

## Contractor Checklist:

### **1. If the school already has INS certification, contractor should review a sample of school's current international student records**

Contractor will be provided with information from INS regarding whether or not the school is currently approved. If it is, the contractor will also be provided with a list of students who, according to INS records, have commenced studies since July 2000. INS will identify five students from this list to be reviewed. Contractor must review at least these five, but may choose to review more. When reviewing the records, the contractor will use the following checklist to verify information regarding the school's records (check all that apply):

- No record for student is available at this location.
  
- Some record for student is available at this location. This record includes:
  - Photo-copy of Form I-20
  - Original school copy of the Form I-20
  - Name
  - Date and place of birth
  - Country of citizenship
  - Address
    - Does the address appear to be the current address of the student? Do all current school records reflect the same address for the student?
  - Supporting documentation verifying the student's qualifications for initial issuance of the I-20 Certificate of Eligibility (may be financial documentation, original application, transcripts, etc). Description of this documentation:  
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\_\_\_\_\_  
\_\_\_\_\_  
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- Some record that the student initially enrolled and is currently enrolled at that school. The record for this currently enrolled student includes:
  - Date of commencement of studies;
  - Status (full or part time);
  - Degree program or field of study;
  - Whether the student had been certified for practical training and beginning/ end dates of such training.
  - If the student's working transcript shows that a student is or has participated in mandatory employment as part of a class or program, (ex: co-op or internship as part of a class), verify that this participation was recorded by the DSO as authorized Curricular Practical Training.

\* Skip if a Title IV institution. If a school is accredited by an agency recognized by the Dept of ED or if the school is Title IV, the contractor will not need to conduct a review of the bonafides of the school. The questions marked with an asterisk should be eliminated in these instances. 1

- If the student's working transcript shows that the student was or is currently pursuing only part time studies, verify that the DSO is aware of this circumstance, and advised that student that such a part-time status was authorized.
  - Reason for such DSO authorization:
 

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- If the student was granted an extension, verify that the DSO recorded a reason for the extension:
  - If extension was for an M-1 student record, indicate evidence that the extension was approved by the Service:
 

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- If the student is an M-1,
  - Verify that any periods of Optional Practical Training recommended by the DSO were after the completion of the student's program.
 

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  - Compare the currently issued I-20, the original I-20 and the student's working transcript to verify that the student's educational objective has not changed during the course of the program.
 

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- If the student is enrolled in an English language program, verify that no Post-Completion Optional Practical Training was recommended or authorized by the DSO.
  
- Other/ Comments:
 

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- Some record that the student initially enrolled, but is no longer enrolled at the school. The records for this student show:
  - Date of commencement of studies; and either
  - Transfer;
  - Change of Status;
  - Program completion; or
  - Termination date and reason, if known.
  - Other/ Comments:
 

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- The school has records indicating that the student never enrolled.

- Additional comments on the schools record retention:

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**2. If school does not have current INS approval, contractor should collect the following information from the school:** (Check all that apply)

- Has the school ever applied for INS approval to admit nonimmigrant F and/ or M students prior to this time?
  - NO (if no, continue to section 3)
  - YES (if yes, complete section 2)
  
- Was the previous certification application:
  - Denied
  - Withdrawn
    - If withdrawn, what was the school code from the previous certification? \_\_\_\_\_

Comments on this denial/withdrawal:

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NOTE: The contractor should accept any supporting documentation that school may wish to submit on past certification denials or withdrawals. This supporting documentation should be submitted to the INS with the packet of other supporting documentation provided by the school.

**3. Contractor will conduct an interview with a DSO and a tour of the campus.**

The purpose of this interview/ tour is to verify that school is a bona fide institution, and that the functions and facilities of both the institution and the DSOs meet INS requirements.

**From the interview**, contractor should provide answers to the following: (answer all questions and check all that apply)

\*1) Evidence that the number of students and type of courses these students are pursuing are supported by the facilities available.

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- Number of students in school \_\_\_\_\_
  - Average number of students per class/ lab/ instructional session: \_\_\_\_\_
  - Room and board arrangements for institutions offering on-campus living as compared with the size of the student body.
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\*2) Percentage of enrolled students that proceed to complete the program (attrition rate).

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3) Indication that school has a DSO acting with knowledge of and in compliance with the regulations governing I-20 issuance and reporting requirements or has the ability to be in compliance upon INS approval.

- Verification that there is at least one individual acting as a DSO, or that there is an individual who has been named to act as DSO upon INS approval. Comments: [PDSO: Bert Barry, Director of International Services; DSO: Don Morris, University Registrar.]
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- - Verification that this individual is not also responsible for recruiting international students. Comments: [No compensation for either PDSO or DSO based on recruitment.]
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- Indication that this DSO has knowledge of, or access to knowledge of INS regulations governing I-20 issuance and reporting requirements. Request brief description of resources used by DSO to maintain awareness of and compliance with her/ his duties as a DSO. [PDSO is a member in good standing of NAFSA: Association of International Educators and has 17 years of experience in International Education. DSO is a member in good standing of AACRAO.]
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- If school has current approval, brief description of process by which DSO
  - Verifies initial student eligibility when issuing Form I-20 for initial attendance. [Official academic records, proof of English language ability, and financial guarantee documents are collected along with the submission

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of a signed application for admission. If the student is in the U.S., copies of the biographical and U.S. visa pages from the passport are also collected.]

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- Determines the status of a transfer-in student; [Students in the U.S. must submit an F-1 Transfer Authorization form, signed by the DSO of the institution they were most recently authorized to attend.]
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- Process by which DSO verifies that a student is still enrolled in a full course of study throughout the program (periodic reporting, checking registrar each term, etc). [The Webster University computer system (CARS) provides information on the enrollment status of every student.]
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- Process by which DSO verifies that the students complete the program (graduate). [CARS records all data on student graduation.]
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- If the school offers post-secondary academic programs, inquire with the DSO her/ his process for:

- Authorizing a program extension; [Currently, Extensions of Status are processed in accordance with INS regulations, using a new form I-20 and a form I-538. Under SEVIS that system will change for the better.]
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- Authorizing a student to drop below a full course of study: [For academic reasons, a letter from the student's academic advisor is required. For medical reasons, a letter from the student's physician is necessary.]
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- Authorizing Curricular Practical Training: [The student must secure a letter from his/her academic department recommending the training and must register for at least one (1) credit of Internship, COOP, Practicum, or related credit. Of course, the PDSO/DSO authorizes the CPT on the I-20 and submits the I-538 to London, KY.]

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If the school is a language school, or offers an English language program, inquire with the DSO her/ his process for:

[N/A]

- Authorizing a program extension;  

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- Authorizing a student to drop below a full course of study:  

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- What kind of practical training the DSO recommends or authorizes for English language students and when that training takes place.  

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If the school offers vocational programs, verify the process for: [N/A]

- Making an extension recommendation and verifying that the extension was approved.  

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- Making a recommendation for post-completion OPT.  

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- Verifying that the transfer request for a student transferring into the school is approved.  

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If the school is a flight school, or offers flight training, inquire with the DSO:

[N/A]

- The training hours required to determine a full-course of study for the student.  

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- The nature of the flight training offered to nonimmigrant students (commercial, private license, etc).  

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If the school is a public secondary school (grades 9-12), verify DSO's: [N/A]

- Knowledge of the limitations to an F-1 high school student's program length (12 month maximum).

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- The process by which the DSO either assists the student in transferring or changing status after one year or informing the student that they can no longer attend that school as an F-1.

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- The process by which the DSO verifies student reimbursement for school costs prior to signing the I-20.

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- List of programs offered at the school for which the DSO has issued a Form I-20. [As indicated in the Graduate Catalogue.]

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4) Other contractor comments from the interview:

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**From the campus tour**, contractor should provide information on the following:

\*1) Evidence that instruction of courses and other school business operations are in fact taking place. (check and answer all that apply)

- Site visit of classroom space, lab and/or library facilities. Comments:

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- Observation of actual classroom/ lab instruction. Comments:

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- Site visit of on-campus housing and/ or food service facilities. Comments:

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- Site visit of administrative or other offices or physical plant components of the institution. Comments:

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2) Evidence that school has a DSO acting with knowledge of and in compliance with the regulations governing I-20 issuance and reporting requirements or has the ability to be in compliance upon INS approval.

- Site visit of a DSO office located at the school or school system. Comments:

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- Site visit to location where nonimmigrant student records are kept or will be kept upon INS approval. Comments:

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- Evidence of resources available to DSO to carry out required I-20 issuance and reporting duties. Comments:

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**4. Contractor to pick up package of the following supporting materials from school:**

School will be advised by INS prior to site visit what materials it will need to include. Contactor is to briefly review the submitted materials and, on following list, check all that apply or are included in materials provided by school:

- I-17 printed from SEVIS. Contractor should verify that form includes original signature and stamp/ seal of institution on page 3.
- I-17A printed from SEVIS. Should include complete information on at least one DSO.

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- I-17B, for those schools that are part of a multi-campus institution, printed from SEVIS. If school has not applied to the INS as part of a multi-campus institution, they will not have an I-17B.
- \*Documentation evidencing business operations of school. Please check all that apply below.
  - School catalogue;
  - Reference to website with school information
  - Other written documentation evidencing its business operations.
  - The institution is exempt from this requirement and has chosen not to submit this evidence. The exempt institution is:
    - A Public school or school system;
    - School accredited by a nationally recognized accrediting body; or
    - A secondary school operated by or as part of a school so accredited.
- \*Evidence of licensure, accreditation or approval.

School will be advised by INS prior to site visit of the evidence required for each school type. It will be the school's responsibility to assure that appropriate and sufficient evidence is included with this package. However, the contractor should be aware of what kind of evidence is allowable and sufficient for each type of school. Contractor should review submitted evidence and check all that apply below to indicate the school type and submitted evidence of licensure, accreditation or approval:

- A **public school** must submit a state license or approval (see attached for examples).
  - NOTE: The school may also show evidence of accreditation, but this accreditation is not sufficient replacement for state licensure or approval.
- A **private/parochial elementary or secondary school** must submit a state license or approval AND:
  - A certification of accreditation or approval from a local educational agency, if such agency is required by the state to approval private schools through an on-site team visit; OR
  - A certification of accreditation or successful evaluation by an organization holding membership in the Council for American Private Education AND letters from at least three public institutions of a higher educational level attesting that graduates from the petitioning school have been and are unconditionally accepted.
  - NOTE: The school may be accredited, but this accreditation cannot replace state licensure or approval for purposes of INS certification.

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- ❑ **All other schools** must show that they are accredited, licensed, or otherwise approve, unless they meet one of the two following exceptions:
  - ❑ A **postsecondary school neither publicly owned and operated nor accredited** must demonstrate that:
    - ❑ Credits are accepted unconditionally by accredited institutions of higher education, evidenced by Letters from at least 3 accredited institutions attesting that it accepts credits from the petitioning school. These letters must state the name of the petitioning institution, names of graduates of the petitioning institution who have been accepted at the accredited institution, and enrollment dates and programs for which the graduates have been accepted. OR
    - ❑ Evidence that the institution or program has established satisfactory assurance of accreditation from the appropriate accrediting body. (*Written statement from the accrediting body documenting their intention to provide accreditation?*)
  - ❑ In lieu of the evidence of certification referenced above, a **school recognized by a state authority as appropriate for study by Veterans** may submit a statement of recognition for specific programs signed by the appropriate public official. These programs must be the same as the programs submitted for approval on the I-17.
- ❑ **Flight schools** must be licensed/approved by the state AND approved by the Federal Aviation Administration (FAA). The approval by the FAA will be the “air agency certificate” and must include a list of authorized courses, instruction ratings, flight hours, and an attachment certifying approval pursuant to 14 CFR Part 141 (See attached).
- ❑ **Vocational schools, business schools, language schools, and American institutions of research** must submit evidence of accreditation to establish that its courses fulfill the appropriate objective. If no accreditation, schools that currently have or are seeking:
  - ❑ F-1 approval and vocational schools awarding recognized associate degrees must submit letters from 3 accredited institutions attesting that graduates of the petitioning school have been and are accepted unconditionally and include the name the name of the graduates, date of enrollment, and the program into which the graduates were accepted.
  - ❑ M-1 approval not included above must submit letters from 3 employers attesting that recent graduates of the petitioning school are fully qualified in the field of training and must state the name, and position of the graduate and the dates of employment with the company.

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- Other/ Comments on evidence:

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*(See set of attachments providing examples of licensure and approval.)*

- \*Financial documentation evidencing school's security as an institution. Check all that apply below:

- Audited financial statements;
- Federal income tax returns;
- Un-audited financial statements.
- Other: \_\_\_\_\_

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- Comments on Submitted Documentation:

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