UNIVERSITY OF CALIFORNIA, SAN FRANCISCO
AUDIT AND ADVISORY SERVICES

Visa Processing for International Scholars
Project #18-086

June 2018

University of California
San Francisco

UCSF

Audit and Advisory Services

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SUBJECT: Visa Processing for International Scholars

As a planned internal audit for Fiscal year 2018, Audit and Advisory Services ("A&AS") conducted a review of Visa Processing for International Scholars. Our services were performed in accordance with the applicable International Standards for the Professional Practice of Internal Auditing as prescribed by the Institute of Internal Auditors (the "IIA Standards").

Our review was completed in June 2018 and the preliminary draft report was provided to department management in June 2018. Management provided us with their final comments and responses to our observations in June 2018. The observations and corrective actions have been discussed and agreed upon with department management and it is management's responsibility to implement the corrective actions stated in the report. In accordance with the University of California audit policy, A&AS will periodically follow up to confirm that the agreed upon management corrective actions are completed within the dates specified in the final report.

This report is intended solely for the information and internal use of UCSF management and the Ethics, Compliance and Audit Board, and is not intended to be and should not be used by any other person or entity.

Sincerely,

Irene McGlynn
Director
UCSF Audit and Advisory Services

EXECUTIVE SUMMARY

I.   BACKGROUND

As a planned audit for Fiscal Year 2018, Audit & Advisory Services (A&AS) completed a review of the international visa processing. The objective of the review was to assess the controls and processes surrounding the processing of visa for international scholars.

The International Students & Scholars Office (ISSO) is responsible for providing scholars, and visitors with information, advice, and assistance in obtaining visa documentation and authorization for employment, and in the maintenance of immigration status; for a number of visa types including J-1 exchange program, F-1 students, and work visas: H-1B, TN, E3, O-1 and B-1. Management of international students and scholar's data and status by ISSO is performed through the International Student Scholar Management (ISSM) system, which captures all relevant demographic and visa details; and does nightly batch uploads of visa applications, check-in and registrations updates to the Student and Exchange Visitor Information Systems (SEVIS).

The ISSO is the entity authorized to submit immigration status applications on behalf of UCSF to federal agencies; it is also required to track and report international scholar data as mandated with state and federal regulations. Annually, ISSO submits a report to the State Department on its program's demographics, i.e. program effectiveness, trends, and initiatives. Also, the State Department requires sponsors to screen and select their participants to ensure the suitability of their program for their prospective participants, ensure participants have sufficient proficiency in the English language, provide pre-arrival and post-arrival information, and monitor the welfare of participants.

The ISSO collaborates with HR to process the J-1 visas, and HR works with the faculty sponsor from the departments to gather documents such as: certification of English language proficiency, curriculum vitae, UCSF offer letter, passport, proof of minimum healthcare insurance coverage and adequate financial supporting documentation. These documents will then be reviewed by the ISSO for accuracy and completeness prior to issuing the DS-2019 form, which the scholar then uses to apply for a J-1 visa. The campus department along with its Principal Investigator are responsible for reviewing prospective participants and initiating the sponsorship process; they are also responsible for collaborating with HR when a visa extension is needed.

Our review focused specifically on J-1 visas for postdoctoral scholars and academic scholars. For the period of 7/1/2017 to 3/31/2018, there were a total of 554 J-1 exchange visitors at UCSF comprising191 postdoctoral scholars, 187 visiting scholars, 110 visiting students, and 66 academic scholars.

II.   AUDIT PURPOSE AND SCOPE

The purpose of this review was to assess the effectiveness of processes and controls for managing the J-1 visa program. The scope of the review covered J-1 visa holders from 7/1/2017 to 3/31/2018. Procedures performed as part of the review included:

    (1) obtaining and reviewing policy and procedures;
    (2) conducting interviews and walkthroughs of the visa processing;
    (3) assessing the screening process for selecting a participant;
    (4) sample testing of 20 participants and reviewing the visa processing for proper supporting
        documentation;
    (5) evaluating compliance with regulations; and

(6) reviewing the processing of payments to international visitors with particular focus on income tax withholding and reporting to the Internal Revenue Service.

Work performed was limited to the specific activities and procedures described above. As such, this report is not intended to, nor can it be relied upon to provide an assessment of compliance beyond those areas specifically reviewed. Fieldwork was completed in June 2018.

III.   SUMMARY

Based on the work performed, effective processes and controls appear to be in place for managing the J-1 visa program and no material deficiencies were found. The administrative processes and controls appear adequate to support the:

- Screening and selecting international program participants
- Pre-and-post-arrival requirements
- Federal regulations for program sponsors

Improvement opportunities exist over the retention of visa records. The ISSO's current practice is to keep records indefinitely largely as a customer service for scholars who have misplaced their records or may require information related to their original application documents. The State Department's requirement for holding visa records is a minimum of three years and UC's record retention policy indicates "three years after the end of the academic year in which the program for the scholar has ended".

Retaining records beyond their required need may lead to the unnecessary resources devoted to storing, maintaining, locating and producing records. Also, when records may legitimately be disposed of but are retained, it may create risks to the university as such records remained are subject to possible future requests under statute or legal proceedings. Additionally, retaining records containing personal information may expose the University to risks related to privacy and related security concerns if records are inadvertently released or lost.

We recommend that ISSO consider reviewing its visa record retention practices to ensure records are kept for the period that they are needed to meet the State Department and the University of California's record retention policy requirements.