



**U.S. Department of State
Bureau of Educational and Cultural Affairs
Private Sector Exchange**

June 22, 2015

Guidance Directive 2015-03

Training/Internship Placement Plan – Form DS-7002 (T/IPP) – Integration of Form DS-7002 in electronic format in SEVIS

The Department of State takes this opportunity to provide guidance on the integration of the Training/Internship Placement Plan - Form DS-7002 (T/IPP) electronically into the Student and Exchange Visitor Information System (SEVIS).

SEVIS Release 6.21 will go into effect the evening of June 26, 2015, and will include Form DS-7002 (T/IPP) in electronic form to be created in SEVIS for all Interns, Trainees, and Student Interns. The addition of T/IPP information in SEVIS only applies to new records created *after* Release 6.21 is available, not to records created (submitted in SEVIS) prior to the T/IPP inclusion in SEVIS (including Initial status records).

This guidance directive is intended to complement 22 CFR Part 62, Exchange Visitor Program regulations, the User Manual for Exchange Visitor Program Sponsor Users (RO/ARO) of SEVIS, the SEVIS-T/IPP User Guide dated June 2015, and the fillable pdf Form DS-7002, Training/Internship Placement Plan, dated March 2015.

Inclusion of the T/IPP electronically in SEVIS does not change any existing regulatory requirements with regard to the Form DS-7002, and all required information must continue to be provided when creating Forms DS-2019 and DS-7002. The process of creating Form DS-2019 in SEVIS remains the same. A link in the SEVIS system between the Form DS-2019 and Form DS-7002 is intended to make sure, however, that a Form DS-2019 cannot be issued to a Trainee, Intern or Student Intern who does not have a completed training plan.

Creating a T/IPP

Sponsors may initiate the T/IPP creation process by using either the fillable pdf version (attached), an existing hard copy, or the SEVIS version of the T/IPP. If using the fillable pdf, the sponsor must include all information collected on the form and ensure that it is in SEVIS prior to issuing Form DS-2019. If using the SEVIS version, the sponsor must enter the T/IPP details in SEVIS¹, print the form, and send it to the host organization and exchange visitor for review, concurrence, and signature. The T/IPP can be

¹ Information may be entered in SEVIS by typing or by copying and pasting from another electronic document.

printed from SEVIS when the record is in Draft, Initial or Active status. Sponsors must ensure the T/IPP information entered in SEVIS is accurate and current for each exchange visitor.

Site of Activity and Phases

The site of activity (SOA) name must contain the name of the host organization where the exchange visitor will be performing his or her training or internship. The sponsor's name and address should only be entered as the SOA if the exchange visitor will be conducting their training or internship at the sponsor's location. The sponsor's name and address should not be entered as a placeholder for a future site of activity. Sponsors are advised that when multiple SOAs are entered, the Responsible Officer/Alternate Responsible Officer must identify the location where the exchange visitor will be primarily training (i.e., the majority of the time) as the "Primary" SOA. If the primary SOA changes, sponsors must update the subject field code remarks to match the new location. A T/IPP covers one SOA with at least one phase associated with the site. If there are multiple SOAs, then a separate phase must be created for each SOA. If an exchange visitor's training or internship is taking place at a host organization with multiple locations, a separate SOA must be entered in SEVIS for each location.

A new SOA is required when a new location is necessary due to either a change in the purpose of training or a new supervisor. If a phase requires an exchange visitor to briefly change location (i.e., attend a lecture or meeting away from the SOA for a day or two), there is no need to create a new SOA as long as the purpose and supervisor of the phase remains the same.

T/IPPs must state the specific goals, knowledge, skills, or techniques to be imparted during the training and internship programs. To do this, sponsors must detail and describe the methodologies of training and identify specific tasks and activities that the exchange visitor will complete. Multiple phases are allowed for the same SOA. SEVIS will permit a maximum of 3,000 characters for the "Phase Specifics" and "Knowledge, Skills, and Techniques to be Imparted" sections. If additional space is needed beyond the 3,000 character maximum in SEVIS, sponsors are permitted to create an additional hard or soft copy page separate from SEVIS entitled "Phase Continued." This page will not be reflected in SEVIS, but it should be attached to the T/IPP that the sponsor, host organization, and exchange visitor have in their possession. However, sponsors must utilize the full 3,000 character capacity permitted in SEVIS prior to using an attachment.

Duration

All phases must cover collectively the exchange visitor's program duration. SEVIS will not allow the sponsor to submit the T/IPP if the phase dates do not fully cover the exchange program duration. Phase dates can overlap.

The Department expects that internship and training programs are continuous and sponsors should not authorize breaks in the program, such as extended vacations. Gaps in dates are not permitted between phases on the T/IPP. If an exchange visitor is in between sites of activity, such as a move or on short-leave, sponsors must include details regarding the gap in program participation in either the previous or next phase. Sponsors must update the exchange visitor's physical address on Form DS-2019 any time the address changes per 22 CFR Section 62.13(b)(1).

Note: There may be times when the training/internship location, such as seminar or class, is part of a T/IPP, but temporarily changes the location for a day or two. As long as it falls under the same purpose of the phase and the supervisor remains the same, a new T/IPP is not necessary.

Signatures

Per 22 CFR Part 62.22(e)(1), sponsors must complete and secure requisite signatures on the T/IPP. Sponsors have the option of obtaining the requisite signatures on either the SEVIS version after printing or the fillable pdf version of the form. The T/IPP will be considered fully executed when it contains the signatures of all required parties: the Responsible Officer (RO) or Alternate Responsible Officer (ARO), the exchange visitor, and the supervisor for each phase. Irrespective of the version used to obtain the requisite signatures, the signature dates for all parties must be recorded in SEVIS prior to issuing Form DS-2019. The signature date entered into SEVIS must match the exact signature date on the fully executed T/IPP. The signature date may be derived from hand-written signatures on the T/IPP or electronic/digital signatures captured by the sponsor. Either method is acceptable. Exchange visitor applicants are still required to present signed and fully executed copies of their T/IPP to consular officials when applying for their J-1 visa. Electronic or E-signatures on the T/IPP are allowed when presenting the T/IPP to consular officials.

Sponsors are required to obtain new signatures when there is a change in the location of training or internship (SOA), a change to the exchange visitor's direct supervisor, or a major change in the purpose or activities within a phase.

The electronic implementation of the T/IPP into SEVIS does not relieve sponsors of record retention requirements. Sponsors must retain copies or have the ability to produce fully executed copies for three years after the completion of the exchange visitor's program. The original signed T/IPP may either be given to the exchange visitor or kept in the sponsor files. There is no requirement that the exchange visitor have the original.

Editing a T/IPP

Information entered on the T/IPP may be edited (i.e., SOA, program dates, phase dates) while the exchange visitor's SEVIS record is in Draft or Initial status (prior to visa issuance). Once the visa has been issued, sponsors cannot edit the T/IPP until the record is validated and updated to Active status. Sponsors may edit program start/end dates of an exchange visitor's program at any time while the record is in Initial status. However, if the program dates are amended, sponsors will be required to update the phase dates as necessary to ensure they continue to fit within the new program dates identified.

Sites of activity may be edited prior to visa issuance. However once the visa is issued, sponsors cannot delete sites of activity. If the sponsor is notified after visa issuance that the exchange visitor will not participate at the site of activity, the sponsor must update the "site of activity remarks" to note that the exchange visitor will not participate at the site. Since the SOA cannot be deleted, the sponsor must update the associated phase dates for that SOA to reflect a one-day duration, which means the phase end date will be the day after the phase begin date.

Phases may be deleted prior to visa issuance. After visa issuance, phases may be deleted at any time prior to the phase start date. If a phase is deleted, sponsors will be required to review and possibly update the phase dates to ensure that the entire exchange program duration is covered by at least one phase.

Substantive changes to the T/IPP, such as changes to the supervisor, training activities, or a change in a department within the host organization (same SOA), may require the sponsor to add or amend a phase and obtain new signatures by all requisite parties.

Several functions in SEVIS permit a sponsor to change an exchange visitor's program begin and/or end date. If a sponsor opts to perform any of the functions (i.e. extension within maximum duration of participation), it must also amend the phase dates to ensure they do not exceed the new program dates identified and there is no time during the program that is not covered by a phase.

Failure to Maintain SEVIS Records

Sponsors are required to comply with the record keeping and reporting requirements as set forth in 22 CFR Part 62 and Section 502(c) of Title V of the Enhanced Border Security Act. Additionally, as set forth in 22 CFR Part 62.10(g) Retention of records, sponsors must retain all records related to their exchange visitor program and exchange visitors (to include accompanying spouse and dependents, if any) for a minimum of three years following the completion of each exchange visitor program.

A sponsor's SEVIS records are reviewed by the Office of Designation during an application review, and by the Offices of Private Sector Exchange Administration, and Exchange Coordination and Compliance periodically for monitoring purposes.

Should you have any questions, please contact the Office of Designation for further guidance.

Email address:

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