

SUPPORTING STATEMENT

Form I-910, STEM¹ OPT Extension Mentoring and Training Plan (OMB No. 1653-NEW)

A. Justification.

- 1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.**

DHS is implementing a new information collection to better ensure that F-1 students with science, technology, engineering and mathematics (STEM degrees) wishing to extend their optional practical training (OPT) on a voluntary basis can do so in a manner that enhances the academic benefit of the STEM OPT extension. The employer who chooses to provide a STEM OPT opportunity to a student will, as a condition of voluntary participation in the program, work with the student to design a customized training plan. Such training plans will require specific goals for the training, as well as a description of how those goals will be achieved. The STEM OPT Extension Mentoring and Training Plan (Form I-910) will ensure that STEM OPT students receive a more comprehensive understanding of their selected course of study and attain better functionality within that field.

This information is sought primarily pursuant to 6 U.S.C. 202 and Sections 101, 103, and 274a of the Immigration and Nationality Act of 1952 (INA), as amended (8 U.S.C. 1101, 1103, and 1324a, respectively). The Secretary of Homeland Security (Secretary) has broad authority pursuant to 6 U.S.C. 202, INA § 103, 8 U.S.C. 1103, to administer and enforce the nation's immigration laws. Section 101(a)(15)(F)(i) of the INA establishes the F-1 nonimmigrant classification for individuals who wish to come to the United States temporarily to enroll in a full course of study at an academic or language training school certified by ICE's Student and Exchange Visitor Program (SEVP). 8 U.S.C. 1101(a)(15)(F)(i). The Secretary also has broad authority to determine which aliens are "authorized" for employment in the United States. 8

¹ Science, technology, engineering and mathematics

U.S.C. 1324a(h)(3). Federal agencies dealing with immigration, such as the legacy Immigration and Naturalization Service pursuant to 12 FR 5355, 5357 (Aug. 7, 1947) have long interpreted section 101(a)(15)(F)(i) of the INA and related authorities to encompass on-the-job-training that supplements classroom training. DHS permits an F-1 student who has been enrolled on a full-time basis for at least one full academic year in a college, university, conservatory, or seminary certified by SEVP, and who has otherwise maintained his or her status, to apply for practical training to work for a U.S. employer in a job directly related to his or her major area of study. 8 CFR 214.2(f)(10). SEVP manages and oversees significant elements of the F visa process, including the certification of schools and institutions in the United States that enroll nonimmigrant students and provide them the ability to pursue practical training while in F status. In overseeing these institutions, SEVP uses the Student and Exchange Visitor Information System (SEVIS) to track and monitor foreign students, and communicate with the schools that enroll them, while they are in the United States and participating in educational opportunities.

SEVP and DHS derive the authority to manage the required and authorized programs, including tracking and monitoring aspects, from several sources, including, in addition to the authorities cited above:

- Section 641 of the *Illegal Immigration Reform and Immigrant Responsibility Act of 1996 (IIRIRA)*, Public Law 104-208, Div. C (Sept. 30, 1996), which 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 Act of 2001*, Public Law 107-56 (October 26, 2001), which 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.
- *Homeland Security Presidential Directive-2*, issued by the President on October 30, 2001, requiring the Department of Homeland Security (DHS) to conduct periodic and ongoing review of all schools certified to accept F and M nonimmigrant students.
- *The Enhanced Border Security and Visa Entry Reform Act of 2002* (EBSVERA), Public Law 107-173, 116 Stat. 543 (May 14, 2002), requiring DHS to recertify all schools approved for attendance by F and/or M students within two years of its passage. Further, EBSVERA mandates that DHS conduct an additional recertification of these schools every two years.
- *The Homeland Security Act of 2002*, Public Law 107-296, 116 Stat. 2135 (Nov. 25, 2002), pursuant to which, on March 1, 2003, the former INS transferred duties from the Department of Justice to DHS. The adjudication functions of INS transferred to U.S. Citizenship and Immigration Services (USCIS), and the SEVIS function transferred to the Bureau of Border Security, now U.S. Immigration and Customs Enforcement (ICE).

Data collection requirements for 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. SEVP is a component of ICE assigned by DHS to administer SEVIS and to carry out the responsibilities mandated by the above laws regarding F and M nonimmigrants.²

² 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 any annual costs or burden associated with the Exchange Visitor Program of the Department of State.

2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.

This is a new data collection. As discussed above, the information collected on the Form I-910 serves as a planning document for STEM OPT students, the SEVP-certified school, and the employer. The STEM OPT Extension Mentoring and Training Plan also serves as an evidentiary document for SEVP, by tracking the STEM OPT student's progress, setting forth the terms and conditions of the practical training, and documenting the obligations of the three parties that are involved – the F student³, the SEVP-certified school, and the employer.

The student and the employer must each complete and sign their part of the Form I-910. The SEVP-certified school will incorporate the completed and signed Form I-910, as part of the student's school file. The SEVP-certified school will make the student's Form I-910 available to DHS upon request.

DHS plans to incorporate the submission of the Form I-910 into SEVIS at a later date. Until that time DHS may require the submission of the form to ICE or USCIS, including to USCIS when the student seeks certain benefit requests from USCIS, such as an application for employment authorization. The student requesting the STEM OPT extension may also be required to submit the Form I-910 to USCIS as part of the employment authorization document application.

DHS officials responsible for the administrative oversight of SEVP will use the information collected specifically to monitor compliance of the Designated School Officials (DSOs), the students and the employers with SEVP regulations (8 CFR 214.1–214.4).

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology (e.g., permitting electronic submission of responses) and the basis for the decision to adopt this means of collection. Also describe any consideration of using information technology to reduce burden.

³ This supporting statement only impacts F nonimmigrant students. For simplicity, all reference to "student(s)" for the remainder of this statement refers to F nonimmigrants.

Form I-910 is a fillable PDF that will be posted to the new SEVP STEM OPT Extension Mentoring and Training Plan website and available for students to download and electronically fill out and save for making future updates. SEVP plans in the future to integrate the Form I-910 into SEVIS in a way that will be accessible for students. The SEVP-certified school is responsible for maintaining the evaluation for SEVP access in electronic or hard copy form.

4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.

Form I-910 does not duplicate other collections of information. This is a new procedure which is directed in a rulemaking expected to be implemented in 2016 entitled “Improving and Expanding Training Opportunities for F-1 Nonimmigrant Students with STEM Degrees and Cap-Gap Relief for All Eligible F-1 Students.”

5. If the collection of information impacts small businesses or other small entities disproportionately (Item 5 of OMB Form 83-I), describe any methods used to minimize burden.

DHS believes the Form I-910 collection of information does not disproportionately impact small businesses or other small entities. Because the collection is a result of the rulemaking discussed above, DHS has conducted an Initial Regulatory Flexibility Analysis (IRFA) in accordance with the Regulatory Flexibility Act⁴, and published the findings of the IRFA in the Regulatory Impact Analysis document in the rulemaking docket, No. ICEB-2015-0002 available at www.regulations.gov. Based on the entity’s burden estimates resulting from the completion and recording of the form, DHS does not believe that this information collection would have a significant economic impact on a substantial number of small entities. The information collected is only that which is required by DHS to meet regulatory requirements under the rulemaking described above and is only required of those individuals or entities involved in the process of obtaining the STEM OPT extension benefit by recommending (in the

⁴ Regulatory Flexibility Act of 1980 (RFA), 5 U.S.C. 601-612, as amended by the Small Business Regulatory Enforcement Fairness Act of 1996, Public Law 104-121 (March 29,1996).

case of DSO schools) or employing (in the case of employers) an F-1 student pursuant to STEM OPT extension regulations. The data the students, their employers, and the DSOs enter through the fillable PDF Form I-910 can be stored electronically, thus making it possible for the user to make adjustments to specific fields of information on the form, as needed, without having the user complete a new form in its entirety.

6. Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.

Officials responsible for the administrative oversight of F-1 nonimmigrant students, including those who monitor compliance of DSOs, will collect and use this data to ascertain whether the student's STEM OPT extension, including all parties involved in the process, are in compliance with DHS regulations (8 CFR 214.1- 214.4). If this collection is not conducted or is scaled back, the academic benefit of the STEM OPT extension may suffer, and program integrity measures may be lost.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner:

- **Requiring respondents to report information to the agency more often than quarterly;**
- **Requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;**
- **Requiring respondents to submit more than an original and two copies of any document;**
- **Requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years;**

- **In connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study;**
- **Requiring the use of a statistical data classification that has not been reviewed and approved by OMB;**
- **That includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or**
- **Requiring respondents to submit proprietary trade secret, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.**

The special circumstances contained in item 7 of the supporting statement are not applicable to this information collection.

- 8. If applicable, provide a copy and identify the data and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.**

Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.

Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years -- even if

the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

ICE is publishing notice of this new collection in the DHS proposed rule “Improving and Expanding Training Opportunities for F-1 Nonimmigrant Students with STEM Degrees and Cap-Gap Relief for All Eligible F-1 Students” and is soliciting public comment.

9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.

SEVP does not provide payment or gifts to respondents, and will therefore not provide any offer of monetary or material value to respondents to the Form I-910.

10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.

The SEVIS system of records covers the use and potential sharing of information in this collection. The SEVIS system of records is covered by the Privacy Act. ICE published notice of this system of records in the Federal Register on January 5, 2010 at 75 FR 412. The SEVIS Privacy Impact Assessment covers the use and potential sharing of information in this collection. ICE published notice of this Privacy Impact Assessment (PIA) on June 23, 2011; see http://www.dhs.gov/xlibrary/assets/privacy/privacy_pia_sevis_update_nctc.pdf. The ICE Office of Privacy conducted a Privacy Threshold Analyses (PTA) on this form and the related proposed rule in July 2015, and determined that no additional PIA will need to be generated.

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to person’s from whom the information is requested, and any steps to be taken to obtain their consent.

There are no questions in this collection of a sensitive nature.

12. Provide estimates of the hour burden of the collection of information. The statement should:

- **Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices.**
- **If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens in Item 13 of OMB Form 83-I.**
- **Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included in Item 14.**

Respondents to the form would include students participating in STEM OPT, DSO's from schools endorsing students on STEM OPT, and employers of STEM OPT students.

Annual Respondents: 61,970 respondents annually

- 43,970 STEM OPT students
- 1,109 School DSO's
- 16,891 Employers of STEM OPT students

Students would have an average annual burden of 1.67 hours per initial completion and submission of the form, and 1.17 hours for six month evaluations. DSO's would have an average burden of 0.25 hours for review of the form and 0.083 hours for recordkeeping time per

submission, both for initial and six month evaluations. Employers would have a person with signatory authority spend 0.5 hours, a student’s supervisor spend 0.5 hours, and a human resource specialist spend 1 hour per initial submission of the form. Employer costs for the six month evaluations would be 0.25 hours per submission. Table 1 provides a summary of the calculations for the annual reporting burden.

Annual Reporting Burden: 330,174 hours annually

Table 1: Calculation of Annual Reporting Burden for Mentoring and Training Plan

Function	Avg Annual Responses	Avg Annual Responses	Time Per Response (Hours)	Avg Annual Hour Burden
Student Burden				
Initial Completion of Mentoring and Training Plan	43,970	43,970	1.67	73,431
Evaluation Requirements	43,970	87,941	1.17	102,891
Sub-Total				176,322
DSO Burden^{1,2}				
Initial Review of Mentoring and Training Plan & Recordkeeping	1,109	43,970	0.333	14,642
Review of Evaluation & Recordkeeping	1,109	87,941	0.333	29,284
Sub-Total				43,926
Employer Burden²				
Initial Completion of Mentoring and Training Plan	16,891	43,970	2.00	87,941
Evaluation Requirements	16,891	87,941	0.25	21,985
Sub-Total				109,926
TOTAL	61,970			330,174

1) Time per response as shown is rounded to the nearest thousandth.

2) Burden estimates for the DSO and Employer respondents include time for reviewing the responses provided by the Student respondents.

The following discussion includes the process by which DHS estimated the hourly opportunity cost for the time burdens previously described. Following the discussion on calculation of wages, used a proxy for hourly opportunity costs, DHS provides an estimate of the annual average costs for the training and mentoring plan.

Wages

Student Wages

F-1 students on post-completion OPT extensions have already obtained their degrees and been authorized to work by USCIS. In addition, under the proposed rule, “Improving and Expanding Training Opportunities for F-1 Nonimmigrant Students with STEM Degrees, and Cap-Gap Relief for All Eligible F-1 Students”, these students would be required to receive commensurate compensation with that of similarly situated U.S. workers from their STEM OPT employers. Therefore, as a proxy for opportunity cost for these students, DHS uses an estimate of their average hourly wages.

STEM students can occupy a range of occupations. For the purposes of estimating an average STEM wage, DHS uses the 184 occupations recommended by a working group formed by the Bureau of Labor Statistics Standard Occupational Classification (SOC) Policy Committee in 2012.⁵ DHS also uses wage data collected under the Occupational Employment Statistics (OES) program for use in the Foreign Labor Certification process from the Foreign Labor Certification Data Center.⁶ DHS uses an average of Level 1 wages for the 184 identified STEM occupations across all geographic areas. Level 1 wages are for entry level employees, such as a worker in training or an internship.⁷ DHS then uses BLS data on the total number of employees in each SOC (regardless of skill level or immigration status) to estimate a weighted average wage rate for STEM OPT students.⁹ Following this process, DHS estimates a weighted average wage rate of \$23.81. Applying the 1.46 multiplier to account for the full cost of employee benefits (such as paid leave, insurance, and retirement), results in a time value of \$34.76 per hour for students on STEM OPT extension.¹⁰

⁵ Bureau of Labor Statistics, Defining STEM Occupations under the 2010 SOC, Attachment C: Detailed SOC occupations included in STEM, available at: http://www.bls.gov/soc/Attachment_C_STEM.xls.

⁶ Foreign Labor Certification Data Center, Online Wage Library, 7/2013-6/2014 FLC Wage Data, ALC_Export File, available at: http://www.flcdatacenter.com/download/OWL_2014_TEXT.zip.

⁷ Employment and Training Administration, Prevailing Wage Determination Policy Guidance, Nonagricultural Immigration Programs, Revised November 2009, page 7, available at: http://www.flcdatacenter.com/download/NPWHC_Guidance_Revised_11_2009.pdf.

⁸ This assumption is for purposes of this analysis only, and that DHS expects that STEM OPT extension participants with higher-level degrees would be compensated at a higher level.

⁹ Bureau of Labor Statistics, Occupational Employment Statistics, May 2014 National Occupational Employment Wage Estimates, Total Employment by SOC, available at: <http://www.bls.gov/oes/special.requests/oesm14nat.zip>.

¹⁰ Bureau of Labor Statistics, Employer Costs for Employee Compensation, Table 1. Employer costs per hour worked for employee compensation and costs as a percent of total compensation: Civilian workers, by major occupational and industry group, June 2014.” Available at http://www.bls.gov/news.release/archives/ecec_09102014.htm . Accessed May 20, 2015. Calculated by dividing total compensation for all workers of \$31.96 by wages and salaries for all workers of \$21.95 per hour

DSO wages

DHS uses the U.S. Department of Labor, Bureau of Labor Statistics (BLS) occupation Educational, Guidance, School, and Vocational Counselors occupational code as a proxy for DSOs. The average wage rate for this occupation is estimated to be \$27.00 per hour.¹¹ When the costs for employee benefits such as paid leave and health insurance are included, the full cost for an hour of DSO time estimated at \$39.33 ($\26.94×1.46).

Employer wages

The STEM OPT Extension Mentoring and Training Plan requires action by an employing management official with signatory authority. DHS assumes that this function is most likely to be completed by a manager serving in a human resources capacity. Therefore, DHS uses BLS occupation Human Resources Managers occupational code as a proxy for an employing management official with signatory authority. The average wage for this occupation is estimated to be \$54.88 per hour.¹² When the costs for employee benefits are included, the full cost for an hour of time is estimated at \$80.12 ($\54.88×1.46).

The STEM OPT Extension Mentoring and Training Plan requirements also necessitate action by a supervisor of the student at the practical training site. DHS uses the average wage for all management occupations as a proxy for estimating the opportunity cost of the supervisor. The average wage for this category of occupations is estimated to be \$54.08 per hour.¹³ When the costs for employee benefits are included, the full cost for an hour of time estimated at \$78.96 ($\54.08×1.46).

The proposed rule also requires action by a human resource specialist or equivalent level position from the employer of the student. DHS uses the average wage for human resource specialists as a proxy for estimating the opportunity cost of the employer's time to address human resource related requirements. The average wage for this occupation is estimated to be

(yields a benefits multiplier of approximately $1.46 \times$ wages).

¹¹ May 2014 Occupational Employment and Wage Estimates, National Cross-Industry Estimates, "21-1012 Educational, Guidance, School, and Vocational Counselors," Hourly Mean "H-mean," <http://www.bls.gov/oes/2014/may/oes211012.htm> (last modified Mar. 25, 2015).

¹² May 2014 Occupational Employment and Wage Estimates, National Cross-Industry Estimates, "11-3121 Human Resources Managers," Hourly Mean "H-mean," <http://www.bls.gov/oes/2014/may/oes113121.htm> (last modified Mar. 25, 2015).

¹³ May 2014 Occupational Employment and Wage Estimates, National Cross-Industry Estimates, "11-0000 Management Occupations," Hourly Mean "H-mean," <http://www.bls.gov/oes/2014/may/oes110000.htm> (last modified Mar. 25, 2015).

\$30.09 per hour.¹⁴ When the costs for employee benefits are included, the full cost for an hour of time estimated at \$43.93 ($\30.09×1.46).

Table 2 includes the calculation of costs based on the respective burden per respondent function on the training and mentoring plan. Costs for employers include burdens for three types of occupations, and the two hour burden reflected in Table 1, is split into three parts so that respective wages could be applied for a cost calculation.

¹⁴ May 2014 Occupational Employment and Wage Estimates, National Cross-Industry Estimates, “13-1071 Human Resource Specialists, Detail,” Hourly Mean “H-mean,” <http://www.bls.gov/oes/2014/may/oes131071.htm> (last modified Mar. 25, 2015).

Table 2: Calculation of Annual Reporting Cost for Mentoring and Training Plan

Function	Avg Annual Respondents	Avg Annual Responses	Time Per Response (Hours)	Avg Annual Hour Burden	Hourly Wage Rate	Avg Annual Cost
Student Burden						
Initial Completion of Mentoring and Training Plan	43,970	43,970	1.67	73,431	\$34.76	\$2,552,462
Evaluation Requirements	43,970	87,941	1.17	102,891		\$3,576,491
Sub-Total				176,322		\$6,128,953
DSO Burden^{1,2}						
Initial Review of Mentoring and Training Plan & Recordkeeping	1,109	43,970	0.333	14,642	\$39.33	\$575,870
Review of Evaluation & Recordkeeping	1,109	87,941	0.333	29,284		\$1,151,740
Sub-Total				43,926		\$1,727,610
Employer Burden²						
Initial Completion of Mentoring and Training Plan - HR Manager w Signatory Authority	16,891	43,970	0.50	21,985	\$80.12	\$1,761,438
Initial Completion of Mentoring and Training Plan - Supervisor	16,891	43,970	0.50	21,985	\$78.96	\$1,735,936
Initial Completion of Mentoring and Training Plan - HR Specialist	16,891	43,970	1.00	43,970	\$43.93	\$1,931,602
Evaluation Requirements - Supervisor	16,891	87,941	0.25	21,985	\$78.96	\$1,735,936
Sub-Total				109,925		\$7,164,912
TOTAL Annual Costs						\$15,021,474

1) Time per response as shown is rounded to the nearest thousandth.

2) Burden estimates for the DSO and Employer respondents include time for reviewing the responses provided by the Student respondents.

Annual Public Cost: \$15,021,474

13. **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).**

- **The cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life); and (b) a total operation and maintenance and purchase of services component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information. Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and record storage facilities.**
- **If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of purchasing or contracting out information collection services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10), utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.**
- **Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government or (4) as part of customary and usual business or private practices.**

There are no capital or start-up costs associated with this information collection. We estimate that there will be no cost to the respondents. No fee is charged in connection with this form. The respondents are required to fill out the form, keep a copy for their files and provide

copies to the SEVP-certified school and to USCIS, including as part of the Form I-765 submission upon request. It is expected that respondents currently have full capacity to complete, process and send the form to participants electronically as part of their current usual and customary business practices. It is anticipated that all material will be submitted electronically resulting in no cost for mailing.

- 14. Provide estimates of annualized cost to the Federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information. Agencies also may aggregate cost estimates from Items 12, 13, and 14 in a single table.**

Annualized Cost Analysis: There are no additional federal governments for this collection.

- 15. Explain the reasons for any program changes or adjustments reporting in Items 13 or 14 of the OMB Form 83-I.**

This is a new collection.

- 16. For collections of information whose results will be published, outline plans for tabulation, and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.**

SEVP does not intend to employ the use of statistics or the publication thereof for this information collection.

- 17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate**

SEVP will display the OMB expiration date.

18. Explain each exception to the certification statement identified in Item 19, "Certification for Paperwork Reduction Act Submission," of OMB 83-I.

SEVP does not request an exception to the certification of this information collection.

B. Collection of Information Employing Statistical Methods.

This collection does not employ statistical methods.