

Institution Name _____

Institution's BICE Code No. _____ 214F _____ Approval Date: _____

City/State _____

Date of Review _____

Name of Team Reviewer _____

ON-SITE IMMIGRATION COMPLIANCE CHECKLIST/GUIDELINES

This Immigration Compliance Checklist is used by the on-site examination team as a sampling tool to provide information relative to the F-1/M-1 record keeping and reporting for which the institution is responsible.

Background/Terminology: The U. S. Bureau of Immigration and Customs Enforcement (BICE) in the Department of Homeland Security (DHS) has primary responsibility for monitoring institutions authorized to enroll non-immigrant F-1/M-1 students. The school official with primary responsibility for an institution's compliance with immigration regulations is termed the Principal Designated School Official (PDSO). Designated School Officials (DSOs) are also authorized to report on F-1/M-1 students on behalf of the institution. Both the PDSO and the DSO, hereinafter referred to as P/DSO, are authorized to issue the Form I-20, a document used by non-immigrants to obtain a student visa. Institutions use a database tracking system called the Student Exchange Visitor Information System (SEVIS) to report regularly on all F-1/M-1 students. DHS approves institutions to admit F-1/M-1 students based partially on information provided via SEVIS on an electronically submitted petition called the I-17.

Any concerns or problems noted in the completion of this checklist should be described fully in the team report.

SECTION I. BICE AUTHORIZATION

Yes No

Is the institution currently authorized to issue Form I-20 for F or M visas?

If the institution is currently unable to issue Form I-20 by virtue of having lost or been denied DHS approval, summarize the reason(s) for which approval was lost or denied. List any BICE findings that reveal a pattern of errors, procedural problems, or non-compliance. Attach correspondence from BICE and note measures being undertaken by the institution to correct the situation.

SECTION II. INSTITUTIONAL ELIGIBILITY

Review the information that the institution has represented to DHS as qualifying that institution for approval to admit F-1/M-1 students. This information may be found in the I-17 section in SEVIS, which is accessible by the institution's P/DSO.

Yes No

- | | | |
|--------------------------|--------------------------|---|
| <input type="checkbox"/> | <input type="checkbox"/> | Is the institution's name and address(es) correct? |
| <input type="checkbox"/> | <input type="checkbox"/> | Has ACCET approved all of the additional locations as listed? |
| <input type="checkbox"/> | <input type="checkbox"/> | Are all additional locations for which the institution issues the Form I-20 listed? |
| <input type="checkbox"/> | <input type="checkbox"/> | Are student records physically housed/maintained at the same location as the P/DSO? |
| <input type="checkbox"/> | <input type="checkbox"/> | Are all of the instructional programs offered directly by the institution? |
| <input type="checkbox"/> | <input type="checkbox"/> | Are any of the instructional programs offered through a contractor/agent? |
| <input type="checkbox"/> | <input type="checkbox"/> | Has ACCET approved all of the programs as listed? |
| <input type="checkbox"/> | <input type="checkbox"/> | Are all programs for which the institution issues the Form I-20 listed? |
| <input type="checkbox"/> | <input type="checkbox"/> | Is the information describing the institution accurate and up to date? |
| <input type="checkbox"/> | <input type="checkbox"/> | Is at least one individual acting as a P/DSO? |
| <input type="checkbox"/> | <input type="checkbox"/> | Are all P/DSOs currently direct employees of the school? |
| <input type="checkbox"/> | <input type="checkbox"/> | Are all P/DSOs listed ineligible to receive commission for recruiting F-1/M-1 students? |
| <input type="checkbox"/> | <input type="checkbox"/> | Are all P/DSOs listed citizens or Legal Permanent Residents of the United States? |

SECTION III. POLICIES AND PROCEDURES

By interviewing the P/DSO and other institution staff and reviewing hard copies of instructions, procedures, or other written guidance materials, establish that there are policies and procedures and systems for communicating the following information on F-1/M-1 students between responsible individuals.

Yes No

- | | | |
|--------------------------|--------------------------|---|
| <input type="checkbox"/> | <input type="checkbox"/> | Changes in enrollment status or program (F-1 only) |
| <input type="checkbox"/> | <input type="checkbox"/> | Prior attendance at other F-1/M-1 approved institutions |
| <input type="checkbox"/> | <input type="checkbox"/> | Full-time enrollment |
| <input type="checkbox"/> | <input type="checkbox"/> | Satisfactory academic progress |
| <input type="checkbox"/> | <input type="checkbox"/> | Vacation, temporary absence, or other break in study |
| <input type="checkbox"/> | <input type="checkbox"/> | Program completion |
| <input type="checkbox"/> | <input type="checkbox"/> | Withdrawal/termination from a program |
| <input type="checkbox"/> | <input type="checkbox"/> | Transfer in from another school |
| <input type="checkbox"/> | <input type="checkbox"/> | Transfer out to another school |

SECTION IV. STAFF RESPONSIBILITIES

P/DSOs are required by BICE to demonstrate a thorough knowledge of regulations concerning I-20 issuance and reporting requirements. P/DSOs must also be provided the training and resources necessary to stay current on F-1/M-1 regulations. By interviewing the institution's P/DSO, answer the following questions:

Yes No

- | | | |
|--------------------------|--------------------------|--|
| <input type="checkbox"/> | <input type="checkbox"/> | Have the institution's P/DSOs been to any immigration training workshops? |
| <input type="checkbox"/> | <input type="checkbox"/> | Do P/DSOs have access to immigration advising resources? (e.g., professional associations, publications, etc.) |
| <input type="checkbox"/> | <input type="checkbox"/> | Is a procedure in place for the P/DSO to verify a new (or prospective) student's academic eligibility prior to issuing Form I-20 for initial attendance? |
| <input type="checkbox"/> | <input type="checkbox"/> | Is a procedure in place for the P/DSO to determine the status of an F-1/M-1 student who is transferring in from another institution? |
| <input type="checkbox"/> | <input type="checkbox"/> | Does a process exist for the P/DSO to verify that an F-1/M-1 student is enrolled in a full course of study throughout the program? |
| <input type="checkbox"/> | <input type="checkbox"/> | Does the P/DSO have a consistently followed method of verifying when an F-1/M-1 student has completed the program? |
| <input type="checkbox"/> | <input type="checkbox"/> | Does the P/DSO have a consistently followed method of verifying when an F-1/M-1 student has been terminated or dismissed? |
| <input type="checkbox"/> | <input type="checkbox"/> | Is there a procedure in place for the P/DSO to track an enrolled student's change of address. |

SECTION V. FILE REVIEW

1. Select a random sample of active and former student files (minimum 10) taken from the past two years. Review the files using the checklist on the following page.
2. Review the above-sampled files to ensure that record keeping reflects the following:
 - Original application and financial documents verifying the student's ability to pay for the program of study were received prior to issuance of the initial I-20 for any new students.
 - Photocopy of student's passport information and photo page (and visa stamp page, if applicable.)
 - Evidence that students' addresses are updated after any moves and timely reported to SEVIS for any continuing students.
 - Evidence that the P/DSO is aware of the circumstances if any student is/was engaged in a part-time course of study, that such a part-time status was authorized by the P/DSO prior to the event, that the event was reported in SEVIS, and that basis for decrease is allowed under DHS SEVIS regulations.
 - If any student was granted an extension, verify that the extension was authorized by the P/DSO in advance of the end date on the I-20 and that the event was reported in SEVIS.
 - Evidence that all I-20s issued are for programs of study (and campus/facility locations) listed on the institution's I-17 (see Section I.)
3. Request a print out from the SEVIS database for all currently enrolled students. Compare it to the institution's class roster and attendance records. Note those students who appear on the SEVIS roster but not on the class roster and/or those on the SEVIS roster who have excessive absences.

