

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.

The Student and Exchange Visitor Information System (SEVIS) is a web-based system used to collect and maintain information on F and M nonimmigrant students during their stay in the United States. The system also facilitates the Student and Exchange Visitor Program's (SEVP) certification of educational institutions to enroll F and M nonimmigrants.

The authority to collect the information in SEVIS, along with the accompanying Form I-20, "Certificate of Eligibility for Nonimmigrant Student Status," and Form I-17, Petition for Approval of School for Attendance by Nonimmigrant Student," is codified at 8 U.S.C. 1372. The Illegal Immigration Reform and Immigrant Responsibility Act of 1996 (IIRIRA)² mandated the creation of an electronic system to collect data on F and M nonimmigrant students and the schools they attend. Subsequent laws, such as the USA PATRIOT Act of 2001³ and the Enhanced Border Security and Visa Entry Reform Act of 2002 (EBSVERA)⁴, added data collection requirements for F and M nonimmigrants and SEVP-certified schools. The Homeland Security Presidential Directive-2 (HSPD-2) required DHS to conduct periodic and ongoing reviews of all SEVP-certified schools.

All data collection requirements for reporting on F and M nonimmigrant students and the SEVP certification, oversight, and recertification of schools authorized to enroll F and/or M students as mandated by laws and directives are contained in regulations at 8 CFR 214.1, 8 CFR 214.2(f) and (m), 8 CFR 214.3, 8 CFR 214.4, 8 CFR 214.13, 8 CFR 103.3 and 103.7, 8 CFR 248, and 8 CFR 274a.12.

2. Indicate how, by whom, and for what purpose the information is to be used.

SEVP uses SEVIS to administer education institutions' certification to enroll F and M nonimmigrant students. Education institutions seeking SEVP certification or recertification must complete and submit the Form I-17, which contains information about the institution, including its programs of study, campus locations, and designated school officials (DSOs) authorized to access SEVIS. Form I-17 also contains the SEVP-certified school's legally binding commitment to comply with all applicable federal laws, regulations, policies, and procedures.

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

² Section 641 of the Illegal Immigration Reform and Immigrant Responsibility Act of 1996 (IIRIRA), Public Law 104-208, Div. C (Sept. 30, 1996).

³ The Uniting and Strengthening America by Providing Appropriate Tools Required to Intercept and Obstruct Terrorism (USA PATRIOT) Act of 2001, Public Law 107-56 (Oct. 26, 2001),

⁴ Homeland Security Presidential Directive-2 (HSPD-2), <https://irp.fas.org/offdocs/nspd/hspd-2.pdf>.

DSOs use SEVIS to maintain the school's Form I-17 and provide information on the F and/or M nonimmigrants studying at their school to comply with regulatory recordkeeping and reporting requirements. Specifically, DSOs complete and issue the Form I-20. The Form I-20 is used to apply for a U.S. visa to study as an F or M student, to be admitted into the United States, and to apply for employment benefits. Eligible F and M nonimmigrant students may also use the SEVP Portal, a subset of SEVIS,⁵ to submit updated personal and employment data directly to DHS.

Law enforcement agencies use SEVIS to protect national security and enforce immigration laws. SEVIS is a critical national security component and a primary resource for conducting counterterrorism and counterintelligence threat analysis by the law enforcement and intelligence communities. The system is used daily to qualify individuals for F and M status and to facilitate:

- Port-of-entry admission screening.
- Processing of nonimmigrant benefit applications⁶.
- 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 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 national security.

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

The collection of information for SEVIS involves extensive use of automated, electronic, and other technological collection techniques. SEVIS allows for the electronic submission of responses and information, replacing the previously complex, decentralized, and inefficient paper-based processes.

Key Technological Features:

- **Electronic Data Entry:** SEVIS enables DSOs to enter and update information electronically, ensuring data is collected uniformly and is immediately accessible to authorized users.
- **Automated Notifications:** SEVIS supports automated email notifications to DSOs and certain nonimmigrant students, providing timely information and reducing the need for traditional paper-based communication.

⁵DHS has implemented the [SEVP Portal](#) to enable students to submit personal and employment information directly to DHS.

⁶ F and M students must apply for off-campus employment, practical training, reinstatement, change, or extension of status with U.S. Citizenship and Immigration Services.

- **Electronic Forms:** Since August 1, 2003, all data must be entered in SEVIS, and all forms, including Forms I-17 and I-20, must be generated through SEVIS, eliminating the need for multiple copies of forms and streamlining the process.
- **Paperless Procedures:** SEVP has instituted paperless procedures for the service of notices and adjudications to schools and requires electronic submissions of Form I-17, which can include uploading scanned or electronically signed Form I-17. When available or requested, DSOs can upload supporting documents via SEVIS to support management of the school certification and the F and M student records. Additionally, SEVP has allowed for electronic signatures and transmission of Form I-20 and plans on fully automating the Form I-20 process.
- **Enhanced Reporting Capabilities:** SEVP has invested in enhancing SEVIS reporting capabilities, allowing for refined data analysis and better oversight of school compliance. These enhanced reporting capabilities also support the identification of performance trends and policy needs. SEVP will be updating the Form I-17 and Form I-20 fields to streamline DSOs reporting and improve the data integrity within the system. These enhanced reporting capabilities will include significant and non-significant changes to Form I-17 and the Form I-20.⁷
- **Student Portal:** DHS has implemented the SEVP Portal, enabling students to submit personal and employment information directly to DHS, reducing the reporting burden on DSOs. Currently, the portal is limited to F-1 students participating in post-completion optional practical training or the science, technology, engineering and mathematics (STEM) extension of OPT, with plans to expand its use in the future.
- **Facilitation of on-site visits:** The information collected on Form I-17 supports on-site visits⁸ of school petitioning for certification to enroll F and M students.

Consideration of Using Information Technology to Reduce Burden:

⁷ The Form I-17 will be revised to collect previous school codes associated with the school and/or owner, school website links, emergency contact information for the school, and additional information on school ownership, as well as to remove the fax number field, which is now obsolete. SEVP will be redesigning the “Program of Study” page on the Form I-17 to better capture the educational level, degree, program of study, time necessary to complete the program, assigned Classification of Instructional Programs (CIP) code, and mode of instruction. In addition, SEVP will require schools to indicate whether a program of study is conducted predominantly online, in a hybrid or low-residency format and whether Curricular Practical Training is a component of a program of study. Other updates to the Form I-17 will allow DSOs to select “weeks” as an academic term length, require DSOs to provide separate numbers for domestic and international students when listing the “Average Annual Number of Students,” allow DSOs to list annual costs by program of study or degree level, allow DSOs to provide additional contact information, require DSOs to indicate whether they work full-time or part-time, and change a DSO’s “Title” to “Job Title,” to better collect information on their position at the school.

The Form I-20 is being revised to collect contact and other information on legal Guardians of minor F and M students, the date of graduation/degree awarded, clarifying details on the source and type of the financial support for the F and M student, as well information to indicate whether a student is engaging in online education, on-campus employment, and whether any employment or training is being conducted on-site or remotely.

⁸ SEVP’s field representatives uses the On-Site Visit Instructions at schools petitioning for certification for a campus location. The On-site visit Instructions is used to validate information on the petitioning school’s Form I-17 and supporting documents.

- **Reduction of Manual and Paper Processing:** The use of SEVIS significantly reduces manual and paper processing by both DHS and school personnel, leading to cost savings and improved efficiency.
- **Minimized Recordkeeping Burden:** SEVIS data and the information uploaded through SEVIS is retained indefinitely in electronic form, reducing the need for schools to retain paper copies of records.
- **Improved Data Integrity:** The electronic system contributes to the timeliness and integrity of data, with a resulting positive impact on other federal systems that interact with SEVIS.
- **Cost Savings for Schools:** The elimination of paper forms and the use of electronic validation reduces the costs associated with postage, handling, and the impact of potentially fraudulent documentation.
- **Minimize DSO Reporting Burden:** The Student Portal allows DSOs to shift reporting of certain information to the F student.

4. Duplication of collection.

SEVP has made efforts to identify and eliminate duplication in the collection of information related to F and M nonimmigrants and SEVP-certified schools. The data collected through SEVIS is highly specific and mandated by various laws, including IIRIRA, the USA Patriot Act, and EBSVERA. These mandates require continuous and detailed data collection that is unique to SEVIS. A comprehensive analysis of existing data systems confirmed that no other system collects the same specific information required for SEVIS. While several systems complement SEVIS by collecting generic data on aliens, they do not provide the ongoing academic and compliance data needed for SEVIS operations.

To further reduce duplication, SEVP has developed interfaces with other government data systems, allowing for relevant data sharing while ensuring SEVIS-specific requirements are met. Despite these interfaces, SEVIS remains unique in its ability to capture and manage real-time updates on student status and school compliance.

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

The collection of information through SEVIS does impact small businesses and other small entities, particularly SEVP-certified schools. To minimize this burden, SEVP leverages existing technology and requires schools to only have internet access to use SEVIS, with no additional software needed⁹. The transition to electronic form submissions and paperless procedures has reduced the administrative costs associated with traditional paper-based processes. Streamlined data entry processes have significantly reduced the time required to submit SEVIS updates, and SEVP provides training and support to help small entities comply efficiently. Although the fee structure associated with school certification and the use of SEVIS applies uniformly to both large and small entities, it is designed to balance costs with the revenues schools typically accrue

⁹ School may decide to invest in software or software development that interfaces with SEVIS and the school's data systems to send large school transfer of data to SEVIS (batch processing). While batch processing reduces data entry time, all reporting can be entered manually to SEVIS via real time interface (RTI). 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.

by enrolling F and M students. These measures ensure that the information collection requirements are manageable and do not impose an undue burden on 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.

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

The collection of information through SEVIS involves several special circumstances that necessitate deviations from standard OMB guidelines:

- **Reporting More Often Than Quarterly:** Respondents are required to report information more often than quarterly due to the need for timely updates on student enrollment, personal information, address changes, and visa status maintenance. This frequent reporting is essential to promptly identify and address potential threats to national security or immigration fraud (8 CFR 214.2(f)(17) and 8 CFR 214.2(m)(18)).
- **Written Responses in Fewer Than 30 Days:** In specific circumstances, such as changes in student status or school compliance, respondents must prepare and submit written responses within 30 days or less. This expedited timeline ensures that enforcement agencies receive timely information to mitigate potential security risks or instances of noncompliance (8 CFR 214.3(g)).
- **Retention of Records for More Than Three Years:** Schools are required to retain student records for at least three years after program completion or transfer to another school. This extended retention period is necessary to ensure compliance with federal regulations and to facilitate audits and reviews of student and school compliance.

These special circumstances are necessary to meet the statutory and regulatory requirements for monitoring and managing F and M nonimmigrant students and SEVP-certified schools, ensuring timely and accurate data collection to support national security and compliance efforts.

8. Solicitation of public comments.

On September 3, 2025, ICE published a notice in the Federal Register at 90 FR 42062 for public review and comment on this information collection for a 60-day period. ICE received a total of 112 public comments during this period. On November 25, 2025, ICE published a follow-up notice in the Federal Register at 90 FR 53377, soliciting public review and comment

for an additional 30-day period with instructions that any comments should be sent directly to the Office of Management and Budget (OMB).

The public comments were from a diverse range of stakeholders, including designated school officials (DSOs), academic institutions, professional organizations, and individual citizens. Only four comments were deemed out of scope and excluded from consideration. The remaining comments reflected mixed reactions to the proposed SEVIS data collection revisions. Some commenters¹⁰ opposed the changes, citing administrative burdens, redundancy, and a lack of clear justification; arguing that elements such as instructional modality classifications and curricular practical training (CPT) designations duplicate existing data collections without offering compliance or security benefits; and urging DHS to narrow or reconsider the revisions to reduce burdens and align with SEVP's goals. Other commenters¹¹ expressed partial support, endorsing updates to improve program integrity and modernize SEVIS, such as removing outdated form fields and adding emergency contact information for DSOs, while opposing changes they viewed as duplicative or overly burdensome. Commenters¹² in favor of the agency's intent to revise the SEVIS collections expressed support for changes that improve oversight and communication and the usability of SEVIS. The commenters emphasized that these updates align with SEVP's operational goals and will improve communication between educational institutions and government officials.

General Comments:

Burden on DSOs

¹⁰ [ICEB-2021-0001-0008], [ICEB-2021-0001-0009], [ICEB-2021-0001-0010], [ICEB-2021-0001-0011], [ICEB-2021-0001-0014], [ICEB-2021-0001-0015], [ICEB-2021-0001-0019], [ICEB-2021-0001-0020], [ICEB-2021-0001-0021], [ICEB-2021-0001-0022], [ICEB-2021-0001-0023], [ICEB-2021-0001-0024], [ICEB-2021-0001-0025], [ICEB-2021-0001-0028], [ICEB-2021-0001-0029], [ICEB-2021-0001-0113], [ICEB-2021-0001-0112], [ICEB-2021-0001-0050-], [ICEB-2021-0001-0114], [ICEB-2021-0001-0031], [ICEB-2021-0001-0033], [ICEB-2021-0001-0034], [ICEB-2021-0001-0035], [ICEB-2021-0001-0036], [ICEB-2021-0001-0037], [ICEB-2021-0001-0038], [ICEB-2021-0001-0039], [ICEB-2021-0001-0040], [ICEB-2021-0001-0041], [ICEB-2021-0001-0042], [ICEB-2021-0001-0044], [ICEB-2021-0001-0109], [ICEB-2021-0001-0057], [ICEB-2021-0001-0100], [ICEB-2021-0001-0060], [ICEB-2021-0001-0100], [ICEB-2021-0001-0105], [ICEB-2021-0001-0071], [ICEB-2021-0001-0072], [ICEB-2021-0001-0074], [ICEB-2021-0001-0076], [ICEB-2021-0001-0099], [ICEB-2021-0001-0098], [ICEB-2021-0001-0097], [ICEB-2021-0001-0095], [ICEB-2021-0001-0094], [ICEB-2021-0001-0092]

¹¹ [ICEB-2021-0001-0016], [ICEB-2021-0001-0023], [ICEB-2021-0001-0026], [ICEB-2021-0001-0083], [ICEB-2021-0001-0032], [ICEB-2021-0001-0101], [ICEB-2021-0001-0103], [ICEB-2021-0001-0073], [ICEB-2021-0001-0077], [ICEB-2021-0001-0096]

¹² [ICEB-2021-0001-0007], [ICEB-2021-0001-0013], [ICEB-2021-0001-0016], [ICEB-2021-0001-0023], [ICEB-2021-0001-0026], [ICEB-2021-0001-0083], [ICEB-2021-0001-0027], [ICEB-2021-0001-0050-A1], [ICEB-2021-0001-0114], [ICEB-2021-0001-0031], [ICEB-2021-0001-0039], [ICEB-2021-0001-0057]

Many commenters¹³ raised concerns about the significant administrative burdens that the proposed changes would impose on DSOs. They noted that requirements such as tracking on-campus employment, collecting guardian contact information for minor students, and reporting granular program-level details would divert resources from DSOs' core advising and compliance functions. Commenters emphasized that DSOs are not positioned to act as investigators or auditors for subjective, frequently changing data, including employment-related data, making these requirements impractical and burdensome. One commenter¹⁴ recommended that DHS provide a clear, field-by-field justification for each proposed addition to SEVIS or the Form I-17. The commenter argued that without this rationale, the data collection appears largely duplicative, increases administrative burden, and risks disrupting student enrollment without improving oversight. Any proposed data element that cannot be clearly tied to enforcement objectives should be removed.

Response: ICE disagrees with the assertion that the proposed revisions will impose significant administrative burdens on DSOs. These revisions do not introduce new reporting requirements for SEVP-certified schools or their DSOs. The primary purpose of the changes is to enhance data integrity within SEVIS and improve the agency's ability to collect accurate information on F and M students. Additionally, several proposed updates are designed to accommodate the needs of schools and DHS officials, such as enabling schools to report on-campus employment and providing law enforcement officials with clearer information about the legal guardian authorized to sign a minor student's Form I-20. Finally, the revisions aim to better align a school's Form I-17 approval to enroll foreign students with a student's Form I-20, which will help SEVP automate processes and reduce duplication on the Form I-20.

Lack of justification or clarity

Many commenters¹⁵ criticized the proposed SEVP changes to the Form I-17 and Form I-20 for lacking clear justification, operational definitions, and compliance utility. They emphasized that ambiguous terminology creates compliance risks and unnecessary burdens. Several

¹³ ICEB-2021-0001-0008], [ICEB-2021-0001-0009], [ICEB-2021-0001-0010], [ICEB-2021-0001-0014], [ICEB-2021-0001-0015], [ICEB-2021-0001-0016], [ICEB-2021-0001-0019], [ICEB-2021-0001-0020], [ICEB-2021-0001-0021], [ICEB-2021-0001-0024], [ICEB-2021-0001-0025], [ICEB-2021-0001-0026], [ICEB-2021-0001-0028], [ICEB-2021-0001-0029], [ICEB-2021-0001-0113], [ICEB-2021-0001-0050-A1], [ICEB-2021-0001-0112], [ICEB-2021-0001-0031], [ICEB-2021-0001-0032], [ICEB-2021-0001-0035], [ICEB-2021-0001-0036], [ICEB-2021-0001-0037], [ICEB-2021-0001-0038], [ICEB-2021-0001-0039], [ICEB-2021-0001-0040], [ICEB-2021-0001-0041], [ICEB-2021-0001-0042], [ICEB-2021-0001-0053], [ICEB-2021-0001-0111], [ICEB-2021-0001-0107], [ICEB-2021-0001-0106], [ICEB-2021-0001-0053], [ICEB-2021-0001-0060], [ICEB-2021-0001-0058], [ICEB-2021-0001-0073], [ICEB-2021-0001-0099]

¹⁴ [ICEB-2021-0001-0057]

¹⁵ [ICEB-2021-0001-0006], [ICEB-2021-0001-0007], [ICEB-2021-0001-0010], [ICEB-2021-0001-0011], [ICEB-2021-0001-0022], [ICEB-2021-0001-0023], [ICEB-2021-0001-0024], [ICEB-2021-0001-0025], [ICEB-2021-0001-0055], [ICEB-2021-0001-0059], [ICEB-2021-0001-0107], [ICEB-2021-0001-0079], [ICEB-2021-0001-0098]

commenters¹⁶ stated that clarification is needed regarding the term "educational level" and how levels are to be defined or categorized and that the lack of information on how DHS plans to revise educational levels makes it difficult to provide proper feedback.

One commenter¹⁷ stated that there are insufficient details on the proposed changes to the Form I-20, which limits stakeholder feedback. The commenter urged DHS to include technical field definitions and operational guidance in the form of a detailed implementation plan and to consult with third-party information technology (IT) system vendors and higher education IT leaders prior to finalizing the SEVIS field changes.

One commenter¹⁸ expressed confusion about DHS's purpose in seeking changes to sections 2.2, 2.3, and 2.4 of the Form I-17 and suggested that DHS work with stakeholder institutions of varying sizes and types to understand the necessity of the required information. The commenter noted their concerns about schools' ability to submit the information and DHS's subsequent ability to process it.

Response: ICE is proposing revisions to SEVIS data collections to support upcoming changes to the Form I-20 and Form I-17 in SEVIS. These updates are intended to enhance data integrity, improve oversight of schools, and strengthen communication with school officials during emergencies. The redesign of the Form I-17 Program of Study page will reduce redundancy in the information required when schools seek approval to enroll foreign students in their programs. This redesign will also provide greater clarity for DSOs and SEVP officials regarding the programs of study approved for foreign student enrollment. The proposed revisions do not establish new definitions or requirements for school officials. Before implementing these changes, ICE will coordinate with relevant partners, including third-party batch vendors, and issue guidance through appropriate channels on the use and requirements associated with the revisions. General guidance on entering information in SEVIS is available in the [SEVIS Help Hub](https://studyinthestates.dhs.gov/sevis-help-hub) at <https://studyinthestates.dhs.gov/sevis-help-hub>.

Burden accuracy

Several commenters¹⁹ criticized DHS's burden estimates as inaccurate and significantly understated. They highlighted that the proposed changes would require extensive manual entries in SEVIS and continuous SEVIS updates, far exceeding published estimates.

¹⁶ [ICEB-2021-0001-0116], [ICEB-2021-0001-0115]

¹⁷ [ICEB-2021-0001-0105]

¹⁸ [ICEB-2021-0001-0107]

¹⁹ [ICEB-2021-0001-0016], [ICEB-2021-0001-0023], [ICEB-2021-0001-0083], [ICEB-2021-0001-0029], [ICEB-2021-0001-0109], [ICEB-2021-0001-0056], [ICEB-2021-0001-0058], [ICEB-2021-0001-0105], [ICEB-2021-0001-0107], [ICEB-2021-0001-0073], [ICEB-2021-0001-0096], [ICEB-2021-0001-0092]

One commenter²⁰ questioned the accuracy of the agency’s estimated annual hour burden, noting that the process of gathering documentation for recertification often requires cross-departmental collaboration, which can be time-consuming, especially during busy periods. The commenter also expressed concern that changes to the Form I-17 could increase the frequency of required updates, leading to additional delays in adjudication by SEVP. Another commenter²¹ argued that DHS grossly underestimated the number of hours it will take PDSOs and DSOs alone to comply with the proposed changes to the Form I-20, including the continuous tracking of legal guardians and the even more time-consuming collection of data about on-campus employment. A commenter²² stated that tracking the level of program changes that seem to be indicated by this proposal and taking action on them on an ongoing basis will take many hours per week at most schools. Obtaining access to the necessary levels of data, identifying what changes need to be made, documenting the changes for the international office records, and then making the changes in SEVIS (or submitting a locked petition update) will be the equivalent of at least a .5 full-time equivalent (FTE) position. For educational institutions with multiple campuses listed on the Form I-17, at least a .75 FTE position would be needed to maintain accurate information.

Response: The burden estimates account for the one-time effort required to redesign and collect information on the Form I-17 Program of Study page. DHS estimates that entering program information into the new page will take approximately one hour for a DSO at each of the 6,778 SEVP-certified schools. Once a school’s program of study data has been updated, ICE does not expect many schools will need to make frequent updates to this information. Additionally, ICE plans to reduce the amount of information entered into free-form text boxes to streamline the process.

One commenter²³ stated that the proposed changes fail to quantify the financial burden altogether. They presented the following as an example for the issue of campus employment reporting: “Using Open Doors data for 2025, there were approximately 845,166 postsecondary international students. Assuming roughly half are F-1 graduate students engaged in campus employment, and that each holds two jobs per year, this results in approximately 422,583 administrative actions annually. Even if each employment update takes just 30 minutes across DSOs, HR, and payroll offices, this single reporting obligation accounts for over 422,000 hours annually—more than half of DHS’s total burden estimate for all proposed changes combined.” According to the commenter, “At a conservative estimate of \$50/hour for professional staff time, this creates a financial burden of over \$21 million annually for campus employment reporting alone.” The commenter urged DHS to publish a revised burden analysis and to reopen the public comment period.

²⁰ [ICEB-2021-0001-0110]

²¹ [ICEB-2021-0001-0060]

²² [ICEB-2021-0001-0059]

²³ [ICEB-2021-0001-0105]

Response: Based on ICE calculations, the total cost for managing both student and school records in SEVIS is listed in Question 12 of the Supporting Statement.

General privacy concerns

One commenter²⁴ urges DHS to include explicit assurances regarding how newly collected information will be stored, protected, and shared. The commenter emphasized the importance of transparency about who has access to the data and for what purposes. The commenter also recommended balancing expanded data collection with robust privacy safeguards and clear communication to all stakeholders.

Response: DHS appreciates the commenter's concerns regarding the storage, protection, and sharing of newly collected information and recognizes the importance of transparency and privacy safeguards. All data collected through SEVIS is subject to strict federal privacy and security standards, including compliance with the Privacy Act of 1974 and applicable DHS policies. Additionally, ICE is committed to balancing expanded data collection with robust privacy protections and will continue to implement safeguards to protect sensitive information. ICE will provide clear communication to stakeholders, including DSOs and SEVP-certified schools, regarding how data is used, who has access, and the purposes for which it is shared. Any updates or changes to data collection processes will be accompanied by appropriate guidance and outreach to ensure transparency and understanding among all stakeholders.

Failure to comply with Paperwork Reduction Act

Several commenters²⁵ expressed concerns about how the proposed requirements fail to comply with the Paperwork Reduction Act (PRA). The commenters emphasized that the proposed data collection does not minimize paperwork burden, is duplicative of information already accessible to SEVP, and lacks practical utility. The commenters urged DHS to engage in meaningful consultation with experienced international educators and organizations before proposing additional SEVIS modifications.

Response: ICE has taken steps to identify and eliminate duplication in the collection of information related to F and M nonimmigrants and SEVP-certified schools. In developing these proposed changes, ICE carefully analyzed the potential burden on DSOs and determined that the benefits of improving data integrity in SEVIS and creating better alignment between the Form I-17 and Form I-20 outweigh the costs. These changes are designed to streamline processes and, over time, reduce the manual data entry required for creating a student's Form I-20. ICE remains committed to engaging with stakeholders, including international educators and organizations, to ensure that SEVIS modifications are practical, effective, and aligned with regulatory objectives.

²⁴ [ICEB-2021-0001-0109]

²⁵ ([ICEB-2021-0001-0108], [ICEB-2021-0001-0101], [ICEB-2021-0001-0105]) ([ICEB-2021-0001-0108], [ICEB-2021-0001-0101], [ICEB-2021-0001-0105])

Form I-17 Changes

Add a field to collect previous school codes associated with the school and/or owner

One commenter²⁶ noted that the proposal to collect previous school codes on the Form I-17 is impractical, as current principal designated school officials (PDSOs) or DSOs may not have access to historical school data. The commenter provided an example of inaccessible data left by a predecessor and argued that this request is unfair and lacks reasoning or clarity. Another commenter²⁷ stated that DHS gives no indication as to how historical school code information will be used and why this data would be relevant.

Response: ICE does not agree that this data collection is impractical. Collecting this information allows a school applying for SEVP certification to directly input previous school codes on the Form I-17, eliminating the need to submit this information as part of supporting evidence or in response to an adjudicator's request. Additionally, as the commenter noted, retaining previous school codes in SEVIS ensures that new DSOs have visibility and awareness of this information, enhancing transparency and continuity within the system.

Add a field to collect school website links

Commenters²⁸ argued that mandating fields on the Form I-17 for public-facing items such as website links is unnecessary and adds workload that could be avoided.

Response: ICE believes that adding a field to collect a school's website links will assist adjudicators in accessing relevant information about the school more efficiently.

Collect emergency contact information for the school

Several commenters²⁹ supported the addition of an emergency contact field for DSOs on the Form I-17, noting it would improve coordination with U.S. Customs and Border Protection (CBP) during urgent situations, such as the need to verify student records upon the student's arrival in the United States. One commenter³⁰ recommended collecting only the name of the office and the emergency contact number.

Response: ICE agrees that the collection of this information would improve DSOs' coordination with CBP.

Remove the fax number field

Many commenters³¹ supported removing this outdated field on the Form I-17.

²⁶ [ICEB-2021-0001-0108]

²⁷ [ICEB-2021-0001-0060]

²⁸ [ICEB-2021-0001-0113], [ICEB-2021-0001-0060], [ICEB-2021-0001-0056]

²⁹ [ICEB-2021-0001-0050], [ICEB-2021-0001-0114], [ICEB-2021-0001-0108])

³⁰ [ICEB-2021-0001-0108]

³¹ [ICEB-2021-0001-0114], [ICEB-2021-0001-0050], [ICEB-2021-0001-0108], [ICEB-2021-0001-0073]

Response: ICE agrees that the fax number field is obsolete.

Redesign the Program of Study page on the Form I-17 to better capture a student's educational level, degree, program of study, time necessary to complete the program, assigned Classification of Instructional Programs (CIP) code, and mode of instruction.

Many commenters³² supported redesigning the Form I-17 Program of Study page to present information on a student's educational level, degree, program of study, completion time for the program of study, CIP code, and mode of instruction in a clear, structured format. However, other commenters³³ raised concerns about the redesign and the additional data that would be collected. One commenter³⁴ stated that some of the information proposed for collection in the updated Form I-17, such as programs and modalities, is already collected. The commenter expressed concern that processing times for school recertification, which already exceed several years, would be further delayed by these updates, and questioned whether additional staff would be allocated to review the data. The commenter also suggested that much of this information is already collected through other mandatory reporting to government agencies and recommended increased collaboration between federal agencies to share data rather than duplicating efforts. Another commenter³⁵ added that degree programs are already approved through accrediting bodies and that there are no exact definitions of the terms presented in this section, suggesting that DHS decouple educational level from major/field of study/CIP code to have an idea of which majors are being offered at which levels. A commenter³⁶ noted that requiring schools to pause enrollment or resubmit petitions for adjudication every time a CIP code changes would disrupt student progress and impose an unnecessary administrative burden.

One commenter³⁷ stated that the requirement to update the Form I-17 program of study page lacks practical utility and will impose a significant data entry burden on schools, especially for schools that offer hundreds of programs of study and fields of study that encompass multiple CIP codes. A commenter³⁸ likewise highlighted the significant administrative burden that the proposed changes would impose on PDSOs and universities. The commenter noted that detailing every academic program at their university would require over 600 pages of data entry, which is excessive and impractical. Another commenter³⁹ stated that the proposed changes raise serious feasibility concerns. Most institutions maintain this information across multiple systems,

³² [ICEB-2021-0001-0016], [ICEB-2021-0001-0026], [ICEB-2021-0001-0083], [ICEB-2021-0001-0027], [ICEB-2021-0001-0051]

³³ [ICEB-2021-0001-0110], [Commenter ICEB-2021-0001-0056] [ICEB-2021-0001-0070], [ICEB-2021-0001-0061], [ICEB-2021-0001-0077], [ICEB-2021-0001-0096], [ICEB-2021-0001-0093]

³⁴ [ICEB-2021-0001-0111]

³⁵ [ICEB-2021-0001-0093]

³⁶ [ICEB-2021-0001-0057]

³⁷ [ICEB-2021-0001-0070]

³⁸ [ICEB-2021-0001-0071]

³⁹ [ICEB-2021-0001-0075]

encompassing the registrar, institutional research, accreditation, and academic affairs, rather than in a single unified database. A commenter⁴⁰ urged SEVP to develop an Application Programming Interface (API) to capture additional information in a more automated manner, which would be beneficial for the initial load of data for schools that are currently certified by SEVP as well as those seeking initial certification. They added that SEVP seems unable to timely complete out-of-cycle reviews, which can result in a loss of school revenue and enrollment opportunities for students.

Response: ICE appreciates the feedback regarding its intent to redesign the Form I-17 Program of Study page to enhance the collection of program information already included on the Form I-17 or submitted as part of a school's application for certification or recertification to enroll foreign students. While ICE acknowledges that DSOs will experience a one-time burden to update their school's Form I-17, the agency does not anticipate that the frequency of updates or adjudication processing times will be negatively impacted by these changes. The redesign is intended to streamline data collection, reduce redundancy, and improve clarity for both schools and SEVP officials.

Additionally, the agency believes these updates are practical and will result in long-term benefits by reducing the overall burden on DSOs. Currently, schools petitioning for initial certification or approval to enroll foreign students in their programs of study are required to input detailed information on the Form I-17, including the types of programs offered, areas of study, degrees by educational level and name, and the time required to complete each program. Schools must also upload a description of each program of study, specifying the mode of delivery (e.g., in-person, online, distance, hybrid, or low-residency) and provide a breakdown of hours earned per academic session, categorized as lecture, lab, employment, internship/externship, or curricular practical training (if applicable).

The redesign of the Program of Study page on the Form I-17 will standardize data collection across SEVP-certified schools, reduce redundancy, and eliminate the need for paper documents as part of the certification or recertification process. ICE also appreciates the commenter's recommendation to develop an API to capture this information in a more automated manner and will take this suggestion into consideration as part of its ongoing efforts to improve SEVIS functionality.

Collection of CIP codes on the Form I-17

Several commenters⁴¹ criticized the proposed requirement to designate program-level CIP codes, noting it would impose unsustainable workloads on institutions and delay adjudications. Other

⁴⁰ [ICEB-2021-0001-0092]

⁴¹ [ICEB-2021-0001-0034], [ICEB-2021-0001-0037], [ICEB-2021-0001-0042], [ICEB-2021-0001-0108]

commenters⁴² stated that institutions already maintain detailed program information, including information on CIP codes, degree designations, and time-to-degree, in multiple systems for federal and state reporting. A commenter suggested that such information should only be required for programs in which only foreign students are eligible to enroll. One commenter⁴³ stated concerns about reporting this information because universities offer interdisciplinary programs that are cross-listed under multiple or evolving CIP codes and program names frequently change even when the curriculum has not. Another commenter likewise expressed that CIP codes can change for a variety of reasons during the course of a school's operations (i.e., from decennial review, changes to curriculum, or the realization that there is a more appropriate CIP code that would be a better match).

The commenters emphasized the need for alignment of program and CIP code data across systems. One commenter⁴⁴ asked for more clarification on how the information that will be collected on program of study will be used and what detail is needed. Another commenter⁴⁵ suggested that SEVP partner with the U.S. Department of Education's Integrated Postsecondary Education Data System (IPEDS) to obtain CIP code data, rather than introduce an additional reporting requirement. A commenter⁴⁶ similarly opposed the proposal to collect CIP codes for programs of study, noting that CIP codes are already reported through IPEDS and the National Center for Education Statistics (NCES). The commenter questioned whether CIP codes would be adjudicated and raised concerns about SEVP's lengthy adjudication times, which could further delay school updates and recertifications. Another commenter⁴⁷ recommended using CIP codes as a standardized framework for reporting program information but emphasized that this would require significant revisions to the Form I-17.

Response: DSOs must input the CIP code for a student's program of study on the student's Form I-20, and this data element is tied to a specific program of study listed on the school's Form I-17. Collecting CIP codes on the Form I-17 will improve alignment between the Form I-17 and Form I-20, reducing ambiguity about which programs of study at SEVP-certified schools are approved for F and M student enrollment. This alignment will provide greater clarity for DSOs and SEVP officials and ensure that schools issue Forms I-20 only for approved programs.

While SEVP acknowledges that many schools already maintain detailed program information, including CIP codes, for state and federal reporting purposes, SEVP cannot leverage other federal or state reporting systems, such as IPEDS, to collect this data. These systems are

⁴² [ICEB-2021-0001-0116], [ICEB-2021-0001-0116], [ICEB-2021-0001-0107], [ICEB-2021-0001-0094]

⁴³ [ICEB-2021-0001-0105]

⁴⁴ [ICEB-2021-0001-0055]

⁴⁵ [ICEB-2021-0001-0105]

⁴⁶ [ICEB-2021-0001-0076]

⁴⁷ [ICEB-2021-0001-0077]

designed for broader educational reporting and do not provide the specific program-level data necessary for SEVP’s regulatory oversight of F and M students.

SEVP recognizes that interdisciplinary programs and evolving CIP codes may present challenges for schools, as program names and CIP codes can change due to curriculum updates, decennial reviews, or adjustments to better match program descriptions. However, collecting CIP codes on the Form I-17 will standardize program reporting across SEVP-certified schools and ensure consistency in the data used to adjudicate school certifications and recertifications. SEVP is committed to providing clear guidance on how program information will be collected and used, as well as the level of detail required, to support schools in meeting these requirements effectively.

Indicate mode of instruction (whether a program of study is conducted predominantly online or in a hybrid or low residency format)

Many commenters⁴⁸ opposed the proposed requirement to classify instructional modes, citing redundancy with existing F-1 regulations and a lack of standardized definitions, specifically for the terms “online,” “hybrid,” and “low residency format.” One commenter⁴⁹ questioned whether SEVP will require schools to submit information on the mode of delivery for each class within a program or CIP code or to submit information on every section’s mode of instruction for each class within the program. This commenter stated that many classes have multiple sections that are offered in different modes of instruction and that providing this data could be overwhelming. They also want to know what collecting this information will achieve.

Response: The commenters’ concerns regarding the lack of standardized definitions for terms such as “predominantly online,” “hybrid,” and “low residency” are outside the scope of this information collection request. SEVP currently requires schools to provide a description of each program, including the mode of instruction offered, as part of their certification, recertification, or out-of-cycle review. Collecting this information in SEVIS ensures consistency across SEVP-certified schools and reduces the reliance on paper documents during the application process.

Indicate whether curricular practical training is a component of a program of study

Commenters⁵⁰ raised concerns about the proposed requirement to indicate whether CPT is a “component” of a program of study, noting that a binary indicator would be of limited utility and potentially inaccurate. Other commenters⁵¹ stated that institutions already enter CPT data into

⁴⁸ [ICEB-2021-0001-0007], [ICEB-2021-0001-0112], [ICEB-2021-0001-0034], [ICEB-2021-0001-0042], [ICEB-2021-0001-0116], [ICEB-2021-0001-0107], [ICEB-2021-0001-0056], [ICEB-2021-0001-0095], [ICEB-2021-0001-0094]

⁴⁹ [ICEB-2021-0001-0055]

⁵⁰ [ICEB-2021-0001-0027], [ICEB-2021-0001-0112], [ICEB-2021-0001-0072], [ICEB-2021-0001-0097], [ICEB-2021-0001-0093]

SEVIS for accurate tracking of work authorization. One commenter⁵² noted that clarification is needed about whether the new CPT information is a prerequisite to authorize CPT as some programs of study have multiple options and may or may not include CPT. If CPT information must be included on the Form I-17, they recommended that another option besides a “yes or no” choice be given.

Several commenters⁵³ expressed concerns about the potential impact of requiring adjudication and approval from SEVP for CPT components before students can participate. One commenter⁵⁴ explained that CPT is not always required but can be highly encouraged or part of an optional track and inquired whether CPT only needs to be entered when it is a required part of the program of study. Several commenters⁵⁵ stated that CPT is often an optional or elective component of a program of study and it could be considered a component of all programs of study listed on the Form I-17 or requirements could change within a particular program. Another commenter⁵⁶ recommended that SEVP consider more specific data collection points, such as identifying graduate programs that require immediate participation in experiential learning.

One commenter⁵⁷ stated that DHS should recognize that CPT is student-specific, program-specific, and variable over time; reporting requirements must accommodate this flexibility. Another commenter⁵⁸ suggested that if DHS intends to monitor CPT through the Form I-17 process, it should focus on programs that require first-year CPT as part of the curriculum. The commenter noted that while first-year CPT may be integral to some programs of study, it could also be subject to abuse. The commenter recommended focusing adjudication resources on differentiating between legitimate and illegitimate uses of CPT.

Response: The purpose of collecting CPT-related data is to improve alignment between the information provided on the Form I-17 and Form I-20. This alignment will reduce confusion or ambiguity regarding the programs of study offered at SEVP-certified schools and ensure greater clarity about whether CPT is an integral part of an established curriculum. Additionally, this data will assist SEVP in assessing a school’s compliance with F and M regulations, including those governing CPT.

ICE acknowledges the commenters’ concerns regarding the limitations of a binary indicator for CPT and the variability of CPT requirements across programs. ICE will consider the

⁵¹ [ICEB-2021-0001-0116], [ICEB-2021-0001-0100], [ICEB-2021-0001-0099], [ICEB-2021-0001-0095], [ICEB-2021-0001-0094], [ICEB-2021-0001-0076]

⁵² [ICEB-2021-0001-0052]

⁵³ [ICEB-2021-0001-0110, ICEB-2021-0001-0073, ICEB-2021-0001-0096)], [ICEB-2021-0001-0106]

⁵⁴ [ICEB-2021-0001-0055]

⁵⁵ ([ICEB-2021-0001-0056, ICEB-2021-0001-0058, [ICEB-2021-0001-0070])

⁵⁶ [ICEB-2021-0001-0107]

⁵⁷ [ICEB-2021-0001-0057]

⁵⁸ [ICEB-2021-0001-0077]

recommendation to provide more nuanced options beyond a simple “yes or no” designation to better reflect the flexibility and diversity of CPT components in various programs of study.

Allow DSOs to select “weeks” as an academic term length

Several commenters⁵⁹ supported adding “weeks” as a program length option on the Form I-17 to accommodate intensive English language training programs and short-term certificate programs. One commenter⁶⁰ wants to make sure term length options remain flexible and that they can continue to report their school’s quarter system.

Response: ICE agrees that adding weeks as a program length option on the Form I-17 would better accommodate schools with short-term programs, such as English language training programs. ICE does not plan on making any additional changes to the term length options in this section of the Form I-17.

Require DSOs to provide separate numbers for domestic and international students when listing the “Average Annual Number of Students”

One commenter⁶¹ reported that their school already tracks enrollment by both domestic and international student populations and that this requirement would impose no additional burden. Other comments on this proposed change were in opposition or asked for clarity. Several commenters⁶² opposed the proposed requirement to provide separate numbers for domestic and international students because of cited significant administrative burdens and concerns that the data request lacks clarity and utility. Several additional commenters⁶³ stated that educational institutions and institutional research offices use different categories for student counts, and many students do not fit a single label (e.g., H-4, J-2, TPS, pending permanent residents, DACA). The commenter recommended that DHS define “international” narrowly, preferably limited to F, M, and J students, and clearly state the intended use of this information to avoid confusion or speculative interpretations. Another commenter⁶⁴ questioned if SEVP is “looking for a certain percentage between domestic and international students” and whether “international student mean F-1 or J-1 students, nonimmigrant students, or some other definition.”

Additionally, they noted that “given some of the language in the requested agreement with some universities that mentioned limiting international students from one country to...5%,” they have

⁵⁹ [ICEB-2021-0001-0016], [ICEB-2021-0001-0026], [ICEB-2021-0001-0083], [ICEB-2021-0001-0027], [ICEB-2021-0001-0051], [ICEB-2021-0001-0054], [ICEB-2021-0001-0108], [ICEB-2021-0001-0102], [ICEB-2021-0001-0073] [ICEB-2021-0001-0076], [ICEB-2021-0001-0096]

⁶⁰ [ICEB-2021-0001-0056]

⁶¹ [ICEB-2021-0001-0096]

⁶² ([ICEB-2021-0001-0034], [ICEB-2021-0001-0038], [ICEB-2021-0001-0040], [ICEB-2021-0001-0070], [ICEB-2021-0001-0092])

⁶³ ([ICEB-2021-0001-0116], [ICEB-2021-0001-0115], [ICEB-2021-0001-0060], [ICEB-2021-0001-0094], [ICEB-2021-0001-0093])

⁶⁴ ([ICEB-2021-0001-0102])

concerns regarding the relevancy of the information and its inclusion on the Form I-17 as a required field. One commenter⁶⁵ stated that the proposed change insinuates that institutions and DHS use different categories for domestic and international student counts and urged DHS to narrowly define “international” as F, M, and J students and to state the intended use of this information to prevent confusion and ensure that the new requirements align with existing data systems (CIP codes, etc.).

Several commenters⁶⁶ stated that this information is already available to DHS through SEVIS and IPEDS, making this request redundant and unnecessary. Additional commenters⁶⁷ noted that identifying domestic and international students separately is unnecessary because SEVP already has international student numbers. They do not understand why they need to identify these numbers if they are already available to DHS through SEVIS or IPEDS. Another commenter⁶⁸ noted that demographic information reported on the Form I-17, such as average number of students, is not always straightforward to calculate. They recommended providing clearer guidelines and formulas to account for differences in program duration and instructional types.

Response: ICE appreciates the feedback regarding the proposed requirement to provide separate enrollment numbers for domestic and international student populations. ICE acknowledges that some schools already track this information and would not experience additional burden, while others have expressed concerns about administrative challenges, lack of clarity, and the utility of the data request. SEVP-certified schools are already required to provide the average number of students enrolled at their institution in Section 4: School Calendar, Costs, and Demographics of the Form I-17. Collecting separate enrollment numbers for international students (F and/or M students) and domestic students (non-international students) will enhance SEVP’s ability to conduct compliance reviews and assess fraud risks among SEVP-certified schools.

While ICE acknowledges that some commenters believe this information is already available through IPEDS, this system does not provide the specific program-level data necessary for SEVP’s regulatory oversight. The revision of this data element on the Form I-17 will ensure consistency and accuracy in reporting across SEVP-certified schools and strengthen SEVP’s ability to evaluate schools’ compliance with F and M regulations.

ICE disagrees with the assertion that this new data element will impose a significant administrative burden on SEVP-certified schools and DSOs. ICE is committed to providing clear guidelines to assist schools in reporting demographic information, taking into account

⁶⁵ [ICEB-2021-0001-0095]

⁶⁶ [ICEB-2021-0001-0108], [ICEB-2021-0001-0107], [ICEB-2021-0001-0105], [ICEB-2021-0001-0059], [ICEB-2021-0001-0076])

⁶⁷ [ICEB-2021-0001-0055], [ICEB-2021-0001-0056], [ICEB-2021-0001-0058], [ICEB-2021-0001-0107]

⁶⁸ [ICEB-2021-0001-0077]

differences in school types. These efforts aim to ensure that reporting requirements are practical, transparent, and aligned with SEVP’s operational goals.

Allow DSOs to provide additional contact information, require DSOs to indicate whether they work full-time or part-time, and change a DSO’s “Title” to “Job Title,” to better collect information on their position at the school

Several commenters⁶⁹ questioned the proposed requirement that a DSO state whether they are full-time or part-time, noting this could create confusion, especially for DSOs working at multiple schools. One commenter⁷⁰ further asked whether the full-time or part-time indicator applies to time spent on SEVIS/DSO duties or if it relates to their work schedule as a whole. If the latter, it is “dubious if that enhances the data related to the (P)DSO.” The commenters expressed a general sentiment around lack of clarity or justification for the requirement and questioned the utility of this information collection. Another commenter⁷¹ stated that the designation for part-time or full-time is reasonable but that the definitions and update process must be clear.

Other commenters⁷² opposed the proposal to collect additional DSO contact information and information on DSO employment status because of both privacy concerns and a lack of justification. The commenters argued that employment status does not indicate experience or work quality and should not be required. One commenter⁷³ stated that compliance with the expanded requirements could potentially force institutions to revise job descriptions for regulatory compliance rather than functional accuracy. Any organizational or staffing change, including routine personnel actions, could trigger multiple updates in SEVIS, and DSO approvals could be further delayed, creating operational risks regarding leadership transitions or staffing changes.

Response: ICE appreciates the commenters’ feedback regarding the proposed changes to DSO contact information, employment status, and job title fields. To provide greater flexibility for DSOs, ICE is adding a field that allows DSOs to provide more than one contact method. This change is intended to facilitate communication between DSOs and SEVP adjudicators or field representatives, ensuring timely and efficient interactions.

Additionally, ICE is updating the “Title” field to “Job Title” to clarify that DSOs should input their official job title at their school. This adjustment aims to reduce ambiguity and improve the accuracy of information reported in SEVIS. ICE is also introducing a field for DSOs to indicate

⁶⁹ [ICEB-2021-0001-0051], [ICEB-2021-0001-0107], [ICEB-2021-0001-0097], [ICEB-2021-0001-0092]

⁷⁰ [ICEB-2021-0001-0097]

⁷¹ [ICEB-2021-0001-0056]

⁷² [ICEB-2021-0001-0108] [ICEB-2021-0001-0107]

⁷³ [ICEB-2021-0001-0105]

whether they work full-time or part-time at the school. This information will enhance SEVP's oversight and compliance efforts, particularly for schools that employ DSOs who are not regular, full-time employees.

ICE disagrees with the assertion that these changes impose a significant burden on schools or DSOs. The additional fields are designed to improve transparency and accountability while supporting SEVP's ability to assess compliance with F and M regulations. ICE recognizes the concerns raised about potential confusion regarding the full-time or part-time designation and clarifies that this indicator applies specifically to the DSO's employment status at the school, not their overall work schedule or time spent on SEVIS duties. Clear guidance will be provided to ensure schools and DSOs understand these requirements and their intended purpose.

ICE also acknowledges concerns about privacy and operational risks related to staffing changes. However, these updates are intended to improve oversight and ensure that schools maintain qualified personnel in DSO roles. ICE will continue to evaluate feedback and provide support to minimize disruptions during leadership transitions or staffing changes.

Form I-20 Changes

Collect contact and other information on legal guardians of minor F and M students

Many commenters⁷⁴ raised significant privacy concerns about the proposed collection of information on legal guardians for minor F and M students. They argued that these requirements exceed SEVP's mandate, duplicate existing data, and may conflict with federal privacy laws such as the Family Educational Rights and Privacy Act (FERPA). One commenter⁷⁵ noted that such changes must align with FERPA requirements. Commenters emphasized that including sensitive data on printed forms such as the Form I-20 introduces privacy risks and urged DHS to limit data collection to information directly tied to immigration oversight.

One commenter⁷⁶ suggested that the information reported should come directly from the legal guardian rather than being submitted to the DSO to then be entered in SEVIS. Another commenter⁷⁷ similarly stated that the information should be added by the student and their guardian through a portal after the Form I-20 is issued.

One commenter⁷⁸ supported the collection of legal guardian contact information for minor students and stated that the burden remains reasonable as long as DSOs are only required to

⁷⁴ [ICEB-2021-0001-0008], [ICEB-2021-0001-0009], [ICEB-2021-0001-0010], [ICEB-2021-0001-0016], [ICEB-2021-0001-0019], [ICEB-2021-0001-0083], [ICEB-2021-0001-0050-A1], [ICEB-2021-0001-0114], [ICEB-2021-0001-0034], [ICEB-2021-0001-0038], [ICEB-2021-0001-0039], [ICEB-2021-0001-0041], [ICEB-2021-0001-0051], [ICEB-2021-0001-0053] [ICEB-2021-0001-0108], [ICEB-2021-0001-0076]

⁷⁵ [ICEB-2021-0001-0105]

⁷⁶ [ICEB-2021-0001-0107]

⁷⁷ [ICEB-2021-0001-0093]

⁷⁸ [ICEB-2021-0001-0096]

collect and record the data provided. Another commenter⁷⁹ acknowledged that collecting guardian information for minor F-1 students enrolled in primary or secondary schools could potentially enhance student safety.

Response: ICE appreciates the feedback and concerns raised regarding the proposed collection of legal guardian information for minor F and M students. The collection of legal guardian information, including the name, address, and contact details of the legal guardian as noted on the Form I-20, is intended to enhance oversight and ensure the safety and accountability of minor students. ICE believes this information is directly tied to immigration oversight, as it ensures SEVP and relevant authorities can identify and contact a responsible adult in cases of emergency, compliance matters, or other situations requiring intervention.

ICE recognizes the commenters' concerns about potential conflicts with federal privacy laws, such as FERPA. While FERPA protects the privacy of student educational records, SEVP operates under its own statutory and regulatory framework that governs the collection and use of data for immigration purposes. FERPA includes exceptions that allow schools to disclose information required to comply with federal immigration reporting requirements, such as SEVP's mandate to monitor F and M students. ICE will ensure that any new data collection requirements align with applicable privacy protections and implement safeguards to minimize the risks associated with sensitive information, particularly when included on printed forms such as the Form I-20.

ICE appreciates the suggestions from commenters to allow legal guardians or students to submit this information directly through a portal or other secure means, rather than requiring DSOs to collect and enter the data in SEVIS. While DSOs are responsible for maintaining accurate records in SEVIS, ICE will explore options to streamline the process and reduce administrative burdens on DSOs. ICE emphasizes that DSOs would only be required to collect and record the information provided by the student or their legal guardian, ensuring the burden remains reasonable.

ICE agrees that collecting legal guardian information for minor F-1 students enrolled in primary or secondary schools could enhance student safety and accountability. However, ICE will carefully evaluate the scope of this requirement to ensure it is narrowly tailored to meet immigration oversight objectives without duplicating existing data or imposing unnecessary burdens. Clear guidance will be provided to stakeholders to address privacy concerns, ensure compliance with all applicable laws and regulations, and clarify how this information will be used to support SEVP's mission.

Collect the date of graduation/degree awarded

⁷⁹ [ICEB-2021-0001-0108]

Many commenters⁸⁰ opposed the proposed requirement to add graduation dates to the Form I-20, stating that this will duplicate program end dates and create confusion and administrative burdens. One commenter⁸¹ stated that Study in the States guidance defines the program end date as the expected completion date, which may differ from the official degree awarded date, and that it is unclear how adding the graduation date will support compliance or enforcement. Another commenter⁸² noted that the date of graduation or degree conferral is administrative in nature and does not impact student status, admissibility, or eligibility for benefits such as practical training. The commenter emphasized that the program end date should remain the relevant status marker and recommended providing guidance on how graduation dates would be interpreted and utilized. A commenter⁸³ noted that the program end date is already recorded in SEVIS and that graduation dates are available in student transcripts. The commenter argued that this additional data entry is unnecessary and does not provide meaningful utility.

Several commenters⁸⁴ stated that precise definitions are needed for "date of graduation/degree awarded," as institutions must know whether this refers to the date of academic completion, commencement, or diploma issuance. Other commenters⁸⁵ noted that this term does not have a consistent meaning across educational institutions and questioned how it would apply to students who have completed all course requirements except for a thesis or the equivalent. The commenters also highlighted the potential impact on program end dates and student eligibility for post-completion optional practical training (OPT). One commenter⁸⁶ raised the issue of challenges in providing this information due to institutional differences and distinctions between program completion dates and when a degree is awarded. Another commenter⁸⁷ noted that information on the date of graduation or degree conferral is irrelevant for immigration purposes and could cause confusion for students. The commenter emphasized that the program completion date is the only date that matters for OPT applications and student grace periods before departing the United States. Another commenter⁸⁸ raised concerns about PhD students whose dissertation defense may be earlier than their technical graduation date, as well as students who take a medical reduced course load. This commenter also stated that many community college students

⁸⁰ [ICEB-2021-0001-0008], [ICEB-2021-0001-0112], [ICEB-2021-0001-0039], [ICEB-2021-0001-0108], [ICEB-2021-0001-0107], [ICEB-2021-0001-0056], [ICEB-2021-0001-0060], [ICEB-2021-0001-0103], [ICEB-2021-0001-0105], [ICEB-2021-0001-0058], [ICEB-2021-0001-0107], [ICEB-2021-0001-0059], [ICEB-2021-0001-0093], [ICEB-2021-0001-0092]

⁸¹ [ICEB-2021-0001-0096]

⁸² [ICEB-2021-0001-0077]

⁸³ [ICEB-2021-0001-0070]

⁸⁴ [ICEB-2021-0001-0116], [ICEB-2021-0001-0115], [ICEB-2021-0001-0095], [ICEB-2021-0001-0094]

⁸⁵ ([ICEB-2021-0001-0110], [ICEB-2021-0001-0098])

⁸⁶ [ICEB-2021-0001-0102]

⁸⁷ [ICEB-2021-0001-0076]

⁸⁸ [ICEB-2021-0001-0054]

do not ever graduate but transfer once they have the prerequisites completed and receive an acceptance letter to a four-year school.

Response: ICE appreciates the feedback and the concerns raised by commenters regarding the proposed requirement to collect graduation dates or degree awarded dates on the Form I-20. ICE would like to clarify that this is not a new requirement but rather an enhancement to improve the collection of information already required under 8 CFR 214.3(g)(1). The current SEVIS data does not capture where a nonimmigrant student completed their course of study, which is critical for maintaining effective oversight of F and M students.

Separating the program end date from the graduation or degree awarded date will provide DHS with a clearer picture of whether a student has officially completed their program. This distinction is particularly important in cases in which schools do not shorten the program end date when a student graduates or completes their program early, creating ambiguity about the student's actual completion status. Collecting this information will improve SEVP's ability to monitor compliance and ensure accurate reporting across SEVP-certified schools.

To minimize administrative burdens, ICE intends for this new field to populate automatically in SEVIS during key processes, such as when a Form I-20 is being transferred, completed, or updated to add employment information. Importantly, this field will not appear on the printed Form I-20, reducing concerns about privacy risks and unnecessary duplication of data.

ICE acknowledges the variability in how institutions define graduation-related dates, such as academic completion, commencement, or diploma issuance, and will provide clear definitions and guidance to ensure schools understand what is required and how the data will be used. By improving the collection of this information, ICE aims to enhance oversight while maintaining consistency and compliance with regulatory requirements.

Collect details on the source and type of financial support for the F or M student

One commenter⁸⁹ supported allowing a range of program costs on the Form I-17 and Form I-20, which they noted will benefit schools with a variety of program and credit costs. This commenter, along with other commenters,⁹⁰ would like to know what additional information will need to be collected, how it will be used, and why. They are concerned that small changes in student funding such as parental support or scholarships will require frequent updates to the Form I-20.

Another commenter⁹¹ stated that they are concerned about how little information there is on what this new requirement would entail, what regulatory requirement this would meet, and why this would be necessary, given existing regulatory language for financial documentation and the

⁸⁹ [ICEB-2021-0001-0054]

⁹⁰ [ICEB-2021-0001-0054] [ICEB-2021-0001-0060], [ICEB-2021-0001-0102],

⁹¹ [ICEB-2021-0001-0059]

practices of Consular Affairs (U.S. Department of State) and U.S. Citizenship and Immigration Services (U.S. Department of Homeland Security). A commenter⁹² noted that the proposal provides no specificity beyond what is already collected and lacks rationale or justification for the public to respond to.

Several commenters⁹³ stated that this collection lacks justification and will duplicate information required for visa processing. They added that student funding sources often change mid-program, making real-time tracking impractical and potentially inaccurate. One commenter⁹⁴ noted that data on annual cost by program already exists in SEVIS and on individual Forms I-20. Another commenter⁹⁵ stated that cost of attendance is already required on each Form I-20, per the regulations. If this additional data submission is only for reporting and is not adjudicated, submission would be redundant but manageable. Similarly, if ICE's intent is to standardize existing funding categories, the additional burden would be minimal. However, requiring detailed documentation of financial sources could be time-intensive and delay student processing. The commenter stated that clear guidance on expectations and the use of existing SEVIS functions would minimize administrative strain. A commenter⁹⁶ noted that requiring annual costs by program of study would impose an excessive time burden on institutions, particularly those with hundreds of programs. The commenter emphasized that the approximate annual cost of attendance is already reported on the Form I-17 and Form I-20, making this requirement redundant.

Several commenters⁹⁷ noted that financial support is already reviewed in detail during the initial Form I-20 creation process and as part of extension or change of educational level requests. The commenters argued that adding clarifying details to this information is unnecessary and does not enhance practical utility. One commenter⁹⁸ questioned the term "clarifying details" and what it entails – if DHS is looking for family member information for instances of family support, for example, or bank account numbers or information – and how DHS will use this information. Another commenter⁹⁹ requested clarification on the purpose and intent of expanding financial support reporting requirements on the Form I-20. The commenter noted that while DSOs are responsible for vetting financial resources, their capacity for extensive auditing of such information is limited.

⁹² [ICEB-2021-0001-0093]

⁹³ ([ICEB-2021-0001-0103, ICEB-2021-0001-0105])

⁹⁴ [ICEB-2021-0001-0056]

⁹⁵ [ICEB-2021-0001-0096]

⁹⁶ [ICEB-2021-0001-0076]

⁹⁷ ([ICEB-2021-0001-0070], ICEB-2021-0001-0076])

⁹⁸ [ICEB-2021-0001-0107]

⁹⁹ [ICEB-2021-0001-0077]

Response: ICE appreciates the feedback and concerns raised by commenters regarding the proposed changes to financial support reporting requirements on the Form I-17 and Form I-20. ICE would like to clarify that the intent of these changes is to improve the accuracy, consistency, and utility of financial information collected in SEVIS while minimizing administrative burdens on schools and DSOs.

Currently, fields such as “School Fund Type” and “Source Type” are free text fields, which can lead to inconsistencies and challenges in tracking and reporting financial data. By standardizing these fields with common identifiers, ICE aims to enhance oversight and streamline reporting. For example, adding checkboxes or other structured options for funding categories, such as athletic scholarships, fellowships, departmental grants, specific research grants, or on-campus employment, will improve the ability to track and analyze financial support provided to F-1 students. Additionally, identifying the person or entity sponsoring the student will help flag potential issues and improve compliance monitoring.

ICE acknowledges commenters’ concerns about the potential redundancy of collecting financial information already reviewed during visa processing or reported on the Form I-20. However, the proposed changes are intended to complement existing SEVIS processes by providing greater clarity and standardization, rather than duplicating efforts. For example, while the approximate annual cost of attendance is already reported on the Form I-17 and Form I-20, adding structured fields for funding sources will ensure consistency across SEVP-certified schools and reduce ambiguity in reporting.

Regarding concerns about frequent updates being needed due to small changes in student funding, ICE does not intend for DSOs to update financial information in real-time for minor adjustments, such as changes in parental support or scholarships. Instead, the proposed changes aim to capture key financial details at critical points, such as during the initial Form I-20 creation, program transfers, or changes in educational level. ICE will provide clear guidance to ensure schools understand when updates are required and how the information will be used.

ICE recognizes that financial support is already reviewed in detail during the initial Form I-20 creation process and as part of extension or change of educational level requests. The proposed changes are not intended to impose excessive auditing responsibilities on DSOs but rather to enhance the utility of financial data collected in SEVIS for compliance and oversight purposes. ICE will ensure that any new requirements align with existing regulatory language under 8 CFR 214.3(k) and provide clear guidance to minimize administrative strain.

Finally, ICE acknowledges the need for transparency regarding the purpose and intent of expanding financial support reporting requirements. These changes are designed to improve SEVP’s ability to assess compliance, identify potential fraud risks, and ensure that students have adequate financial resources to support their studies. ICE will continue to engage with

stakeholders to refine these requirements and ensure they are practical, narrowly tailored, and aligned with SEVP's mission.

Whether an F or M student is engaging in online education, on-campus employment, or remote employment

Several commenters¹⁰⁰ noted that the proposed collection of additional information on online education, as well as information about on-campus employment and student employment/training locations, would increase the time required to issue and update Forms I-20. The commenters emphasized that this would create additional burdens for PDSOs, DSOs, and students, as PDSOs and DSOs would need to gather data from other school departments and students would need to report more information regularly. Another commenter¹⁰¹ additionally recommended that DHS address the definition of "distance education" to help schools in monitoring compliance.

Other commenters¹⁰² stated that they do not understand why online classes must be reported in SEVIS if there is already a regulation about online class limitations. Several commenters¹⁰³ similarly stated that collecting information on whether a student is engaging in online education is unnecessary, as F-1 students are already restricted in terms of online credits, which is monitored by PDSOs and DSOs. One commenter¹⁰⁴ stated that he understands that fully online programs are already restricted but noted that hybrid or low-residency models must be clearly defined.

Response: ICE appreciates the feedback and concerns raised by commenters regarding the proposed collection of additional information on online education, on-campus employment, and student employment/training locations. Regarding online education, ICE recognizes that F-1 students are already subject to regulatory limitations on online credits, which are monitored by PDSOs and DSOs. These updates are intended to improve oversight, ensure compliance with F and M regulations, and enhance the accuracy of data collected in SEVIS. The intent of collecting information on online education is not to duplicate existing monitoring efforts but to help SEVP ensure compliance with existing regulations. Finally, these proposed revisions do not establish new definitions or requirements for school officials. Before implementing these changes, ICE will coordinate with relevant partners, including third-party batch vendors, and issue guidance through appropriate channels on the use and requirements associated with the revisions.

Indicate whether a student is engaging in on-campus employment

¹⁰⁰ [ICEB-2021-0001-0110, ICEB-2021-0001-0105]

¹⁰¹ [ICEB-2021-0001-0105]

¹⁰² [ICEB-2021-0001-0054, ICEB-2021-0001-0058, ICEB-2021-0001-0102, ICEB-2021-0001-0097]

¹⁰³ [ICEB-2021-0001-0070, ICEB-2021-0001-0079, ICEB-2021-0001-0072, ICEB-2021-0001-0076]

¹⁰⁴ [ICEB-2021-0001-0057]

Many commenters¹⁰⁵ opposed reporting F-1 on-campus employment on the Form I-20, citing significant administrative burdens and regulatory overreach. Several commenters¹⁰⁶ noted that such employment is "incident to status" and does not require specific authorization. The commenters argued that this information does not impact a student's ability to maintain their status and would impose a significant reporting burden on schools. Several other commenters¹⁰⁷ stated that DHS has not indicated why on-campus employment information is relevant. F students are already permitted to work on campus, and DHS does not provide any explanation as to what problem is solved by collecting this information. Another commenter¹⁰⁸ further stated that this introduces a new reporting requirement through an information collections notice rather than formal notice-and-comment rulemaking.

One commenter¹⁰⁹ stated that the on-campus employment reporting requirement is "legally unfounded and administratively unworkable" as current regulations do not have an explicit reporting requirement. Additionally, the nature of on-campus employment can vary widely and is dynamic for many students, with changes happening more frequently than they can be processed. Further, Form I-9 employment rules do not require updated documentation for each discrete role at the same institution. Another commenter¹¹⁰ argued that reporting on-campus employment is extra regulatory and unnecessary. One commenter¹¹¹ questioned the practical utility of knowing whether a student is working on-campus or remotely.

A commenter¹¹² noted that information about on-campus employment and whether employment or training is in-person or remote may change frequently given a student's evolving time commitments and the requirements of the campus employer. Furthermore, employment information is typically tracked by a payroll office and this office does not disaggregate student employment hours based on the student's citizenship and visa status. Adding this information to the Form I-20 would require multiple campus offices (payroll, international programs, technology services, etc.) to change their existing practices in order to gather and report the data. Another commenter¹¹³ noted that at their school, student employment decisions are decentralized across colleges and departments. Implementing a centralized reporting system would therefore

¹⁰⁵ ([ICEB-2021-0001-0016], [ICEB-2021-0001-0020], [ICEB-2021-0001-0083], [ICEB-2021-0001-0027], [ICEB-2021-0001-0108], [ICEB-2021-0001-0102], [ICEB-2021-0001-0103], [ICEB-2021-0001-0105], [ICEB-2021-0001-0097], [ICEB-2021-0001-0093])

¹⁰⁶ ([ICEB-2021-0001-0107], [ICEB-2021-0001-0070], [ICEB-2021-0001-0061], [ICEB-2021-0001-0072], [ICEB-2021-0001-0076], [ICEB-2021-0001-0077], [ICEB-2021-0001-0092])

¹⁰⁷ ([ICEB-2021-0001-0060, ICEB-2021-0001-0079, ICEB-2021-0001-0098])

¹⁰⁸ [ICEB-2021-0001-0079]

¹⁰⁹ [ICEB-2021-0001-0105]

¹¹⁰ [ICEB-2021-0001-0058]

¹¹¹ [ICEB-2021-0001-0107]

¹¹² [ICEB-2021-0001-0061]

¹¹³ [ICEB-2021-0001-0096]

require significant coordination, training, and system updates. This commenter also stated that providing DSOs with clear federal guidance on address reporting in SEVIS would likely achieve greater consistency than introducing a new field for reporting remote versus on-site work. The additional reporting burden of this proposed requirement may be minimal if the proposed change is limited to a drop-down or radio button.

Response: ICE appreciates the feedback and concerns raised by stakeholders regarding the proposed collection of information about F-1 on-campus employment on the Form I-20. ICE acknowledges that current regulations under 8 CFR 214.2(f)(9)(i) govern on-campus employment for F-1 students and do not require schools to report this information in SEVIS. The purpose of this proposal is to provide schools with the flexibility and option to report on-campus employment information, should they choose to do so, to enhance oversight and improve data accuracy.

Several commenters¹¹⁴ supported the proposal to report on-site versus remote employment for practical training, noting that this information would add practical utility and could be incorporated into SEVIS without significant burden. Another commenter¹¹⁵ considered the collection of this information to be useful for reflecting modern work arrangements. One commenter¹¹⁶ stated that while an indicator of engagement in online education is valuable, it may not fully replace DSO oversight and contextual review. Additionally, their school already audits course enrollments to ensure compliance with the regulations.

Response: ICE appreciates the feedback from stakeholders regarding the proposal to report on-site versus remote employment for practical training. ICE acknowledges the support for this proposal and agrees that collecting this information would add practical utility, particularly in reflecting modern work arrangements and ensuring compliance with F and M regulations. ICE is committed to implementing this change in a way that minimizes administrative burden and ensures seamless integration in SEVIS.

While ICE recognizes that schools already audit course enrollments and employment arrangements to ensure compliance, the proposed collection of on-site versus remote employment information is intended to complement existing DSO oversight and contextual review. This data will provide SEVP with a clearer understanding of how practical training is being conducted and help identify trends or compliance risks associated with remote work arrangements.

ICE will provide clear guidance to schools and DSOs on how to report this information in SEVIS, ensuring that the process is straightforward and does not impose significant burdens. ICE

¹¹⁴ [ICEB-2021-0001-0108], [ICEB-2021-0001-0105]

¹¹⁵ [ICEB-2021-0001-0103]

¹¹⁶ [ICEB-2021-0001-0096]

remains committed to balancing the need for effective oversight with minimizing administrative strain on schools and DSOs.

Several commenters¹¹⁷ did not understand why SEVP needs separate notification for online enrollment if the student can only take one class online. They also think the term “online class” needs to be defined and compliance expectations need to be made clear. One commenter¹¹⁸ asked what the term “predominantly” in reference to online classes means?

Another commenter¹¹⁹ believes that reporting online education would create a very significant burden. This could require Form I-20 updates. In addition, the information is constantly changing and has no relation to a student maintaining status if regulatory requirements are being followed. One commenter¹²⁰ stated that academic programs are dynamic, making reporting misleading or outdated. Another commenter¹²¹ argued that tracking each student’s class modality would not be feasible and that students could change class sections during a quarter. A commenter¹²² asked about what happens if a student adds or drops an online course partway through the term? The DSO might need to update a single student’s record two or three times a term.

Response: ICE appreciates the concerns raised by commenters regarding the proposed reporting of online enrollment. The intent of collecting this information is to enhance SEVP’s oversight and ensure compliance with existing regulations, which limit F-1 students to one online class per term that counts toward their full course of study. ICE will provide clear guidance to schools and DSOs on how to report this information in SEVIS, ensuring that the process is straightforward and does not impose significant burdens.

Miscellaneous

One commenter¹²³ stated that including the time necessary to complete the program of study is unnecessary. When a DSO issues the Form I-20, the program length is a general estimate of the amount of time they expect a student will require to complete the program. The actual program length varies from student to student, particularly for graduate programs in which research and thesis work frequently are determining factors in the length of time needed to obtain the degree. General estimates for different degree levels can be gleaned from the Form I-20 program dates and national statistics.

¹¹⁷ [ICEB-2021-0001-0056], [ICEB-2021-0001-0058], [ICEB-2021-0001-0059], [ICEB-2021-0001-0061], [ICEB-2021-0001-0098], [ICEB-2021-0001-0097]

¹¹⁸ [ICEB-2021-0001-0059]

¹¹⁹ [ICEB-2021-0001-0058]

¹²⁰ [ICEB-2021-0001-0053]

¹²¹ [ICEB-2021-0001-0053]

¹²² [ICEB-2021-0001-0061]

¹²³ [ICEB-2021-0001-0058]

Response: ICE disagrees with the assertion that including the time necessary to complete a program of study on the Form I-17 is unnecessary. While ICE acknowledges that program length can vary from student to student, particularly for graduate programs in which research and thesis work may extend completion timelines, the program length reported on the Form I-17 serves as a general estimate of the time required to complete the program. This estimate is intended to align with the program length information provided on the Form I-20, which reflects the expected duration of a student's program. Providing this information helps SEVP monitor compliance with regulatory requirements, ensures consistency across SEVP-certified schools, and supports effective oversight of F and M students.

Several commenters¹²⁴ noted that many of the proposed changes will also require updates to the batch schema, and time will be needed for testing those updates. Similarly, time will be critical for providers who offer SEVIS interface software. Neither of these issues are referenced in this proposal. One commenter¹²⁵ suggested a delayed implementation so that SEVP can develop a better system for data processing and submission and also suggested that updates be allowed as notifications rather than submissions for adjudication.

Response: ICE acknowledges the commenters' concerns regarding the impact of the proposed changes on batch schema updates and the need for adequate time for testing and implementation. Before implementing these changes, ICE will coordinate with relevant partners, including third-party batch vendors, regarding the updates. Additionally, ICE will issue guidance through appropriate channels to ensure stakeholders understand the requirements and processes associated with the changes. General guidance on SEVIS technical changes and functionality is available in the [SEVIS Help Hub](#) on the [DHS Study in the States website](#) at <https://studyinthestates.dhs.gov/sevis-help-hub>.

One commenter¹²⁶ recommended modernizing the Form I-17 and Form I-20 by improving formatting, addressing adjudication delays, and implementing electronic verification for travel endorsements to reduce fraud. The commenter also suggested collecting employment-related information directly in SEVIS or through updates to the SEVP Portal, rather than adding redundant fields to the Form I-20.

Response: ICE thanks the commenters for their recommendations to modernize the Form I-17 and Form I-20, improve formatting, address adjudication delays, and implement electronic verification for travel endorsements to reduce fraud. ICE will also evaluate the suggestion to collect employment-related information directly in SEVIS or through the SEVP Portal to streamline processes and minimize redundancy.

¹²⁴ [ICEB-2021-0001-0059, ICEB-2021-0001-0070]

¹²⁵ [ICEB-2021-0001-0107]

¹²⁶ [ICEB-2021-0001-0076]

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 Update¹²⁷ on February 20, 2020. The most current System of Records Notice (SORN)¹²⁸ was published on December 8, 2021.

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.

11. Justification of questions of a sensitive nature.

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

12. Annual and one-time 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 their school's reporting burden (F and M nonimmigrants do not currently have a reporting burden, as identified in this supporting statement).

One-Time Public Reporting Burden and Public Cost

There is a one-time burden associated with this collection of information. SEVP will be redesigning the "Program of Study" page on the I-17 Form. DHS estimates that this change will impose a burden that will be borne by DSOs to enter program information into the new program of study page. DHS estimates that entering program information into the new page will require approximately one hour of time from a DSO at each of the 6,778 SEVP-certified schools. At \$50.04 per hour for 6,778 hours, the one-time cost for entering program information into the new Program of Study page will be \$339,171.

Management of school information – one-time costs

¹²⁷ DHS/ICE/PIA-001 Student and Exchange Visitor Program (SEVP), February 20, 2021, <https://www.dhs.gov/publication/dhsicepia-001-student-exchange-visitor-information-system-sevis>

¹²⁸ DHS/ICE-001 Student and Visitor Exchange Program (SEVP) Privacy Act of 1974; System of Records, 86 FR 69663, December 8, 2021; <https://www.federalregister.gov/d/2021-26477>.

SEVP-certified Form I-17 school information	Number	Frequency	Burden (hours)	Subtotal (hours)	Cost/hr.	Subtotal (\$) ¹²⁹
SEVP-certified schools	6,778					
Redesign of the program of study page	6,778	1	1	6,778	\$50.04	\$339,171
			Total hours	6,778	Total cost	\$339,171

Annual Public Reporting Burden and Public Cost

This collection information also has ongoing annual public reporting burdens. 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 annual public reporting burden and cost of schools. Greater explanation of this summary and the net cost to the respondents is presented in the text that follows.

Combined summary of annual public reporting burden and cost based on calendar year (CY) 2025 data: student and school records

¹²⁹ Values may not sum due to rounding.

Type of information collection	Form	Number of respondents	Number of responses per DSO	Total annual burden (hours)	Cost (hourly)	Total annual cost ¹³⁰
A. Management of student records	1. Form I-20 – Routine	20,890 DSOs	1	482,377	\$50.04 ¹³¹	\$24,138,153
	2. Form I-20 – off-campus and OPT employment	20,890 DSOs	1	16,021	\$50.04	\$801,686
	3. Form I-20 – STEM OPT	20,890 DSOs	1	14,746	\$50.04	\$737,876
Subtotal - student data				513,144	\$50.04	\$25,677,715
B. Management of school data	1. Form I-17 SEVP certification/ updates/ recertification	20,890 DSOs	1	302,361 ¹³²	\$50.04	\$15,130,136
	2. SEVP certification fees	112 Schools	\$3,000 + \$655 x 2 (site visits)			\$482,720
	3. Recertification fees	3,000 schools	\$1,250 + \$655 x 0.5 (site visit)			\$4,732,500

¹³⁰ Values may not sum due to rounding.

¹³¹ Based on the Bureau of Labor Statistics (BLS) mean hourly wage for SOC 21-1012 (Educational, Guidance, and Career Counselors and Advisors), available at: <https://data.bls.gov/oes/#/industry/000000>. The fully loaded wage rate is calculated using the percentage of wages and salaries to total compensation, found in the Bureau of Labor Statistics, Employer Costs for Complete Compensation, Table 1: Employer Costs for Employee Compensation by ownership, March 2025: Civilian workers, available at: <https://www.bls.gov/news.release/ecec.t01.htm>. Wages and salaries are 68.7% of total compensation.

¹³² Includes 14 hours per respondent for training, research, reports, and professional development annually

Type of information collection	Form	Number of respondents	Number of responses per DSO	Total annual burden (hours)	Cost (hourly)	Total annual cost
Subtotal – school data				302,361		\$20,345,356
Total student and school data				815,505		\$46,023,071

Annual burden of reporting: collection, updating, and management of prospective and continuing F and M nonimmigrant data by DSOs in SEVIS, based on Aug 2025 data, projected for each year CY 2025-2027

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 1,179,028 for each year.¹³³
- SEVP anticipates that an average of 499,421 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 RTI¹³⁴ procedures, at 33 minutes (0.55 hour) each to complete. At \$50.04 per hour for 240,346 hours, the cost for RTI-loaded initial Forms I-20 will be \$12,026,908.
- For approximately 65 percent of these, the data will be loaded using batch procedures, at one minute (0.017 hour) each to complete. At \$50.04 per hour for 13,526 hours, the cost for batch-loaded initial Forms I-20 will be \$676,841.
- 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 approximately six minutes (0.1 hour). The update time is one minute using the batch method. On average, students receive four updates to their records annually. An estimated 35 percent of updates will be RTI, at an average annual cost of \$8,259,803; 65 percent of updates will be batch, at an average annual cost of \$2,556,604.

¹³³ For Aug 2025, the total number of active F-1 and M-1 students in SEVIS was 1,179,028. SEVP projects no change over the next three years covered by this supporting statement (i.e., 1,179,028 students for CY 2025 and the same amount for CY 2026 and CY 2027). Estimates for initial F-1/M-1 students, active F-2/M-2 dependents, initial F-2/M-2 dependents, participants in off-campus employment, participants in OPT, and participants in STEM OPT are calculated in the same way.

¹³⁴ 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.

- SEVP anticipates the 3-year average of active F-2/M-2 dependent records in SEVIS to be 117,531 and anticipates 30,670 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 are 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 \$617,998.
- 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 Form I-20. SEVP estimates the average number of students applying for off-campus employment or OPT at 137,322¹³⁵ and each recommendation will require about seven minutes. For students recommended off-campus or OPT employment, the cost is \$801,686.
- SEVP anticipates that an average of 126,392 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 seven minutes. For students recommended for STEM OPT, the additional annual cost will be \$737,876.
- The total cost for management of student data is \$25,677,715.

Management of student data

F-1/M-1 student forms I-20 and personal info.	Total	Frequency	Burden (hours)	Subtotal (hours)	Cost/hr.	Subtotal (\$) ¹³⁶
Active F-1/M-1 students	1,179,028					
Initial F-1/M-1 students	499,421					
Initial Forms I-20 (RTI)	174,797	2.5	0.55	240,346	\$50.04	\$12,026,908
Initial	324,624	2.5	0.017	13,526	\$50.04	\$676,841

¹³⁵ Aug 2025 – 136,315 applications for OPT.

¹³⁶ Values may not sum due to rounding.

F-1/M-1 student forms I-20 and personal info.	Total	Frequency	Burden (hours)	Subtotal (hours)	Cost/hr.	Subtotal (\$)
Forms I-20 (batch)						
Updates (RTI)	412,660	4	0.1	165,064	\$50.04	\$8,259,803
Updates (batch)	766,368	4	0.017	51,091	\$50.04	\$2,556,604
Off-campus and OPT employment	137,322	1	0.11	16,021	\$50.04	\$801,686
STEM OPT	126,392	1	0.11	14,746	\$50.04	\$737,876
Active F-2/M-2 dependents	117,531					
Initial F-2/M-2 dependents	30,670					
F-2/M-2 Forms I-20 initial and update	148,201	1	0.0833	12,350	\$50.04	\$617,998
			Total Hours	513,144	Total Cost	\$25,677,715

Annual burden of maintain school information by DSOs in SEVIS, based on Aug 2025 data, projected for each year CY 2025-CY 2027

- 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 spent entering 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 Aug 2025, there were 6,778¹³⁷ SEVP-certified schools. SEVP anticipates an average of 112 schools to petition for initial certification annually in each of the next three years.
- On average, a DSO at a school will need approximately three 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 3 hours each = \$16,813, aggregate cost.
- An average of 50 percent of the 6,778 schools, or 3,389 schools, will provide two updates to their SEVIS school information annually. Updates to school information will average five minutes (0.08 hours) each, for 565 hours and an aggregate cost of \$28,264.
- An average of 3,000 schools will petition for SEVP recertification annually. A principal DSO at a school petitioning for recertification will need approximately 3 hours at an aggregate annual cost of \$450,360.
- 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, 20,890 DSOs x 14 hours = 292,460 total hours at an aggregate cost to schools of \$14,634,698.
- The total cost for management of school information is \$15,130,136.

Management of school information

SEVP-certified Form I-17 school information	Number	Frequency	Burden (hours)	Subtotal (hours)	Cost/hr.	Subtotal (\$) ¹³⁸
SEVP-	6,778					

¹³⁷ For Aug 2025, and as reported in SEVIS By the Numbers, the total number of SEVP-certified schools was 6,778. 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., 6,778 schools from CY 2025 through CY 2027).

¹³⁸ Values may not sum due to rounding.

SEVP-certified Form I-17 school information	Number	Frequency	Burden (hours)	Subtotal (hours)	Cost/hr.	Subtotal (\$)
certified schools						
1. Initial school certification	112	1	3	336	\$50.04	\$16,813
2. Updates to Form I-17 school information	3,389	2	0.083	565	\$50.04	\$28,264
3. School recertification	3,000	1	3	9,000	\$50.04	\$450,360
4. DSO professional development.	20,890	1	14	292,460	\$50.04	\$14,634,698
			School Data Total hours	302,361	Total cost	\$15,130,136

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 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 \$482,720.

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) 2025 to 2027 is estimated to be \$186,610. This is based on the budget overview for the Student and Exchange Visitor Program in FY 2024 and FY 2025.¹³⁹

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 Certain F, J and M Nonimmigrants, (OMB #1653-0034),¹⁴⁰ 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.

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. The respondent count and the estimate of respondent wage rate have been updated to reflect 2025 data.

This information collection has been revised to reflect changes being made by SEVP to the SEVIS information collection. Some of these changes will impact the burden for completing Form I-20, and other changes will impact the burden for completing Form I-17.

Burden changes related to management of school information (Form I-17)

¹³⁹ [25_0613_ice_fy26-congressional-budget-justificatin.pdf](#)

¹⁴⁰ <https://www.fmjfee.com/i901fee/index.html#>

The most substantial of the changes that will impact the Form I-17 is a redesign of the Program of Study page. DHS estimates that this redesign will require effort from each of the 6,778 SEVP-certified schools (a one-hour estimated burden to enter program information into the redesigned web page). However, this cost is a one-time cost. After schools have entered their program information into the redesigned page, DHS estimates that the initial school certification process and the school recertification process will both be less burdensome than under the current process (reducing time required for school certification and recertification by approximately one hour).

In addition to updating the Program of Study page, DHS is adding or updating several fields on the Program of Study page – type of program offering, Classification of Instructional Program codes, mode of instruction, and a flag for Curricular Practical Training. DHS expects these changes will necessitate schools making more frequent updates to Form I-17 school information (from 1 update per year to 2).

DHS is also updating the school information that schools are required to provide – adding requirements for previous school codes, school websites, emergency contacts, and school ownership, while removing the requirement to provide a fax number. DHS estimates that after the redesign of the Program of Study page and the incorporation of these changes, school certification and recertification will take approximately three hours.

DHS is also updating how information on school calendar, costs, and demographics, and on school officials, is entered into the website. The changes to these fields are not expected to increase the burden per response.

Burden changes related to management of student data (Form I-20)

SEVP is changing the information that DSOs are required to collect for Form I-20. This includes changes to the collected contact information (adding contact information for legal guardians for minors), program information (adding date of graduation/degree awarded), and SEVP authorizations (adding an online education indicator, on-campus employment indicator, physical worksite indicator, and work location indicator). DHS estimates that these changes will increase the burden for each initial Form I-20 submitted via the RTI method (from 32 minutes to 33 minutes), as well as for off-campus and OPT employment recommendations and for STEM OPT recommendations (from 6 to 7 minutes). DHS also estimates that these changes will necessitate more frequent Form I-20 updates (from 3 updates per year to 4 updates).

SEVP is also changing how information is entered for financial information (changing school funding type and any other funding source type from a free text to a drop-down list) that DHS estimates will not increase the burden per response.

All changes, including changes in student population, school population, DSO population, and DSO wages, between this ICR and the previous version, are available in the below table.

Change in annual public reporting burden and cost, combined student and school records, 2020 to 2025

Type of information collection	Form	Change in number of respondents	Change in hours	Change in costs ¹⁴¹	Explanation for Change
A. Management of student records	1. Form I-20 - Routine	-26,867 DSOs	163,844	\$10,498,603	Form changes increase per-form burden and increase number of annual updates
	2. Form I-20 – off-campus and OPT employment	-26,867 DSOs	2,819	\$236,376	Form changes increase per-form burden
	3. Form I-20 – STEM OPT	-26,867 DSOs	8,090	\$452,845	Form changes increase per-form burden
Subtotal - student data			174,753	\$11,187,824	
B. Management of school data	1. Form I-17 SEVP certification/updates/recertification	-26,867 DSOs	-379,005	-\$14,045,962	Redesign of Program of Study page reduces per-form burden; form changes increase number of annual updates
	2. SEVP certification fees	0 schools	-	\$450	
	3. Recertification fees	0 schools	-	-	
Subtotal – school data			-379,005	-\$14,045,962	

¹⁴¹ Numbers may not sum due to rounding

Total student and school data		-204,252	-\$2,857,688

Management of student data

F-1/M-1 student forms I-20 and personal info	Change in number of respondents	Change in hours	Change in costs
Active F-1/M-1 students	279,028		
Initial F-1/M-1 students	116,665		
Initial Forms I-20 (RTI)	40,832	62,842	\$4,426,202
Initial Forms I-20 (batch)	75,833	2,952	\$224,079
Updates (RTI)	97,660	70,564	\$4,213,313
Updates (batch)	181,368	21,256	\$1,279,069
Off-campus and OPT employment	5,303	2,819	\$236,376
STEM OPT	59,827	8,090	\$452,845
Active F-2/M-2 dependents	54,801		
Initial F-2/M-2 dependents	16,900		
F-2/M-2 Forms I-20 initial and update	71,701	6,230	\$355,940
Total		174,754	\$11,187,824

Explanation for Change

Form changes increase per-form burden

Form changes increase per-form burden and increase number of annual updates

Form changes increase per-form burden

Form changes increase per-form burden

Management of school information

SEVP-certified Form I-17 school information	Change in number of respondents	Change in hours	Change in costs
SEVP-certified schools	-1,227		
1. Initial school certification	0	-112	-\$2,370
2. Updates to Form I-17 school information	-613	245	\$14,555
3. School recertification	0	-3000	-\$63,480

Explanation for Change

Redesign of Program of Study page reduces per-form burden

Form changes increase number of annual updates

Redesign of Program of Study page reduces per-form burden

4. DSO professional development.	-26,867	-376,138	-\$13,994,668
Total		-\$379,005	-\$14,045,963

Change in one-time public reporting burden and cost, school records, 2020 to 2025

SEVP-certified Form I-17 school information	Change in number of respondents	Change in hours	Change in costs ¹⁴²	Explanation for Change
Redesign of the Program of Study Page	6,778	6,778	\$339,171	New one-time cost
Total		6,778	\$339,171	

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.

¹⁴² Numbers may not sum due to rounding Numbers may not sum due to rounding

