To: UMass Amherst Campus Leadership Council
From: Kumble R. Subbaswamy, Chancellor
Date: May 26, 2015
Subject: International Admissions/Visa/Compliance

I received a report and recommendations on 4/21/15 from the International Admissions and Federal Compliance Committee (IAFCC). That report was subsequently vetted by the Iranian Graduate Student Association, the International Programs Office (IPO), the Graduate Council, the Rules Committee, the Research Council, the Deans, and the relevant Vice Chancellors. After receiving feedback from all of these constituencies, I offer the following observations:

As pointed out by the IAFCC, the University of Massachusetts Amherst is a diverse and multicultural community that values, supports, and is accepting of differences, and continually strives to be equitable, fair, and inclusive. UMass is committed to non-discriminatory admissions and to educating every student without discrimination in all areas of the educational process, in the classroom and in every course of study or degree. This practice of non-discrimination operates within the laws and regulations that protect the safety and security of the entire campus community and that are established in local, state, and federal laws; statutes, and regulations. Thus, in considering our practices for student admissions and federal compliance, our campus starts from a commitment to the following guiding principles.

The University of Massachusetts Amherst:

- maintains a policy and history of equal opportunity, diversity, and inclusion;
- fosters an open educational environment and promotes academic freedom;
- supports excellence and innovation in research;
- promotes fairness, transparency, and clarity in all policies and practices;
- fosters a supportive relationship between the institution and its members; and
- seeks to minimize risk and liability for individuals and the institution.

Within that context, I offer the following guidelines for international student issues:
Admissions: UMass Amherst does not discriminate based on ethnicity, nationality, or country of origin. International students will continue to be offered admission based on the decisions made by Undergraduate Admissions and by the Graduate School and are contingent upon the U.S. Department of State issuance of a student visa. The Graduate School and the Undergraduate Admissions Office will provide disclaimer/notification language for prospective international graduate and undergraduate students informing them that the U.S. government, through its Office of Foreign Assets Control (OFAC), maintains sanctions and embargoes programs that have the potential to impact international student applicants’ ability to secure a visa, most often in specific disciplines or areas of study. Likewise, once a student has been accepted and is on campus, the IPO will inform each international student of any specific issues related to visa issuance. The IPO will continue to individually advise and offer guidance to all international students with regard to initial visa issuance and travel to the U.S., as well as the visa renewal and re-entry process to the U.S.

Visa Renewals: Each department in the Science, Technology, Engineering and Mathematics (STEM) academic fields (as defined by the Department of Homeland Security’s Immigration and Customs Enforcement unit) will require international students to write a research statement (a few sentences) that must be approved and signed by the student’s advisor prior to any international travel. Faculty advisors will have the greatest knowledge of the research project and will be aware of federal regulations (see training requirement, below). The research statement will be a short description of the international student’s academic research in layman’s terms; the IPO will provide general models for such a statement. This will accompany the existing requirement for IPO signature on a student’s I-20 form (for F-1 visas) or the DS-2019 form (for J-1 visas) for international travel endorsement. This practice will ensure that the student, faculty advisor, and other relevant faculty and staff can discuss the research areas in the context of federal compliance.

Coursework: We will not impose restrictions or targeted monitoring of regular coursework for international students. However, we recommend a broad program of education on related federal regulations for all faculty and students, particularly concerning the research context, since capstone and independent studies may require a case-by-case assessment (see Research section below).

Research: Educating the campus community on issues related to OFAC and export control laws will continue to be very important in minimizing the risk and liability for researchers, students, employees, and our institution. More specifically:

- The campus will continue to maintain an informative and succinct public website on export control and OFAC regulations, and other state and federal laws related to research.
- All faculty and staff (including visiting international scholars) will be sent a memo from my office once per year, reminding them of U.S. export control and trade sanctions, laws, and regulations.

• All faculty and graduate students, as well as undergraduate students funded by sponsored research, in the following programs will be required to receive and certify Collaborative Institutional Training Initiative (CITI) training in export control laws once per year: Chemical Engineering, Electrical and Computer Engineering, Mechanical and Industrial Engineering, Physics, Chemistry, and Microbiology. I recommend that over the period of the next year we assess whether to expand this training requirement to all STEM fields\(^1\) and that our Office of Research Compliance identify an appropriate means to document and ensure compliance with this training requirement.

Overall, I concur with the IAFCC that no restrictions should be placed on admissions to our undergraduate or graduate programs based on nationality. It is also clear, however, that we should broaden our program of training and education to ensure that all faculty and students are well informed about the variety of federal laws that may affect both U.S. visa issuance and federal compliance in the research context.

Please share this memo with relevant offices in your area.