

SUPPORTING STATEMENT

Form I-983, Training Plan for STEM OPT Students

(OMB No. 1653-0054)

Justification.

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

The Student and Exchange Visitor Program (SEVP) authority for the collection of information for the Form I-983, “Training Plan for STEM OPT Students,”¹ is from a rulemaking, “Improving and Expanding Training Opportunities for F-1 Nonimmigrant Students With STEM Degrees and Cap-Gap Relief for All Eligible F-1 Students,” published in the Federal Register at [80 FR 63375](#) (Oct. 19, 2015; NPRM; U.S. Department of Homeland Security (DHS)) and [81 FR 13039](#) (March 11, 2016; final rule; DHS). This supporting statement fulfills the requirement for the periodic update to that collection.² DHS derives authority to manage SEVP, including tracking and monitoring aspects, from the following:

- Section 641 of the Illegal Immigration Reform and Immigrant Responsibility Act of 1996 (IIRIRA), Public Law 104208, Div. C (Sept. 30, 1996), which requires the creation of a program to collect information, on an ongoing basis, from SEVP-certified schools 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

¹ <https://www.ice.gov/doclib/sevis/pdf/i983.pdf>.

² OMB Control Number History at <https://www.reginfo.gov/public/do/PRAOMBHistory?ombControlNumber=1653-0054>.

federal approval and authorization of schools and exchange visitor program sponsors participating in such enrollment. IIRIRA mandates collecting the identity, current U.S address, and the admission 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 DHS; the current program status (academic or vocational) 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 school or the exchange visitor program sponsor 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 Act of 2001, Public Law 107-56 (Oct. 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 on October 30, 2001, which requires DHS to conduct periodic and ongoing review of all schools certified to enroll F-1 and M-1 students.
- The Enhanced Border Security and Visa Entry Reform Act of 2002 (EBSVERA), Public Law 107-173, 116 Stat. 543 (May 14, 2002), which requires DHS to recertify all schools approved to enroll F-1 and/or M-1 students within 2 years of its passage. Further, EBSVERA mandates that DHS conduct an additional recertification of these schools every 2 years.

DHS implemented the Form I-983 information collection to provide F-1 students with science, technology, engineering, and mathematics (STEM) degrees who are approved to extend their optional practical training (OPT)³ with a prescribed reporting document and methodology that complies with regulations. The employer of a STEM OPT student, as a condition of voluntary participation in the program, works with the student to design a customized training plan. These training plans require specific training goals as well as a description of how those goals will be achieved. The reporting required by the Form I-983 better ensures that STEM OPT students receive a comprehensive understanding of their selected course of study by obtaining greater experiential training within that field.

Overall information collection by DHS through SEVP, a component of U.S. Immigration and Customs Enforcement (ICE), is sought 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, 1184, and 1324a, respectively). The Secretary of Homeland Security (Secretary) has broad authority pursuant (6 U.S.C. 202, INA section 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 student 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 SEVP. 8 U.S.C. 1101(a)(15)(F)(i).

The Secretary has broad authority to track F-1 students and ensure their timely departure, *see, e.g.*, 8 U.S.C. 1103, 1184, and 1372, and to determine which noncitizens

³Authority for the STEM extension of OPT is derived from “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).

are “authorized” for employment in the United States. 8 U.S.C. 1103, 1184, and 1324a(h) (3).

Federal agencies that oversee immigration, such as the legacy Immigration and Naturalization Service (INS), pursuant to 12 FR 5355 and 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 status, to apply for practical training to work for a U.S. employer in a job directly related to the student’s major area of study. (8 CFR 214.2(f)(10)).

SEVP manages and oversees significant elements of the F-1 process, including the certification of schools in the United States that enroll F-1 and/or M-1 students, and provides students the ability to pursue practical training while in that status. As part of this oversight, SEVP uses the Student and Exchange Visitor Information System (SEVIS) to track and monitor F-1 and M-1 students and communicate with the schools that enroll them while they are in the United States and participating in educational opportunities.

Data collection requirements for SEVP certification, oversight, and recertification of schools authorized to enroll F and/or M students are detailed by regulation in 8 CFR 214.2, 8 CFR 214.3, and 8 CFR 214.4. SEVP is assigned by DHS to administer SEVIS and to carry out the responsibilities mandated by the above laws regarding F and M nonimmigrants.⁴

⁴ The Bureau of Educational and Cultural Affairs Exchange Visitor Program, a component of the U.S. Department of State, is under the same IIRIRA mandate as SEVP with respect to the Exchange Visitor Program, authorized under the J visa classification. The Exchange Visitor Program fulfills its requirements using 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.

2. Purpose of the collection.

The information collected on the Form I-983 serves as a planning document for STEM OPT students, the SEVP-certified school, and the employer. SEVP uses the form as an evidentiary document to track the STEM OPT student's progress, identifying the terms and conditions of the practical training and documenting the obligations of the three parties that are involved—the F-1 student,⁵ SEVP-certified school, and employer.

The student and the employer must each complete and sign their portion of the Form I-983. The SEVP-certified school adds the executed Form I-983 to the student's school file and uploads it to SEVIS. The school and student must make the student's Form I-983 available to ICE and to U.S. Citizenship and Immigration Services (USCIS) upon request or when the student seeks certain benefits from USCIS, such as an application for employment authorization.

Currently, only STEM OPT students are required to use the SEVP portal to directly report address, telephone, and employer information to SEVP instead of relying on their designated school official (DSO) to update their information. The SEVP portal shares the reported information with SEVIS. The SEVP portal does not eliminate the need for a STEM OPT student to communicate with his or her DSO; instead, it reinforces the communication and eliminates delays in reporting. As the portal becomes more functional and is further deployed, the student information reporting burden for DSOs should further decline.

SEVP limits what can be reported using the portal. STEM OPT students are not able to add a new employer or change the start date with their employers through the

⁵ This supporting statement only impacts F-1 students. All references to "student(s)" used in the remainder of this statement refer to F-1 students.

portal but can update other information about an employer already in the system. DSOs are required to add new employer information directly in SEVIS for STEM OPT students because they must verify that the student's Form I-983 has been completed and submitted. When data is entered into the SEVP portal, it is sent immediately to SEVIS to update the student's record.

DHS officials responsible for the administrative oversight of SEVP use the information collected from the Form I-983 to monitor the compliance of DSOs, SEVP-certified schools, students, and employers with SEVP regulations related to STEM OPT at 8 CFR 214.1 through 214.4.

3. Use of information technology.

The Form I-983 is a fillable PDF available at the SEVP portal website (see SEVP Study in the States at <https://studyinthestates.dhs.gov/sevp-portal-help>). Students may download and electronically complete, update, and save the form. At a future date, SEVP will enhance the accessibility of this student reporting channel by integrating the Form I-983 into SEVIS and expanding its use to all students engaged in practical training. SEVP-certified schools are responsible for retaining the Form I-983, including the evaluation portion of it, in electronic or hard-copy form for at least 3 years.

4. Duplication of collection.

The Form I-983 does not duplicate other collections of information.

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

DHS believes the Form I-983 collection of information does not disproportionately impact small businesses or other small entities.

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

Officials responsible for the administrative oversight of F-1 students, including those who monitor compliance of DSOs, collect and use this data to assess whether all parties in the student's STEM OPT extension process are complying with DHS regulations (8 CFR 214.1 through 214.4). If this collection is not conducted or is scaled back, the academic benefit realized from 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 inconsistent with OMB guidelines.

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

8. Solicitation of public comments.

On August 5, 2021, ICE published a 60-day notice in the Federal Register at 86 FR 42870. ICE received 46 comments. Below is a summary of comments received that

were directly related to the renewal of this information collection. On May 30, 2025 ICE published a 30-day notice in the Federal Register.

Comment Summary

Thirty-six of the forty-six comments ICE received were unrelated to the Form I-983 information collection and instead focused on the effectiveness of the STEM OPT program and its impact on U.S. workers. A few of these commenters suggested that elimination of the STEM OPT program would be the most effective solution to reduce the paperwork and the administrative burden associated with administering the Form I-983. Other commenters emphasized support for the STEM OPT program. While ICE appreciates these comments and suggestions about the STEM OPT program, any major modifications to or the elimination of the STEM OPT program is outside of the scope of this Notice.

Comment: Four commenters [**Commenters:** ICEB-2018-0003-0010 (<https://www.regulations.gov/comment/ICEB-2018-0003-0010>) submitted by United Tech Workers; ICEB-2018-0003-0019 (<https://www.regulations.gov/comment/ICEB-2018-0003-0019>) submitted by Anonymous; ICEB-2018-0003-0013 (<https://www.regulations.gov/comment/ICEB-2018-0003-0013>) submitted by Victor Sachs; and ICEB-2018-0003-0031 (<https://www.regulations.gov/comment/ICEB-2018-0003-0031>) submitted by MG] opposed the renewal of the Form I-983 because the renewal seeks to simplify and automate the Form I-983 filing process. Commenters believed that the form is auto-approved with minimal scrutiny, flawed, and often involves employers fabricating or providing progress reports on behalf of students without any meaningful review.

Response: The information collected on the Form I-983 assists DHS with tracking students' activities while they are engaged in STEM OPT and verifying both students' and employers' compliance with applicable STEM OPT rules. Simplifying the filing process for completing the form will improve the accuracy of the collected data and compliance with form submission requirements.

Comment: Six commenters [ICEB-2018-0003-0017

(<https://www.regulations.gov/comment/ICEB-2018-0003-0017>) submitted by Justin Davis; ICEB-2018-0003-0035 (<https://www.regulations.gov/comment/ICEB-2018-0003-0035>) submitted by Anonymous; ICEB-2018-0003-0050 (<https://www.regulations.gov/comment/ICEB-2018-0003-0050>) submitted by Anonymous; ICEB-2018-0003-0051 (<https://www.regulations.gov/comment/ICEB-2018-0003-0051>) and ICEB-2018-0003-0052 (<https://www.regulations.gov/comment/ICEB-2018-0003-0052>) submitted by Institute for Sound Public Policy; and ICEB-2018-0003-0054 (<https://www.regulations.gov/comment/ICEB-2018-0003-0054>) submitted by Federation of American Societies for Experimental Biology (FASEB)] supported both the renewal of the Form I-983 and the minor revisions made to the form to better capture designated school official contact information and the compensation foreign students receive while engaging in STEM OPT. One commenter [ICEB-2018-0003-0054] stated that the clear collection of contact information and compensation information streamlines compliance and reduces process burdens while preserving program integrity. Another commenter believed that the Form I-983 will increase oversight and accountability of the STEM OPT program as well as allow for meaningful assessment of the entire STEM OPT program and its impact on STEM graduate students who are U.S. citizens. One commenter

believed that the data collected will help demonstrate that workers from other countries are given preference over U.S. citizens. One commenter suggested that DHS should collect the Internal Revenue Service (IRS) Form W-2, rather than relying on self-reported compensation data, which leaves room for inaccuracies and potential misuse without data verification.

Response: ICE agrees with commenters that the minor changes to the Form I-983 will allow SEVP to better capture designated school official contact information and to analyze compensation data for STEM OPT students to ensure compliance with STEM OPT requirements, including the requirement that the STEM OPT opportunity be commensurate with that of a similarly situated U.S. worker in duties, hours, and compensation. However, ICE believes that collecting IRS information to verify a student's compensation is a significant regulatory change and is outside the scope of this Notice.

9. Explanation of payment or gifts to respondents.

SEVP does not provide payment or gifts to respondents for this information collection.

10. Assurance of confidentiality.

SEVIS, as the SEVP system of record, addresses the use and potential sharing of information in this collection as governed by the Privacy Act. ICE published notice of this system of record in the *Federal Register* on January 5, 2010, 75 FR 412 at <https://www.govinfo.gov/content/pkg/FR-2010-01-05/pdf/E9-31268.pdf>. The SEVIS Privacy Impact Assessment (PIA) covers the use and potential sharing of information in

this collection. ICE published notice of this PIA on February 20, 2020; see <https://www.dhs.gov/publication/dhsicepia-001-student-exchange-visitor-information-system-sevis>. The ICE Office of Privacy conducted a Privacy Threshold Analysis of this form and determined that no additional PIA is needed.

11. Justification of questions of a sensitive nature.

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

12. Onetime and annual public reporting burden and public cost.

Respondents to the Form I-983 include students participating in STEM OPT,⁶ DSOs from schools endorsing students who are engaged in STEM OPT, and employers of STEM OPT students.

Annual Responses: 366,303

- 122,101 from STEM OPT students.
- 122,101 from School DSOs.
- 122,101 from Employers of STEM OPT students.

Students would have an estimated average annual burden of 2.17 hours per initial completion and submission of the form and 1.50 hours for the required 12-month evaluations. DSOs would have an estimated average burden of 1.33 hours for time spent on the initial 12-month review of the training plan, including associated recordkeeping per submission. They will then spend another 1.33 hours per submission on the final

⁶ For November 2023, as reported in SEVIS by the Numbers, the total number of F-1 students approved for STEM OPT was 122,101. SEVP projects the same amount for the next three calendar years (CYs) covered by this supporting statement (i.e., CY 2025, CY 2026, and CY 2027).

evaluation and associated recordkeeping. The employer official who will oversee the student's training would spend an estimated 3 hours per initial submission of the form, and a human resource specialist at the employer would spend an additional 1 hour per initial submission of the form. Employer burden for the 12-month evaluations would be an estimated 0.75 hours per submission.

TABLE 1—Calculation of Annual Reporting Burden for Training Plan

Function		Avg. Annual Responses	Time Per Response (Hours)	Avg. Annual Hour Burden ⁷
Student Burden				
Initial Completion of Training Plan		122,101	2.17	264,959
12-month Evaluation Requirements		122,101	1.50	183,152
Subtotal				488,111
DSO Burden				
Initial Review of Training Plan & Recordkeeping		122,101	1.33	162,394
Review of Evaluation & Recordkeeping		122,101	1.33	162,394
Subtotal				324,788
Employer Burden				
Initial Completion of Training Plan		122,101	4.00	488,404
Evaluation Requirements		122,101	0.75	91,576
Subtotal				579,980
Total Burden Hours				1,352,879

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

(2) Burden estimates for the DSO and employer respondents include time for reviewing the responses provided by the student respondents.

The following discussion describes the process by which DHS estimated the hourly opportunity cost for the time burdens previously estimated and describes the estimation of wages. It uses a proxy for hourly opportunity costs to provide the estimate of annual average costs for the Training Plan.

Wages

⁷ Numbers may not add up due to rounding.

Student Wages

F-1 students on STEM OPT extensions have already obtained their degrees and have been authorized to work by USCIS. Under [81 FR 13039](#) (March 11, 2016), these students would be required to receive compensation from their STEM OPT employers commensurate with that of similarly situated U.S. workers in the area of employment. Therefore, as a proxy for opportunity cost for these students, DHS uses an estimate of their average hourly wages.

STEM students can fill a range of occupations to gain additional training in their course of study. For the purposes of estimating an average STEM wage, DHS uses 72 of 184 occupations recommended by a working group formed by the Bureau of Labor Statistics Standard Occupational Classification (SOC) Policy Committee in 2012.⁸ DHS also uses wage data collected under the Occupational Employment Statistics program for use in the Foreign Labor Certification process from the Foreign Labor Certification Data Center.⁹ DHS uses an average of Level 1 wages for the 72 occupations the department identified as most relevant to the STEM OPT extension across all geographic areas. Level 1 wages¹⁰ are for entry-level employees, such as a worker in training or an internship.¹¹ DHS then uses U.S. Department of Labor, Bureau of Labor Statistics (BLS) data on the total number of employees in each SOC (regardless of skill level or immigration status)

⁸ U.S. Bureau of Labor Statistics, Defining STEM Occupations under the 2010 SOC, Attachment C: Detailed SOC occupations included in STEM, available at: https://www.bls.gov/soc/attachment_c_stem.pdf

⁹ Foreign Labor Certification Data Center, Online Wage Library, 7/2024–6/2025 FLC Wage Data, ALC_Export File, available at: https://flag.dol.gov/sites/default/files/wages/OFLC_Wages_2024-25.zip. Accessed Apr. 24, 2025.

¹⁰ Employment and Training Administration, Prevailing Wage Determination Policy Guidance, Nonagricultural Immigration Programs, Revised November 2009, p.7, available at: https://www.dol.gov/sites/dolgov/files/ETA/oflc/pdfs/NPWHC_Guidance_Revised_11_2009.pdf. Accessed Apr. 24, 2025.

¹¹ This assumption is for purposes of this analysis only, and DHS expects that STEM OPT extension participants with higher-level degrees would be compensated at a higher level.

to estimate a weighted average wage rate of \$37.23 for STEM OPT students. When the costs for employee benefits such as paid leave and health insurance are included, the loaded wage is \$52.88 per hour for students participating in the STEM OPT extension.¹² The average hourly loaded wage rate is calculated using the percentage of wages and salaries to total compensation. Wages and salaries are 70.5 percent of total compensation: $\$52.81 = \$37.23 / 0.705$.¹³

DSO wages

DHS uses 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 \$34.38 in 2024 dollars¹⁴ When the costs for employee benefits such as paid leave and health insurance are included, using the percentage of wages and salaries to total compensation found in the BLS, Employer Costs for Employee Compensation, 0.705, the full cost for an hour of DSO time is estimated at $\$48.77 = \$34.38 / 0.705$.

Employer wages

The Training Plan for STEM OPT Students requirements necessitate action by an official representative of the student's employer at the practical training site. DHS uses the average wage for all management occupations as a proxy for estimating the

¹² U.S. 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: private industry workers, by major occupational and industry group, December 2024. Available at <https://www.bls.gov/news.release/pdf/eccec.pdf>. Accessed Apr. 24, 2025.

¹³ U.S. 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: private industry workers, by major occupational and industry group, December 2024. Available at <https://www.bls.gov/news.release/pdf/eccec.pdf>. Accessed Apr. 24, 2025.

¹⁴ U.S. Bureau of Labor Statistics, Occupational Employment and Wage Statistics, Industry: Cross-industry, Private, Federal, State, and Local Government, Period: May 2024 "21-1012 Educational, Guidance, School, and Vocational Counselors," Hourly Mean Wage, <https://data.bls.gov/oes/#/industry/000000> (last modified April, 2025). Accessed April 24, 2025.

opportunity cost of the official representative of the employer. The average wage for this category of occupations is estimated to be \$68.15 per hour in 2024 dollars.¹⁵ When the costs for employee benefits such as paid leave and health insurance are included, using the percentage of wages and salaries to total compensation, identified as 0.704 in the BLS, Employer Costs for Employee Compensation, the full cost for an hour of the employer's time is estimated at $\$96.67 = \$68.15/0.705$.

The rule, [81 FR 13039](#) (March 11, 2016), 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 \$38.33 in 2024 dollars.¹⁶ When the costs for employee benefits (such as paid leave and health insurance) are included, using the percentage of wages and salaries to total compensation (identified as 0.704 in BLS, Employer Costs for Employee Compensation), the full cost for an hour of DSO time is estimated at $\$54.37 = \$38.33/0.705$.

TABLE 2 is based on the respective burden per respondent function on the Training Plan for STEM OPT Students. Costs for employers include burdens for two types of occupations, and the 2-hour burden reflected in TABLE 1 is split into two parts so that respective wages could be applied for a cost calculation.

¹⁵U.S. Bureau of Labor Statistics, Occupational Employment and Wage Statistics, Industry: Cross-industry, Private, Federal, State, and Local Government, Period: May 2024, "11-0000 Management Occupations," Hourly Mean Wage, <https://data.bls.gov/oes/#/industry/000000> (last modified April, 2025). Accessed April 24, 2025.

¹⁶ U.S. Bureau of Labor Statistics, Occupational Employment and Wage Statistics, Industry: Cross-industry, Private, Federal, State, and Local Government, Period: May 2024, "13-1071 Human Resource Specialists," Hourly Mean Wage, <https://data.bls.gov/oes/#/industry/000000> (last modified April, 2025). Accessed April 24, 2025.

TABLE 2—Calculation of Annual Reporting Cost for Training Plan (2019 Dollars)

Function	Avg. Annual Responses	Time Per Response (Hours)	Avg. Annual Hour Burden	Hourly Wage Rate (2019 Dollars)	Avg. Annual Reporting Cost ¹⁷ (2019 Dollars)
Student Initial Completion of Training Plan	122,101	2.17	264,959	\$52.81	\$13,992,090
Student 12-month Evaluation Requirements	122,101	1.50	183,152		\$9,671,984
Subtotal					\$23,664,075
DSO Initial Review of Training Plan & Recordkeeping	122,101	1.33	162,394	\$48.77	\$7,919,299
DSO Review of Evaluation & Recordkeeping	122,101	1.33	162,394		\$7,919,299
Subtotal					\$15,838,598
Initial Completion of Training Plan - Official Representative of the Employer/ Supervisor	122,101	3.00	366,303	\$96.67	\$35,409,290
Initial Completion of Training Plan - HR Specialist	122,101	1.00	122,101	\$54.37	\$6,638,484
12-month Evaluation Requirements - Official Representative of the Employer/ Supervisor	122,101	0.75	91,576	\$96.67	\$8,852,347

¹⁷ Numbers may not add up due to rounding.

Function	Avg. Annual Responses	Time Per Response (Hours)	Avg. Annual Hour Burden	Hourly Wage Rate (2019 Dollars)	Avg. Annual Reporting Cost (2019 Dollars)
Subtotal					\$50,900,121
Total					\$90,402,793

(1) Time per response as shown is rounded to the nearest hundredth. Numbers may not add up due to rounding.

(2) Burden estimates for the DSO and employer respondents include time for reviewing the responses provided by the student respondents.

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 start-up costs associated with this information collection.

There are no costs to the respondents. No fee is charged in connection with this form.

Students are required to fill out the form, keep a copy for their files for a limited time, and provide copies to the SEVP-certified school upon request and to USCIS, as part of the Form I-765, "Application for Employment Authorization," submission. Respondents are fully capable of completing, processing, and submitting the form electronically as part of their current usual and customary business practices. It is anticipated that all material will be submitted electronically, with no cost for mailing. The Form I-983 must be provided to SEVP by the school upon request. (8 CFR 214.2 (f)(10)(ii)(C)(9)(iii); 8 CFR 214.3 (g)(1)).

14. Annual government burden and cost.

Currently, Form I-983 can be uploaded and submitted electronically. Enabling the full electronic completion of the Form I-983 through SEVIS will require expenditures. Similar development and production of SEVIS, such as updating SEVIS to enable upload of the U.S. Department of State's Form DS-7002, "Training/Internship Placement Plan (T/IPP)," required \$2.1 million of expenditures. ICE/SEVP spent a total of \$7.7 million for the SEVIS modernization from June 2013 to December 2014. The modernization included standardizing nonimmigrant names, validating U.S. addresses, collecting more detailed history on nonimmigrant activities, collecting detailed information on school accreditations and recognitions, and developing the U.S. Department of State's Form DS-7002. About 28 percent, or \$2.1 million, of the \$7.7 million modernization budget was spent on the development of the T/IPP upload. This included development, information technology testing, and deployment of the T/IPP into SEVIS. ICE estimates that these tasks are comparable to the tasks that will need to be completed to deploy the Form I-983 into SEVIS. Such costs to ICE that will enable the form to be completed electronically through SEVIS are funded by fees collected from nonimmigrant students and exchange visitors.

For law enforcement reasons, ICE does not include an estimate of the number of site visits that may be conducted, during which the Form I-983 may be requested and reviewed. ICE is thus unable to provide a total annual estimated cost for such potential occurrences. USCIS may also request training plan documentation from students in connection with a Form I-765. Form I-765 fees will be reviewed on a bi-annual basis to ensure fees are set to recover the cost of collecting and reviewing information associated with the Form I-765, including the training plan.

There is no net cost to the federal government for this data collection and SEVP's other data collections: SEVIS (OMB No. 1653-0038); Form I-901, "Fee Remittance for Certain F, J and M Nonimmigrants," (OMB No. 1653-0034); and Form I-515A, "Notice to Student or Exchange Visitor," (OMB No. 1653-0037). SEVP is mandated by law to be fully fee-funded. Section 286(m) of the INA, 8 U.S.C. 1356(m), provides that fees may be set at a level that will ensure the recovery of all costs of providing adjudication services. That section, together with Title V of the Independent Offices Appropriations Act of 1952, 31 U.S.C. 9701, and OMB Circular No. A-25 (Revised), requires that a fee be set at an amount sufficient to recover the full cost to the federal government. Fees are developed at a level projected to cover the aggregate of SEVP operating costs.

Expenditures are restricted from exceeding the actual amount of revenue received. For a detailed explanation of the cost to the federal government and the fees that compensate the government for this cost, see the following rule: "Adjusting Program Fees for the Student and Exchange Visitor Program" (83 FR 33762 (July 17, 2019), NPRM; 84 FR 23930 (May 23, 2019), Final Rule).

Background

Section 641 of IIRIRA, 8 U.S.C. 1372, directs DHS to collect information relating to academic nonimmigrant students (F-1 visa), vocational nonimmigrant students (M-1 visa), and exchange visitors (J-1 visa), as well as their dependents (F-2, M-2, or J-2 visas), and provides for the collection of the required fee to defray the costs of this program. Through the Form I-901 (OMB No. 1653-0034; see the fmjFee.com website), SEVP collects the fees.

The respondents to the Form I-901 are the F visa, J visa, or M visa nonimmigrants. The fees collected from these nonimmigrants support the Form I-901 and FMJ fee site activities, as well as fund other facets of SEVP, including the SEVIS.

15. Change in burden hours and cost.

Regarding the public burden associated with the Form I-983, SEVP saw an average increase of 55,536 in each respondent group: students, DSOs, and employers during this reporting cycle. This reflects the end of the COVID-19 pandemic. SEVP predicts no increase of STEM OPT applicants during the next 3 years. SEVP anticipates a reduction in DSO burden during the next 3 years as the new SEVP portal is more fully deployed. The following table identifies the delta from previous estimates to future estimates.

TABLE 3—Summary of Current Estimates, Previous Totals, and Differences

	Student	DSO	Employer	Total¹⁸
Responses				
Current	122,101	122,101	122,101	366,303
Last Supporting Statement	66,565	66,565	66,565	199,695
Difference	55,536	55,536	55,536	166,608
Burden Hours				
Current	488,111	324,788	579,980	1,352,879
Last Supporting Statement	244,294	177,062	316,184	737,540
Difference	243,817	147,726	263,796	615,339

16. Published results.

There is no intent to employ the use of statistics or the publication thereof for this information collection.

¹⁸ Numbers may not add up due to rounding.

17. Waiver of display of expiration date.

SEVP will display the OMB 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.