![PimaCommunityCollege logo]

Center for International Education and Global Engagement Follow-Up Audit Report

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EXECUTIVE SUMMARY

SCOPE & METHODOLOGY
The Office of the Internal Auditor (Internal Audit) has completed a follow-up review of the Center for International Education and Global Engagement (formerly called the International Student Services Office (ISSO) and referred to as ISSO throughout this report). We recognize that valuable time was required of the International Students' staff during the audit, and express our appreciation for their efforts in helping us complete the audit as efficiently as possible.

The planned objective of this follow-up audit was to determine if the findings in the original audit (completed May 2012) were addressed and to communicate the implementation status of Management's Corrective Action Plans. *The Institute of Internal Auditors (IIA) International Standards for the Professional Practice of Internal Auditing* (Standards) requires that Internal Audit follow-up upon the disposition of management's actions to address risks identified and to communicate the results of the audit engagement.

To determine if the findings on the original audit had been addressed and ascertain the implementation status of Management's Corrective Action Plan, Internal Audit:
- interviewed applicable International Student Services Office staff and administration,
- examined various International Student documents and Banner System student records,
- obtained and reviewed documentation from the *U.S. Department of Homeland Security, U.S. Department of State, Student and Exchange Visitor Information System (SEVIS), Payment Card Industry (PCI) Data Security Standards,* West Campus Cashier's Office, Contracts Office, and Information Technology Departments.

Other areas were included beyond the scope of a regular follow-up audit due to regulatory changes and increased information security risks. This resulted in additional testing of ISSO processes and procedures including:
- the newly implemented J-1 visa Student Exchange Visitor Program administration,
- testing and assessment of international student visa compliance requirements (27 attributes) for the fall 2015,
- testing of Information Technology (IT) controls.

ISSO OVERVIEW
The Pima Community College (PCC) ISSO, located on the West Campus, is responsible for international student federal compliance, as well as:
- providing international students with a welcoming environment/orientation that supports the achievement of their academic goals,
- providing cultural activities to help international students adjust to living in the United States,
- administering international student visas (J1-Student Exchange Visitors, F-1 Full-time Students, and other visa types),
- conducting support activities for visa administration including issuing I-20 forms (issued by the College for F-1 Visas) and reviewing TOEFL (English as a second language students) exam scores,
- providing academic counseling, and
- recruiting new students globally to attend PCC.

SUMMARY & ANALYSIS
Efforts have been started by International Student Services Office management to improve processes related to international student compliance. Significant work remains in order to address certain control conditions and help ensure ongoing compliance.

Since the original audit (May 2012), there has been nearly a 100% turnover in ISSO staff. In August 2015, an experienced Associate Director, International Admissions - Compliance and Operations was hired to provide direction, develop and implement systems to overhaul operations, rebuild the ISSO team, and to help ensure on-going compliance. ***Internal Audit noted that significant progress has been made since August 2015 to address issues; new management and staff continue to work diligently on implementing improvements***.

A critical milestone was achieved in March 2015 when the College received approval from the *U.S. Department of State* to issue J-1 Exchange Visitor Program visas after losing this privilege in 2009 (due to lack of use). The new J-1 Program provides significant opportunities for the College to grow enrollment in special programs that promote cultural and educational exchanges.

A *summary* of conditions (findings) is outlined below; the complete audit conditions (including repeat conditions, new conditions, and the status of prior FY12 audit conditions) are included in the detailed report starting on page 4. General Concerns follow the detailed report; while the General Concerns are not findings, they are included to help address issues not within the direct control of ISSO, but that impact ISSO.

Internal Audit will continue to follow-up to determine if all conditions identified are addressed. A follow-up is planned for the fall of fiscal year 2016/2017; the results of this follow-up audit engagement will be communicated to International Student Services Office Administration, applicable senior management, the Board of Governors and the Finance and Audit Committee.

Audit Report Definitions
The following are definitions for audit terms listed in this report.

- **Condition –** An area of potential control weakness, policy violation, financial misstatement, inefficiency, or other problematic issue identified during the audit (previously referred to as an audit finding).

- **Repeat Conditions** – Conditions that were identified in both the original audit (2012) and the current audit.

- **Current Conditions** – Conditions identified within the current audit; but not in the original audit report.

- **FY12 Conditions Status** – Status of conditions identified during the original audit report; not repeated in the current audit.

SUMMARY OF AUDIT CONDITIONS (FINDINGS)

Repeat Conditions

- Written ISSO departmental operating procedures do not exist.
- Prior to August 2015, international students (J1 visas) were not provided with the required on campus employment information delineating where students can work.
- Prior to August 2015, international Student Services Office did not have a process in place to monitor academic progress of international students.

Current Conditions

- Prior to August 2015, ISSO did not have a process in place to periodically review all Banner system records for changes in visa status.
- Prior to August 2015, no process was in place to ensure that all international students have provided a current address and telephone number, as required.
- Records of student application fees are not consistently maintained for students with visas issued by other schools or students with non-F1 Visas.
- Visa codes in the Banner system are not always accurately applied by ISSO staff.
- A process is not in place to prevent or identify international students bypassing the ISSO international student application and utilizing a domestic student application.
- A written contract for the Fall 2015 Becalos program does not exist.
- Prior to November 2015, College email systems utilized to collect international student data were not secure (unencrypted email).
- No ISSO records disposal compliance plan existed prior to November 24, 2015. The plan has not yet been fully implemented.

FY12 Conditions Status

- Partially Addressed:
  - The document collection process was not in accordance with College policy for F-1 students applying from another school.
- Substantially Complete:
  - Not consistently reporting students as not maintaining status.
- No Progress:
  - 8% of the files did not contain a receipt for application fee.

[Note: Items that have been addressed are not included; see the *Prior Audit Findings Status – Non Repeat Conditions* section for details.]

DETAILED REPORT

BACKGROUND

Internationalization Strategic Plan 2015-2020

Internationalization is a key strategic initiative for the College and increased enrollment of international students is <u>essential</u> to growing the College in a more global direction. The *Chancellor's Goals, Objectives and Timelines for 2014/2015* included to "strengthen, enhance and increase diversity, inclusion and **global education**" and to "establish a task force to develop and begin implementation of a College-wide internationalization plan. "The College's *Strategic Plan for Internationalization 2015-2020* (issued May 21, 2015) was created as a result of the *Chancellor's Internationalization Task Force* with input from staff, faculty and students, including international students, and community members.

Vision: "Global education without limits"

Mission: "Developing communities through global education"

The *PCC Strategic Plan for Internationalization 2015-2020* includes seven (7) main objectives including the following:
1. *Infuse Global Knowledge Into the Curriculum*
2. *Create a Language Institute*
3. *Develop Community and Global Engagement*
4. *Develop a Study Abroad Program*
5. *Identify Opportunities for Workforce Development in the International Arena*
6. *Provide International And Cultural Development For Faculty, Staff and Administrators*
7. *Expand International Student Outreach, Recruitment and Services*

This important international initiative also supports the College with HLC Criterion for Accreditation.

Higher Learning Commission

HLC Criterion Five (Resources, Planning, and Institutional Effectiveness) notes that the Institution's resources, structures, and processes are sufficient to fulfill its mission, improve the quality of its educational offerings, and respond to future challenges and opportunities. Further, criterion 5.C. indicates that *institutional planning anticipates emerging factors, such as technology, demographic shifts, and globalization.*

Student and Exchange Visitor Program (SEVP)
The *SEVP* program within the *U.S. Immigration and Customs Enforcement (ICE),* acts as a bridge for government organizations that have an interest in information on nonimmigrants whose primary reason for coming to the United States is to be students. International student requirements are very complex and require constant oversight to ensure compliance with specific visa regulations.

Student and Exchange Visitor Information System (SEVIS)
The *Student and Exchange Visitor Information System (SEVIS)* is the web-based system used by the *U.S. Department of Homeland Security* (F and M visas) and the *U.S. Department of State* (J visas) to maintain information on SEVP certified schools. PCC's ISSO utilizes SEVIS in its international student compliance efforts. This tool is critical in protecting national security while supporting the more than one million F, M, and J nonimmigrants that are in the United States for education and cultural exchange. The Department of State and U.S. Department of Homeland Security utilizes *SEVIS* to issue forms (e.g. Form I-20 "Certificate of Eligibility for Nonimmigrant Status"). ISSO utilizes SEVIS to fulfill legal reporting responsibilities.

Global International Students Statistics
In the United States (as of November 2015) there are:
- 1.2 million F & M Visa students;
- 201,800 J-1 Visa exchange visitors;
- 8,803 U.S. schools (F&M); and
- 1,452 designated programs (J) certified by the *SEVP* to enroll international students

Statistics for places of student origin are provided on the world map below.

PCC International Students Statistics

In Fall 2015 there were 259 international students attending PCC, a 5% total increase from 2014. PCC had fifty-eight (58) J-1 visa students from Mexico attending courses at various PCC campus locations, while the majority of students were F-1 Visa students studying full-time at PCC. The top five countries sending students to PCC in the Fall 2015 were Mexico, China, Saudi Arabia, Vietnam and South Korea.

Visa Definitions

There are numerous visas issued to students. The primary visa types at PCC are F-1 and J-1:
- F-1 Visa – A non-immigrant student visa for international students wishing to study in the U.S.; students must maintain a full course of study.
- J-1 Visa – A non-immigrant visa issued to exchange visitors, scholars, and college students.

PCC J-1 Exchange Visitor Program

PCC became an active J-1Visa Exchange Visitor Program granting institution in March, 2015. The goal of the Exchange Visitor Program is to foster global understanding through education and cultural exchanges. This status allows PCC to issue J-1 Visa Form DS-2019 "*Certificate of Eligibility for Exchange Visitor (J-1) Status*".

New PCC International Student Initiatives

New ISSO initiatives include the creation of an "*American Institute of Language & Culture*". Planned for launch in summer 2016, the Institute will greatly expand global marketing efforts to recruit international students, with a strong emphasis on Latin America and Asia.

AUDIT CONDITIONS AND RECOMMENDATIONS

REPEAT CONDITIONS

AUD.FY16-01 – Condition 1
Written ISSO departmental operating procedures do not exist.

Written procedures are necessary to ensure compliance with complex J-1 Visa Exchange Visitor Program and F-1 Visa requirements.

The lack of written ISSO procedures could lead to:
- errors;
- non-compliance with State, College and Federal requirements; and/or
- inconsistent application of processes.

RECOMMENDATION

We recommend that International Student Services Office complete the drafting of the written operating procedures that was initiated by the Associate Director and provide a copy to Internal Audit when available.

MANAGEMENT CORRECTIVE ACTION	RESPONSIBLE OVER IMPLEMENTATION	DATE OF IMPLEMENTATION
Written operating procedures will continue to be developed in light of new and updated policies, procedures and protocols.	Associate Director	On-going; 2016-17 edition to be completed by October 2016

AUD.FY16-01 – Condition2
Prior to August 2015, International J1 visa students were not provided with the required on-campus employment information delineating where the student can work.

Federal regulations require that international students with J-1 Visas are provided with specific on-campus employment options during orientation *(22 CFR Part 62 – Exchange Visitors)*.
The lack of proper on-campus employment advisement could lead to:
- Non-compliance with federal regulations; and/or
- Students who do not seek on-campus employment opportunities because they are not aware they exist.

RECOMMENDATION

We recommend that International Student Services Office continue to include on-campus employment information during the orientation program for international students; and, issue the *Social Security Administration* letter for on-campus and Curricular Practical Training (CPT).

MANAGEMENT CORRECTIVE ACTION	RESPONSIBLE OVER IMPLEMENTATION	DATE OF IMPLEMENTATION
On-campus employment information is already included in orientation and on our website; the corresponding letter to the Social Security Administration is also issued.	Associate Director	Completed

AUD.FY16-01 – Condition 3
Prior to August, 2015 the International Student Services Office did not have a process in place to monitor academic progress of international students.

Specific details are as follows:
- Academic progress was not monitored or documented for three (3) of twenty five (25) (12%) F-1 Visa students selected for review (from Fall 2015).
- One student's visa was terminated on November 2, 2015 because the student had a zero (0.00) GPA and could not meet visa requirements; however, the same student did not receive academic counseling for one and half years.

The College Banner system does not automatically flag international students with poor academic performance GPAs because the feature was only designed for domestic students. To ensure compliance, ISSO must manually review GPAs and the class delivery type for each international student every semester.

Federal regulations require monitoring international student's academic GPAs to ensure compliance with visa and SEVP regulations.

The lack of consistent monitoring of student academic progress could result in:
- International student visas not be terminated as required; and
- Academic assistance not being provided to students until it is too late to make sufficient progress to meet GPA requirements.

RECOMMENDATION
We recommend that management continue the efforts that began in the Fall 2015 semester to regularly monitor international student academic status and provide academic counseling as soon as possible when academic issues are identified. We also recommend ISSO management work with IT to modify the Banner system to automatically flag GPA federal compliance issues for international students.

MANAGEMENT CORRECTIVE ACTION	RESPONSIBLE OVER IMPLEMENTATION	DATE OF IMPLEMENTATION
A new Satisfactory Academic Progress policy has been developed and implemented which will be published in the 2016-17 Catalog. International Student Advisors review weekly attendance records for all international students as a way to preemptively identify students who may be struggling since we currently do not have an Early Alert System. We will continue to provide input regarding the design of such a system and/or develop a separate reporting mechanism in collaboration with the Registrar's Office and IT that meets federal immigration regulations.	Associate Director	On-going

CURRENT CONDITIONS

AUD.FY16-01 – Condition 4
Prior to August, 2015 the International Student Services Office did not have a process in place to periodically review all Banner system records for changes in visa status.

A process/ system should be in place to periodically review international student records for changes in visa status so that records are accurate and students can be properly advised.

The lack of a process for record reviews could lead to:
- Inaccurate count of student visa types for international student records;
- Inefficient processes or unnecessary work; and
- Inaccurate reporting.

RECOMMENDATION
We recommend that International Student Services Office continue their efforts regarding their systematic follow-up process to identify/confirm students listed on their reports as having changes in visa status. In addition, we recommend that staff should regularly review Banner system student visa records and reports and after the review is complete, revise records found to be in error.

MANAGEMENT CORRECTIVE ACTION	RESPONSIBLE OVER IMPLEMENTATION	DATE OF IMPLEMENTATION
In August 2015 we began running and reviewing reports four (4) times a semester: prior to the start of the semester; just prior to the federal reporting deadline of 30 days after the semester begins; after 45th day reporting is complete and the second 8-week session has begun; and, at the end of the semester. Cross-referencing is conducted between Banner and SEVIS to ensure accuracy. Furthermore, an "International Hold" is placed on all visa types (not just F or J) in order to prevent a status change be completed without notification to our office.	Associate Director	On-going

AUD.FY16-01 – Condition 5
Prior to August, 2015 no process was in place to ensure that all international students have provided a current address and telephone number, as required.

Overall, eighty-six (86) of two hundred fifty-six (256) (33.59%) international students did not have confirmed current addresses and telephone numbers.

The College and the U.S. Department of Homeland Security require that students report their valid/current U.S. address to ISSO management within ten days of moving.

The lack of a current address/telephone number could result in:
- Loss/termination of student's visa status;
- Non- compliance with U.S. Department of Homeland Security *SEVIS requirements*; and/or
- Delays in contacting students due to invalid information.

RECOMMENDATION
We recommend that ISSO management continue their efforts to actively follow-up on international student's confirmation of address/telephone numbers. This process should include taking appropriate action if students do not reply within 10 days to College emails requesting information. Also, we recommend that ISSO management continue plans to develop a standard operation procedure (SOP) and provide documented results to Internal Audit.

MANAGEMENT CORRECTIVE ACTION	RESPONSIBLE OVER IMPLEMENTATION	DATE OF IMPLEMENTATION
We communicate with students throughout the semester and verify their contact information during advising sessions and when students request any assistance.	Associate Director	On-going

AUD.FY16-01 – Condition 6
Records of student application fees are not consistently maintained for students with visas issued by other schools or students with non-F1 Visas.

The *PCC Payment Handling Manual, 3.2.4 Credit Cards,* requires that credit card receipts are retained. Standard business practices include retaining all receipts supporting proof of payment.

The potential risks to the College include:
- Required application fee revenue not being collected; and/or
- An inability to determine if a fee was paid if the receipt is lost.

RECOMMENDATION
We recommend that all international student application fee hard copy receipts be retained. In addition, we recommend that ISSO management work with Finance to develop an accounting code specifically for international student application fees and utilize the code to provide proof that the fee was paid in the event that the original receipt is lost.

MANAGEMENT CORRECTIVE ACTION	RESPONSIBLE OVER IMPLEMENTATION	DATE OF IMPLEMENTATION
An inquiry was already made in September 2015 to determine if an accounting code for the application fee could be created. The response at that time was "no" since applicants do not have a PCC ID number. Since then, we have implemented the creation of a Banner record for every applicant in order for a PCC ID number to be generated in an attempt to find a solution. The College will be implementing a new online application process in the next six (6) months which will provide international students with the ability to pay the fee online.	Associate Director	On-going

AUD.FY16-01 – Condition 7
Visa codes in the Banner system are not always accurately applied by ISSO staff.

Specifically IA found that two (2) of four (4) visa types (50%) were inaccurately coded; the proper visa code was available in the Banner system but not utilized.

Banner system visa records should accurately reflect student visa types.

Inaccurate Banner system coding of visa records could lead to:
- An incomplete listing/understanding of all visa types being utilized; and/or
- Non-compliance with specific visa requirements.

RECOMMENDATION
We recommend that ISSO management conduct refresher training to ISSO staff on proper visa coding.

MANAGEMENT CORRECTIVE ACTION	RESPONSIBLE OVER IMPLEMENTATION	DATE OF IMPLEMENTATION
As part of the development of an online application, a complete review of all forms, codes and unused functions in Banner has been conducted to determine relevant and necessary data. IT is currently processing those system improvements and Legal Counsel is also verifying the list of visas authorized for In-State Tuition classification. Upon finalization, all stakeholders will be updated.	Associate Director	On-going

AUD.FY16-01 – Condition 8
A process is not in place to identify or prevent international students from bypassing the ISSO international student application and utilizing a domestic student application.

Two (2) of fourteen (14) (14.28%) non-F-1 Visa students reviewed did not pay the international student application fee but used the domestic student application.

College policies indicate that international students complete an international student application; all international students applications should be processed by ISSO with the appropriate fee paid.

Bypassing the international student application process may result in:
- Non-compliance with visa requirements;
- Insufficient knowledge of all international students attending PCC classes; and/or
- Lost revenue when the appropriate fee is not collected.

RECOMMENDATION
We recommend that ISSO establish a process (and work with IT staff to implement) to help ensure that all international students 'applications are processed through the ISSO office.

MANAGEMENT CORRECTIVE ACTION	RESPONSIBLE OVER IMPLEMENTATION	DATE OF IMPLEMENTATION
The College is implementing a new online application within the next six (6) months with much more robust logic in order to accurately gather data, intention and student status.	Associate Director in collaboration with AVC of Student Development and Registrar's Office	On-going; full implementation by November/December 2016

AUD.FY16-01 – Condition 9
A written contract for the fall 2015 Becalos program (sponsored by the Mexican government) does not exist.

A verbal agreement, rather than a written contract, was completed between the College and Mexican officials regarding the Becalos Program; the program includes 58 students with J-1 Visas. ISSO generated 2015 Becalos Program invoices (that contained some elements of a contract) that were paid prior to the end of the Fall 2015 semester by the Mexican Government.

College policies require that contracts be signed. Also, standard internal controls dictate obtaining written, executed contracts that include all expectations between parties.

The lack of a written contract could lead to:
- An inability to enforce terms or rectify misunderstandings between the College, international students and government officials;
- Financial and legal liabilities;
- Missed revenue from fees/tuition due for the program; and/or
- An increased risk of fraud.

RECOMMENDATION
We recommend that ISSO obtain written contracts between PCC and all foreign governments for international student services. In addition, we recommend College General Counsel review all ISSO contracts prior to approval, consider developing a standard ISSO legal template that can be utilized for future ISSO contracts, and that ISSO retain copies of all contracts.

MANAGEMENT CORRECTIVE ACTION	RESPONSIBLE OVER IMPLEMENTATION	DATE OF IMPLEMENTATION
Differing legal systems and business practices make contract standardization difficult; however, proposals are submitted for every program so we will work with Legal Counsel to identify and incorporate contractual elements into those documents which can serve the same purpose.	VP for International Development	October 2016

AUD.FY15-02 – Condition 10
College email systems utilized to collect international student data were not secure (unencrypted email).

IT data security controls and Payment Card Industry (PCI) Data Security Standard 3.1 include encrypting confidential data.

A secure email system was created by College IT in the summer 2015; however ISSO staff did not utilize the new system until after the start of the audit.

The lack of controls over sensitive student and credit card data could lead to:
- inadvertent release of confidential student data;
- credit card fraud;
- increased credit card processing fees from the College's banking partners; and/or
- identity theft.

RECOMMENDATION

We recommend that ISSO continue to utilize the College's secure email system they began using in Fall 2015 and provide additional training to staff as needed.

MANAGEMENT CORRECTIVE ACTION	RESPONSIBLE OVER IMPLEMENTATION	DATE OF IMPLEMENTATION
The secure email system will continue to be used until the online application system is fully deployed since it will have the capability for documentation uploading.	Associate Director in collaboration with AVC of Student Development and the Registrar's Office	November/December 2016

AUD.FY15-02 – Condition 11
No ISSO records disposal compliance plan existed prior to November 24, 2015. The plan has not yet been fully implemented.

State, College and federal requirements include developing a records management plan that includes a plan for disposal of records. Changes in disposal plan requirements and electronic document scanning processes managed by the Director of Records Management have contributed to delays in implementation of the ISSO disposal plan.

The lack of a records disposal plan could lead to:
- non-compliance with State, College and/or federal regulations; and/or
- retention of unnecessary records.

RECOMMENDATION
We recommend that ISSO continue their efforts to complete the implementation of the ISSO records disposal compliance plan.

MANAGEMENT CORRECTIVE ACTION	RESPONSIBLE OVER IMPLEMENTATION	DATE OF IMPLEMENTATION
We are members of the new Banner Digital Management System initiative spearheaded by the Registrar's Office and revised requirements and timelines are currently being developed district-wide. The group meets monthly.	Associate Director	On-going

PRIOR AUDIT FINDINGS STATUS - NON REPEAT CONDITIONS

Implementation Status Classifications

After analysis, the implementation status of each finding was classified by Internal Audit into one of the status categories listed below:

Finding Status Classifications	Descriptions
Addressed	Implemented at 100% or risk/issue addressed
Substantially Complete > 50%	Substantially complete with more than 50% completion; but less than 100%
Partially Complete ≤ 50%	Partially complete with less than 50% completion; but more than 0%
No Progress	No progress observed or action taken

[NOTE**:** The scope of the prior ISSO audit (May 2012) included all students: admitted for academic year 2009/2010 and active in academic year 2010/2011; students admitted for academic year 2010/2011 and active in academic year 2010/2011, and students with I-20s issued for 2010/2011 academic year (may or may not have been admitted to the College). The students reviewed during 2012 are no longer attending the College; however some of the issues identified still exist].

Finding Description	Finding Status			
	Addressed	Substantially Complete >50%	Partially Complete ≤ 50%	No Progress
Noncompliance with federal reporting requirements; types of noncompliance that were noted include the following: ▪ Failure to report student status by the reporting deadline. ▪ Incorrectly reporting a student as active when the student was not enrolled, or not enrolled in the required 12 credits. ▪ Failure to report any information for a student or to report a change of student address. ▪ Failure to report students as not maintaining status when course load fell below 12 credits or when the student did not maintain a 2.00 GPA and 67% completion rate.	✓ ✓ ✓	✓		

Finding Description	Finding Status			
	Addressed	Substantially Complete >50%	Partially Complete ≤ 50%	No Progress
Noncompliance with college policies and ISSO procedures over the document collection process for prospective F-1 students. ▪ 14% of the files did not contain a high school transcript or the transcript was not properly translated. ▪ 10% of the files contained Affidavits of Support not properly certified by the bank or the bank statement was not properly translated. ▪ 8% of the files did not contain a receipt for the application fee or the authorization form for the fee was not processed. ▪ 4% of I-20s were issued prior to completion of the review and approval process. ▪ 12% of the files did not contain a copy of the student's I-94, Arrival-Departure Record. ▪ 20% of the files did not contain a copy of the student's I-20 stamped at the port of entry. ▪ 8% of the files did not contain a copy of the student's visa.	✓ ✓ ✓ ✓ ✓ ✓			✓
Delay in issuing I-20s: For four (4) prospective F-1 students, I-20s were not issued in a timely manner; there was a delay of 30 to 90 days between the dates of approval to the date the I-20 was issued.	✓			
I-20 reconciliation: There is no process to ensure that all I-20s issued in SEVIS by the College have been properly reviewed and approved by the Student Services Coordinator or the Student Services Manager; there are no controls in place to detect or prevent I-20s from being issued without proper administrative approval.	✓			

Finding Description	Finding Status			
	Addressed	Substantially Complete >50%	Partially Complete ≤ 50%	No Progress
F-1 students applying from another school: The ISSO document collection process for F-1 students applying from another school within the U.S. was not in accordance with SPG-3501/AA, IV, B. Review of files for students applying from another school, showed the following: ▪ None of the files contained TOEFL score reports, official secondary school transcripts, Affidavits of Support, proof of health insurance and official transcripts from the school currently being attended. ▪ 10% of files did not contain a copy of the I-94 and visa page.	✓ ✓			
TOEFL requirements on the College's website: The College's International Students website, updated in February 2012, includes incorrect TOEFL score admissions requirements.	✓			

GENERAL CONCERNS
The items below were noted as items of general concern and are presented for consideration. General Concerns include issues that were noted during the audit that were not under the direct control of ISSO. While these items are not conditions, and therefore do not require a management response, we recommend that ISSO continue to work closely with the appropriate departments to help address these issues with the overall goal to improve operations and decrease any potential negative impact upon the College's international students.

General Concern 1
The International Student Health Insurance Enrollment process is not as efficient as possible primarily due to outstanding IT system modifications.

Key Issues:
▪ The international student health insurance process requires numerous manual steps by ISSO staff each semester.
▪ The International Student Health Insurance Report from IT is inaccurate and does not provide a status of international student health insurance enrollments.
▪ The IT report "International Student Health Insurance" has not been corrected since errors were identified in it during the original audit in May 2012.
▪ The potential for errors is increased when manual processes are required rather than relying upon automated information technology reports.

Suggested Actions:
ISSO work with College IT staff to fix/modify the International Student Health Insurance Report and ensure it generates accurate data.

General Concern 2
A new College Administrative Procedure was submitted by ISSO October 29, 2015; however, it is still under review. As a result the College website does not have the appropriate international student application fee published and ISSO is at a competitive disadvantage when recruiting new international students globally due to the College's current admissions policies.

Key Issues:
▪ The *TOEFL* English exam is currently the only permitted exam per College *SPG 3501: AA Admissions* policy; while the new College Administrative Procedure has a more flexible policy. More competitive ISSO recruiting efforts and increased PCC international student enrollment may result if the College adopts the new Administrative Procedure. For example, students who have taken English language exams such as the globally recognized *International English Language Testing System (IELTS)* may choose to attend a competing college that accepts *IELTS* rather than PCC.
▪ The international student application fee is listed as $25; however this fee was changed in March, 2015 to $65.
▪ The College policy has been in the process of updating since October 29, 2015 and remains under review by the Registrar's Office and College General Counsel.
▪ Outdated information published on the College web-site could result in misunderstandings, application fee under-payments and disgruntled students.

Suggested Actions:
College General Counsel obtains necessary approvals for the new Administrative Procedure (AP) for Admissions, the new AP is posted to the College web-site and all areas where the international student application fee is posted are updated.

General Concern 3
Certain visa types have not been created/programmed in the Banner system by IT staff and the Registrar's Office; as a result some international students have not been properly coded.

Key Issues:
- Six (6) of fourteen (14) (42.85%) non F-1 Visa student visas did not have the correct visa type listed in the Banner system.
- Inadequate Banner system records could lead to issues including: incomplete listing/understanding of all visa types being utilized; and/or non-compliance with specific visa requirements.

Suggested Actions:
ISSO management continues to work with IT staff and the Registrar's Office to help ensure that the Banner system is modified to include all available visa type codes.