

Supporting Statement

Student and Exchange Visitor Information System (SEVIS)

Forms I-17 and I-20

Office of Management and Budget (OMB) No. 1653-0038¹

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)² requires the creation of a program to continuously collect information from designated school officials (DSOs) at Student and Exchange Visitor Program (SEVP)-certified schools relating to F and M nonimmigrants³ 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 enrolling F-1 and M-1 students.

IIRIRA mandates collecting the identity, current U.S. address and visa 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, and any disciplinary action taken by the school against the nonimmigrant 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),⁴ amended IIRIRA to add the requirement that information be collected on F and M nonimmigrants' admission date and port of entry into the United States.

¹ OMB Control Number History <https://www.reginfo.gov/public/do/PRAOMBHistory?ombControlNumber=1653-0038>

² <https://www.govinfo.gov/content/pkg/PLAW-104publ208/pdf/PLAW-104publ208.pdf#0-0-0-322>

³ F-1 and M-1 students and, if accompanying, their F-2 and M-2 spouse and minor dependents

⁴ <https://www.govinfo.gov/content/pkg/PLAW-107publ56/pdf/PLAW-107publ56.pdf#0-0-0-222>

On October 30, 2001, the President issued *Homeland Security Presidential Directive-2 (HSPD-2)*,⁵ requiring DHS to conduct periodic and ongoing review of all schools certified to accept F-1 and M-1 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),⁶ was enacted requiring DHS to recertify all schools approved for attendance by F-1 and M-1 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 SEVP certification, oversight and recertification of schools authorized to enroll F-1 and/or M-1 students required by these laws and directive are operationalized through regulation at 8 CFR 214.2, 8 CFR 214.3, and 8 CFR 214.4.

SEVP is a component of U.S. Immigration and Customs Enforcement (ICE), assigned by DHS to administer SEVIS and to carry out the responsibilities mandated by the above laws regarding F and M nonimmigrants.⁷ Substantive requirements and procedures for SEVP and SEVIS are promulgated in the following rulemakings:

- 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, interim final].
- *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].

⁵ <https://fas.org/irp/offdocs/nspd/hspd-2.pdf>

⁶ <https://www.govinfo.gov/content/pkg/PLAW-107publ173/pdf/PLAW-107publ173.pdf#0-0-0-208>

⁷ The Bureau of Educational and Cultural Affairs Exchange Visitor Program, a component of the U.S. 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 OMB 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.

- 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].
- *Adjustment to Limitations on Designated School Official Assignment and Study by F-2 and M-2 Nonimmigrants* [[78 FR 69778](#) (November 21, 2013), proposed; [80 FR 23680](#) (April 29, 2015), final].
- Improving and Expanding Training Opportunities for F-1 Nonimmigrant Students With STEM Degrees and Cap-Gap Relief for All Eligible F-1 Students [[80 FR 63375](#) (October 19, 2015, proposed; [81 FR 13039](#) (March 11, 2016), final].
- *Adjusting Program Fees for the Student and Exchange Visitor Program* [[83 FR 33762](#) (July 17, 2018), proposed; [84 FR 23930](#) (May 23, 2019), final].

In addition to OMB No. 1653-0038, SEVP has four additional Paperwork Reduction Act of 1995 (PRA) authorizations for forms used in program-related processes, but not produced by SEVIS. OMB form numbers are as follows:

- OMB No. 1653-0037 for the Form I-515A, *Notice to Student or Exchange Visitor*, used when F or M 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 nonimmigrant status.
- OMB No. 1653-0034 for the Form I-901, *Fee Remittance Form for Certain F, J and M Nonimmigrants*, used by prospective F-1 and M-1 students in conjunction with the mandatory payment of their I-901 SEVIS fee, which funds SEVP operations.
- OMB 1653-0050 for the ICE Form 73-043 *Field Representative Feedback* for DSOs to provide input on the quality of their service from their respective SEVP Field Representatives.
- OMB 1653-0054 for the Form I-983, *Science, Technology, Engineering, and Mathematics (STEM) Optional Practical Training (OPT) Extension Mentoring and Training Plan*, used by F-1 students to obtain approval for a STEM OPT extension and to provide routine student and employer reporting to SEVP.

2. Purpose of collection.

SEVIS is an internet-based data-entry, collection and reporting system that provides authorized users access to information on F and M nonimmigrants. DHS, Department of State, and many other government agencies, as well as SEVP-certified schools use SEVIS data.

SEVIS is an effective platform for SEVP to certify schools for enrolling F-1 and M-1 students, to periodically recertify schools and to oversee them. It gives SEVP the ability to regulate access to information and communicate by email with all DSOs at SEVP-certified schools. Further, SEVIS supports SEVP in efficiently administering denial or withdrawal of SEVP certification, when necessary. This includes the management of appeals and motions to reopen or reconsider final decisions.

SEVIS enables schools to instantaneously transmit electronic information and event notifications to SEVP on F and M nonimmigrants throughout the nonimmigrants' stay in the United States. These include required notifications, reports, and updates to personal data. In obtaining SEVP certification, a school makes a legally binding commitment to comply with applicable federal laws, regulations, and DHS requirements. Currently, DSOs at these SEVP-certified schools are the only respondents that collect and enter the information in SEVIS⁸ using the following:

- Form I-17, Petition for Approval of School for Attendance by Nonimmigrant Student.
- Form I-20 (A-B), Certificate of Eligibility for Nonimmigrant (F-1) Student Status – For Academic and Language Students.
- Form I-20 (M-N), Certificate of Eligibility for Nonimmigrant (M-1) Student Status – For Vocational Students.

Law enforcement agencies benefit by using SEVIS to monitor F and M nonimmigrants about 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. The primary law enforcement/intelligence users of SEVIS are the Federal Bureau of Investigation's Foreign Terrorist Tracking Task Force and ICE's Counterterrorism and Criminal Exploitation Unit.

Government benefit and service providers use SEVIS to better serve their F and M nonimmigrant customers. SEVIS data is used daily to qualify individuals petitioning for F and M status and to facilitate:

- Port-of-entry admissions screening.
- Processing of nonimmigrant benefit applications.
- Verification of nonimmigrant status maintenance.
- Timely removal of nonimmigrants from the United States, as needed.

SEVIS data is used to assist school officials and the United States government in promoting the *Secure Borders and Open Doors* initiative (January 17, 2006). In concert

⁸ DHS has initiated the [SEVP student portal](#) to enable students to submit personal and biographic information directly.

with biometric assessment technologies, SEVIS data continues to support access to the United States for bona fide aliens seeking F and M 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 the replacement of complex, decentralized, time-consuming and inefficient paper-based processes with internet-based technology. This allows for simpler, quicker, more efficient paperless processes. Data is now collected uniformly and electronically, available to agencies at any time and with resulting cost savings to its users. The timeliness and integrity of SEVIS data has positively impacted all systems with which SEVP interacts. Specific improvements with the implementation of SEVIS include:

- OMB now approves the entry, collection, and production of all fields previously approved for the paper Forms I-17 and I-20 in SEVIS; 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 DSOs. 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 copies from the ports of entry to a central data-entry location and then forwarding them to the school—a process that often took weeks.
- SEVP uses its website 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 reduced manual processing by DHS and school personnel and provides DSOs more timely information. Electronic communication minimizes the burden of filing and recordkeeping.
- SEVP is identifying other government data resources where there are shared data needs. Where identified, SEVP brokers 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 DSO recommendation or 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 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 paper-copy records retention requirements for schools are significantly reduced.
- SEVP instituted paperless procedures for service of all its notices and adjudications to schools and schools must make their submissions to SEVP electronically. Where signatures of DSOs or other school officials are required, scanned copies are submitted electronically.
- SEVP invests heavily in the enhancement of SEVIS reporting capabilities. Refined reporting and data analysis are increasingly the basis for overseeing school compliance and verifying eligibility and qualification for continued SEVP school certification. Identification of performance trends enables 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.
 - o Electronic forms submission and signature acceptance processes will expedite processing.
 - o 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.⁹
 - o Primary use of electronic validation of forms will further reduce the potential negative consequences of fraudulent documentation.
 - o Elimination of the use of paper forms will present significant savings for schools in postage and handling.
- Previously when schools applied for SEVP certification, required supporting documents were collected by a DHS representative at the time of the 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 accepted. School submission of required documentation is required to be electronic as much as feasible for both certification and recertification.
- SEVP incorporated F-1 and M-1 student email addresses and telephone numbers in the SEVIS data collection. In an emergency, SEVP can selectively contact individual F-1 or M-1 students or groupings of students; DSOs can selectively contact individual F-1 and M-1 students, or groupings of students enrolled at their school.

⁹ Form I-20 information can be viewed electronically at most consulates and ports-of departure or entry.

- DHS has initiated the SEVP student portal to enable students to submit personal and biographic information directly, without relying on their DSO for initial entry or updates. The SEVP portal will not eliminate the need for the F-1 or M-1 student to communicate with his or her DSO. Instead, it reinforces the communication and does so without delays. The SEVP portal is currently limited to use by F-1 students on post-completion OPT or STEM OPT. With the further development and deployment of the student portal to encompass all nonimmigrant students, SEVP believes that the reporting burden for DSOs on student information will decline.

4. Duplication of collection.

SEVP is unaware of any duplication in the focused collection of F and M nonimmigrant or SEVP-certified school data, and there is no other similar information system currently available that can be used for the purposes of SEVIS. However, several data systems complement SEVIS by collecting generic noncitizen visitor data in processes that F or M nonimmigrants encounter outside the collection of data for SEVIS. Through a concerted effort to develop interfaces with these systems, SEVP is making progress in reducing the duplication of collection.

SEVP uses the SEVIS data collection functionality in two primary areas that encompass management of F-1 and M-1 students (and, to a limited degree, their F-2 and M-2 dependents): personal enrollment/participation information; and SEVP certification, oversight and recertification of schools authorized to enroll F-1 or M-1 students. With minor changes,¹⁰ SEVIS collects the same data that was originally required by DHS (or

¹⁰ See Notice Privacy Act of 1974; Department of Homeland Security U.S. Immigration and Customs Enforcement-001 Student and Exchange Visitor Information System (SEVIS) System of Records at <https://www.federalregister.gov/documents/2010/01/05/E9-31268/privacy-act-of-1974-department-of-homeland-security-us-immigration-and-customs-enforcement-001>. Changes include F-1 and M-1 email address, phone number and city of birth; F-2 and M-2 addresses, phone number, country of citizenship and city of birth (if different from the F-1/M-1 principal). These additional collections are necessary for the following reasons: 1. SEVP has been charged by Congress to eliminate certain vulnerabilities in its SEVIS collection. At the core of this approach is the objective to create a person-centric system. 2. SEVIS is currently configured to track activity/history over the lifespan of a single form as identified by a SEVIS ID. When a nonimmigrant begins a new educational program, a new SEVIS record is created for them. 3. SEVP is now trying to match these individual SEVIS records to a single individual to better ascertain the true history of their participation in U.S. educational and exchange programs. City of birth will help SEVP better distinguish between two or more people born in the same country on the same day so SEVP does not have this problem moving forward. 4. SEVP has found that over time, some individuals move from J to F or M status. In a person-centric system, the personal data collected must match. To be consistent with the biographical data collected on exchange visitors, J records will become part of an individual's SEVIS profile when current form-based SEVIS records are matched to a single individual.

SEVP laws and regulation, in aggregate:

1. Support the authorization standards necessary to fulfill the mandate to fully implement machine-readable, tamper-resistant entry and exit documents, as called for by Congress.
2. Recognize that, along with date of birth and country of birth, city of birth is a primary data field for validation of an individual alien's identity on most passports. DSOs use the passport as a source document in creating the Form I-

the predecessor agency, the Department of Justice, Immigration and Naturalization Service). Qualitatively, data in SEVIS is now collected uniformly and electronically and is made available to needing agencies at any time. Regarding the management of F and M nonimmigrant information:

- As addressed in Item 3, the introduction of SEVIS eliminated multi-copy Forms I-20 that were formerly used by schools. Since SEVIS implementation, only Forms I-20 from SEVIS are accepted. The SEVIS Form I-20 data elements, with minor additions, are previously approved by OMB, pre-SEVIS.
- SEVIS issues the accompanying F-2 spouse and dependents of an F-1 or M-1 student to have their own Form I-20. Previously, they entered the United States with a copy of the F-1/M-1 principal's Form I-20.
- SEVIS replaces Form AR-11, *Alien's Change of Address Card*, reporting for F and M nonimmigrants. With SEVIS, F and M nonimmigrants report changes in name or U.S. address to their DSOs, eliminating 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 the need for 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 control on both Forms I-20 and I-17 updating is significant.

Historically, an initial Form I-20 averaged 30 minutes to complete and every pre-SEVIS paper update required the same time. A student in a four-year program could require 10-12 updates to the Form I-20 information over the duration of the student's program of study. A DSO can now complete updates in SEVIS in about five minutes. The Form I-17, from “scratch,” may take one to two hours to complete data entry. Now, SEVP estimates that one-fourth of the “as needed updates” should take less than 10 minutes. This includes updates to the Form I-17 submitted for recertification. While the initial completion can be lengthy, the long-term time savings are significant.

5. Impact on small business or any other small entities.

SEVP's most recent analysis of its impact on small entities was conducted in conjunction with the rulemaking *Adjusting Program Fees for the Student and Exchange Visitor Program* [83 FR 33762 (July 17, 2018), proposed; 84 FR 23930 (May 23, 2019),

20.

3. Authorize the collection of “city of birth” data. ([Pub. L. 107-173, section 501\(b\)](#)) 4. Mandate the collection of F and M nonimmigrant country of origin address.

4. Do not differentiate the personal data collection requirements among F and M nonimmigrants (i.e., requirements are identical for the principal and dependents). This data is currently collected by schools as part of nonimmigrant admissions processing from birth certificates and/or passports and does not constitute an added reporting burden.

final]. The term “small entities” encompasses small businesses, not-for-profit organizations that are independently owned and operated and are not dominant in their fields, and governmental jurisdictions with populations of fewer than 50,000.

SEVP’s analysis is limited to SEVP-certified schools and schools petitioning for certification; it does not apply to increases in the I-901 F and M fees because these fees are paid by individuals who are not, for purposes of the Regulatory Flexibility Act, within the definition of small entities established by 5 U.S.C. 601(6). As of May 2017, there were a total of 8,746 SEVP-certified schools that would be subject to the I-17 recertification fee, site visit fee, and fee to file a motion or an appeal. New schools applying for SEVP certification would be subject to the I-17 initial certification fee. DHS estimates that 7,842 schools meet the Small Business Administration definition of a small entity. This is approximately 90 percent of the 8,746 of SEVP-certified schools included in this analysis.¹¹

The rule increased and established additional fees for all involved schools in support of SEVP operations. The fees are essential to sustain SEVP and meet program objectives. The fee structure applies identical fees to all schools. SEVP examined several alternatives in determining the fee structure that might make the impact of fees less burdensome on all schools and make fees proportionately a more equal burden on small schools, compared to larger schools; these alternatives included no increase to any fee, only increasing the I-901 SEVIS fee and I-17 fee, and not subsidizing the school fees with the I-901 F and M fees. These alternatives were not found to be feasible. Added considerations were offered by the public in the comment period of the rulemaking. However, these comments did not result in any revisions to the established fee amounts for small entities in the final rule. Commenters suggested recertifying small entities less frequently. This is not a legal alternative. A suggestion was made that fees be prorated based on average student enrollment at a school or otherwise lowered for small schools. DHS could not identify a convincing basis for establishing a lower fee for small schools. However, DHS identified two main reasons for keeping the recertification fee the same for all schools, regardless of size. First, many of the administrative costs related to the recertification process are essentially similar irrespective of school type. The workload and cost of recertification adjudications does not change for different types of schools. Second, schools with large nonimmigrant student populations typically require fewer resources in some respects, since they are more knowledgeable of the process, have a stable professional pool of employees, and have better internal

¹¹ In contrast, the 2016 STEM OPT rulemaking (81 FR 13039; March 11, 2016, <https://www.federalregister.gov/documents/2016/03/11/2016-04828/improving-and-expanding-training-opportunities-for-f-1-nonimmigrant-students-with-stem-degrees-and>) identified 48 percent of the SEVP-certified schools that sponsored F-1 students engaged in STEM OPT as small entities.

reporting systems to assist in their compliance efforts. By contrast, schools with smaller nonimmigrant enrollment may require more frequent training of DSOs, or significant oversight if they are identified as higher risk. Of note, DHS did not receive comments from the Chief Counsel for Advocacy of the Small Business Administration in response to the proposed rule.

Finding no better alternative to the fees of this rulemaking, DHS considered whether they pose an inordinate burden on small entities. The DHS analysis is that, for nearly all small entities, no single fee represented more than one percent of annual earnings; for the few schools needing to pay more than a single fee in a year, they did not exceed three percent of annual earnings. Balanced with the revenues schools typically accrue by enrolling F-1 and M-1 students, the burden is not inordinate.

Using SEVIS for record keeping and reporting streamlines the paper-based processes previously in existence. SEVIS uses technology that was already in place at most schools when it was introduced. Authorized schools 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.¹² DHS took these costs into account in designing SEVIS and minimized them by utilizing common industry standards. As a result, the implementation of SEVIS had no significant impact on more than a few small entities.

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. Information would need to be collected through a paper process, as previously required, which would most likely necessitate resumption of manual data entry and create a backlog for data entry. The data integrity of the F and M 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 and M nonimmigrant threats to national security or threats of immigration fraud.

¹² 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 systems, the alternative is that all data entry be done by real time interface (RTI), which requires that all data be manually entered. A school that utilizes batch processing does so as a business decision, based upon determination that its investment is less than the on-going cost of RTI.

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

The following special circumstances necessitate information collection in a manner inconsistent with OMB guidelines:

- Requiring respondents to report information to SEVP more often than quarterly. Reporting requirements (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 F and M nonimmigrants provide updated information to DSOs more often than quarterly. The allowable maximum time before F and M nonimmigrants are required to report changes to their DSOs is determined by the potential possibility of threats to national security that could result from failure to timely inform enforcement agencies of changes.
- 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 specified circumstances (8 CFR 214.3(g)), the recordkeeping, retention and reporting requirements for SEVP-certified schools require the submission of changes in SEVIS in 30 or fewer days of the change. The allowable maximum time before such changes must be reported is determined by the potential of possible threats to national security or of immigration fraud that could result from failure to timely inform enforcement agencies of changes. Untimely reporting may lead to the prosecution of noncompliant DSOs.
- 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 nonimmigrant student's record for at least three years after program completion or the nonimmigrant student's transfer to another school.
- Recommending retention of personal records. To facilitate maintenance of nonimmigrant status and the processing of future applications for visitation to the United States, F and M nonimmigrants are encouraged to retain personal copies of Forms I-20, visas, passports, entry, and benefit-related documents indefinitely.

8. Solicitation of public comments.

On, February 9, 2021, ICE published a notice in the Federal Register at 86 FR 8796, soliciting public review and comment for a 60-day period on the proposed extension of this information collection. ICE received two comments. On April 21, 2021 ICE published a follow up notice in the Federal Register at 86 FR 20704, soliciting public review and comment for an additional 30-day period

From 60-day notice to SEVIS supporting statement, overview ([Federal Register :: Agency Information Collection Activities: Student and Exchange Visitor Information System \(SEVIS\); Extension, With Change, of a Currently Approved Collection](#))

Comment submitted by Jean Pubileee

Response: Comment not related to the information collection.

Comment - (<https://www.regulations.gov/comment/ICEB-2021-0001-0003>) submitted by Stacey Sowards:

This proposed change is somewhat unclear. In the "Overview of this Information Collection" section, there is an explanation of what SEVIS is, followed by a sentence that starts with "Additionally". That sentence proposes the change to add the city of birth to the information collection system. It is unclear from the document if this is the only change requested, complicated by the use of the term "additionally."

If the only additional information collected will be a student or exchange visitor's city of birth, this change does not seem burdensome for future immigrant arrivals under this system. However, since this change will affect all student and exchange visitors, I suggest that the change be limited to new entries in the information collection system, rather than a request for all current SEVIS users to enter in additional data. In particular, because students and exchange visitors have temporary stay status, the additional information (city of birth) could be phased out as old users change immigration status or return to their countries of origin.

Many students and exchange visitors, as well as university program administrators (especially for SEVP), struggle to keep up with such changes and information collection systems. COVID-19 has further complicated students' and universities' abilities to implement changes, so would best be implemented as a change for all future, rather than current, students and exchange visitors.

Response:

SEVIS collects the same data today that was originally required by DHS (or the predecessor agency, the Department of Justice, Immigration and Naturalization Service). City of birth data collection was included in the initial authorization but has not previously been collected. At the core of adding this field now is a desire to improve a person-centric character in SEVIS (i.e., all SEVIS records of an F or M nonimmigrant will be consolidated into a single record). This initiative has been complicated by the significant number of nonimmigrant records with the same identifying information (name, country of birth, and date of birth), making it difficult to distinguish one individual from another. The city of birth collection is being added to overcome this complication.

SEVP laws and regulation, in aggregate:

1. Support the authorization standards necessary to fulfill the mandate to fully implement machine-readable, tamper-resistant entry and exit documents, as called for by Congress.
2. Recognize that, along with date of birth and country of birth, city of birth is a primary data field for validation of an individual alien's identity on most passports. (DSOs use the passport as a source document in creating the Form I-20.)
3. Authorize the collection of "city of birth" data. ([Pub. L. 107-173, section 501\(b\)](#))
4. Mandate the collection of F and M nonimmigrant country of origin address.

This data is currently collected by schools, as part of nonimmigrant admissions processing, from birth certificates and/or passports. It will be, as suggested by you, required for Initial student records, added to continuing student records as part of routine updates. This change will not be burdensome but will contribute to simplification of SEVIS and enhancement of data integrity.

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 Update¹³ on February 20, 2020, for SEVIS; Student and Exchange Visitor Program Automated Management System (SEVPAMS); and SEVP External Training Application (SETA) on June 15, 2017. The most current System of Records Notice (SORN)¹⁴ was published at 75 FR 412 (January 5, 2010).

There is no assurance of petitioner confidentiality associated with appeal or motion proceedings related to SEVP certification. SEVP will use the information submitted to determine eligibility for the benefit. SEVP may provide information on the form to other government agencies.

¹³ <https://www.dhs.gov/publication/dhsicepia-001-student-exchange-visitor-information-system-sevis>

¹⁴ <https://www.reginfo.gov/public/do/DownloadDocument?objectID=79830901>

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.

SEVP certifies qualifying schools and grants them access to SEVIS. DSOs at these SEVP-certified schools are their primary respondents. As employees of the SEVP-certified schools, DSOs collect and enter the information required in SEVIS through their school's own admission information collection tools. That data is used to populate the SEVIS Forms I-17 and the Forms I-20 identified in Item 2 of this supporting statement; DSOs carry nearly all of their school's reporting burden (F and M nonimmigrants do not currently have a reporting burden, as identified in this supporting statement).

The ongoing annual public reporting burden is borne by DSOs through:

- Collecting F-1 and M-1 student information in their school's admission information collection tools and with their processes.
- Collecting, updating recertification and managing F and M nonimmigrant information in SEVIS.
- Managing their respective school's SEVP certification, including initial certification, compliance.

The ongoing public cost is borne by SEVP-certified schools through:

- Paying salaries of DSOs while engaged in reporting to SEVP.
- Paying fees for SEVP certification and recertification to be authorized to enroll F and/or M nonimmigrant students.

The following table summarizes the combined public reporting burden and cost of schools. This summary does not include the savings to the respondents that is realized by the introduction of electronic versus paper-copy data management. Greater explanation of this summary and the net cost to the respondents is presented in the text that follows.

Combined summary of public reporting burden and cost based on calendar year (CY) 2019 data: student and school records

Type of information collection	Form	Number of respondents	Number of responses per DSO	Total annual burden (hours)	Cost (hourly)	Total annual cost ¹⁵
A. Management of student records	1. Form I-20 – Routine	47,757 DSOs	1	318,533	\$42.82 ¹⁶	\$13,639,550
	2. Form I-20 – off-campus and OPT employment	47,757 DSOs	1	13,202	\$42.82	\$565,310
	3. Form I-20 – STEM OPT	47,757 DSOs	1	6,656	\$42.82	\$285,031
Subtotal - student data				338,391	\$42.82	\$14,489,891
B. Management of school data	1. Form I-17 SEVP certification/ updates/ recertification	47,757 DSOs	1	681,366 ¹⁷	\$42.82	\$29,176,098
	2. SEVP certification fees	112 Schools	\$3,000 + \$655 x 2 (site visits)			\$482,270
	3. Recertification fees	3,000 schools	\$1,250 + \$655 x 0.5 (site visit)			\$4,732,500
Subtotal – school data				681,366		\$34,390,868
Total student and school data				1,019,757		\$48,880,759

¹⁵ Values may not sum due to rounding.

¹⁶ Based on the Bureau of Labor Statistics (BLS) mean hourly wage for SOC 21-1012 (Educational, Guidance, School, and Vocational Counselors), available at: <https://www.bls.gov/oes/2019/may/oes211012.htm>. The benefits-to-wage multiplier is calculated by the BLS as (Total Employee Compensation per hour) / (Wages and Salaries per hour) = \$37.10 / \$25.47 = 1.457 (1.46 rounded) based on the average national wage for all occupations (wages represent 68.6 percent of total compensation). See Economic News Release, Employer Cost for Employee Compensation (December 2019), U.S. Dept. of Labor, BLS, 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 (March 19, 2020), available at: https://www.bls.gov/news.release/archives/ecec_03192020.pdf. Figures on the number of DSOs, certified schools, number of certified schools, and OPT and CPT approval used throughout this supporting statement reflect data from SEVIS at a Glance, Nov 2020.

¹⁷ Includes 14 hours per respondent for training, research, reports, and professional development annually

Annual burden of reporting: collection, updating, and management of prospective and continuing F and M nonimmigrant data 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 number of active student records in SEVIS is estimated to total 900,000 for each year.¹⁸
- SEVP anticipates that an average of 382,756 initial F-1/M-1 students will enroll at SEVP-certified schools annually. Typically, applicants will apply to more than one school, requiring development of an average of 2.5 Forms I-20 per applicant.
- For approximately 35 percent of these, the data will be loaded using real-time interface RTI¹⁹ procedures, at 32 minutes (0.53 hour) each to complete. At \$42.82 per hour for 177,504 hours, the cost for RTI-loaded initial Forms I-20 will be \$7,600,705.
- For approximately 65 percent of these, the data will be loaded using batch procedures, at one minute (0.017 hour) each to complete. At \$42.82 per hour for 10,574 hours, the cost for batch-loaded initial Forms I-20 will be \$452,762
- DSOs must update Form I-20 information on students on an ongoing basis. These updates can be for several reasons but, because the data fields populated during initial Form I-20 loading are pre-populated for updates, the update using RTI method is six minutes (0.10 hour). The update time is one minute using the batch method. On average, students receive three updates to their records annually. An estimated 35 percent of updates will be RTI, at an average annual cost of \$4,046,490; 65 percent of updates will be batch, at an average annual cost of \$1,277,535.
- SEVP anticipates the 3-year average of active F-2/M-2 dependent records in SEVIS to be 62,730 and anticipates 13,770 initial F-2/M-2 dependent records each year. Each dependent requires an individual Form I-20. Most data on the dependent initial Form I-20 is derived and pre-populated from the data in the principal's record, so each dependent Form I-20—whether for initial issue or an update—takes five minutes (0.08 hour) to complete. A dependent averages one update per year. The annual aggregate cost for dependents is \$262,050.

¹⁸ For Nov 2020, the total number of active F-1 and M-1 students in SEVIS was 900,000. SEVP projects no change over the next three years covered by this supporting statement (i.e., 900,000. students for CY 2020 and the same amount for CY 2021 and CY 2022). Estimates for active F-2/M-2 dependents, initial F-2/M-2 dependents, and participants in OPT are calculated in the same way. Student and School actual numbers are provided by SEVP's "SEVIS at a Glance," Nov 2020. Forecast initial F-1/M-1 students are 397,914 for CY 2020; 381,312 for CY 2021; 369,041; average 382,756. Forecast STEM OPT participants is 66,565.

¹⁹ Real-time interface is when the DSO enters data into SEVIS manually through the keyboard. The alternative is batch processing (i.e., the use of third-party software or a database) to identify and push changes from international student records in a school's official academic database to SEVIS.

- For students applying for off-campus employment or OPT, DSOs must provide United States Citizenship and Immigration Services (USCIS) a recommendation for this employment and evidence substantiating the student’s eligibility for the benefit to enable adjudication of application. This information is submitted using the Form I-20. SEVP estimates the average number of students applying for off-campus employment or OPT at 132,019²⁰ and each recommendation will require about six minutes. For students recommended for off-campus or OPT employment, the cost is \$565,310.
- SEVP anticipates that an average of 66,565 students will apply for STEM OPT. DSOs have the additional burden to make a recommendation update to the student SEVIS record. Each recommendation will require about six minutes. For students recommended for STEM OPT, the additional annual cost will be \$285,031.
- The total cost for management of student data is \$14,489,891.

Management of student data

F-1/M-1 student forms I-20 and personal info.	Total	Frequency	Burden (hours)	Subtotal (hours)	Cost/hr.	Subtotal (\$) ²¹
Active F-1/M-1 students	900,000					
Initial F-1/M-1 students	382,756					
Initial Forms I-20 (RTI)	133,965	2.5	0.53	177,504	\$42.82	\$7,600,705
Initial Forms I-20 (batch)	248,791	2.5	0.017	10,574	\$42.82	\$452,762
Updates (RTI)	315,000	3	0.1	94,500	\$42.82	\$4,046,490
Updates (batch)	585,000	3	0.017	29,835	\$42.82	\$1,277,535
Off-campus and OPT employment	132,019	1	0.1	13,202	\$42.82	\$565,310
STEM OPT	66,565	1	0.1	6,656	\$42.82	\$285,031
Active F-2/M-2 dependents	62,730					
Initial F-2/M-2 dependents	13,770					
F-2/M-2 Forms I-20 initial and update	76,500	1	0.08	6,120	\$42.82	\$262,058
			Total Hours	338,391	Total Cost	\$14,489,891

Annual saving on management of student data using SEVIS, based on Nov 2020, for each year CY 2020-2022)

By using SEVIS, the projected annual savings resulting from the reduction in burden of hours to the SEVP-certified schools is \$69,693,694.

²⁰ Nov 2020 – 109,960 applications for OPT.

²¹ Values may not sum due to rounding.

F-1/M-2 student Forms I-20 and personal info.	Totals	Frequency	Burden (hours)	Subtotal (hours)	Cost/hr.	Subtotal (\$) ²²
Active F/M students	900,000					
Initial F/M students	382,756					
Initial Forms I-20 (RTI)	133,965	2.5	0.5	167,456	\$42.82	\$7,170,455
Initial Forms I-20 (batch)	248,791	2.5	0.5	310,989	\$42.82	\$13,316,560
Updates (RTI)	315,000	3	0.5	472,500	\$42.82	\$20,232,450
Updates (batch)	585,000	3	0.5	877,500	\$42.82	\$37,574,550
Off-campus and OPT employment	132,019	1	0.5	66,010	\$42.82	\$2,826,548
STEM OPT	66,565	1	0.5	33,283	\$42.82	\$1,425,157
Active F-2/M-2 dependents	62,730					
F-2/M-2 initial dependents	13,770					
F-2/M-2 Forms I-20 initial and update	76,500	1	0.5	38,250	\$42.82	\$1,637,865
			Pre- SEVIS Hours	1,965,988	Pre- SEVIS Cost	\$84,183,585
			Current Hours	338,391	Current cost	\$14,489,891
			Savings	1,627,597		\$69,693,694

Annual burden of reporting by DSOs in SEVIS, based on Nov 2020 data, projected for each year CY 2020-CY 2022

The maintenance of school information by SEVP-certified schools includes the initial certification, periodic recertification, and updates (i.e., on-request submission of Forms I-17, reporting of changes, and correction of identified errors).

- Computed costs include expenses incurred by SEVP-certified schools and 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.
- For Nov 2020, there were 8,005²³ SEVP-certified schools. SEVP anticipates an average of 112 schools to petition for initial certification annually in each of the next three years.

²² Values may not sum due to rounding.

²³ For Nov 2020, and as reported in SEVIS By the Numbers, the total number of SEVP-certified schools was 8,005. SEVP projects 112 schools will receive SEVP certification during each of the next three years covered by this supporting statement; negligible change for each of these years (i.e., 8,005. schools from CY 2020 through CY 2022).

- On average, a DSO at a school will need four hours to complete an initial petition for SEVP certification, to include obtaining access to SEVIS, data entry and the SEVP site visit, 112 schools x 4 hours each = \$19,183, aggregate cost.
- An average of 50 percent of the 8,005 schools, or 4,002 schools, will provide updates to their SEVIS school information annually.²⁴ Updates to school information will average five minutes (0.08 hours) each, 320 hours an aggregate cost of \$13,709
- An average of 3,000 schools will petition for SEVP recertification annually. A principal DSO at a school petitioning for recertification will need four hours at an aggregate annual cost of \$513,840.
- All documents necessary for the initial petition and recertification are collected electronically.
- SEVP estimates DSO DHS-related personal development (e.g., training, research, reports, and professional development) at 14 hours per DSO annually, 47,757 DSOs x 14 hours = 668,598 total hours at an aggregate cost to schools of \$28,629,366.

Management of school information

SEVP-certified Form I-17 school information	Number	Frequency	Burden (hours)	Subtotal (hours)	Cost/hr.	Subtotal (\$) ²⁵
SEVP-certified schools	8,005					
1. Initial school certification	112	1	4	448	\$42.82	\$19,183
2. Updates to Form I-17 school information	4,002	1	0.08	320	\$42.82	\$13,709
3. School recertification	3,000	1	4	12,000	\$42.82	\$513,840
4. DSO professional development.	47,757	1	14	668,598	\$42.82	\$28,629,366
			School Data Total hours	681,366	Total cost	\$29,176,098

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 and M nonimmigrants). Development costs for SEVIS and the initial implementation of SEVP were underwritten

²⁴ Updates of DSO personal information are no longer part of this process. Also, a significant number of updates are being implemented as part of recertification. These changes reduce the previous volume of updates.

²⁵ Values may not sum due to rounding.

with appropriated funds. Recurring maintenance and further development costs are funded by prospective F-1 and M-1 students in conjunction with their payment of the I-901 SEVIS fee, *Fee Remittance Form for Certain F, J and M Nonimmigrants* (OMB 1653-0034).

Schools that wish to enroll F and/or M students must receive SEVP certification. The initial certification fee is \$3,000 for the petition and \$655 for site visit for each campus (an average of 2 campuses per petition). For 112 schools anticipated to file for initial certification annually, the aggregate fee for each year will be \$77,015.

All SEVP-certified schools must receive recertification every two years. The recertification petition fee is \$1,250 and \$655 for each site visit (new locations, average 0.5 per school). Over the next three years, an average of 3,000 schools will be recertified annually, for an aggregate annual fee of \$4,732,500.

14. Annual government burden and cost.

The total cost projection for SEVP for fiscal year (FY) 2019 was \$186,610,000 and for FY 2020 was \$188,405,000.²⁶ This included current services for SEVP and supporting both the Counterterrorism and Criminal Exploitation Unit and Homeland Security Investigations Domestic Operations personnel in FY 2019 (\$74.45 million) and FY 2020 (\$74.45 million). It also included enhancements and other costs, which included investigative analysis, SEVIS modernization, increased numbers of adjudication personnel, and annualized inflation.

As a fee funded entity, there is no net ongoing 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 must 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 enough 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.

Section 641 of IIRIRA, 8 U.S.C. §1372, in directing DHS to collect information relating to academic nonimmigrant students (F-1) and vocational nonimmigrant students (M-1), as well as their accompanying dependents (F-2 or M-2), also provides for the collection of a fee to cover the costs of this program. Through the Form I-901, Fee Remittance for

²⁶ *Adjusting Program Fees for the Student and Exchange Visitor Program* [83 FR33762 (July 17, 2018), proposed; 84 FR 23930 (May 23, 2019), final]

Certain F, J and M Nonimmigrants, (OMB #1653-0034),²⁷ SEVP collects its fees. The Form I-901/fmjfee.com website used for payment of the fee also provides necessary payment verification (electronic receipt) to the prospective F-1 or M-1 student for presentation at their consular interview to obtain their visa.

The respondents to the Form I-901 are the prospective F-1 and M-1 students. The fees collected from them support the Form I-901/FMJ fee site activities and all other facets of SEVP, including SEVIS.

15. Change in burden hours and cost.

The data collection has changed, but not significantly, since the previous supporting statement. Respondents in SEVIS are the DSOs. The DSOs input data into SEVIS in order to fulfill two responsibilities: the management of their school's F and M nonimmigrant data, and the management of their school's SEVP certification. Requirements and processes for management of this data have not changed. Actual variances in aggregate costs/burden between this supporting statement and the preceding one reflect changes in overall student enrollment, the number of schools having or seeking SEVP certification, the number of DSOs, and the average DSO salary. Also, school fees related to SEVP certification and recertification have been added as a relevant cost.

The revision is to add a new data field for city of birth. This field allows SEVP to distinguish between applicants with the same name and country of birth. The field is not expected to increase the burden per response.

²⁷ <https://www.fmjfee.com/i901fee/index.html#>

Data/categories (based on 2016 data projected for each year, CY 2017-2019)	# of respondents	# of responses	Burden (hours)	Costs	Data/categories (based on Nov 2020 data projected for each year, CY 2020-2022)	# of respondents	# of responses	Burden (hours)	Costs	Change responses
Management of school data (SEVP certification, recertification, updates)	8,811 schools	20,103	14,065	\$553,209	Management of school data (SEVP certification, recertification, updates)	8,005 schools		12,768	\$546,732	
Training/Professional development	37,780 DSOs	37,780	528,920	\$20,802,424	Training/Professional development	47,757 DSOs		668,598	\$28,629,366	
					SEVP certification fees and site visits	112 schools			\$482,270	
					SEVP recertification fees and site visits	3,000 schools			\$4,732,500	
Management of school data - totals		57,883	542,985	\$21,355,633	Management of school data - totals			681,366	\$34,390,868	
Management of student data, routine (SEVIS and Forms I-20)					Management of student data, routine (SEVIS and Forms I-20)					
Initial SEVIS/Forms I-20 (RTI)	37,780 DSOs	592,046	784,461	\$30,852,853	Initial SEVIS/Forms I-20 (RTI)	47,757 DSOs	133,965 x 2.5	177,504	\$7,600,705	
Initial SEVIS/Forms I-20 (batch)	37,780 DSOs	208,004	8,320	\$327,232	Initial SEVIS/Forms I-20 (batch)	47,757 DSOs	248,791 x 2.5	10,574	\$452,762	
Updates (RTI)	37,780 DSOs	7,765,979	1,933,729	\$76,053,553	Updates (RTI)	47,757 DSOs	315,000 x 3	94,500	\$4,046,490	

Data/categories (based on 2016 data projected for each year, CY 2017-2019)	# of respondents	# of responses	Burden (hours)	Costs	Data/categories (based on Nov 2020 data projected for each year, CY 2020-2022)	# of respondents	# of responses	Burden (hours)	Costs	Change responses
Updates (batch)	37,780 DSOs	5,641,884	270,810	\$10,650,974	Updates (batch)	47,757 DSOs	585,000 x 3	29,835	\$1,277,535	9, D
F-2/M-2 SEVIS/Forms I-20 (RTI)	37,780 DSOs	7,284	605	\$23,778						
F-2/M-2 SEVIS/Forms I-20 (batch)	37,780 DSOs	20,758	332	\$13,063	F-2/M-2 initial and updates	47,757 DSOs	76,500 x 1	6,120	\$262,050	9, D
Subtotal		14,235,955	2,998,257	\$117,921,453	Subtotal			318,533	\$13,639,550	
Management of student data, OPT (SEVIS and Forms I-20)	37,780 DSOs	136,607	11,338	\$445,939	Management of student data, off-campus and OPT employment (SEVIS and Forms I-20)	47,757 DSOs	132,019 x 1	13,202	\$565,310	9, D
Management of student data, STEM OPT (SEVIS and Forms I-20)	37,780 DSOs	36,833	3,057	\$120,237	Management of student data, STEM OPT (SEVIS and Forms I-20)	47,757 DSOs	61,195 x 1	6,656	\$285,031	9, D
Subtotal		173,440	14,395	\$566,176	Subtotal			19,858	\$850,341	

Data/categories (based on 2016 data projected for each year, CY 2017- 2019)	# of respondent s	# of responses	Burden (hours)	Costs	Data/categories (based on Nov 2020 data projected for each year, CY 2020- 2022)	# of respondents	# of responses	Burden (hours)	Costs	Change respons
Management of student data (SEVIS and Forms I-20) - totals		14,409,395	3,012,65 2	\$118,487,629	Management of student data (SEVIS and Forms I-20) - totals			338,391	\$14,489,891	
Management of student and school data and fees (SEVIS, Forms I-17 and I-20) - combined totals		14,467,278	3,555,63 7	\$139,843,262	Management of student and school data and fees (SEVIS, Forms I-17 and I-20) - combined totals			1,019,75 7	\$ \$48,880,759	

16. Published results.

DHS did not employ the use of statistics or the publication of statistics for this collection of information.

17. Waiver of display of expiration date.

SEVP will display the expiration date for OMB approval of this information collection.

18. Exception to the certification statement.

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