

Supporting Statement

The Student and Exchange Visitor Information System (SEVIS)

(No Agency Form No.: File No. OMB-30)

OMB No. 1653-0038

A. Justification.

1. **Explanation of necessity.** Section 641 of the Illegal Immigration Reform and Immigrant Responsibility Act of 1996 (IIRIRA), Public Law 104-208, Div. C (Sept. 30, 1996; see attachment 1) requires the creation of a program to collect current information, on an ongoing basis, from schools and exchange visitor programs relating to nonimmigrant F, M or J foreign students and exchange visitors during the course of their stay in the United States (U.S.), using electronic reporting technology to the fullest extent practicable. It further requires Federal approval and authorization of schools and exchange visitor programs participating in such enrollment. The information collection about nonimmigrants mandated by IIRIRA includes the identity and current address in the United States of the alien, the nonimmigrant classification of the alien, the date on which a visa under the classification was issued or extended or the date on which a change to such classification was approved by the Department of Homeland Security (DHS), the current academic status of the alien, including whether the alien is maintaining status as a full-time student, or whether an exchange visitor is satisfying the terms and conditions of his or her program, and any disciplinary action taken by the institution or exchange visitor program sponsor against the alien as a result of a conviction of a crime. The Uniting and Strengthening America by Providing Appropriate Tools Required to Intercept and Obstruct Terrorism (USA PATRIOT) Act of 2001, Public Law 107-56 (October 26, 2001), subsequently amended IIRIRA and added the requirement that information be collected on the date of entry and port-of-entry. On October 30, 2001, the President issued Homeland Security Directive No. 2 (Directive 2) requiring DHS to conduct periodic, ongoing review of all institutions certified to accept nonimmigrant students. On May 14, 2002 the Enhanced Border Security and Visa Entry Reform

Act of 2002 (Border Security Act), Public Law 107–173, 116 Stat. 543 (May 14, 2002), was enacted. It required DHS to recertify all schools approved for attendance by F or M nonimmigrant students within two years of the passage of the Border Security Act. Further, it mandates that DHS conduct an additional recertification of these schools every two years following. Data collection requirements for SEVP certification, oversight and recertification of schools authorized to enroll F or M nonimmigrant students are not specified in the aforementioned legislation, but are enumerated in 8 CFR 214.3 and 214.4.

The Student and Exchange Visitor Program (SEVP), a component of U.S. Immigration and Customs Enforcement (ICE), is the program mandated by these laws to carry out these responsibilities. SEVP administers the Student and Exchange Information System (SEVIS). Substantive requirements and procedures for SEVP and SEVIS are promulgated in the following rulemaking proceedings:

- **Retention and Reporting of Information for F, J, and M Nonimmigrants; Student and Exchange Visitor Information System (SEVIS)** [67 FR 34862 (May 16, 2002), proposed; 67 FR 76256 (December 11, 2002), final]
- **Allowing Eligible Schools to Apply for Preliminary Enrollment in the Student and Exchange Visitor System (SEVIS)** [67 FR 44343 (July 1, 2002), interim final]
- **Requiring Certification of all Service Approved Schools for Enrollment in the Student and Exchange Visitor Information System (SEVIS)** [67 FR 60107 (September 25, 2002), interim final]
- **Exchange Visitor Program: SEVIS Regulations** [67 FR 76307 (December 12, 2002), DOS interim final]
- **Authorizing Collection of the Fee Levied on F, J, and M Nonimmigrant Classification Under Public Law 104-208** [64 FR 71323 (December 21, 1999), proposed; 68 FR 31148 (October 27, 2003), proposed; 67 FR 39814 (July 1, 2004), final]

The Bureau of Educational and Cultural Affairs Exchange Visitor Program, a component of the Department of State (DOS) is under the same mandate of IIRIRA as SEVP with respect to the Exchange Visitor Program, authorized under the J visa category. DOS also fulfills their requirements within SEVIS. However, DOS addresses their data collection requirements to the Office of Management and Budget (OMB) in a separate filing. This Supporting Statement does not include the costs associated with the DOS Exchange Visitor Program.

2. **Purpose of collection.** DHS, DOS, and a growing number of other government agencies, as well as approved schools and exchange visitor programs, use SEVIS data. SEVIS is an Internet-based data entry, collection and reporting system. It provides authorized users access to reliable information on F, M and J nonimmigrant foreign students, exchange visitors, and their dependents. The SEVIS database enables:
 - Schools and exchange visitor programs to instantaneously transmit electronic information and event notifications on nonimmigrants to ICE and DOS throughout their stay in the United States. These include required notifications, reports, and updates to personal data.
 - DHS and DOS to efficiently administer their approval and oversight processes (i.e., certification and designation, respectively) of schools and programs wishing to benefit from enrolling nonimmigrants.
 - Law enforcement agencies to track and monitor F, M and J nonimmigrants with regard to the maintenance of their nonimmigrant status and to apprehend violators before they can potentially endanger national security.
 - Government benefits and service providers to better serve their F, M and J nonimmigrant customers.

SEVIS data is used daily to qualify individuals petitioning for F, M and J status and to facilitate:

- port-of-entry screening
- processing of benefit applications
- nonimmigrant status maintenance

- as needed, timely removal.

SEVIS data is used to assist schools, exchange visitor programs and the United States government in promoting the **Secure Borders and Open Doors** initiative (January 17, 2006). In concert with biometric assessment technologies that are being introduced, SEVIS data will continue to support access to the United States for bona fide nonimmigrants, while elevating the detection and barring of individuals that might threaten the nation.

3. **Use of information technology.** SEVIS replaced complex, time-consuming and inefficient paper-based processes with Internet-based technology to institute processes that are simpler, quicker, more efficient and paperless. While start-up has been expensive for all SEVIS users, cost savings are beginning to be seen. The timeliness and integrity of SEVIS data is positively impacting all systems with which SEVP interacts. Specific improvements include:

- OMB presently approves the entry, collection and production of all fields previously approved for the paper Forms I-17 (Petition for Approval of School for Attendance by Nonimmigrant Student) and I-20 (Certificate of Eligibility for Nonimmigrant Student Status). The use of SEVIS provides the most efficient means for collecting and processing required data. It promotes single-point entry of data by the individual with the most reliable source data, the schools and programs. This facilitates all phases of data entry—initial, update and correction.
- SEVP is transitioning to accept electronic submission of forms and data, in lieu of paper forms.
 - Since August 1, 2003, all data must be entered in SEVIS and all forms must be generated through SEVIS. Certification and recertification applications must be submitted electronically.
 - Electronic signature acceptance processes are in development.
 - Electronic forms submission expedites processing.
 - When electronic validation of forms by consulates, ports-of-entry and benefit providers becomes more uniformly available to government

users, presentation and authentication of paper copies will be reduced in priority to an infrequent, secondary requirement.

- Primary use of electronic validation of forms will further reduce the potential negative consequences of fraudulent documentation.
- Eventual elimination of paper forms will present significant savings for schools in postage and handling.
- Multiple-copy forms have been eliminated. This streamlining is most evident with Forms I-20, which previously entailed mailing of copies from the ports-of-entry to a central data entry location and, then, to the school—a process that could take weeks.
- SEVIS-generated forms incorporate encryption, which significantly reduces the likelihood of fraud in forms issuance and the opportunity for successful counterfeiting.
- SEVP uses its Web site as its primary means of general communication with schools; it uses email as the primary means of directed communication. In circumstances involving adjustment of or response to SEVIS data, emails are generated automatically by SEVIS. This reliance on email significantly reduces manual processing by SEVP personnel and provides schools more timely information. Electronic communication is also minimizing the burden of filing and recordkeeping.
- SEVP is investing heavily in enhancement of SEVIS reporting capabilities. Improved reporting and data analysis will increasingly be the basis for overseeing school compliance and verifying eligibility and qualification for continued SEVP school certification. Identification of performance trends will enable SEVP to better identify policy, outreach and training needs.
- SEVP is aggressively identifying other government data resources where there are shared data needs. Where identified, SEVP is brokering arrangements for interfaces and data sharing. In the short term, this improves the overall currency of data among government resources. In the long-term, it enables development of algorithms between data systems that

will identify discrepancies as they occur and resolve them immediately, enhancing overall data integrity and elevating national security.

- SEVIS data collection incorporates the entire designated school official (DSO) approval process for F-1 student employment. This eliminates the need for the Form I-538.
- Many SEVIS users report to SEVP that they are recognizing management benefits and improved ease in complying with SEVP requirements as a consequence of working within the framework of SEVIS.
- When schools apply for SEVP certification, required supporting documents are collected by a DHS representative at the time of the mandatory on-site review. This business process is being amended. If verifiable electronic forms of documentation are available, the alternates are being accepted. (Prime examples are tax information and school catalogues.) Schools are encouraged to submit remaining required paper documents by mail to expedite certification processing. School submission of required paper documents by mail will be required for recertification.
- SEVIS data is retained indefinitely in electronic form, either in active or archived records. Consequently, traditional records retention requirements for schools are being significantly reduced.

4. **Duplication of collection.** SEVP is unaware of any duplication of effort in the collection of F, M and J nonimmigrant or participant school/program data, and there is no other similar information currently available that can be used for the purposes of SEVIS. However, a number of data systems collect generic foreign visitor data in processes that F, M or J nonimmigrants encounter subsequent to the collection of data for SEVIS. Through a concerted effort to develop interfaces with these systems, SEVP is making progress in reducing duplication of collection.

Data collection in SEVIS by SEVP is made in two primary areas: management of nonimmigrant student (and, to a limited degree, their dependent's) personal information; and SEVP certification, oversight and recertification of schools

authorized to enroll F or M nonimmigrant students. With respect to both areas, other than the addition of the SEVIS tracking numbers, SEVP does not require the collection of any data that was not previously required by DHS (or the previous Immigration and Naturalization Service, which DHS incorporates). What differs qualitatively with SEVIS over the previous workload is that the data is now collected uniformly and electronically, and is made available to needing agencies at any time.

Regarding the management of nonimmigrant student and dependent information,

- As addressed in item 3 (above), the introduction of SEVIS eliminates multi-copy Forms I-20 that were formerly used by schools and sponsors. Since SEVIS implementation, only Forms I-20 from SEVIS are accepted. The SEVIS Form I-20 was designed to not change any of the data elements previously approved by OMB to be collected on each form.
- SEVIS allows dependents of a student to have their own copy of the Form I-20. (Previously, they entered the United States with a copy of the sponsor's Form I-20.)
- SEVIS provides an alternative to F, M and J nonimmigrants to the Form AR-11 (Alien's Change of Address Card). The AR-11 cannot be filed electronically, but must be mailed to a central data entry location where the information is transcribed manually. It may be several weeks from the time an AR-11 is filed until the change is accessible to authorized government agencies. School officials can instantaneously update SEVIS with change of address information. Authorized government agencies can view this updated information at any time after posting by accessing SEVIS. Since the recognized burden of reporting an address change on the AR-11 is only 5 minutes, the burden saving is negligible. However, the increased convenience, timeliness and data integrity make address information on this group of aliens much more reliable.

In balance with the new burden of data entry, the nature of information technology allows systems to “remember” data that has been previously entered and to pre-populate data fields from those previous entries. This, then, limits new data entry to only changes. Further, design features of the software can dramatically reduce the likelihood of data entry errors, in comparison with paper-based processes. The impact of this reduced redundancy and improved quality on both Forms I-20 and I-17 updating is significant. Historically, an initial Form I-20 averages 30 minutes and every paper update requires the same time. A student, in a four-year program, may require 10-12 updated forms. Each one updated in SEVIS should be able to be completed in about 5 minutes. The Form I-17, from “scratch,” may take 2-3 hours. A quarterly or “as needed” update in SEVIS shouldn’t take more than 10 minutes. This includes a Form I-17 submitted for recertification. Clearly, while SEVIS required heroic effort to populate for initial implementation of the program, the long-term timesavings are significant.

5. **Impact on small businesses or any other small entities.** The collection of information for SEVP does not disproportionately impact small businesses or other small entities. SEVP performed an analysis for the Regulatory Flexibility Act. As assessed, SEVP and SEVIS directly affect all schools that seek to be or are SEVP-certified to admit F and M nonimmigrant students.

At the time of the most recent analysis (January 2006), there were 8,220 certified schools. Of these, SEVP estimates that about 50% (4,099) are small entities as defined by the Small Business Administration (SBA). For the purposes of the SBA, the following three types of schools qualify as small entities¹:

- Those with annual revenues of \$6 million dollars or less
- Public schools systems serving a population of less than 50,000
- Flight schools with annual revenues of \$21 million dollars or less

¹ OMB Circular A-4, Regulatory Analysis, September 17, 2003.

The use of SEVIS, as a means for record keeping and reporting, streamlines paper-based processes previously in existence. SEVIS uses technology that was already in place at most institutions and sponsors. Authorized institutions and sponsors only need to access the Internet. There is no download of software. SEVP does not charge a SEVIS subscriber or user fee. However, while there is no charge for access to SEVIS, there may be individual organizational costs for a certifying school to upgrade vendor software or campus information technology systems for those schools that choose to use the batch-method interface of SEVIS. DHS took these costs into account in designing SEVIS and minimized them by utilizing common industry standards. Accordingly, the implementation of SEVP and SEVIS had no significant impact on more than a few small entities, as that term is defined in 5 U.S.C. 601(6).

6. **Consequences to the Federal program.** If information is not collected in SEVIS, DHS will not be able to comply effectively with the statutory mandates of legislation cited in item 1 (above). Information will need to be collected through a paper process, as previously required, which will most likely necessitate resumption of manual data entry by government employees and create a backlog for data entry. The data integrity of the F/M/J nonimmigrant information may also be compromised. DHS measures to ensure compliance with the law and regulations will be severely limited without the information being retained and without it being as readily accessible as it is in SEVIS. Collection of data less frequently than is required by SEVP could result in failure to make timely identification of potential nonimmigrant threats to national security.
7. **Explanation of special circumstances.**
 - Student reporting more often than quarterly. F and M nonimmigrant reporting requirements [as specified in 8 CFR 214.2(f) & (m)] with respect to enrollment, address, and maintenance of visa status require that they provide updated information to DSOs much more often than quarterly. Thresholds (i.e., the allowable maximum time before such changes must

be reported) for this reporting are determined by the potential of threats to national security that could result from failure to inform enforcement agencies of changes within a reasonable time.

- School reporting more often than quarterly and written response required in 30 days or less. In some circumstances, the recordkeeping, retention and reporting requirements for SEVP-certified schools (as specified in 8 CFR 214.3) require the submission of changes in SEVIS in 30 or fewer days of the school being made aware of the change. Thresholds (i.e., the allowable maximum time before such changes must be reported) for this reporting are determined by the potential of threats to national security or of fraud that could result from failure to inform enforcement agencies of changes within a reasonable time. They are also essential for prosecution of noncompliant school officials.
- Student and school retention of records for more than three years. The length of a student's program varies depending on the academic or vocational goal. To ensure student and school compliance and to enable auditing of compliance, schools are required to maintain a student's record for at least three years after program completion or student transfer to another school. To facilitate maintenance of F or M visa status and the processing of future applications for visitation to the United States, F and M nonimmigrant students are encouraged to retain personal copies of Forms I-20, visas, passports, entry, and benefit-related documents indefinitely.

8. **Solicitation of public comments.** As required by 5 CFR 1320.8(d), DHS published a notice in the Federal Register soliciting public comment on this information collection for a period of 60 days [72 FR 38095 (July 12, 2007)]. No comments were received.
9. **Explanation of payment or gift to respondents.** SEVP does not provide payments or gifts to respondents for this information collection.

10. **Assurance of confidentiality.** SEVP published a Privacy Information Assessment (PIA; February 5, 2005), available at http://www.dhs.gov/xlibrary/assets/privacy/privacy_pia_sevis.pdf, and a System of Records Notice (SORN), available at 70 FR 14477 (March 22, 2005). Further, DHS has designated SEVIS to be a Privacy Act system of records and SEVIS information will be used and disclosed in accordance with 5 U.S.C. §552a, Privacy Act of 1974, as amended.
11. **Justification of questions of a sensitive nature.** There are no questions of sensitive nature asked in this information collection.
12. **Annual public reporting burden and public cost.** The public reporting burden and cost of SEVP and SEVIS is divided between the management of student data, and the management of SEVP certification. The table immediately below this paragraph provides a combined summary of the public reporting burden. This summary does not include savings to the respondent realized by the introduction of electronic versus paper-copy data management, nor does it include time for training, research and reports. Greater explanation and net cost to the respondents is presented in the text that follows.

SUMMARY OF PUBLIC REPORTING BURDEN							
Type of Respondent or Information Collection	Form Name	No. of Respondents	No. of Responses per Respondent	Avg. Burden per Response (in hours)	Total Annual Burden (in hours)	Average Hourly Wage Rate	Total Annual Respondent Cost
Management of Student Data by DSO	Form I-20	30,000	1	6.76	202,767	\$15	\$3,041,505 (\$101.38 per respondent)
Management of SEVP Certification and Training	Form I-17	30,000	1	2.31	69,403	\$15	\$1,041,045 (\$16.99 per respondent)
Total				(9.07 hours per respondent including 2.0 for training)	272,170		\$4,082,550 (\$118.37 per respondent)

Management of Student Data—This includes issuance of Forms I-20; gathering, updating, and reporting student information; and the correction of identified errors in student information.

- Over the coming 3-year authorization period, there will be an average of 660,000 active student records in SEVIS at any given time.
- SEVP anticipates that 260,000 initial F/M students will enroll at SEVP-certified schools annually. The normal applicant will apply to more than 1 school, requiring development of an average of 2.5 Forms I-20. For approximately 35% of these, the data will be loaded using real time interface (RTI) procedures, at 30 minutes each to complete. Presuming clerical costs of \$15 per hour for 113,750 hours, the cost for RTI-loaded initial Forms I-20 will be \$1,706,250. For approximately 65% of these Forms I-20, the data will be loaded using batch procedures, at 1 minute each to complete. Presuming clerical costs of \$15 per hour for 6760 hours, the cost for batch-loaded initial Forms I-20 will be \$101,400.
- DSOs must update Form I-20 information on students on an ongoing basis. These updates can be for a number of reasons but, because the data fields populated during initial Form I-20 loading are pre-populated for updates, the update only takes about 5 minutes to complete using the RTI method or 1 minute using the batch method. On average, students should receive 3 updates to their records annually. An estimated 35% of updates will be RTI, at an annual cost of \$866,520; 65% of updates will be batch, at an annual cost of \$308,160. The pending recertification rule clarifies DSO updating requirements to include items normally found in school transcripts. While this enumerates specific requirements, the rule does not substantively increase the reporting burden.
- There are 100,000 F-2/M-2 dependents in SEVIS and 25,000 arrivals are anticipated annually. They each require their own individual Form I-20. Most data on the dependent initial Form I-20 is derived and pre-populated from the data in the sponsor's record, so they only take 5 minutes each to complete. A dependent will usually average 1 update per year. The annual

cost for dependents is \$43,575 for RTI-loaded and \$15,600 for batch loaded.

- The total cost for management of student data is \$3,041,505.

MANAGEMENT OF STUDENT DATA

F/M students: Forms I-20 & Personal Info.	Freq- uency	Burden (hrs)	Subtotal (hrs)	Cost/hr	Subtotal (\$)
Total F/M students	660,000				
Initial students	260,000				
Initial Forms I-20 (RTI)	91,000	2.5	0.5	113,750	\$15 \$1,706,250
Initial Forms I-20 (batch)	169,000	2.5	0.016	6,760	\$15 \$101,400
Updates (RTI)	232,000	3	0.083	57,768	\$15 \$866,520
Updates (batch)	428,000	3	0.016	20,544	\$15 \$308,160
F-2/M-2 Forms I-20 (RTI)	35,000	1	0.083	2,905	\$15 \$43,575
F-2/M-2 Forms I-20 (batch)	65,000	1	0.016	1,040	\$15 \$15,600
			Total hours	202,767	Total cost
					\$3,041,505

- Further, the introduction of SEVIS resulted in the elimination of the Form I-538, which was required to be completed and sent out by DSOs for all students applying for off-campus employment or practical training. The same information is required for USCIS to adjudicate the application, but it is now entered during the Form I-20 update. Estimating that 35% or more than 225,000 students will apply for one of these forms of employment authorization, the cost savings for schools will be (225,000 students x 4 minutes per Form I-538 x \$15 hourly wage to complete = \$225,000).
- The overall cost to the public to support management of student data, borne by SEVP-certified schools, averages \$366 per school.
- Requirements for management of student data are no greater now than they were pre-SEVIS, when all Forms I-20 took nearly 30 minutes to complete. At the volume of these projections, by using SEVIS, the annual cost savings from the reduction in burden of hours to schools is \$17,433,445.

COST SAVING ON FORMS I-20 WITH SEVIS

F/M students: Forms I-20 & Personal Info.		Freq- uency	Burden (hrs)	Subtotal (hrs)	Cost/hr	Subtotal (\$)	
Total F/M students	660,000						
Initial students	260,000						
Initial Forms I-20 (RTI)	91,000	2.5	0.5	113,750	\$15	\$1,706,250	
Initial Forms I-20 (batch)	169,000	2.5	0.5	211,250	\$15	\$3,168,750	
Updates (RTI)	232,000	3	0.5	348,000	\$15	\$5,220,000	
Updates (batch)	428,000	3	0.5	642,000	\$15	\$9,630,000	
F-2/M-2 Forms I-20 (RTI)	35,000	1	0.5	17,500	\$15	\$262,500	
F-2/M-2 Forms I-20 (batch)	65,000	1	0.5	32,500	\$15	\$487,500	
				Total hours	1,365,000	Total cost	\$20,475,000
				Current cost			minus \$3,041,505
				Saving			\$17,433,445

- The benefit to schools in costs saved in processing Forms I-20 with SEVIS, compared with the pre-SEVIS process is \$17,433,445. The benefit in costs saved by elimination of the Form I-538 through SEVIS is \$225,000. Combined savings is \$17,658,445. For 8,300 schools, this cost saving averages \$2,128.

Maintenance of SEVP certification—This includes initial, periodic and on-request submission of Forms I-17, reporting of changes, and correction of identified errors.

- Computed cost include the expense incurred by SEVP-certified schools in the time expended to enter data and submit reports.
- It does not incorporate costs that may be placed on schools to acquire and maintain equipment for SEVP-related activities.
- There are currently 8,300 SEVP-certified schools. SEVP anticipates 715 schools to petition for initial certification and 1,200 schools to recertify annually in each of the next 3 years. It is expected that the overall number of SEVP-certified schools will level around 7,000.
- A petition for initial certification is given 4 hours for completion, to include obtaining access to SEVIS, data entry, and familiarization with SEVIS user manuals. The current initial certification fee (\$580 + \$350 for

each campus other than the main) does not meet government costs. A cost analysis and rule are pending.

- Updates to school information will average 5 minutes for completion.
- Recertification processing for schools will take the same amount of time as initial certification. Review and update of Form I-17 information data fields should not take more than 30 minutes. Electronic submission of the petition and hard-copy mail submission of the required supporting documents should take less than an hour. Should an on-site review be required, it may take as long as 2 business days. However, they will be infrequent and not impact the overall average preparation time of 4 hours.
- SEVP estimates the overall costs to SEVP-certified schools related to DSO professional development to be collectively \$900,000 (an average of 2 hours per DSO annually).

MANAGEMENT OF SEVP CERTIFICATION

School certification, oversight, recertification		Freq- uency	Burden (hrs)	Subtotal (hrs)	Cost/hr	Subtotal (\$)
Total approved schools	8300					
Initial certification (processing)	715	1	4	2,860	\$15	\$42,900
Updates	7000	3	0.083	1,743	\$15	\$26,145
Recertification (processing)	1200	1	4	4,800	\$15	\$72,000
Training/research/ reports (per DSO)	30000	1	2	60,000	\$15	\$900,000
			Total hours	69,403	Total cost	\$1,041,045
Management of student data and SEVP certification—combined totals		Grand totals	Hours	272,170	Cost	\$4,082,550

13. **Capital start up and on-going equipment costs.** There were no capital or start up costs associated to respondents or recordkeepers resulting from initiation of this collection of information (i.e., the government cost to initiate this collection was not passed to schools or nonimmigrant students). Development costs for SEVIS and initial implementation of SEVP were underwritten with appropriated

funds. Recurring maintenance and further development costs of SEVIS are incorporated in school and student fees.

14. **Annual government burden and government cost.** There is no net cost to the Federal government for SEVP and SEVIS since the initial implementation of the program.

15. **Change in the burden hours and cost.** The previous submission of this statement identified students in SEVIS as respondents. Those students are respondents to the Form I-901 fee collection in OMB 1653-0034, but they make no input in SEVIS. Actual respondents are the DSOs, who make input to SEVIS to fulfill their responsibilities in the management of student data and in the management of SEVP certification of their schools. Consequently, the actual number of respondents is much lower than previously registered (approximately 30,000 DSOs, compared with an average of 660,000 students anticipated at any given time during the next three years).

The previous calculation of hours was estimated before implementation of SEVIS and the operation of SEVP. Actual experience indicates a much lower burden of hours than previously estimated. The original estimate was nearly one million hours annually. The current estimate is at 202,767 for management of student data and 69,400 for management of SEVP certification (including an additional 60,000 for training/research/reports). The total annual burden is 272,170 hours, an average of slightly more than 9 hours annually per DSO.

Requirements for management of student data are no greater now than they were pre-SEVIS, when all Forms I-20 took nearly 30 minutes to complete. At the volume of these projections, by using SEVIS, the annual savings to schools is \$17,433,445 (See item 12).

16. **Published results.** DHS did not employ the use of statistics or the publication thereof for this collection of information.

17. **Waiver of display of expiration date.** SEVP is seeking approval to not display the expiration date for OMB approval of this information collection. As mandated by 5 CFR 1320.3(f)(2), the first screen will include the OMB control number and PRA burden statement. However, as the collection of this information utilizes the complete electronic submission of responses for various types of notification and reporting requirements there is no single place to display the expiration date. Additionally, to continually upgrade an automated system to change only expiration dates would be costly to SEVP, as well as counter-productive and inefficient.
 18. **Exception to the certification statement.** SEVP does not request an exception to the certification of this information collection. See attached Item 19 of Form OMB 83-I.
- B. Collection of Information Employing Statistical Methods.** Not Applicable.