



Top Ten Questions from Designated School Officials (DSOs) about Record Keeping and Reporting Requirements

Note: This document provides answers that interpret U.S. government regulation, but does not serve as a replacement for federal regulation or official Student and Exchange Visitor Program (SEVP) policy guidance. Questions have been edited for grammar and style. Questions were taken from the [SEVP Ask the Experts Webinar: What DSOs Need to Know about Record Keeping](#) on June 21, 2018.

1. **Our school’s admissions office is separate from our international center, and the admissions office processes and maintains our international students’ applications and admissions documents. Designated school officials (DSOs) can access these files when/if needed. However, per SEVP requirements, is our international student office also required to maintain copies of student records?**
 - A. As a best practice, SEVP recommends that DSOs maintain copies of student documents—such as financial statements, applications, etc.—in a single location to have easy access to a complete picture of the international students enrolled at their school.

However, school officials may maintain a student’s original documents in different locations that may not necessarily be the school’s international student office. For example, school officials may keep a student’s application in the admissions office and financial statements in the bursar’s office. Schools may keep original documents in these locations if they are accessible to U.S. Department of Homeland Security officials.
2. **The [SEVP Ask the Experts Webinar: What DSOs Need to Know about Record Keeping](#) mentioned that school officials can store student records in either paper or electronic format. If school officials must store paper records in a physical, locked file cabinet, how can this security measure be applied to electronic records?**
 - A. For electronic student records, a simple digital security measure to ensure the integrity of the files is permissible. SEVP recommends that school officials implement security procedures that work best in the context of their own institution. Such procedures may include password protecting documents or limiting document access to certain school officials. Remember, SEVP does not require schools to retain paper copies of international student records if the school maintains electronic records.



3. Are DSOs required to keep Forms I-20, “Certificate of Eligibility of Nonimmigrant Student Status,” that were created for students that were later cancelled because the student did not attend our school? If so, how long do we need to keep them?

A. SEVP does not require that DSOs maintain copies of cancelled Forms I-20 for students that apply, but never attend the school. Additionally, SEVP does not require that DSOs maintain copies of documents for students that applied, but were not admitted to the school.

4. The webinar mentioned that DSOs should provide the Form I-20 only to the student. However, can the school release a Form I-20 to a sponsor/relative when the student has provided the school with written consent?

A. In general, SEVP recommends that students maintain control of all their personal documents, including the Form I-20; I-901 SEVIS Fee payment receipt; passport and/or visa; a printout of the Form I-94, “Arrival/Departure Record;” and proof of finances.

In the case of an F-1 minor student, SEVP recommends that the student’s parent or legal guardian maintain control of these documents if they plan to accompany the student in the United States. If the parent/legal guardian will not accompany the student, SEVP recommends the parent/legal guardian give control of these documents to the party that is authorized through a power of attorney for oversight of their child while in nonimmigrant status. That party may be the school, an agency or a trusted host family.

For case-specific situations, please contact the SEVP Response Center (SRC) and provide all relevant information regarding the details of the situation, including: the school name, school code, school type, nature of the sponsor/relative relationship to the student and examples of specific students (including name and SEVIS ID) so SEVP can provide a thorough response. Stakeholders can contact SRC via telephone at 703-603-3400 or at 1-800-892-4829. Additionally, stakeholders may email SRC at SEVP@ice.dhs.gov. SRC’s hour of operation are Monday through Friday, 8 a.m. to 6 p.m. ET, except federal holidays.

5. Our school has many students who have information science degrees and work remotely from home. Should DSOs indicate the student’s home address as their employment address, even though the company itself has a different address? What if the DSO inputs the employer address in the employer field, but notes in the comment field that the



student is working from home and lists the student's home address, which is already in the Student and Exchange Visitor Information System (SEVIS)? Is this permissible?

A. For students engaged in post-completion optional practical training, DSOs may input the student's employer address in the employer field, but note that the student is working from home in the comment field. DSOs must also list the student's home address in the comment field.

6. Our school receives at least 10,000 applications for admission each year. What application documents are schools required to maintain for international students?

A. DSOs are required to maintain records of all items marked with an asterisk in SEVIS. As a best practice, SEVP recommends that DSOs maintain copies of the following items:

- Form I-20.
- Passport ID page.
- Student's address.
- Academic transcripts.
- Proof of student's financial ability.
- Student's application to the school.
- Student's acceptance letter.
- Proof of language proficiency, if applicable.
- Employment Authorization Document and Form I-797, "Notice of Action."
- Certificate of graduation or diploma, if applicable.
- Termination date and reason, if applicable.

Remember, according to SEVP regulations, schools must keep a student's record for at least three years after the student is no longer pursuing a full course of study at the school, or conclusion of the student's practical training opportunity. These records are in addition to the information found in the student's SEVIS record.

7. What if a student does not report information to their DSO within the 10 days required by federal regulation?

A. DSOs can only report changes communicated to them by students; therefore, SEVP will not hold DSOs accountable if a student fails to report information within the required period. SEVP recommends that DSOs establish open lines of communication with their students and encourage them to report changes to their personal information, course of



study or other items related to their course of study to their DSO as soon as possible. Delays to update a student's information may negatively impact them in the future.

- 8. If an F-1 student fails out of an academic program, is the DSO required by regulation to terminate the student's record or can the record be transferred to another university in Active status?**
- A. Federal regulation requires DSOs to report if a student is suspended or expelled within 21 days. However, there are situations where a student may not be suited for a specific school and may need to transfer to another SEVP-certified school. In this situation, SEVP recommends that the DSO at the transfer-out and transfer-in school work together to transfer the student's record. For situations involving M-1 transfer, SEVP recommends that DSOs contact SRC for assistance.
- 9. Can a PDSO submit an update to add a new program to a locked Form I-17, "Petition for Approval of School for Attendance by Nonimmigrant Student," by emailing SEVP? What about the other types of updates that can be submitted via email to SEVP when a petition is locked? Are there any updates that DSOs cannot submit to SEVP while their petition is locked?**
- A. Yes. PDSOs can submit an update to add a new program of study or any other material change to a locked Form I-17 by emailing SEVP@ice.dhs.gov, and providing all necessary evidence related to the change. For additional information about evidence requirements, visit [ICE.gov/SEVIS/Schools](https://ice.gov/SEVIS/Schools).

For PDSO or DSO updates, school officials must email the requested change to FormI17SupportingEvidence@ice.dhs.gov. School officials should refer to the [SEVP Fact Sheet 8.1: Designated School Official Submissions](#) for additional information about required evidence and how to submit the update.

Remember, federal regulations require DSOs to update the Form I-17 within 21 days of any material change, even if the Form I-17 is locked due to a pending update or recertification.



10. If a school submits a Form I-17 update along with recertification, will the updates and recertification petition be adjudicated separately? For example, could the update be denied, but the recertification still approved?

- A. SEVP adjudicators consider all requested edits when reviewing a school's application for recertification. If the requested update lacks all required evidence or is otherwise not able to be approved by SEVP, then yes, the adjudicator would approve the school's recertification and notify school officials that the corresponding update was denied.