

## 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. Explain the circumstances that make the collection of information necessary.

Section 641 of the *Illegal Immigration Reform and Immigrant Responsibility Act of 1996 (IIRIRA)*, Public Law 104-208, Div. C (Sept. 30, 1996) requires the creation of a program to collect information, on an ongoing basis, from school officials and exchange visitor program sponsors relating to F, M, and J nonimmigrants during the course of their stay in the United States, using electronic reporting technology to the fullest extent practicable. It further requires federal approval and authorization of schools and exchange visitor program sponsors participating in such enrollment.

IIRIRA mandates collecting the identity and current address in the United States of the nonimmigrant and the classification of the nonimmigrant, 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 nonimmigrant, including whether the nonimmigrant 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), amended IIRIRA to add the requirement that information be collected on the F, M, and J nonimmigrants' date and port of entry into the United States.

On October 30, 2001, the President issued *Homeland Security Presidential Directive-2 (HSPD-2)*, requiring the Department of Homeland Security (DHS) to conduct periodic and ongoing review of all schools certified to accept F and M students.

On May 14, 2002 the *Enhanced Border Security and Visa Entry Reform Act of 2002 (EBSVERA)*, Public Law 107–173, 116 Stat. 543 (May 14, 2002), was enacted requiring DHS to recertify all schools approved for attendance by F and/or M students within two years of its passage. Further, it mandates that DHS conduct an additional recertification of these schools every two years.

Data collection requirements for Student and Exchange Visitor Program (SEVP) certification, oversight and recertification of schools authorized to enroll F and/or M students required by these laws and directive are detailed by regulation in 8 CFR 214.2, 8 CFR 214.3, and 8 CFR 214.4.

The Student and Exchange Visitor Program is a component of U.S. Immigration and Customs Enforcement (ICE) assigned by DHS to administer the Student and Exchange Information System (SEVIS) and to carry out the responsibilities mandated by the above laws regarding F and M nonimmigrants.<sup>1</sup> 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), Department of State (DoS) interim final]

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<sup>1</sup> The Bureau of Educational and Cultural Affairs Exchange Visitor Program, a component of the Department of State, is under the same mandate of IIRIRA as SEVP with respect to the Exchange Visitor Program, authorized under the J visa classification. The Exchange Visitor Program fulfills its requirements within SEVIS and addresses its data collection requirements to the Office of Management and Budget in a separate filing. This Supporting Statement does not include the ongoing annual costs associated with the Exchange Visitor Program of the Department of State.

- *Authorizing Collection of the Fee Levied on F, J, and M Nonimmigrant Classifications Under Public Law 104-208* [64 FR 71323 (December 21, 1999), proposed; 68 FR 61148 (October 27, 2003), proposed; 69 FR 39814 (July 1, 2004), final]
- *Extending Period of Optional Practical Training by 17-Months for F-1 Nonimmigrant Students with STEM Degrees and Expanding Cap-Gap Relief for All F-1 Students with Pending H-1B Petitions* [73 FR 18944, (April 8, 2008), interim final]
- *Adjusting Program Fees and Establishing Procedures for Out-of-Cycle Review and Recertification of Schools Certified by the Student and Exchange Visitor Program To Enroll F or M Nonimmigrant Students* [73 FR 21260 (April 21, 2008), proposed; 73 FR 55683 (September 26, 2008), final]

SEVP has two additional Paperwork Reduction Act of 1995 (PRA) authorizations for forms used in program-related processes, but not produced by SEVIS. The Office of Management and Budget (OMB) form numbers are as follows:

- OMB No. 1653-0037 for the Form I-515A, *Notice to Student or Exchange Visitor*, used when F, M, or J nonimmigrants arrive at ports of entry without proper documentation, are given temporary admission, and must present proper documentation to SEVP within 30 days to remain in status.
- OMB No. 1653-0034 for the Form I-901, *Fee Remittance Form for Certain F, J and M Nonimmigrants*, used by prospective F and M students or J exchange visitors in conjunction with their mandatory payment of the I-901 SEVIS fee, which funds SEVP operations.

## **2. Purpose of collection.**

DHS, DoS, and a growing number of other government agencies, as well as SEVP-certified schools and designated 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 and M students, J exchange visitors, and the accompanying spouses and dependents of all three classifications. The SEVIS database enables:

- Schools and exchange visitor program sponsors to instantaneously transmit electronic information and event notifications on F, M, and J 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 exchange visitor program sponsors wishing to benefit from enrolling F, M, and J nonimmigrants.
- DHS to efficiently administer its SEVP certification denial and withdrawal processes, to include appeals and motion to reopen or reconsider submitted by schools subject to adverse decisions leading to removal of the benefit to enroll F and/or M students.
- Law enforcement agencies to monitor F, M, and J nonimmigrants with regard to the maintenance of their nonimmigrant status. SEVIS is a critical national security component, a primary resource for conducting counterterrorism and/or counterintelligence threat analysis by the law enforcement and intelligence communities. Two primary law enforcement/intelligence users of SEVIS are
  - The Foreign Terrorist Tracking Task Force
  - The ICE Counterterrorism and Compliance Enforcement Unit.
- Government benefit 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
- Timely removal of nonimmigrants from the United States, as needed.

SEVIS data is used to assist school officials, exchange visitor program sponsors, 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 continues to support access to the United States for bona fide aliens seeking F, M, or J nonimmigrant status, while elevating the detection and barring of aliens that might threaten the nation.

### **3. Use of information technology.**

The introduction of SEVIS enabled replacement of complex, time-consuming and inefficient paper-based processes with Internet-based technology which allows for simpler, quicker, more efficient paperless processes. Data is now collected uniformly and electronically, available to needing agencies at any time. While startup was expensive for SEVIS users, cost savings have resulted. The timeliness and integrity of SEVIS data is positively impacting all systems with which SEVP interacts. Specific improvements with the implementation of SEVIS 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 of data (currently the school officials and exchange visitor program sponsors; SEVIS will be enhanced to enable nonimmigrants to enter their personal information). This facilitates all phases of data entry—initial, update, and correction. Consequently, the data entry burden for schools and exchange visitor programs will be reduced significantly and overall data integrity among all governmental systems where data might appear about the nonimmigrant will be elevated.
- 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.

- 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 the 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, rather than traditional paper-copy mailing, significantly reduces manual processing by SEVP personnel and provides school officials and exchange visitor program sponsors more timely information. Electronic communication is also minimizing the burden of filing and recordkeeping.
- SEVP is 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 incorporated the entire designated school official (DSO) approval process for F-1 student employment. This eliminated the need for the Form I-538, *Certification by Designated School Official*, consequently now obsolete.
- Many SEVIS users reported to SEVP that they recognized management benefits and improved ease in complying with SEVP requirements as a benefit of working within the framework of SEVIS.
- SEVIS data is retained indefinitely in electronic form, either in active or archived records. Consequently, traditional records retention requirements for schools are significantly reduced.
- SEVP has instituted paperless procedures for service of all its notices and adjudications to schools and schools must make their submissions to SEVP electronically.

- SEVP is investing heavily in the 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 transitioning to accept electronic submission of forms and data, in lieu of paper forms.
  - Electronic forms submission and signature acceptance processes will expedite processing
  - Electronic validation of forms by consulates, ports-of-entry and benefit providers will be uniformly available to government users. Consequently, presentation and authentication of paper copies will be eliminated from all Federal processes.
  - 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.
- When schools applied for SEVP certification, required supporting documents were collected by a DHS representative at the time of the mandatory site visit. This business process is amended. If verifiable electronic forms of documentation are available (including, but not limited to faxing and Websites) the alternates (e.g., tax information and school catalogues) are being accepted. School submission of required documentation is required to be electronic as much as feasible for both certification and recertification.

#### **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 system currently available that can be used for the purposes of SEVIS. However, a number of data systems collect generic alien 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 that encompass management of: F, M, and J nonimmigrant (and, to a limited degree, their dependents) personal, enrollment/participation information; and SEVP certification, oversight and recertification of schools authorized to enroll F or M students. With respect to these areas, other than the addition of the SEVIS tracking numbers, SEVIS does not require the collection of any data that was not previously required by DHS (or the previous Immigration and Naturalization Service, which DHS incorporated). 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 F, M, and J nonimmigrant information:

- As addressed in Item 3 (above), the introduction of SEVIS eliminated 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 incorporate only the data elements previously approved by OMB to be collected on each form.
- SEVIS allows the accompanying spouse and dependents of a student or exchange visitor to have their own copy of the Form I-20 or DS-2019, *Certificate of Eligibility for Exchange Visitor (J-1) status*. (Previously, they entered the United States with a copy of the sponsor's Form I-20 or DS-2019.)
- SEVIS replaces Form AR-11, *Alien's Change of Address Card*, reporting for F, M, and J nonimmigrants. With SEVIS, F, M, and J nonimmigrants report changes in name or U.S. address to their DSOs or ROs. SEVIS eliminated a redundancy in reporting with the Form AR-11 process.

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 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 averaged 30 minutes and every pre-SEVIS paper update required the same time. A student, in a four-year program, may require 10-12 updates to Form I-20 information over the durations of the student's program of study. A DSO can complete each one of these updates in SEVIS in about five minutes. The Form I-17, from "scratch," may take one to two hours. A quarterly or "as needed" update in SEVIS shouldn't take more than 10 minutes. This includes updates to the Form I-17 submitted for recertification. Clearly, while SEVIS required heroic effort to populate for initial implementation of the program, the long-term time savings are significant.

##### **5. Impact on small business 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 (December 2013), there were 10,205 certified schools. Of these, SEVP estimates that about 46% (4,143) 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 entities:

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

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, such as upgrades to vendor software or campus information technology systems, for certifying schools that choose to use the batch-method interface with SEVIS<sup>2</sup>. DHS took these

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<sup>2</sup> While batch processing (the large scale transfer of data from one system to another) may entail a school investing in software or software development to develop an interface to SEVIS and the school's data

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. Consequence to the federal program or policy activities if the collection is not conducted or is conducted less frequently.**

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 would need to be collected through a paper process, as previously required, which would 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, and 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 F, M, and J nonimmigrant threats to national security or threats of immigration fraud.

**7. Explain special circumstances that would cause an information collection to be conducted in a manner inconsistent with OMB guidelines.**

- Requiring respondents to report information to SEVP more often than quarterly. F and M nonimmigrant reporting requirements [as specified in 8 CFR 214.2(f)(17) and 8 CFR 214.2(m)(18)] with respect to enrollment, personal information, 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.
- Requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it. SEVP regards a submission made electronically in SEVIS as equivalent to a written response. In some circumstances, the recordkeeping,

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systems, the alternative is that all data entry be done by real-time interface (RTI), which requires that all data be manually keyed-in. A school that utilizes batch processing does so as a business decision, based upon determination that its investment is less than the cost of RTI.

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 immigration fraud that could result from failure to inform enforcement agencies of changes within the allotted time. They are also essential for prosecution of noncompliant school officials.

- Requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax 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.**

On March 28, 2014, ICE published a notice in the Federal Register at **79 FR 06903**, soliciting public review and comment for a 60-day period on the proposed extension of this information collection. ICE received no comments during this period. On June 18, 2014, ICE published a follow up notice in the Federal Register at **79 FR 14226**, soliciting public review and comment for an additional 30-day period on the proposed new information collection.

## **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.**

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. SEVP published a [Privacy Impact Assessment on February 5, 2005](#) and a [Privacy Impact Assessment Update on June 23, 2011](#). A System of Records Notice (SORN) published at [70 FR 14477](#) (March 22, 2005).

With regard to SEVP certification appeal or motion proceedings, there is no assurance of confidentiality. SEVP will use the information submitted to determine eligibility for the benefit. SEVP may provide information on the form to other government agencies.

## **11. Justification of questions of a sensitive nature.**

There are no questions of sensitive nature asked in this information collection.

## **12. Annual and onetime public reporting burden and public cost.**

The ongoing annual public reporting burden and cost of SEVP and SEVIS is divided among:

- The collection of F and M nonimmigrant data from F and M nonimmigrants by schools via their own admission information collection tools;
- The collection, updating, and management of F and M nonimmigrant data from F and M nonimmigrants by DSOs via SEVIS; and,
- The management of SEVP-certified school information, including initial certification, compliance and recertification by DSOs via SEVIS.

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. Greater explanation and net cost to the respondents is presented in the text that follows.

**Summary of Public Burden and Cost**

<b>Type of Respondent or Information Collection</b>	<b>Form Name</b>	<b>No. of Respondents</b>	<b>No. of Responses per Respondent</b>	<b>Total Annual Burden (in hours)</b>	<b>Avg. Hourly Wage Rate</b>	<b>Total Annual Respondent Cost</b>
<b>F-1 and M-1 initial students</b>	School Form	619,696	2.5	0	\$15	0
<b>F-2 and M-2 initial dependents</b>	School Form	22,315	0	0	\$15	0
				0		0
<b>Management of Student records by DSO</b>	SEVIS / Form I-20	37,213	1	479,522	\$15	7,192,816
	SEVIS/ Student OPT	37,213	1	8,987	\$15	134,800
	SEVIS/ Student 17-month OPT	37,213	1	1,667	\$15	24,998
				490,176	\$15	7,352,614
<b>Management of SEVP certification and recert by DSO</b>	SEVIS /Form I-17	37,213	1	*537,708	\$15	8,065,616

\*includes 14 hours per respondent for training, research, reports and professional development

Annual burden and cost of collection, updating, and management of prospective F and M nonimmigrant data from F and M nonimmigrants by Schools via their own admission information collection tools.

Schools subscribe to online services that enable the electronic collection of student information, or schools use their own proprietary admission information collection systems. Common Application ([www.commonapp.org](http://www.commonapp.org)) is representative of the online subscription school admission information gathering tools.

SEVP anticipates that 619,696 initial F/M students will enroll at SEVP-certified schools annually via a school’s online admission information collection service or its own admission information collection tools. The normal applicant will apply to more than one school, requiring development of an average of 2.5 applications. .

SEVP used the Common Application online admissions tool to populate admission applications as both a U.S. citizen applying for admission, and as a nonimmigrant applying for admission. Common Application collected the information through pull-down menus, yes/no check-the-box, and fill-in the blank responses.

SEVP noted that the questions directed at the U.S. citizen and nonimmigrant applicants were the same, with one exception. However, the exception, a yes/no check-the-box response question directed specifically at the nonimmigrant student, is not a data element that SEVP collects via SEVIS or in any other capacity.

SEVP concludes that the SEVIS data collection imposes no burden on the F and M nonimmigrant.

F/M Students Forms I-20 and personal info.	Total	Frequency	Burden (hours)	Subtotal (hours)	Cost/hr.	Subtotal (\$)
Active F/M students	1,582,658					
Initial F/M students	619,696	2.5	0	0	\$15	0
Active F-2/M-2 dependents	126,336					
Initial F-2/M-2 dependents	22,315	0	0	0	\$15	0

Annual burden and cost of collection, updating, and management of prospective and continuing F and M nonimmigrant data from F and M nonimmigrants by DSOs in SEVIS.

The management of student data by DSOs in SEVIS includes the issuance of Forms I-20; gathering, updating and reporting student information; and the correction of identified errors in student information.

- The 3-year average of active student records in SEVIS is estimated to be a cumulative total of 1,582,658 for each year.<sup>3</sup>
- SEVP anticipates that 619,696 initial F/M students will enroll at SEVP-certified schools annually. The normal applicant will apply to more than one school, requiring development of an average of 2.5 SEVIS/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 271,118 hours, the cost for RTI-loaded initial SEVIS/Forms I-20 will be \$4,066,763.
- For approximately 65% of the SEVIS/Forms I-20, the data will be loaded using batch procedures, at one minute each to complete. Presuming clerical costs of \$15 per hour for 16,112 hours, the cost for batch-loaded initial SEVIS/Forms I-20 will be \$241,681.
- DSOs must update SEVIS/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 SEVIS/Form I-20 loading are pre-populated for updates, the update only takes five minutes to complete using RTI method or one minute using the batch method. On average, students should receive three updates to their records annually. An estimated 35% of updates will be RTI, at an annual cost of \$2,068,929; 65% of updates will be batch, at an annual cost of \$740,684.
- SEVP anticipates the 3-year average of active F-2/M-2 dependent records in SEVIS to be 126,336, and anticipates 22,315 initial F-2/M-2 dependent records each year. Each dependent requires an individual SEVIS/Form I-20. Most data on the dependent initial SEVIS/Form I-20 is derived and pre-populated from the data in the sponsor's record, so

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<sup>3</sup> For calendar year 2013, the total number of active F and M students in SEVIS was 1,507,293. SEVP projects an increase of a flat 5% for the next three years covered by this Supporting Statement (i.e., 1,582,658 students for calendar year 2014 and the same amount for calendar years 2015 and 2016). Estimates for active F-2/M-2 dependents, initial F-1/M-1 students, initial F-2/M-2 dependents, participants in optional practical training (OPT), and participants in the 17-month OPT extension are calculated in the same way.

Note: [SEVIS by the Numbers](#) data, posted on the SEVIS Outreach page of the SEVP website, reflect a limited period of the year (a “snapshot” of that segment) rather than the entire year, as given in this statement.

each dependent SEVIS/Form I-20 takes five minutes each to complete. A dependent will usually average one update per year. The annual cost for dependents is \$55,051 for RTI-loaded and \$19,708 for batch loaded.

- 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 SEVIS/Form I-20. SEVP estimates the number of students applying for practical training at 108,273. If 108,273 students apply for practical training, DSOs have the additional burden to make a recommendation update to the student SEVIS record. Consequently, with each student recommended for OPT, a DSO will have to make one additional action at a cost of \$134,800.
- SEVP anticipates that 20,079 students will apply for the 17-month OPT extension option. DSOs have the additional burden to make a recommendation update to the student SEVIS record. Consequently, for each student authorized the 17-month OPT extension option a DSO will have to make one additional action for a cost of \$24,998.
- The total cost for management of student data is \$7,352,614.

The overall cost to the public to support management of student data, borne by SEVP-certified schools, averages \$686.<sup>4</sup>

**Management of Student Data: Burden/Costs for Each Year of this Reporting Period (calendar years 2014-2017)**<sup>5</sup>

F/M Students SEVIS/Forms I-20 and personal info.	Total	Frequency	Burden (hours)	Subtotal (hours)	Cost/hr.	Subtotal (\$)
Active F/M students	1,582,658					

<sup>4</sup> **Calculation:** Total cost of student management from chart – divided by – number of schools = cost per school. 7,352,614 cost of managing student data – divided by – 10715 estimated approved schools = \$686.

<sup>5</sup> These actions are taken by DSOs in SEVIS to support the F and M visa nonimmigrant students.



Initial F/M students	619,696					
Initial SEVIS/Forms I-20 (RTI)	216,894	2.5	0.5	271,118	\$15	\$4,066,763
Initial SEVIS/Forms I-20 (batch)	402,802	2.5	0.016	16,112	\$15	\$241,681
Updates (RTI)	553,930	3	0.083	137,929	\$15	\$2,068,929
Updates (batch)	1,028,728	3	0.016	49,379	\$15	\$740,684
Student SEVIS/OPT	108,273	1	0.083	8,987	\$15	\$134,800
Students SEVIS/17-month OPT extension option	20,079	1	0.083	1,667	\$15	\$24,998
Active F-2/M-2 dependents	126,336					
Initial F-2/M-2 dependents	22,315					
F-2/M-2 SEVIS/Forms I-20 (RTI)	44,218	1	0.083	3,670	\$15	\$55,051
F-2/M-2 SEVIS/Forms I-20 (batch)	82,118	1	0.016	1,314	\$15	\$19,708
			Total Hours	490,176	Total Cost	\$7,352,614

### Cost Saving on Forms I-20 with SEVIS

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. The benefit in costs saved by the elimination of the Form I-538 through SEVIS is \$962,640.<sup>6</sup>

At the volume of these projections, by using SEVIS, the annual cost savings from the reduction in burden of hours to the SEVP-certified schools is \$41,786,649. This results in an estimated public cost burden reduction of, \$3,900<sup>7</sup> per SEVP-certified school.

<sup>6</sup> OPT 108,273 + OPT 29 month 20,079 = total # Forms I-538 (no longer used) 128,352 X 0.5 completion time =64,176 hour burden;64,176 hour burden X \$15 = \$962,640 savings gained because SEVIS eliminated use of Form I-538.

<sup>7</sup> Total public burden reduction 41,786,649 – divided – by the number of SEVP certified schools 10715 = the cost saving per SEVP certified school \$3,900.

**Cost Saving on Forms I-20 with SEVIS for Each Year of this Reporting Period (calendar years 2014-2017)**

<b>F/M Students SEVIS/Forms I-20 and Personal Info.</b>	<b>Totals</b>	<b>Frequency</b>	<b>Burden (hours)</b>	<b>Subtotal (hours)</b>	<b>Cost/hr.</b>	<b>Subtotal (\$)</b>
Active F/M students	1,582,658					
Initial F/M students	619,696					
Initial SEVIS/Forms I-20 (RTI)	216,894	2.5	0.5	271,118	\$15	\$4,066,762
Initial SEVIS/Forms I-20 (batch)	402,802	2.5	0.5	503,503	\$15	\$7,552,537
Updates (RTI)	553,930	3	0.5	830,895	\$15	\$12,463,425
Updates (batch)	1,028,728	3	0.5	1,543,092	\$15	\$23,146,380
Student SEVIS/OPT	108,273	1	0.5	54,136	\$15	\$812,047
Students SEVIS/17-month OPT extension option	20,079	1	0.5	10,039	\$15	\$150,592
Active F-2/M-2 dependents	126,336					
F-2/M-2 initial dependents	22,315					
F-2/M-2 SEVIS/Forms I-20 (RTI)	44,218	1	0.5	22,109	\$15	\$331,635
F-2/M-2 SEVIS/Forms I-20 (batch)	82,118	1	0.5	41,059	\$15	\$615,885
			<b>Total Hours</b>	3,275,951	<b>Total Cost</b>	\$49,139,263
			<b>Current Cost</b>			Minus \$7,352,614
			<b>Savings</b>			\$41,786,649

**Management of SEVP certification (i.e., school information).**

The maintenance of SEVP-certification includes the management of initial, periodic and on-request submission of SEVIS/Forms I-17, reporting changes and correction of identified errors.

- Computed costs include 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 an estimated 10,715<sup>8</sup> SEVP-certified schools. SEVP anticipates 475 schools to petition for initial certification and 3,331 schools to recertify annually in each of the next three years.
- A petition for initial certification is given four hours for completion to include obtaining access to SEVIS, data entry and the SEVP on-site school inspection. The current initial certification fee (\$1,700 cost of petition + \$655 for site visit, with each additional campus incurring a separate site visit fee) does meet government’s cost.
- Updates to school information will average five minutes for completion.
- Recertification process for schools will take the same amount of time as the initial certification.
- All documents necessary for the initial petition or recertification are collected electronically.
- SEVP estimates the overall costs to SEVP-certified schools related to DSO personal development, to include training, research, reports and professional development cost, to be collectively \$7,814,730, at approximately 14 hours per DSO.

**Management of SEVP Certification: Burden/Costs for Each Year of this Reporting Period**  
**(calendar years 2014-2017)**

<b>SEVIS/Form I-17 School certification, oversight,</b>	<b>Total</b>	<b>Frequency</b>	<b>Burden (hours)</b>	<b>Subtotal (hours)</b>	<b>Cost/hr.</b>	<b>Subtotal (\$)</b>
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<sup>8</sup> For calendar year 2013, the total number of SEVP-certified schools was 10,205. SEVP projects an increase of a flat 5%, or 510 schools, for a projected 10,715 schools for the next three years covered by this Supporting Statement (i.e., 10,715 schools for calendar year 2014 and the same amount for calendar years 2015 and 2016).

Estimates for initial school certification petitions, school recertification petitions, school petition updates and designated school officials are calculated in the same way.

Note: SEVIS by the Numbers data, posted on the Outreach page of the SEVP website, reflect a limited period of the year (a “snapshot” of that segment) rather than the entire year, as given in this statement.

<b>recertification</b>						
<b>SEVP-certified schools</b>	10,715					
<b>SEVIS/Form I-17 Initial school certification processing</b>	475	1	4	1900	\$15	\$28,500
<b>SEVIS/Form I-17 Petition updates</b>	6,031	3	0.083	1502	\$15	\$22,526
<b>SEVIS/Form I-17 Recertification processing</b>	3,331	1	4	13,324	\$15	\$199,860
<b>DSO training, research, reports, and professional development.</b>	37,213	1	14	520,982	\$15	\$7,814,730
			<b>Total hours</b>	537,708	<b>Total cost</b>	\$8,065,616
<b>Management of student data and SEVP certification – combined totals</b>		<b>Grand Totals</b>	<b>Hours</b>	1,027,884	<b>Cost</b>	\$15,418,230

**13. Capital startup and ongoing equipment costs. Provide an estimate of the total annual cost burden to respondents or record keepers resulting from the collection of information. (Do not include the cost of any hour burden shown in Items 12 and 14).**

There were no capital or startup costs charged to the respondents or record keepers as a result of the initiation of this collection of information (i.e., the government cost to initiate this collection was not passed on to the schools or the F, M and J nonimmigrants). Development costs for SEVIS and the initial implementation of SEVP were underwritten with appropriated funds. Recurring maintenance and further development costs of SEVIS are incorporated in the student fees.

**14. Annual government burden and cost.**

There is no net cost to the federal government for SEVP and SEVIS. SEVP is mandated by law to be fully fee-funded (see Item 1). Section 286(m) of the Act, 8 U.S.C. 1356(m), provides that fees may be set at a level that will ensure the recovery of all costs of providing adjudication services. That section, together with Title V of the Independent Offices Appropriations Act of 1952, 31 U.S.C. 9701, and the OMB Circular No. A-25, Revised requires that a fee be set at an amount sufficient to recover the full cost to the federal government. Fees are developed at a level projected to cover the aggregate of SEVP operating costs. Expenditures are restricted from exceeding the actual amount of revenue received. For a detailed explanation of the cost to the federal government and the fees that compensate the government for this cost, see the following rule: *Adjusting Program Fees and Establishing Procedures for Out-of-Cycle Review and Recertification of Schools Certified by the Student and Exchange Visitor Program To Enroll F or M Nonimmigrant Students* [73 FR 21260 (April 21, 2008), proposed; 73 FR 55683 (September 26, 2008), final].

**15. Change in burden hours and cost.**

The data collection has not changed since the previous Supporting Statement. Respondents in SEVIS have been and continue to be the DSOs, not the students. The DSOs input data into SEVIS in order to fulfill two responsibilities: the management of their school's F and M visa nonimmigrant student data, and the management of their school's SEVP certification. Requirements and processes for management of this data have not changed. Variances in aggregate costs/burden between this Supporting Statement and the preceding one only reflect changes in overall student enrollment and the number of schools having or seeking SEVP certification.

2011					2014							
Numbers/Categories	Total # of Respondents	Total # of Responses	Burden in Hours	Costs	Numbers/Categories	Total # of Respondents	Total # of Responses	Burden in Hours	Costs	Difference in Responses	Difference in Hours	Difference in Costs
<b>Respondents - Students</b>					<b>Respondents - Students</b>							
Initial F Students SEVIS/Forms I-20	280,000	840,000	420,000	8,404,200	Not applicable. Respondents in SEVIS have been and continue to be the DSOs, not the students.	N/A	N/A	N/A	N/A	(840,000)	(420,000)	(8,404,200)
Initial M Students SEVIS/Forms I-20	90,000	90,000	45,000	900,450	Not applicable. Respondents in SEVIS have been and continue to be the DSOs, not the students.	N/A	N/A	N/A	N/A	(90,000)	(45,000)	(900,450)
Student SEVIS/OPT	280,000	840,000	69,720	1,395,097	Not applicable. Respondents in SEVIS have been and continue to be the DSOs, not the students.	N/A	N/A	N/A	N/A	(840,000)	(69,720)	(1,395,097)
Student SEVIS/OPT 17-month Extension	12,000	12,000	996	19,930	Not applicable. Respondents in SEVIS have been and continue to be the DSOs, not the students.	N/A	N/A	N/A	N/A	(12,000)	(996)	(19,930)
<b>Totals</b>		1,782,000	535,716	10,719,677						(1,782,000)	(535,716)	(10,719,677)
<b>Respondents - DSOs</b>					<b>Respondents - DSOs</b>							
Maintenance of SEVP Certification SEVIS/Form I-17	5,525	5,525	22,100	442,221	Maintenance of SEVP Certification SEVIS/Form I-17	9,837	21,899	16,726	250,886	16,374	(5,374)	(191,335)
					Training/Professional development	37,213	37,213	520,982	7,814,730	37,213	520,982	7,814,730
					Management of SEVP Certification - Totals	47,050	59,112	537,708	8,065,616			
					Management of Student records - SEVIS/Forms I-20							
					Initial SEVIS/Forms I-20 (RTI)	37,213	216,894	271,118	4,066,763			
					Initial SEVIS/Forms I-20 (batch)	37,213	402,802	16,112	241,681			
					Updates (RTI)	37,213	553,930	137,929	2,068,929			
					Updates (batch)	37,213	1,028,728	49,379	740,684			
					F-2/M-2 SEVIS/Forms I-20 (RTI)	37,213	44,218	3,670	55,051			
					F-2/M-2 SEVIS/Forms I-20 (batch)	37,213	82,118	1,314	19,708			
								479,522	7,192,816			
					Subtotal		2,328,690	479,522	7,192,816			
					Management of SEVIS/Student OPT	37,213	108,273	8,987	134,800			
					Management of SEVIS/Student 17-month OPT	37,213	20,079	1,667	24,998			
					Subtotal		128,352	10,654	159,798			
					Management of Student records - SEVIS/Forms I-20 - Totals	2,457,042		490,176	7,352,614	2,457,042	490,176	7,352,614
					Management of Student data and SEVP certification - Combined Totals	2,516,154		1,027,884	15,418,230	2,510,629	1,005,784	14,976,009

## 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 of SEVIS 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.

**C. Certification and Signature.**

**PAPERWORK CERTIFICATION**

In submitting this request for OMB approval, I certify that the requirements of the Privacy Act and OMB directives are complied with, to include paperwork regulations, statistical standards or directives, and any other information policy directives promulgated under 5 CFR 1320.

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xxx

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Date

xxx

Office of the Chief Information Officer  
Immigration and Customs Enforcement  
Department of Homeland Security