

## Top 10 Questions from Designated School Officials (DSOs) about the Form I-20, "Certificate of Eligibility for Nonimmigrant Student Status"

Note: This document provides answers that interpret U.S. government regulation, but does not serve as a replacement for federal regulation or official Student Exchange Visitor Program (SEVP) policy guidance. Questions have been edited for grammar and style. Questions are taken from the SEVP Ask the Experts Webinar: Behind the Scenes of the Form I-20.

**Note:** On Nov. 1, 2021, the SEVP published Policy Guidance: Use of Electronic Signatures and Transmission for the Form I-20, outlining the procedures for the use of electronic signatures and transmission of the Form I-20. Based on this guidance, some information in this document may be out of date. Read the guidance for more information.

- 1. Should the student's name on the Form I-20 match their passport name?
  - A. Yes, the student's name on the Form I-20 should be the same as the name recorded on the student's passport. It is important that all information on the student's immigration record be accurate and consistent with the student's other official records.
- 2. Can SEVP please clarify the definition of a third-party recruiter? When SEVP says third-party recruiter, are they referring to agents? Or is SEVP referring to an employee who works directly for the school and has the title and function of recruiting students? Are these and other school employees, such as admission counselors, eligible to be a DSO?
  - A. A DSO has responsibilities to both SEVP and a nonimmigrant student; a recruiter has no such responsibilities. There is nothing that a recruiter should do that relates to DSO responsibilities for qualifying and admitting students to a school, F-1 and M-1 student record keeping, or any other SEVP-related responsibilities. It is acceptable if a school determines it necessary to have recruiters for outreach purposes. However, the roles of a DSO and recruiter are different as DSOs are approved by SEVP to perform their roles and follow specific federal regulations. An individual may not be both a DSO and a recruiter.
- 3. Should students carry their Form I-20 as a form of identification at all times, or do they only need to carry it on their person to re-enter the United States at a port of entry?

  Additionally, can a student travel with a copy of the Form I-20 or must it be the original?



A. It is not a requirement that students carry the Form I-20 with them at all times. However, the Form I-20 is required for re-entry to the United States.

The original Form I-20 is the document containing both the DSO and student's actual signatures. If the student is a minor, then the parent or legal guardian's signature must be used in place of the student's signature. SEVP advises all F-1 and M-1 nonimmigrant students to take both the original Form I-20 with signatures and the most recently updated Form I-20 when traveling internationally.

4. If a student is traveling more than once during a 12-month period, should the DSO sign the travel approval more than once, or is the original signature enough if the travel dates are within the 12-month period? Can the DSO refuse a student's international travel?

Additionally, if the travel signature is valid for one year, it creates precedent for students to leave the United States at any time, even when not authorized by the DSO for a time frame during class time. How would SEVP recommend preventing students from disappearing while traveling abroad?

A. If the student travels multiple times during a 12-month period, the DSO's original travel endorsement is sufficient. A DSO would be required to provide an additional travel endorsement if any part of the student's travel—departure or return—occurs more than 12 months from the date of the original signature.

DSOs can refuse a student's international travel, although it is not common. DSOs should encourage communication with the nonimmigrant students on their campus to ensure students understand the liability involved when leaving the United States without the DSO's prior knowledge. DSOs have a responsibility to terminate a student's SEVIS record if the student is missing class and the DSO is not aware of the student's location. DSOs should set clear travel expectations during the initial meeting between the DSO and the student. At minimum, DSOs should have students email them about travel plans to have proof of travel in case any questions come up.

- 5. Should the DSO sign the travel endorsement box on page two when issuing an Initial Form I-20? Or should the DSO wait until after the student arrives to sign the travel endorsement box?
  - A. DSOs should provide their single signature—also known as the attestation signature—on page one of the Form I-20 when the document is first issued to the student. The DSO should not sign the travel endorsement until the student has an expected travel time.



This is so that the DSO signs the travel endorsement box within the student's limited validity period, which is one year for F-1 nonimmigrant students and six months for M-1 nonimmigrant students. The travel signature must still be valid within that time frame that the student seeks to return to the United States from their travel.

- 6. How should DSOs handle a situation where a student arrives in the United States more than 30 days prior to the Initial Session Start Date? Should DSOs:
  - Register the student's record,
  - Terminate the student's record,
  - · Transfer the student's record to another institution, or
  - Recommend the student returns to their home country and re-enter the United States 30 days prior to the Initial Session Start Date?
  - A. Assuming that the student has already reported to the DSO, the DSO should mark the student's record as Active (i.e., "register the student's record") and monitor the student as normal. If possible, please retrieve the port of entry information and forward it to the SEVP Response Center so that SEVP may coordinate with U.S. Customs and Border Protection to ensure this does not happen again.
- 7. Are DSOs required to reprint the Form I-20 after each registration period? Are DSOs required to reprint the Form I-20 if a student's address changes?
  - A. After receiving the initial Form I-20 upon program acceptance, students must receive a new Form I-20 from their DSO in the following circumstances:
    - If the physical copy of the form is destroyed or misplaced;
    - For travel endorsement;
    - When the student's SEVIS status changes (e.g., from Initial to Active); and
    - For any substantive change to student information, such as a change to a student's personal information, program of study, optional practical training, etc.

For a change of student address, DSOs must update the student's SEVIS record within 21 days. Since the student's address does not appear on the Form I-20, there is no need to print a new Form I-20 subsequent to a student's change of address.



- 8. After the DSO signs the Form I-20, should they scan and email a copy to the family or should the family receive the original copy? Additionally, should all signatures on the Form I-20 be in blue ink?
  - A. Federal regulations require that, upon admission to an SEVP-certified school, a DSO provide an accepted student with a Form I-20 containing the DSO's actual signature.
    - Upon receipt, the student must also sign the Form I-20. If the student is a minor, then the student's parent or legal guardian must sign the form in the student's place.

If a minor student arrives at a school and the parent or legal guardian has not signed the Form I-20, then the DSO should send a scanned copy of the form containing the DSO's and student's signatures to the parent or legal guardian. In this situation, the parent or legal guardian must sign the Form I-20 and return it to the DSO by traditional mail only (i.e., not a scanned copy or via electronic mail). The DSO should make a copy of the signed Form I-20 for school records and provide the form with the parent or guardian's signature to the student. In the future, when applying for nonimmigrant benefits that require students to present a signed Form I-20, the student will need to present the two Forms I-20 with original signatures.

The U.S. Department of Homeland Security has no requirement for the Form I-20 signature to be in blue ink.

- 9. What should DSOs do if they issue an initial Form I-20 to a prospective student, but the student decides to postpone attendance from the fall to spring semester? Should DSOs terminate the student's record and reissue a Form I-20 with the revised date, or update the student's record with the revised date?
  - A. If a student decides to postpone attendance from the fall to spring semester after the DSO issued the initial Form I-20, the DSO must update the student's Form I-20 to the actual date that the student arrives. The DSO should still preserve the initial record that was originally initiated in SEVIS, so that it reflects the original date and the revised date of entry into the United States.
- 10. In certain cases, a student may not have a local address when a DSO issues an initial Form I-20. How should DSOs handle this situation, since the form requires a local address prior to issuance?
  - A. For initial Form I-20 issuance, DSOs may enter a student's U.S. address in SEVIS if the student has one. If the DSO has not entered a local address prior to Initial Form I-20



issuance, the local address should be added when the student reports to the DSO and the DSO activates the student's record. It is a good practice, but not a requirement, that DSOs issuing an initial Form I-20 for a student without a local address enter the school address (i.e., the address of the school's international student and scholar office) where the student receives mail. Schools engaging in this practice should create a reminder to update the student's SEVIS record to include a local address when the student reports to the school.