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| **Comment #** | **Public Comments** | **USCIS Response** |
| **Comment 1.** | **Commenter: Erin Hillis (received May 1, 2018)** |  |
|  | Dear DHS Officials:  Regarding the “bridge application” / Form I-539 – I submit the following comments for your consideration:  The “bridge application” is a problematic piece of immigration bureaucracy which serves little purpose for the applicants, but instead benefits USCIS. Please consider a revision of the Form I-539. This difficult-to-understand (and entirely too pricey) policy should either be removed, or, at least, should be rewritten in the Form Instructions to transparently, accurately, and helpfully explain the policy.  Please do your best to serve the populations that are so helpful to the US, in so many tangible and intangible ways.  Thank you-  Erin  **Erin Hillis, PhD**  (Dr. Hillis, Erin, she/her)  *Associate Director of International Programs, PDSO*  *Chair, LGBTQ Working Group*  *Chair, NAFSA Region VII*  Rhodes College  Memphis, Tennessee  [hillise@rhodes.edu](mailto:hillise@rhodes.edu)  (901) 843-3403 | **Response:**  USCIS is not making changes to the bridge application at this time. Guidance has been available on the USCIS website for many months and has not represented a policy change. See 8 CFR §§ 248.1(b) and 214.2(f)(5). See also Form I-539, Instructions for Application to Extend/Change Nonimmigrant Status, OMB No. 1615-0003, which state, in pertinent part:  A change of status may be granted for a period up to 30 days before the report date or start date of the course of study listed on Form I-20. You must maintain your current, or other, nonimmigrant status up to 30 days before the report date or start date of the course of study listed on Form I-20 or your requested change of status may not be granted.  We will consider these suggestions in a future revision. |
| **Comment 2.** | **Commenter: Eowyn Greeno (received May 2, 2018)** |  |
|  | **I am writing to support  the suggestions made by NAFSA in their April 12, 2018 letter, namely:**   * Abandon the burdensome, complicated, and expensive "bridge application" policy or revise Form I-539 and the Form Instructions to address the policy adequately * Clarify the instructions on change of status effective date * Clarify the use of Form I-539 when filed to extend M-1 stay in connection with a Form I-765 filed for M-1 practical training * Reference all D/S categories in the instructions, and specify that nonimmigrants with "D/S" should leave the expiration date field blank on the Form I-539   **Sincerely,**  **Eowyn Greeno | Interim Director**  UNIVERSITY OF PUGET SOUND  Office of International Programs 1500 N. Warner St. #1055 Tacoma, WA 98416-1055 T: +1.253.879.2513 E: [egreeno@pugetsound.edu](mailto:egreeno@pugetsound.edu) [pugetsound.edu](file://HQP-RS-C1-01/Share$/OPS/Share/RCD/PRA/PRA%20ICs/Currently%20Approved/I-539%201615-0003/005%20Revision%20-%20Biometrics/FRN/60-Day%20FRN/Form%20I-539%2060-Day%20REV%20FRN/Public%20Comments/Response/%3ehttp:/www.pugetsound.edu%3c)   [facebook.com/UPSInternationalPrograms](file://HQP-RS-C1-01/Share$/OPS/Share/RCD/PRA/PRA%20ICs/Currently%20Approved/I-539%201615-0003/005%20Revision%20-%20Biometrics/FRN/60-Day%20FRN/Form%20I-539%2060-Day%20REV%20FRN/Public%20Comments/Response/%3ehttps:/www.facebook.com/UPSInternationalPrograms%3c) | **Response:**  USCIS is not making changes to the bridge application at this time. Guidance has been available on the USCIS website for many months and has not represented a policy change. We will consider these suggestions in a future revision.  USCIS appreciates your suggestions for clarifications to certain instructions, and this input can be considered in future revisions. |
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