficiency-requirements> (last visited Oct. 22, 2018). This policy separately indicates the lower standards of English proficiency that would be the basis for provisional admission.

SPECIFIC CHARGE THREE: Study the effects of the newly implemented *Tobacco Free Campus Policy* on the international community.

On July 1st, 2017, the Provost and the Executive Vice Chancellor of the University of Kansas approved the Tobacco Free Campus Policy. The purpose of this policy is to “promote a respectful, healthy, environmentally sustainable, and clean environment by being tobacco-free. This policy sets forth the University’s restrictions on the use of tobacco products and electronic cigarette devices”²¹. This policy applies to faculty, staff, students and visitors of the Lawrence, Edwards, Parsons, Juniper Gardens, Yoder and Topeka campuses. To find out the effects of this policy on international students at KU Lawrence Campus, the International Affairs Committee conducted a survey.

I. SUMMARY OF RECOMMENDATIONS

Taking under consideration multiple factors that vary from culture to traditions, international students currently enrolled at the University of Kansas were asked whether the newly implemented *Tobacco Free Campus Policy* (TFCP) affected them in any way – positively or negatively. Based on the findings of the survey, the International Affairs Committee concluded that the policy has had an overall positive outcome in the international community. Nevertheless, a percentage of students did mention suffering some setbacks in their academic development and overall mental health. Moreover, the IAC recognizes that communication is a key factor in implementing the TFCP and that resources related to the policy should be more easily available for international students.

Accordingly, the International Affairs Committee recommends improving the overall communication channels both on campus and even before the international students’ arrival at the University. The IAC also considers that it is important that international students become more aware of the different resources provided by the University to give assistance for those that wish to stop smoking.

II. BACKGROUND

The KU *Tobacco Free Campus Policy* Statement is as follows: **“Smoking, including the use of electronic cigarettes or any future product that simulates or approximates tobacco use or smoking, and tobacco use are not permitted on the Lawrence or Edwards campuses, all other university sites reporting to the Lawrence campus, and at the facilities of Student Housing, the Kansas and Burge Unions, Athletics, and the KU Center for Research, Inc. (KUCR). Any exclusions to this prohibition are noted below.**

- **The University will not advertise tobacco on University owned, operated, or leased property or at any University sponsored event or University owned or sponsored media.**

²¹ Provost and Executive Vice Chancellor. *Tobacco Free KU*. KU Policy Library 2018, <https://policy.ku.edu/provost/tobacco-free>

- **KU is strongly committed to supporting individuals to become tobacco free to encourage a respectful, healthier, and more productive learning/living environment for all members of our campus community.**
- **Tobacco cessation programs and support will be available to faculty, staff, and students as identified below.**
- **Exempted is the traditional or sacred use of tobacco. KU will continue to be a "tobacco honoring" campus for Native American spiritual and cultural ceremonies, when requests are made and approved in advance by the Office of the Vice Provost for Student Affairs. This Tobacco Free Policy will in no way prohibit the use of traditional/ceremonial/sacred use of tobacco or infringe in any manner on any off-campus tobacco cultivation or harvesting for spiritual and ceremonial use.**
- **The policy will not be applicable to tobacco use in personal vehicles.**
- **The University policy does not apply to properties leased by the University where offices occupy a portion of a building not owned by the University.**
- **The University policy applies to all properties that the University of Kansas leases from The Kansas University Endowment Association.**
- **The university will not discharge, refuse to hire or retaliate against an employee, applicant or customer for reporting or attempting to prosecute a violation of these state statutes.**
-
- **FDA-approved nicotine replacement therapy products for the purpose of cessation are permitted.²²**

For more information on the policy, please visit the KU Policy Library website: <https://policy.ku.edu/provost/tobacco-free>

III. METHODOLOGY AND FINDINGS

The International Affairs Committee (IAC) was set with the charge of studying the effects the Tobacco Free Campus Policy has had in the international student community in the Lawrence Campus. To conduct this study, the members of the IAC considered that the best way to reach out to the students and obtain well developed and thoughtful answers was through an online survey. The committee came up with 14 questions that can be found attached at the end of this document (See Appendix 3).

²² Provost and Executive Vice Chancellor. *Tobacco Free KU*. KU Policy Library 2018, <https://policy.ku.edu/provost/tobacco-free>

Survey Results

- The survey was sent out to the International student community and received a total of 94 responses, a majority of respondents being students from China.
- The results point out that 71.6% of the students answering the survey do not smoke and 14.8% of the students smoke multiple times a day. Another 13.6% mentioned smoking only occasionally or a couple of times a week.
- Additionally, 74.7% consider the policy has had a positive effect in their lives while 25.3% consider the policy to have had a negative impact in their life.
- The majority of the students, 42.5%, pointed out how they would have liked to know about this policy before arriving at the university and another 25.3% did not consider knowing the policy before arriving at campus necessary. Most importantly, 13.8% of the students interviewed would have not come to KU if they had known about this policy beforehand. Nevertheless, 74.7% of the students said it would not have changed their plans of coming to KU. The remaining 11.5% said maybe.
- Regarding whether the policy will have a positive impact or a negative impact in the KU community, more specifically in the international community, 60.9% of the students considered it will have a positive impact. 12.6% consider it will have no direct impact at all in the KU community, and 13.8% considered it would have a negative impact.
- Finally, the IAC considered it necessary to ask international students if they had any cultural/religious obligation to smoke tobacco. To this question, 82.8% mentioned they had no obligation to smoke and 11.5% said they did have an obligation to.

For further consultation of the results, please see Appendix 4.

IV. CONCLUSIONS AND RECOMMENDATIONS

In conclusion, based on the survey answered by 94 international students in the KU Lawrence campus, the new Tobacco Free Campus Policy has had an overall positive result in the international community. Nevertheless, there is a percentage of students that pointed out skipping class in order to be able to smoke outside of campus and consider this policy to be affecting their academic development. It is also important to consider that there are students who mentioned having a cultural/religious obligation to smoke, though the current policy does allow exclusion for such observance. Moreover, despite the major positive

reaction to this policy, the IAC considers that it is important that all international students should feel comfortable on campus and no policy should be negatively affecting the academic development of students.

In some cases, students are even unaware about the existence of the policy or of exclusions for religious/cultural obligations. **For this reason, the IAC recommends that better channels of communication are established with the international students.** The University should make greater effort to inform international students before arriving at the University about the policy since, as stated in the findings, some students would have changed their idea about studying at the University of Kansas if they had been aware of this policy. The university also provides resources to students seeking assistance to stop smoking, and international students should be informed about the existence of such resources.

REPORT ON STANDING CHARGES:

STANDING CHARGE THREE: Restructuring of KU International Affairs

The Committee heard from Dr. Charles Bankart, Associate Vice Provost for International Affairs, about the recent restructuring within the office of KU International Affairs (KUIA). A comprehensive assessment of the inventory of KUIA units had not taken place since Spring 2004, and some of the activities related to international programs of the university were based on other units such as the Graduate School and there was overlapping of responsibilities and initiatives without proper coordination. Therefore, there was an immediate need to align the KUIA activities with the strategic planning and policies of the university and to streamline the activities for better serving the internal community at the university and for effective management of limited resources. The new structure, effective from the beginning of spring 2019 semester, include seven units within KUIA and two functional areas. They include: International Affairs Administration; International Admissions; International Support Services; International Short Programs; Applied English Center; Academic Accelerator Program; Study Abroad & Global Engagement; International Faculty Programs (a functional area of the division headed by Professor Megan Greene; and Intercultural Learning Assessment (a new functional area of the division headed by Assistant Vice Provost Joe Potts).

Dr. Bankart provided details of each unit's scope of work, which include traditional functions as well as new responsibilities. Website for KUIA is under redesigning to display the new structure.

(a) International Affairs Administration oversees the comprehensive internationalization efforts of the KU Lawrence Campus, including strategic internationalization, agreements and partnerships, international education policy, budget oversight and management, data and reporting, public relations, delegation and events coordination, and KU Passport Center.

(b) International Admissions recruits international students and supports them in their transition to KU. It also manages the recruiting personnel abroad, communications to international students, credential evaluation, and scholarship awards.

(c) International Support Services provides immigration services to students, staff, and faculty and keep KU in compliance with federal immigration regulations, especially in a constantly changing regulatory environment. It provides immigration advising (including the changing lifecycles of immigration statuses), orientation for students and scholars, sponsored student services, Jayhawk Semester program, and federal advocacy.

(d) International Short Programs develops credit-bearing, field-specific short courses for visiting international groups. It also focuses on program budgeting and reporting, online curriculum development, grant preparation, and campus and regional partnerships.

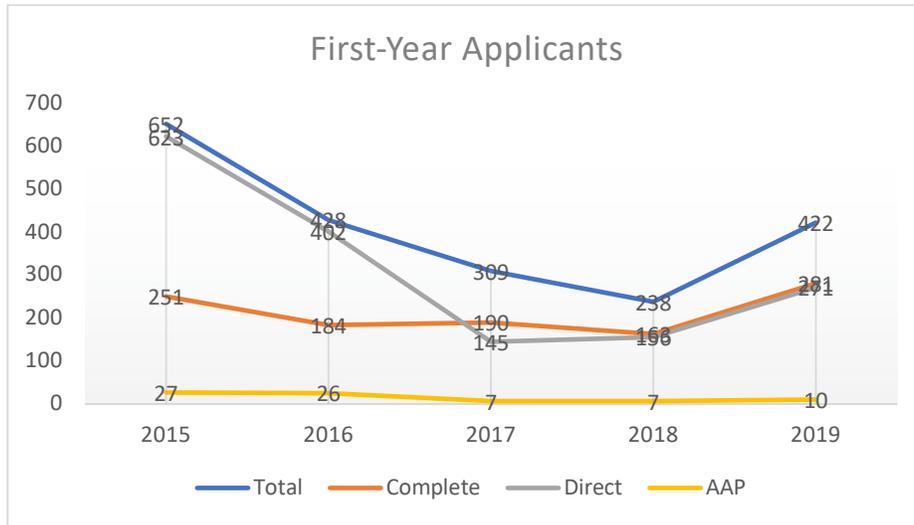
- (e) Applied English Center offers international students and scholars at all levels of English proficiency language classes to prepare them for study and research at American universities. It provides online ESL and EAP curricula, in addition to intensive, academic, and professional English training, and manage Edwards Campus programs, regional English outreach, and graduate student preparation.
- (f) Academic Accelerator Program prepares international students for full-time degree programs through advising, college transition courses, and career enhancement.
- (g) Study Abroad and Global Engagement develops and implements global educational and research experiences for all students and faculty on campus and abroad. Its scope also includes graduate-level programs, global scholars' program, and faculty engagement and support.
- (h) International Faculty Programs helps connect the faculty to the right sources and resources across the International Affairs division, including research travel grants, new partnership agreements, grant application assistance, teaching resources, and support for the development of new education abroad opportunities related to the majors. .
- (i) Intercultural Learning and Assessment develops tailored programs for student hourly employees, faculty, and staff based on intercultural competency objectives, such as training HR personnel on intercultural competencies and training for multicultural research teams on collaboration. The unit has already received some requests from outside companies.

RECOMMENDATION:

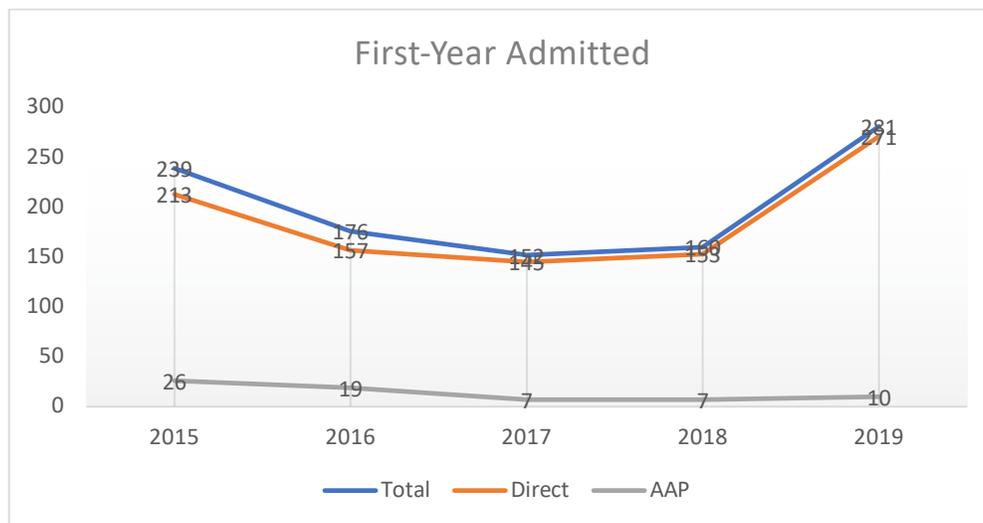
The Committee appreciates the restructuring efforts at KUIA. The Committee recommends receiving an update from these KUIA units in AY 2019-20, focusing on an assessment of the effectiveness of the new structure and responsibilities and on possible further improvements/changes.

APPENDIX 1: 2019 PROJECTIONS FOR KU INTERNATIONAL ENROLLMENT

**Point-in-Cycle Undergraduate International Applications and Admitted,
First Year Students as of March 1**

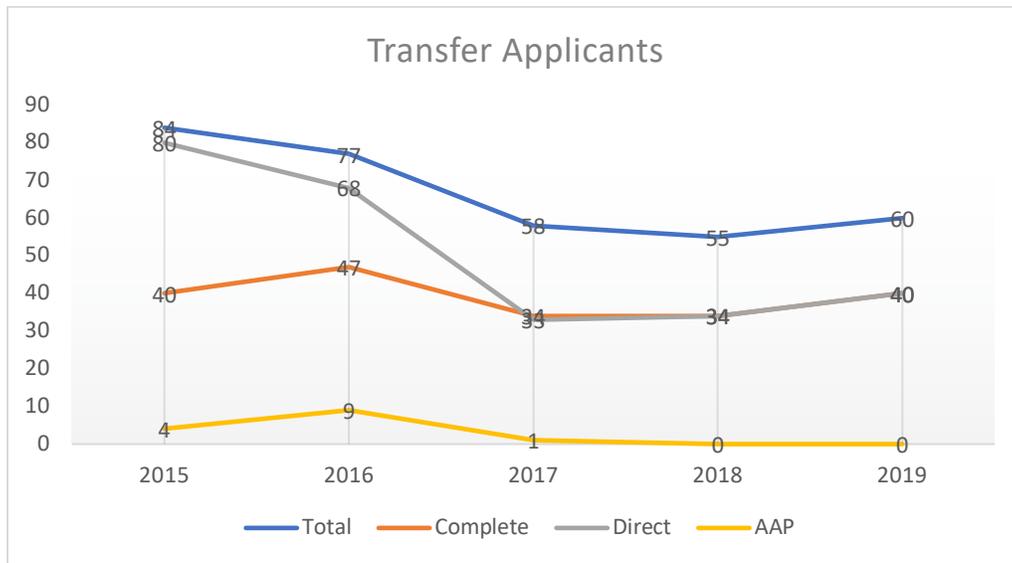


First-Year Applicants	2015	2016	2017	2018	2019
FY App Total	652	428	309	238	422
FY Complete Apps	251	184	190	163	281
FY App Direct	623	402	145	156	271
FY App AAP	27	26	7	7	10

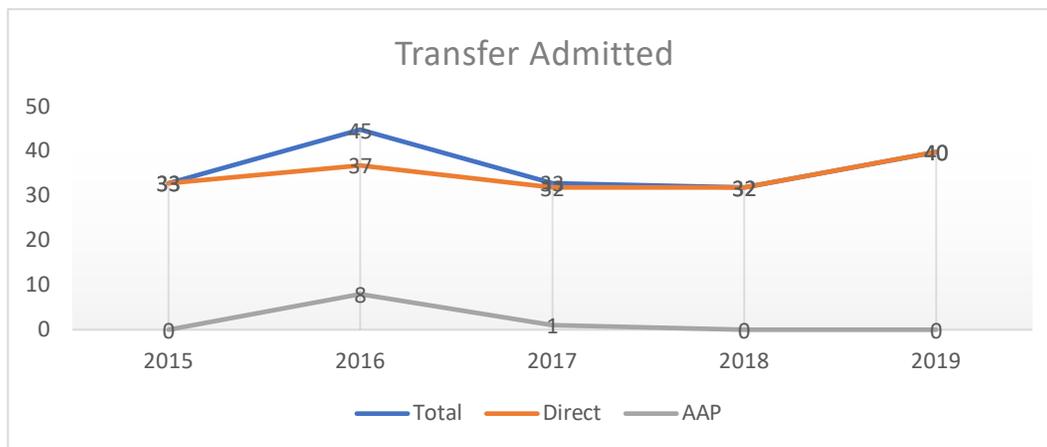


First-Year Admitted	2015	2016	2017	2018	2019
FY Admit Total	239	176	152	160	281
FY Admit Direct	213	157	145	153	271
FY Admit AAP	26	19	7	7	10

**Point-in-Cycle Undergrad International Applications and Admissions,
Transfer Students as of March 1**

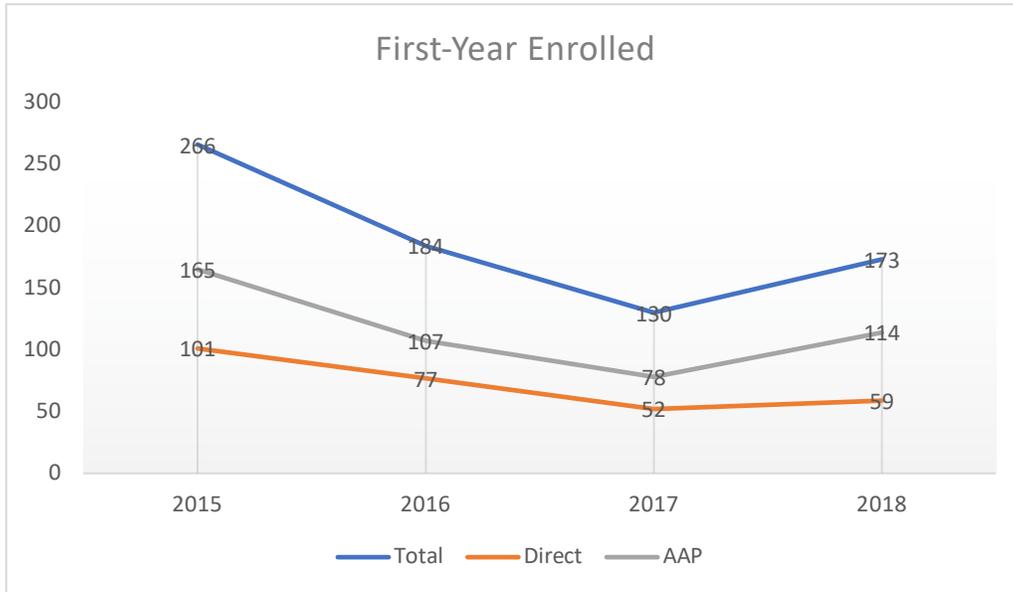


Transfer Applicants	2015	2016	2017	2018	2019
Transfer App Total	84	77	58	55	60
Transfer Complete Apps	40	47	34	34	40
Transfer App Direct	80	68	33	34	40
Transfer App AAP	4	9	1	0	0

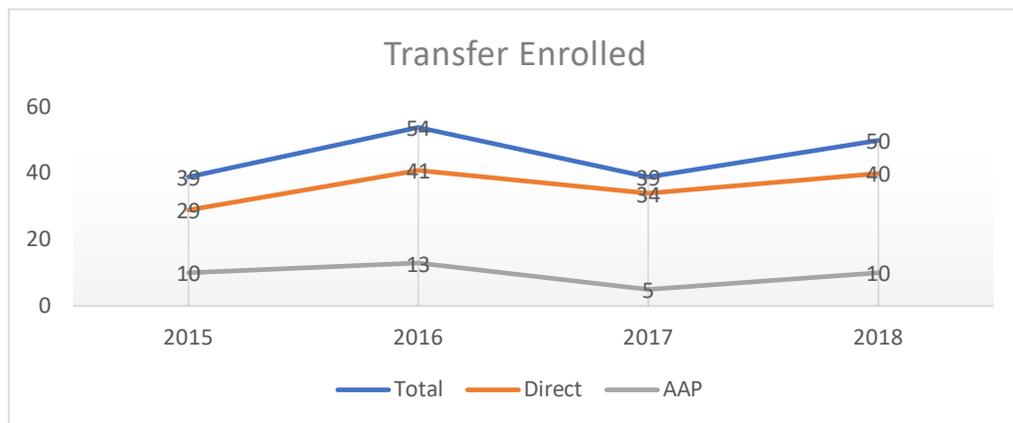


Transfer Admitted	2015	2016	2017	2018	2019
Transfer Admit Total	33	45	33	32	40
Transfer Admit Direct	33	37	32	32	40
Transfer Admit AAP	0	8	1	0	0

Census Date Undergraduate International Enrolled, First Year & Transfer Students



First-Year Enrolled	2015	2016	2017	2018
First-Year Total	266	184	130	173
20th Day Enrolled Direct	101	77	52	59
20th Day Enrolled AAP	165	107	78	114



Transfer Enrolled	2015	2016	2017	2018
Transfer Total	39	54	39	50
20th Day Enrolled Direct	29	41	34	40
20th Day Enrolled AAP	10	13	5	10

APPENDIX 2: TABLES FOR SPECIFIC CHARGE # 1.

Table 1: International Enrollment in 2016 at Universities that have partnership with Shorelight Education

Provided by: Dr. Katherine Lang, the Executive Director for Regional Operations of Shorelight Education.

Name	Control of institution	Total Enrollment	Total International Enrollment	Percent International-TOTAL	Total Undergraduate Enrollment	Total International Undergrad Enrollment	Percent International-UNDERGRAD	Total Postgraduate Enrollment	Total International Postgrad Enrollment	Percent International-GRADUATE
Adelphi University, NY	Private not-for-profit	8,373	431	5.1%	5,391	220	4.1%	2,982	211	7.1%
American University, DC	Private not-for-profit	14,882	1,681	11.3%	8,666	871	10.1%	6,216	810	13.0%
Auburn University, AL	Public	29,237	1,959	6.7%	22,953	736	3.2%	6,284	1,223	19.5%
Auburn University at Montgomery, AL	Public	5,996	254	4.2%	5,072	168	3.3%	924	86	9.3%
Florida International University, FL	Public	66,721	4,647	7.0%	55,100	2,909	5.3%	11,621	1,738	15.0%
Louisiana State University and Agricultural & Mechanical College, LA	Public	34,192	1,965	5.7%	27,720	669	2.4%	6,472	1,296	20.0%
University of Central Florida, FL	Public	74,170	2,092	2.8%	63,692	1,009	1.6%	10,478	1,083	10.3%
University of Dayton, OH	Private not-for-profit	12,509	1,947	15.6%	8,999	1,102	12.2%	3,510	845	24.1%
University of Illinois at Chicago, IL	Public	31,848	3,374	10.6%	19,184	629	3.3%	12,664	2,745	21.7%
University of Massachusetts-Amherst, MA	Public	33,767	2,859	8.5%	25,988	1,141	4.4%	7,779	1,718	22.1%
University of Massachusetts-Boston, MA	Public	21,391	2,414	11.3%	16,082	1,779	11.1%	5,309	635	12.0%
University of South Carolina-Columbia, SC	Public	36,906	1,917	5.2%	25,594	612	2.4%	11,312	1,305	11.5%
University of the Pacific, CA	Private not-for-profit	6,952	397	5.7%	3,973	269	6.8%	2,979	128	4.3%
University of Utah, UT	Public	36,949	2,821	7.6%	28,297	1,551	5.5%	8,652	1,270	14.7%

Table 4: Colorado State University (INTO Pathway Provider) - International Undergraduate Student Enrollment

Data provided by: Tyler Clayton, SEVIS Manager, International Student & Scholar Services, Office of International Programs

	Academic Year (fall semester)									
	2010	2011	2012	2013	2014	2015	2016	2017	2018	
Number of Pathway Program enrollment				54	98	66	60	49	63	
What are the two most common nationalities of these students?				China, Pakistan	China, South Korea	China, Indonesia/Pakistan/South Korea/Taiwan	China, Pakistan/U.A.E.	China, Brazil/Indonesia/South Korea/Taiwan/U.A.E.	China, Taiwan	
Total enrollment at the Institution	425	470	534	668	862	905	924	965	998	
What are the two most common nationalities overall?	Saudi Arabia, China	Saudi Arabia, China	China, Saudi Arabia	China, Saudi Arabia	China, Saudi Arabia	China, Saudi Arabia	China, Saudi Arabia	China, Oman	China, Oman	

APPENDIX 3. REPORT ON HIGH GROWTH UNIVERSITIES BY SHORELIGHT



SHORELIGHT EDUCATION

Case Study: High Growth Universities

October 2017

Objectives & Methodology

OBJECTIVES

- Identify universities with high growth in international student enrollment within the 1-2 years

CRITERIA

- Universities that experienced a minimum of 50% growth from 2014 to 2016 in international student I-20s via undergraduate, postgraduate, or other* programs
- Outside of traditional pathway portfolio (e.g., INTO, Navitas, StudyGroup, etc)

UNIVERSITIES SELECTED

- Harrisburg University, Morgan State University, Miami University, University of South Alabama, Troy University, St. Cloud State University, Southern Arkansas University, California State University Monterey Bay

NOTE: Where noted throughout this analysis, 'other' refers to a non-degree or bridge/pathway program

Executive Summary

COMMON THEMES

I. Growth is typically driven by one or two countries, and in some cases, one city within that country

- India (mostly from Hyderabad)
- Other countries that are experiencing high growth in students seeking to study abroad, but are not yet top senders
 - Nepal (+18% growth)
 - Kuwait (+8% growth)

II. Majority of these universities offer a form of conditional admission or ‘american culture’ program

III. Some universities have program attributes that are designed to attract a specific profile of student

- In the case of Harrisburg University, executive style learning and rolling start dates
- In other cases, scholarship offerings that give in-state tuition to international students (St. Cloud State)

Harrisburg University

Harrisburg, PA

+199% GROWTH
in last two years

WHY SUCCESSFUL IN ATTRACTING INTERNATIONAL STUDENTS?

- Executive learning format, classes once per month
- Growth driven by graduate students, transfers from other U.S. colleges and universities who come to the U.S. on the F-1 student visa
- Partners with Ryan International Group, privately owned K-12 network of schools in India
- Focused international recruitment efforts on India, particularly in Hyderabad
- Grad students are largely concentrated in STEM and data analytics programs; invests in technology "hub" buildings and host data analytics' summit' / hackathons and summer exploration camps
- Rolling admissions and start dates

LEVEL	Year of Program Start Date	
Student Education Level	2015	2016
MASTER'S	1,598	1,976

ADMISSIONS REQUIREMENTS

- English: TOEFL 80+, IELTS 6.0, degree from US institution
- 100% of accepted undergrad students receive a scholarship
- STEM graduate programs have a CPT requirement; min of 2 semesters study works in field of study and attend school (FT or PT)
- International students who have just arrived need to wait 1 semester before the CPT provision. International students who are transferring can start CPT and work full time immediately from Day 1

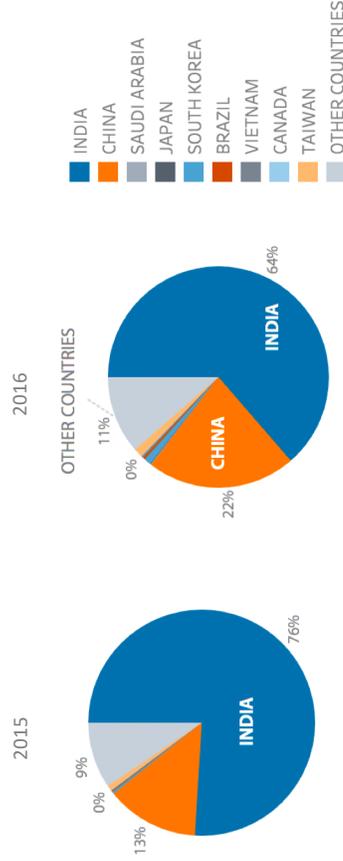
AVG. TUITION PAID (2016) MAJORS (2016)

MASTER'S	Business and Communications	36%
	Engineering, Computer Science, Mathematics	63%
	Professional Programs	1%

\$15,446

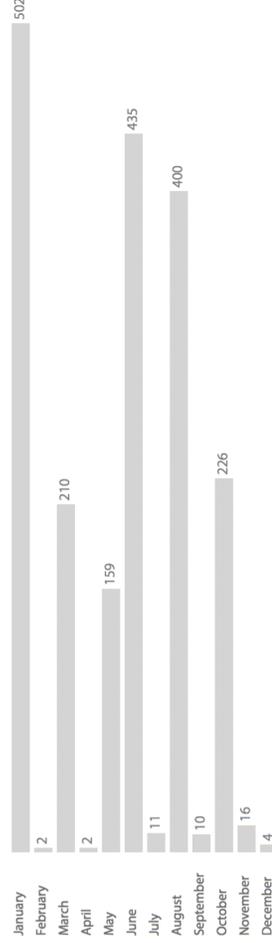
NATIONALITY

Recruitment focus in India, though see some diversification into China in 2016



PROGRAM START DATES (2016)

Rolling start dates consistent with rolling admissions



COLLATERAL: [Website Brochure 1](#) [Brochure 2](#) [Brochure 3](#) [LinkedIn Video](#)



Morgan State University

Baltimore, MD

+96% GROWTH
in last two years

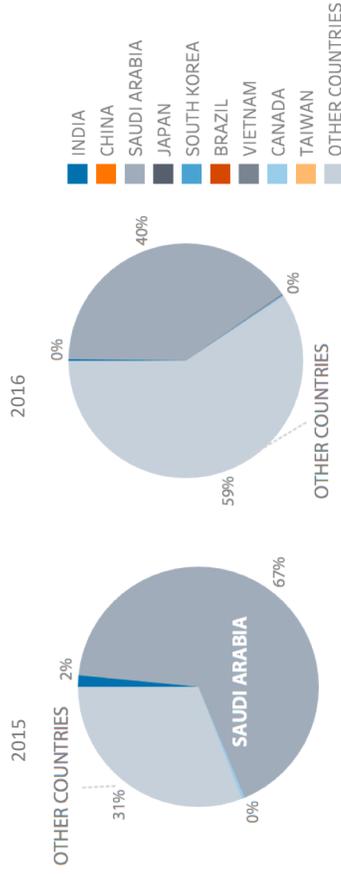
WHY SUCCESSFUL IN ATTRACTING INTERNATIONAL STUDENTS?

- HBCU prioritizing international enrollments as many domestic students do not study abroad
- Growth driven by students seeking bachelor's degree from Kuwait
- Majority seeking to study STEM majors
- Tuition at attractive price point

LEVEL	Year of Program Start Date	
Student Education Level	2015	2016
BACHELOR'S	180	443
MASTERS	82	70

NATIONALITY

Saudia Arabia had been primary sender of students, however increase in 'Other Countries' percent is now driven by Kuwait, particularly for undergrad



ADMISSIONS REQUIREMENTS

- English: TOEFL 79, IELTS 5.0

MAJORS (2016)

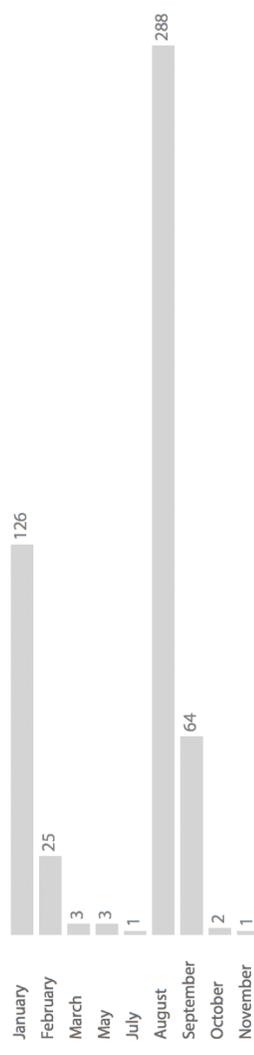
Business and Communications	24%
Engineering, Computer Science, Mathematics	61%
Humanities, Social Sciences, and Other	4%
Medical and Applied Social Sciences	2%
Physical, Biological, and Environmental Sciences	3%
Professional Programs	5%

AVG. TUITION PAID (2016)

BACHELOR'S	MASTERS
\$17,933	\$20,939

PROGRAM START DATES (2016)

Traditional start dates aligned with Spring and Fall semesters



COLLATERAL: [Website](#) [Facebook](#) [Video](#)



St. Cloud State University

St. Cloud, MN

+89% GROWTH
in last two years

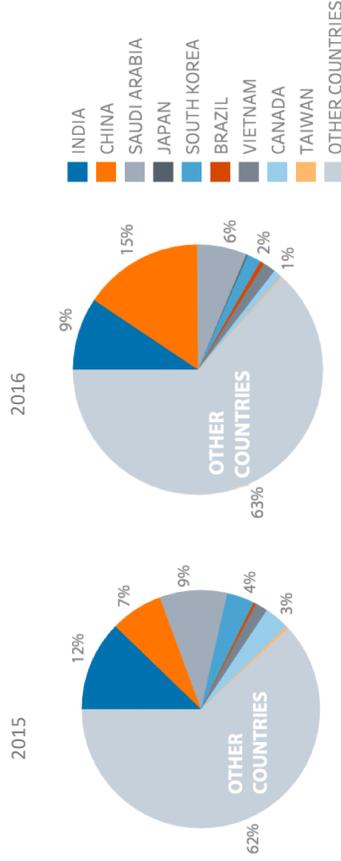
WHY SUCCESSFUL IN ATTRACTING INTERNATIONAL STUDENTS?

- Growth driven by students seeking bachelor's degree from Nepal
- Post-Nepal Earthquake fundraising efforts through student organization 'Helping Nepal International'
- Attractive tuition also a draw, particularly for Nepali students ([WP Article](#))
- Offers Intensive English Center (IEC), as well as conditional admission
- For direct students, offer 'Academic & Cultural Sharing Scholarship' which is in-state tuition price

LEVEL	Year of Program Start Date	
Student Education Level	2015	2016
BACHELOR'S	192	434
MASTERS	102	121

NATIONALITY

Nepal students represent largest percentage of international students, followed by additional growth in Chinese students



ADMISSIONS REQUIREMENTS

- English: No specified score requirements

MAJORS (2016)

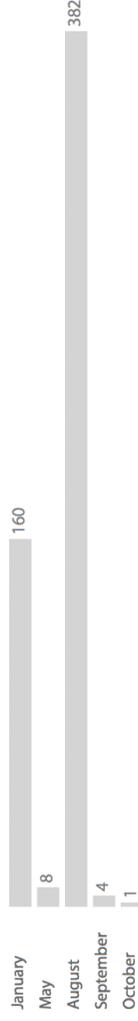
Business and Communications	38%
Engineering, Computer Science, Mathematics	38%
Humanities, Social Sciences, and Other	7%
Medical and Applied Social Sciences	5%
Physical, Biological, and Environmental Sciences	7%
Professional Programs	4%

AVG. TUITION PAID (2016)

BACHELOR'S	MASTERS
\$11,920	\$9,596

PROGRAM START DATES (2016)

Traditional start dates aligned with Spring and Fall semesters



COLLATERAL: [Website Brochure 1 Brochure 2](#)



+79% GROWTH
in last two years

Cal State University Monterey Bay Seaside, CA

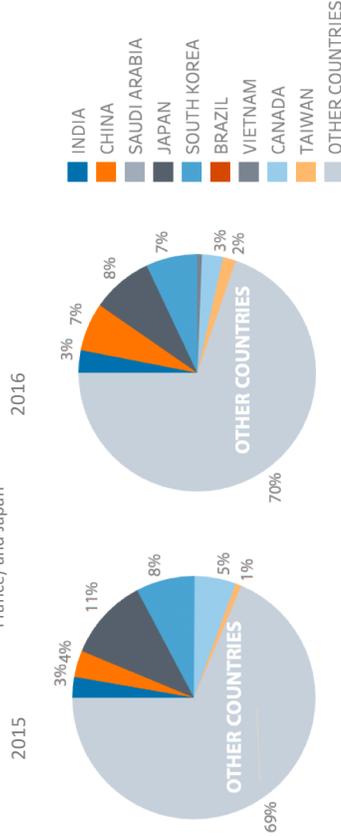
WHY SUCCESSFUL IN ATTRACTING INTERNATIONAL STUDENTS?

- CSUMB is made up of about 5% international students, with the goal of achieving a 10% international population by 2024. Have specific internationalization strategy ([here](#))
- Offer 'American Language and Culture Program' / conditional admission with varying lengths of time (4 weeks, 8 weeks, 1 semester, or 1 year (4 week and 8 week sessions have 4 different start options)). This program has driven high growth in last two years.
- Bilateral/exchange partnerships for easy credit transfer with universities across the world. Partner Portal set up for ease of marketing material distribution for partners

LEVEL	Year of Program Start Date	
Student Education Level	2015	2016
BACHELOR'S	242	173
MASTER'S	11	4
OTHER	2	279

NATIONALITY

Students in American Language and Culture Program have driven growth in last two years, particularly those from European countries (Germany, Norway, France) and Japan



ADMISSIONS REQUIREMENTS

- English: TOEFL 61+, IELTS 6.0

MAJORS (2016)

Business and Communications	6%
Engineering, Computer Science, Mathematics	2%
Humanities, Social Sciences, and Other	90%
Medical and Applied Social Sciences	0%
Physical, Biological, and Environmental Sciences	1%
Professional Programs	1%

AVG. TUITION PAID (2016)

BACHELOR'S	MASTER'S	OTHER
\$8,510	\$12,361	\$6,906

PROGRAM START DATES (2016)

Traditional start dates aligned with Spring, Summer, and Fall semesters



COLLATERAL: [Website](#) [Video](#) [Brochure](#) [Partner Materials](#)



Miami University Oxford, OH

+78% GROWTH
in last two years

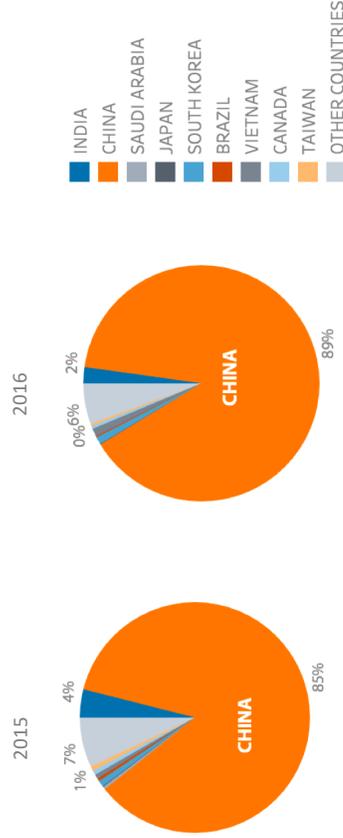
WHY SUCCESSFUL IN ATTRACTING INTERNATIONAL STUDENTS?

- Offers 'ACE' a one semester bridge program for international students who were not directly admitted to the university because they did not get the required TOEFL score for direct admission
 - Progression rate of 98%
- Students take two language and one cultural course; must receive B- or higher; earn 12 credits
- Partners with Education USA, direct to overseas high schools, markets passively via website and emails
- Offers virtual open houses, ESL counselor trips
- Miami believes growth is due to attraction to business school ranking in particular

LEVEL	Year of Program Start Date	
Student Education Level	2015	2016
BACHELOR'S	417	848
MASTER'S	66	76
OTHER	303	345

NATIONALITY

China is the consistent driver of growing enrollments



ADMISSIONS REQUIREMENTS

- English: TOEFL 80 IELTS 6.5
 - ACE: TOEFL 65-79+, IELTS 5.5 - 6.0
- Merit-based scholarships for international students

MAJORS (2016)

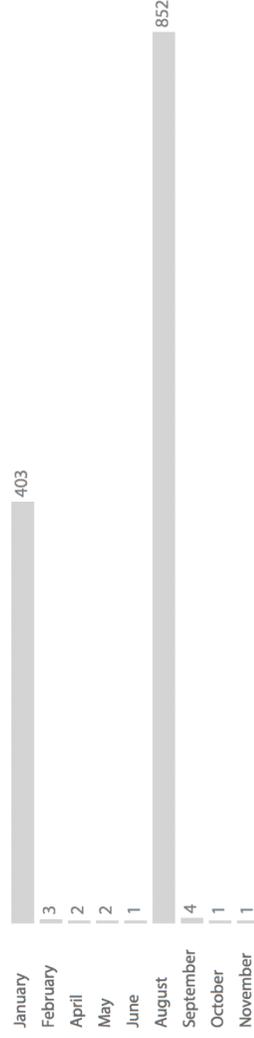
Business and Communications	15%
Engineering, Computer Science, Mathematics	18%
Humanities, Social Sciences, and Other	60%
Medical and Applied Social Sciences	1%
Physical, Biological, and Environmental Sciences	3%
Professional Programs	3%

AVG. TUITION PAID (2016)

BACHELOR'S	MASTER'S	OTHER
\$30,733	\$21,696	\$16,234

PROGRAM START DATES (2016)

Traditional start dates aligned with Spring and Fall semesters



COLLATERAL: [Website Brochure 1](#) [Brochure 2](#) [Facebook](#) [Video Map of Students](#)



+62% GROWTH
in last two years

Southern Arkansas University Magnolia, AK

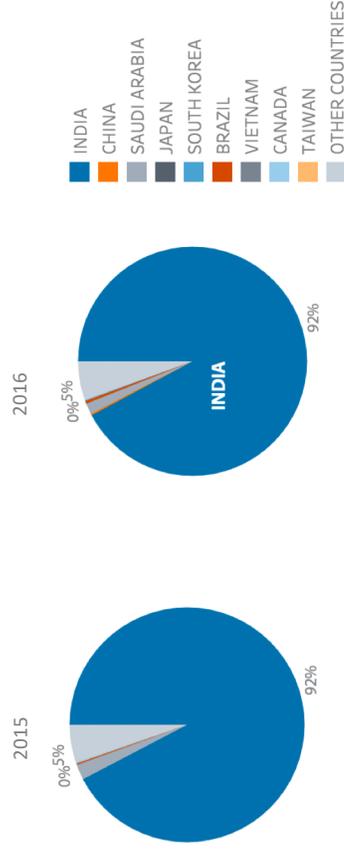
WHY SUCCESSFUL IN ATTRACTING INTERNATIONAL STUDENTS?

- Offers 'SAU-ESL' program and conditional admission
- Growth driven by Indian students seeking STEM Master's degree
- Almost all of these students are from city of Hyderabad
- Administration says that it is word of mouth and affordability driving growth ([here](#))

LEVEL	Year of Program Start Date	
Student Education Level	2015	2016
BACHELOR'S	29	46
MASTER'S	491	799

NATIONALITY

Indian students comprise majority of international student population.



ADMISSIONS REQUIREMENTS

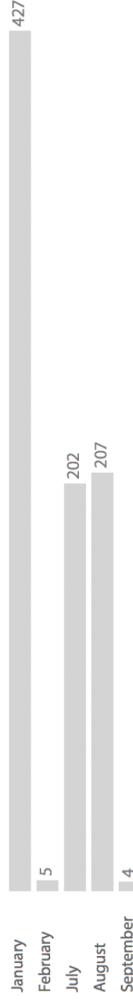
- English: TOEFL 61 IELTS 5.5

MAJORS (2016)

AVG. TUITION PAID (2016)	MAJORS	MAJORS (2016)
BACHELOR'S	\$11,512	Business and Communications
MASTER'S	\$7,802	Engineering, Computer Science, Mathematics
		Humanities, Social Sciences, and Other
		Medical and Applied Social Sciences
		Physical, Biological, and Environmental Sciences
		3%
		95%
		0%
		1%
		1%

PROGRAM START DATES (2016)

Traditional start dates aligned with Spring, Summer, and Fall semesters



COLLATERAL: [Website Brochure 1 Video](#)



University of South Alabama

Mobile, AL

+56% GROWTH
in last two years

WHY SUCCESSFUL IN ATTRACTING INTERNATIONAL STUDENTS?

- Launched 'Global USA' as outcome of strategic plan to internationalize campus; Global USA at South Alabama integrates all international initiatives and activities (including admission)
- Growth driven by undergrad students from Kuwait
- Kuwait embassy halted all financial support letters for University of South Alabama after explosive growth in 2016 due to over enrollment
- Offers 2+2 programs with several universities abroad (depending on school/major)

LEVEL	Year of Program Start Date	
Student Education Level	2015	2016
BACHELOR'S	203	643
MASTERS	98	53

ADMISSIONS REQUIREMENTS

- English: TOEFL 61 IELTS 5.5 (undergrad)

MAJORS (2016)

Business and Communications	12%
Engineering, Computer Science, Mathematics	82%
Humanities, Social Sciences, and Other	2%
Medical and Applied Social Sciences	0%
Physical, Biological, and Environmental Sciences	2%
Professional Programs	1%

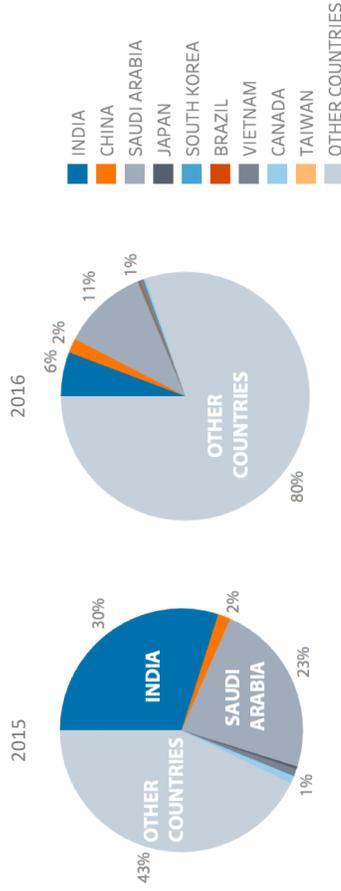
AVG. TUITION PAID (2016)

BACHELOR'S MASTER'S

\$18,561 \$16,273

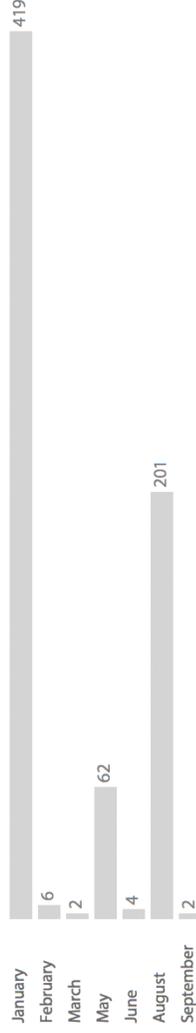
NATIONALITY

Growth driven by increase in students from Kuwait, specifically



PROGRAM START DATES (2016)

Traditional start dates aligned with Spring, Summer, and Fall semesters



COLLATERAL: [Website](#) [Video](#) [Brochure 1](#)



Troy University Troy, AL

+55% GROWTH
in last two years

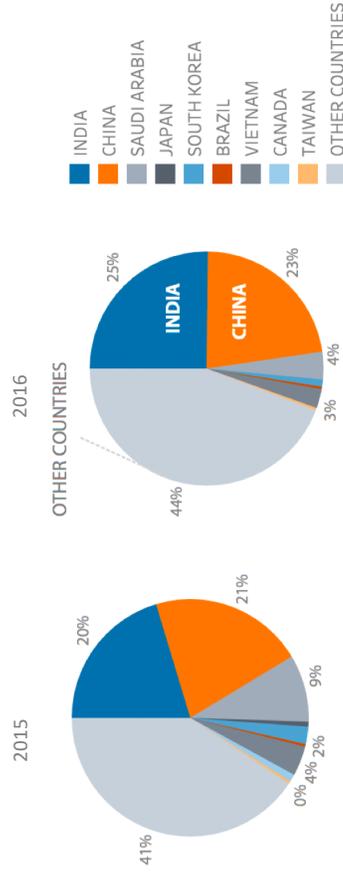
WHY SUCCESSFUL IN ATTRACTING INTERNATIONAL STUDENTS?

- Offers ESL program, with additional component called 'Explore America' that includes trips to Disney, Gulf Coast, Tennessee)
- Growth driven by students from Nepal (both undergrad and grad); additional jump in Indian students at graduate level
- Offers conditional admission
- Partners directly with agents (e.g., IDP)
- Attractive tuition price

LEVEL	Year of Program Start Date	
Student Education Level	2015	2016
BACHELOR'S	182	339
MASTERS	112	265

NATIONALITY

Growth in Indian students at Master's level, as well as in students from Nepal overall



ADMISSIONS REQUIREMENTS

- English: TOEFL 61 IELTS 5.5 (undergrad)
- Several international scholarships offered

MAJORS (2016)

Business and Communications	28%
Engineering, Computer Science, Mathematics	38%
Humanities, Social Sciences, and Other	12%
Medical and Applied Social Sciences	6%
Physical, Biological, and Environmental Sciences	12%
Professional Programs	5%

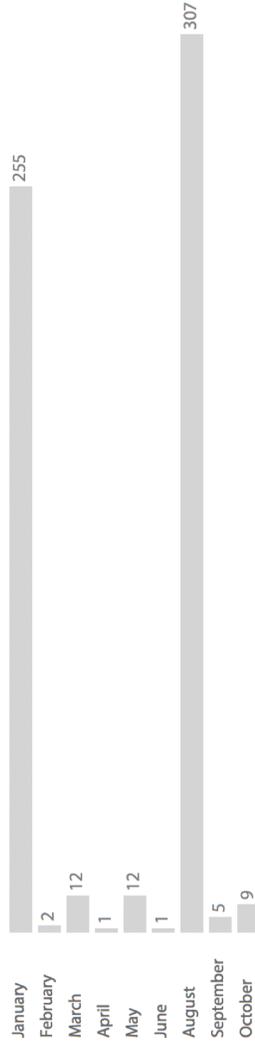
AVG. TUITION PAID (2016)

BACHELOR'S MASTER'S

\$14,947 **\$14,864**

PROGRAM START DATES (2016)

Traditional start dates aligned with Spring and Fall semesters



COLLATERAL: [Website](#) [Facebook](#) [Brochure 1](#)



APPENDIX 4. SURVEY DATA FOR SPECIFIC CHARGE # 3

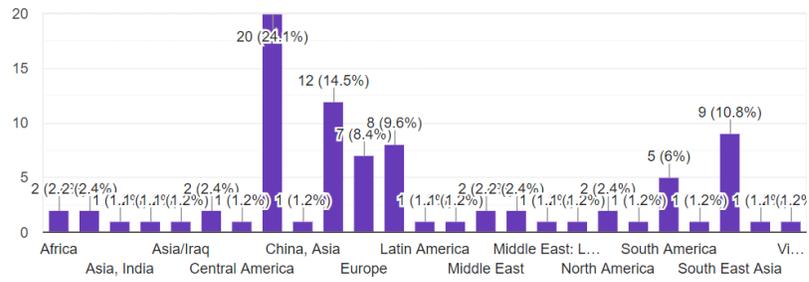
Survey Questions

- 1) Where are you from? Please write the continent and country.
- 2) How frequently do you smoke tobacco products?
- 3) Are you close to someone that smokes occasionally or regularly?
- 4) Are you aware of the newly implemented Tobacco Free Campus Policy?
- 5) Has this policy affected you directly, either positively or negatively?
- 6) If it has impacted you, please explain how so.
- 7) Has this policy impacted people and friends you know?
- 8) Has this policy impacted people and friends you know?
- 9) If it has had an impact, please explain how so.
- 10) Is this a policy you would have liked to know before you arrived to the university?
- 11) If you had known it, would it have changed your idea about studying at KU?
- 12) Do you think this policy will have a positive or negative impact in the KU community, especially in the international community?
- 13) Do you have any cultural/religious obligations to smoke?
- 14) Is there anything else you would like to share about your opinion on the Tobacco Free Campus Policy?

Survey Results:

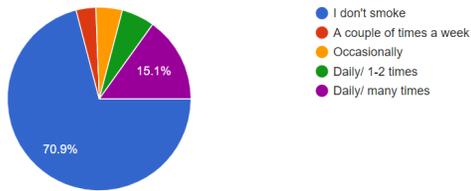
Where are you from? Please write the continent and country

83 responses



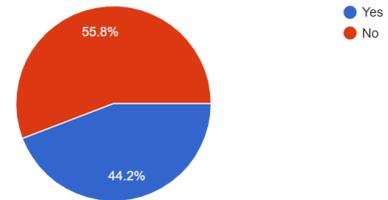
How frequently do you smoke tobacco products?

86 responses



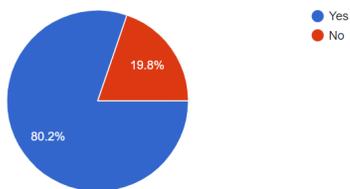
Are you close to someone that smokes occasionally or regularly?

86 responses



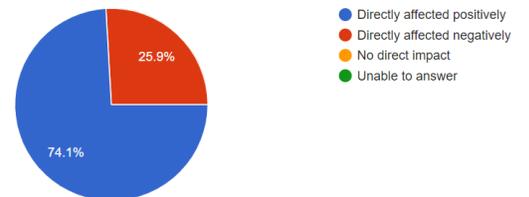
Are you aware of the newly implemented Tobacco Free Campus Policy?

86 responses



Has this policy affected you directly, either positively or negatively?

85 responses



Positive Responses:

If it has impacted you, please explain how so.

54 responses

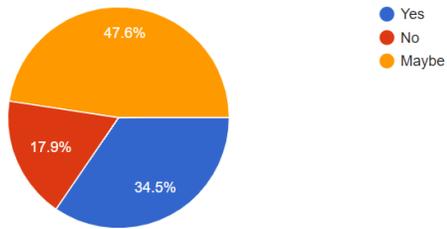
It has helped me reduce smoking
I have asthma so it affects me directly.
I have asthma, it's nice not to walk through clouds of smoke
I have allergies to cigarette smoke, and can get severe headaches if I am around smoking, or heavy smokers (when scent lingers on them). The tobacco free campus policy has made it much easier and enjoyable to be on campus, and I am not at risk of my headaches any more
wonderful to have good air but still people around buildings doing it
Since people are not allowed to smoke on campus, I am not affected by the second-hand smoke.
I am a PhD candidate in chemistry, and have read extensively about health effects of smoking. I believe this decision is for the better.
thank you very much
There are almost no people smoke in front of wescoe hall.

Negative Responses:

Stressing out and can't smoke due to the new policy!
I benefit from this policy
I think the free tobacco policy is great, but is a pity to know that there are some people that are smoking anyways in the campus.
Headache
I would like to have a privilege to smoke on campus, although I don't smoke on a regular basis.
good to live in a smoking free environment
I get headache when I smell or when I am in a passive smoking environment. So, I am happy the law is implemented.
I frequently saw some students smoking on campus, and I don't like the smell. I think this is a good measure.
I have friends who smoke in front of me inside KU campus and I get breathing problem while exposed to cigarette smoke. I cannot directly ask them to not smoke but a tobacco free campus would make sure that I don't have to deal with this.
better environment, healthier life.

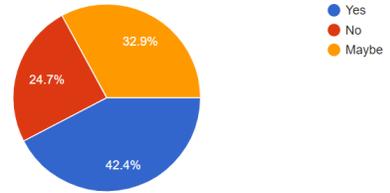
Has this policy impacted people and friends you know?

84 responses



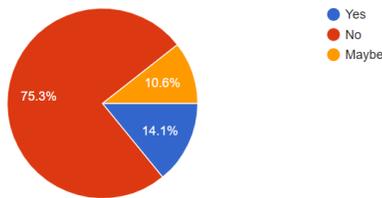
Is this a policy you would have liked to know before you arrived to the university?

85 responses



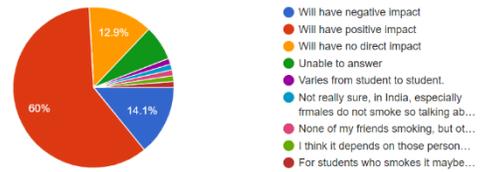
If you had known it, would it have changed your idea about studying at KU?

85 responses



Do you think this policy will have a positive or negative impact in the KU community, especially in the international community?

85 responses



Do you have any cultural/religious obligation to smoke?

85 responses

