To: Graduate Program Heads  
Re: Letters of Certification for International Students  
Date: February 6, 2018

Upon request, the Graduate School provides Letters of Certification for students who have completed all their degree requirements and will have their degree conferred at the end of a given semester, but need documentation before Commencement. These letters can be used for potential employers, licensure boards, embassies, and other agencies that may require this type of verification (including petitions for H-1B visas). Such letters are dated with the date the requirements are completed (e.g., on the date that the thesis or dissertation was approved and reported by the Thesis Office, or the date the culminating experience was approved and reported to the Graduate School).

It has come to our attention that some international students are requesting Letters of Certification to support H1B visa applications during the semester in which they will graduate; in accordance with Graduate School procedure these are then dated according to the date the requirements were fulfilled. These same students then contact the Office of Global Programs later in the semester listing the date of Commencement at the end of the semester as the completion date in support of Optional Practical Training (OPT) applications. This results in two different completion dates being listed on two different forms that are submitted to the same US government agency (the Department of Homeland Security's (DHS) U.S. Citizenship and Immigration Services (USCIS)), which is not appropriate. Please note that any attestations made by faculty members become part of the record. Importantly, the declarations submitted by the University are made under penalty of perjury.

Programs should note the relevant federal requirement:

“(C) Completion of course of study ... if the student is not required to take any additional courses to satisfy the requirements for completion, but continues to be enrolled for administrative purposes, the student is considered to have completed the course of study and must take action to maintain status. Such action may include application for change of status or departure from the U.S.”

To avoid Penn State presenting conflicting information to DHS-USCIS in the future, effective immediately, The Graduate School will copy the Office of Global Programs and the graduate program head on all Letters of Certification for all international graduate students. This will result in DISSA changing the “Program End Date” on the student’s I-20 form to the date the program requirements were completed. Such changes will impact the student’s visa status, including their ability to retain their assistantship through the end of the semester.

1 TITLE 8 OF CODE OF FEDERAL REGULATIONS (8 CFR)  
8 CFR PART 214 -- NONIMMIGRANT CLASSES § Sec. 214.2(f).6.iii.C  
DISSA is preparing a one-page handout to summarize the critical issues for graduate students holding US visas.

We also wish to bring to your attention the consequences of this regulation to international students on assistantships. Unlike the previous University business system (IBIS), WorkDay will automatically prorate the monthly stipend of any international student on an assistantship who is terminated before the last day of the month because they no longer have a valid I-20. In the absence of other contractual or policy requirements, the Graduate School recommends that programs follow the NSF policy:

If a student remains active on the appointment for at least 14 days of the month, the full monthly stipend can be paid, otherwise the stipend is prorated.

To pay eligible students the remaining amount of the monthly stipend the program should submit a "one-time payment" form in Workday.

Please note that it is not appropriate for students who have continuing assistantship duties through the end of the semester to request a Letter of Certification.

For questions about a student’s visa status, please contact DISSA in Global Programs at dissa-adviser@psu.edu

For questions about letters of certification, please contact the appropriate Graduate Enrollment Coordinator.

For questions about stipend payments in the final month of a student’s assistantship, please contact Emily Martell (epb108@psu.edu) or 814-863-0344.

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