

Institution Name: _____
City/State: _____
ACCET ID #: _____
Date of Review: _____
Name of Team Reviewer: _____

ON-SITE COMPLIANCE CHECKLIST RELATIVE TO ENROLLED NON-IMMIGRANT STUDENTS

Document 50-I - On-Site Compliance Checklist Relative to Enrolled Non-Immigrant Students is to be completed by the on-site evaluation team for an institution authorized to enroll F-1, M-1, and/or J non-immigrant foreign students. Pursuant to ACCET Standard II.A - Governance, the on-site evaluation team shall review an institution's policies and procedures for compliance with regulatory requirements in the enrollment of non-immigrant status students. The team shall utilize this document, ACCET Document 50-I, to evaluate that the school has an effective framework and policies to ensure its integrity and effectiveness in compliance with regulatory requirements for the enrollment of non-immigrant students. Any concerns or problems noted in the completion of this checklist should be described fully in the team report, including any findings that reveal a pattern of errors, procedural problems, or non-compliance.

Background/Terminology: Educational institutions that admit and enroll non-immigrant students must be approved by the appropriate federal agency and must adhere to regulatory and policy requirements of those agencies. Schools may petition to accept students in the following non-immigrant visa categories: F (academic), M (vocational), and J (exchange). Students who enter the United States with these visas have specific requirements for the maintenance of their non-immigrant status, and the school is responsible for reporting the students' maintenance of status.

Within the US Department of Homeland Security (DHS), SEVP is responsible for the approval of schools for the admission and enrollment of non-immigrant F and M status students. The U.S. Department of State (DOS) is responsible for the approval of schools for the admission and enrollment of non-immigrant J status students. All reporting by the schools for all three visa categories is done through the on-line interface, the Student and Exchange Visitor Information System (SEVIS).

Schools are responsible for ensuring that they comply with all regulatory requirements, inclusive of official policy from DHS and SEVP, in the maintenance and reporting of school bona fides, information provided to non-immigrant students, and the reporting of the maintenance of status of non-immigrant students.

Schools must have governance structures and policies to ensure regulatory compliance, and they must have specific policies on student compliance that are communicated clearly and consistently to students. The school official with primary responsibility for an institution's

compliance with immigration regulations is the Primary Designated School Official (PDSO) for F and M status students and the Responsible Officer (RO) for J status students. Schools may also have Alternate Responsible Officers (ARO) and Designated School Officials (DSO) who are authorized to report on the maintenance of non-immigrant students on behalf of the institution.

Schools must submit, through SEVIS, the form I-17 to apply for approval to enroll non-immigrant F and/or M students and the form DS-3036 to apply for approval to enroll non-immigrant J students. Approval allows the school to issue the documents I-20 and DS-2019, respectively. The PDSO and RO are responsible for maintaining a school's I-17 and/or DS-3036, ensuring that the documents are updated and accurately reflect the institution's current operations and program offerings. As well, the PDSO and RO are responsible for ensuring that the school is properly issuing the appropriate immigration documents to students, either form I-20 (F/M students) or DS-2019 (J students).

SECTION I. FEDERAL AGENCY AUTHORIZATION

Which approvals does the institution currently possess (check all that apply and list the appropriate school code or program number):

- F Approval. School Code: _____(Page 1, item 11.ii, of the I-17 or identified in SEVIS)
- M Approval: School Code: _____(Page 1, item 11.ii, of the I-17 or identified in SEVIS)
- J Designation. Program ID: _____(Page 3 of DS-3036 or identified in SEVIS)

If the institution is currently unable to issue Form I-20 or DS-2019 by virtue of having lost or been denied SEVP or DOS approval: (1) summarize the reason(s) for which approval was lost or denied, (2) attach correspondence from SEVP and DOS, and (3) note measures being undertaken by the institution to correct the situation.

SECTION II. INSTITUTIONAL APPROVAL (I-17 AND/OR DS-3036)

Review the information that the institution has represented to SEVP or DOS as qualifying that institution for approval to admit F-1/M-1 and/or J students. This information is found in the program section of SEVIS, which is accessible by the institution's P/D SO or A/RO. Based on a review of the program information found on the I-17 and/or DS-3036, answer the following questions:

- | Yes | No | |
|--------------------------|--------------------------|--|
| <input type="checkbox"/> | <input type="checkbox"/> | Is the institution's name and address(es) correct (Both F/M and J)? |
| <input type="checkbox"/> | <input type="checkbox"/> | Has ACCET approved all of the additional locations listed (F/M only)? |
| <input type="checkbox"/> | <input type="checkbox"/> | Are all additional locations for which the institution issues the Form I-20 listed (F/M only)? |

- Is the ownership correct and consistent with that on record with ACCET (F/M and J)?
- Has ACCET approved all of the programs listed (F/M only)?
- Are all of the instructional programs delivered directly by the institution and not through a third-party provider, subcontractor, or agent?
- Are all programs for which the institution issues the Form I-20 listed (F/M only)?
- Does the institution have ACCET-approved programs to match the approved sponsorship (J only)?
- Is the J program status currently active?

SECTION III. P/DSO AND A/RO REQUIREMENTS/RESPONSIBILITIES

P/DSOs and A/ROs are required to meet federal eligibility requirements and their appointment must be adjudicated either by DOS or SEVP. Additionally, P/DSOs must 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/M regulations. Based on interviews with the P/DSOs and/or A/ROs and a review of their personnel files, answer the following questions:

Yes No

- Are all P/DSOs and/or A/ROs currently direct employees of the school? (If an A/RO is not a direct employee or officer of the institution, has the institution received approval from DOS for the individual to serve as an A/RO?)
- Are all listed P/DSOs ineligible to receive commissions for recruiting F-1/M-1 students?
- Are all listed P/DSOs and/or A/ROs citizens or legal permanent residents of US?
- Have the institution's P/DSOs completed on-line training provided by SEVP on SEVIS (certificate of completion)?
- Have the institution's P/DSOs and/or A/ROs been to any SEVP-related training workshops in the past twelve months? If not, what policies does the institution have to keep them current on regulatory requirements and SEVP/DOS policies?
- Do P/DSOs and/or A/ROs have access to immigration advising resources? (e.g. professional associations, publications, etc.)

SECTION IV. REPORTING COMPLIANCE

Before completing the items below, the team must: (1) interview the P/DSO and/or A/RO, (2) review the institution's policies and procedures for reporting the maintenance of status of F, M, J status students, and (3) observe the P/DSO and/or ARO demonstrate the information maintained in SEVIS, by reviewing the SEVIS records for a sample of current and former students (completed, withdrawn, terminated).

Verify that the institution has developed and implemented policies, procedures, and systems for recording and monitoring the up-to-date status of its F-1/M-1 and/or J students in SEVIS, including the information identified below.

Yes No

- | | | |
|--------------------------|--------------------------|--|
| <input type="checkbox"/> | <input type="checkbox"/> | Changes in enrollment status or program (F only) |
| <input type="checkbox"/> | <input type="checkbox"/> | Changes of US addresses |
| <input type="checkbox"/> | <input type="checkbox"/> | Prior attendance at other F/M approved institutions |
| <input type="checkbox"/> | <input type="checkbox"/> | Full-time enrollment |
| <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 from another school |
| <input type="checkbox"/> | <input type="checkbox"/> | Transfer to another school, with no fees or conditions required. |

Verify that the institution has developed and implemented policies and procedures, along with any systems, for its responsibilities to students (F/M/J status) and the reporting of students' maintenance of status for the following:

Yes No

- | | | |
|--------------------------|--------------------------|---|
| <input type="checkbox"/> | <input type="checkbox"/> | Does the institution have written policies and procedures for its responsibilities for the enrollment of non-immigrant students? |
| <input type="checkbox"/> | <input type="checkbox"/> | Does the institution provide non-immigrant students with immigration information on the responsibilities of maintenance of status? |
| <input type="checkbox"/> | <input type="checkbox"/> | Does the institution have in place systems (such as internal reporting mechanisms) for the collection, review and reporting on the maintenance of non-immigrant student status? |

GENERAL COMMENTS: