Introduction
This document is intended for USC academic planners, program directors, and academic advisors as a resource for issues related to enrollment and advising of international students for the Fall 2020 semester. Included are reminders of existing policies and procedures concerning international students, as well as new guidance that has been gathered and developed during the COVID-19 emergency. Many internal and external resources were used to prepare this document, including the following:

USC Resources
- Office of Graduate Admission
- Office of International Services
- Office of Academic Records and Registrar
- Office of the Provost

External Resources
- US Department of Homeland Security – Student and Exchange Visitor Program (DHS-SEVP)
- US Department of State
- NAFSA: Association of International Educators

Due to the evolving nature of conditions related to COVID-19, including uncertainty about potential future guidance to be received from US government sources, the information in this document is subject to change at any time before/after the start of USC’s Fall 2020 semester. This document will be updated as necessary if changes occur.

Special Accommodations Due to COVID-19
Due to the global COVID-19 pandemic, in March 2020 DHS-SEVP began releasing a series of guidance statements temporarily allowing for flexibility in how international students in the US are able to participate in their academic programs. Most significantly, they removed the strict limitations on online coursework, recognizing the need for most institutions to switch from in-person to online instruction during the Spring term.

As of 06/04/2020, DHS-SEVP stated that guidance for Fall 2020 for international students and institutions is not yet available. Current flexibility and accommodations for international students, much of which is noted in this document, cover only until the end of Summer 2020 term. Fall 2020 policies and guidelines will be shared with the higher education community once completed. At this time, all sections of this document headed by “COVID-19 NOTE:” are based on the existing DHS-SEVP guidance which covers until the end of Summer term only.

Full Course of Study Requirements
International students are required to enroll in a full-time course load in courses that meet their degree requirements while in the US, to maintain their immigration status on a student visa. USC’s standard full-time requirements apply:
- Undergraduate students: 12 units
- Master’s students: 8 units
- Doctoral students: 6 units
Assuming a student meets the full-time enrollment requirements in Fall and Spring semesters, summer is an optional term (continuing students may enroll in summer classes or not be enrolled at all, and will still maintain immigration status).

In certain limited circumstances, as designated by immigration regulations, students may be approved for a reduced course load (RCL) or leave of absence (LOA).

**COVID-19 NOTE:** Despite some limited flexibility regarding mode of instruction granted by DHS-SEVP during the COVID-19 emergency, specifically for students who were already studying in the US as of Spring 2020, the requirement for international students to maintain a full course of study while in the US remains in place.

**Limits for Online Course Enrollment**

International students are limited in the amount of online coursework they can count toward full-time enrollment while in the US. In any semester, no more than 3 units of online coursework may be counted toward a student’s minimum full-time course load. The 3 unit limit applies to students at all degree levels:

- Undergraduate students, to meet 12 units for full-time, must enroll in at least 9 units of in-person coursework and 12 units total.
- Master’s students, to meet 8 units for full-time, must enroll in at least 5 units of in-person coursework and 8 units total.
- Doctoral students, to meet 6 units for full-time, must enroll in at least 3 units of in-person coursework and 6 units total.

After meeting the full-time minimum as shown above, any additional coursework may be in-person or online.

**COVID-19 NOTE:** In March 2020, DHS-SEVP provided guidance if a university adjusts classes to an online format due to COVID-19 and documents such changes with DHS-SEVP, international students who were in the US in active immigration status at that time have temporary flexibility to take any number of online courses/units and still maintain immigration status. The student may participate in the online coursework either inside or outside the US, and still be kept in active immigration status. The temporary flexibility applies only to CONTINUING students, for as long as USC operates with a different instructional model due to COVID-19, and until DHS-SEVP removes the special flexibility (As of 06/04/2020, CURRENT DHS-SEVP GUIDANCE ONLY COVERS UNTIL END OF SUMMER TERM). Once the university/program returns to offering in-person instruction then CONTINUING international students are expected return to in-person classes at the same unit levels described above. DHS-SEVP specifically noted that this flexibility does not apply to NEW international students arriving in the US to begin academic programs, since they were not in status in the US at the time the university first switched to online instruction. **If an academic program is not able to provide sufficient in-person coursework for Fall 2020, then new international students should not enter the US to begin the program.**
Hybrid Classes

Immigration regulations provide an opportunity for classes that are hybrid in nature to be classified as “in-person” for purposes of international student enrollment, as long as they are not “principally online” and meet specific institutional requirements defining eligible hybrid classes. USC’s provost has adopted the following definition for use by all USC academic programs for this purpose:

USC hybrid course guidelines for international students in the US

“Hybrid” instruction refers to any course that involves the use of both online and in-person (on-ground) learning. Hybrid models involve four variables that can be combined in different ways: (1) synchronous instruction; (2) asynchronous instruction; (3) online instruction; and (4) in-person instruction.

Per regulations, a course can qualify as in person instruction for international students if it specifically requires the student’s physical attendance for classes, examination or other purposes integral to completion of the class. It also requires the course be principally offered for in-person instruction.

The following is required of USC Hybrid courses to qualify as in-person for F-1 international student enrollment:

1. The course must specifically require the student’s physical attendance for classes, examination or other purposes integral to completion of the class.
2. The syllabus for these courses must include the specific class sessions and examination dates and times when students are required to be present in person.
3. 50% of the course content delivered live must be in-person, at a minimum.

Reduced Course Load

International students are allowed to temporarily enroll in a reduced course load if certain academic conditions are met. RCLs are limited in number, and require the approval of both the academic advisor and the Office of International Services.

COVID-19 NOTE: Regular RCL policies remain in place during the COVID-19 emergency. DHS-SEVP has indicated that the COVID-19 situation, by itself, is not a valid reason for approving an RCL. For example, if a student prefers not to take a full course load due to classes being offered in an online or hybrid format, that is not an allowable reason for an RCL. In such a case, the student would need to remain enrolled full time, or leave the US for either a leave of absence or to take online coursework.

COVID-19 NOTE: DHS-SEVP has stated that a continuing international student may be approved for a temporary waiver of the full-time enrollment requirements during the COVID-19 emergency only if their academic program cancels classes due to the public health emergency. While this is not expected to happen at USC since classes may be offered online, any such occurrence would need to be documented with DHS-SEVP before students could be waived from full-time enrollment requirements while in the US due to class/program cancellation. If considering such an action, an academic program manager should consult with Office of International Services (OIS) leadership.
**Leave of Absence**

An international student may opt to take 1-4 semesters of leave of absence for any reason (academic, personal, financial, medical, etc.), per US immigration regulations. Only in the case of medical LOAs, with appropriate documentation, may an international student remain in the US during an approved leave of absence. For all other LOAs, the student must depart the US for the LOA semester, to avoid falling out of immigration status. Eligibility for LOAs is also determined by university and academic program policies and procedures.

Graduate students may not be approved for a LOA during their first semester of their admission. A student who stops taking classes during their first term is considered to be withdrawn and must be updated/admitted again in a future term.

**COVID-19 NOTE:** DHS-SEVP have not changed LOA rules during COVID-19. So if an international student in the US decides to take a LOA due to dissatisfaction with the instructional format provided in their program, the normal requirement to leave the US during the leave would still apply. Again, only medical leaves (with appropriate documentation of US-based medical or mental health care) would qualify a student to remain in the US during a LOA, even during the COVID-19 situation.

**Admission and I-20 Forms**

**Academic Calendar Changes and Replacement I-20 Forms**

I-20 documents will be re-issued for all international students whose academic year is affected by a new start date. All undergraduate I-20s have been re-issued with the new August 17 start date. Some graduate departments may have alternative calendars approved by the Office of the Provost and I-20s will be re-issued accordingly.

Departments with alternative calendars should contact the Office of Graduate Admission at graddept@usc.edu with the program’s new start and end dates.

**Updating Admission to a Future Semester**

**Graduate Students**

Graduate students can request to update their application to the next available term by contacting their intended graduate program. If approved, the department submits the request on behalf of the student to Graduate Admission at uscapply@usc.edu with the student’s information (USCID#, POST Code, Current Term, and Intended New Term). Graduate Admission will update the application, and re-department notify the application for readmission.
**Undergraduate Students**

Incoming undergraduates who have committed to enroll may submit a deferral request and should contact their admission counselor to begin that process (https://admission.usc.edu/find-your-counselor/). All requests will be reviewed on a case-by-case basis and will likely result in the following outcomes:

- Requests due to students not wishing to take courses online and/or due to financial concerns (i.e. inability to pay for a year’s worth of tuition and living expenses) will generally be denied, but students may re-apply for a space in next year’s class.
- Requests due to things such as compulsory national service, medical issues, etc. will generally be approved and students may be granted a deferral for a semester or a year.

If undergraduate students cannot obtain a visa and/or find a way to travel to campus, we will ask that they register for classes and attempt to build a schedule that is compatible with their time zone. If constructing such a schedule proves difficult, USC may consider deferring their enrollment for one semester.

**Deferring I-20 to Later Arrival Date and Beginning Academic Program Online**

If students are unable to arrive in Los Angeles in time to begin coursework on campus, they are permitted to begin coursework online and arrive at a later date, if such online coursework is available. Deferred I-20s will be issued after the start of the Fall semester.

**NOTES:**

- New international students who remain outside the US to begin their academic program may do so fully online, without implications for immigration requirements, since they have not yet entered the US and activated student immigration status.
- Since student immigration status only begins once students enter the US with a student visa and begin enrollment on campus, international students beginning degree programs online from outside the US will not start accruing time in F-1 status for purposes of meeting CPT/OPT employment eligibility (one full academic year required).
- For such students, there are no full course of study requirements based on immigration status. Any requirements for specific levels of enrollment are at the discretion of the academic program. There may be non-immigration implications of part-time vs. full-time enrollment that are not addressed in this document (insurance, grad fellowships, etc.).
Current Issues/Challenges

Reduction/Stoppage of Visa Processing at US Consulates
As of June 2020, many US consulates have not yet re-opened for student visa applications, due to COVID-19 related closures. Potential new international students (as well as some continuing students who left the US and need to renew their student visa) may not be able to get a student visa in time to come to campus for Fall 2020 classes. Where applicable, new students should be advised about online options to begin their academic program from outside the US for their first semester.

US Entry Restrictions Due to COVID-19
Current restrictions prevent US entry by any non-immigrants who have been in any of the following locations in the 14 days prior to attempting to enter the US: China excluding Hong Kong and Macau, Brazil, United Kingdom, Republic of Ireland, 26 European countries comprising the Schengen area, and Iran. At this time it is not known how long such restrictions will be in place, or if other countries/regions may be added. If still in place in August, these restrictions will keep many new international students from coming to LA to begin in-person instruction, and continuing students who are currently outside the US may also find it difficult or impossible to return in time for USC’s Fall semester.

Travel Disruptions
Continuing reduction of commercial airlines’ flight schedules globally could potentially limit opportunities for some international students to get to LA for the start of Fall semester. Some may be delayed and would need to begin classes online if offered, and others may decide it’s better to wait until January to try to return to campus. All issues regarding potential need for new I-20s for new students impacted by travel disruptions should be directed to the Office of Graduate Admission.

International Student Employment Implications
USC is seeking further guidance from DHS-SEVP on issues related to three categories of employment for F-1 international students: on-campus employment, curricular practical training (CPT), and Optional Practical Training (OPT). At present, very few special COVID-19 accommodations for rules concerning international student employment have been provided. This document will be updated with more details as new information becomes available.