

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 Forms I-20, "Certificate of Eligibility for Nonimmigrant Student Status," and Forms 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. The 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 applications.⁶
- 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.

⁵ DHS 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 include facilitating extension of stay process for F nonimmigrants and updating program information fields.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:

- **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.

⁷ SEVP is revising the electronic Form I-20 to support the notice of proposed rulemaking, “*Establishing a Fixed Time Period of Admission and an Extension of Stay Procedures for Nonimmigrant Academic Students, Exchange Visitor, and Representative of Foreign Information Media.*” This includes updating the list educational levels, Form I-20 instructions, DSO and student attestations, and adding fields to support F student (and their dependents) extension of stay application to USCIS.

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

- **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 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

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). However, 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.

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.

To be addressed after the receipt of comments.

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 Update¹⁰ on February 20, 2020. The most current System of Records Notice (SORN)¹¹ was published on December 8, 2021.

¹⁰ 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>

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).

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

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

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

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

The following table summarizes the combined public reporting burden and cost of schools. Greater explanation of this summary and the net cost to the respondents is presented in the text that follows.

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

¹¹ 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>.

Type of information collection	Form	Number of respondents	Number of responses per DSO	Total annual burden (hours)	Cost (hourly)	Total annual cost ¹²
A. Management of student records	1. Form I-20 – Routine	47,757 DSOs	1	363,533	\$42.82 ¹³	\$15,566,450
	2. Form I-20 – off-campus and OPT employment	47,757 DSOs	1	13,202	\$42.82	\$565,310
	3. Form I-20 – STEM OPT	47,757 DSOs	1	6,656	\$42.82	\$285,031
Subtotal - student data				383,391	\$42.82	\$16,416,791
B. Management of school data	1. Form I-17 SEVP certification/ updates/ recertification	47,757 DSOs	1	681,366 ¹⁴	\$42.82	\$29,176,098
	2. SEVP certification fees	112 Schools	\$3,000 + \$655 x 2 (site visits)			\$482,270

¹² Values may not sum due to rounding.

¹³ Based on the Bureau of Labor Statistics (BLS) mean hourly wage for SOC 21-1012 (Educational, Guidance, School, and Vocational Counselors), available at: <https://www.bls.gov/oes/2019/may/oes211012.htm>. The benefits-to-wage multiplier is calculated by the BLS as (Total Employee Compensation per hour) / (Wages and Salaries per hour) = \$37.10 / \$25.47 = 1.457 (1.46 rounded) based on the average national wage for all occupations (wages represent 68.6 percent of total compensation). See Economic News Release, Employer Cost for Employee Compensation (December 2019), U.S. Dept. of Labor, BLS, Table 1. Employer costs per hour worked for employee compensation and costs as a percent of total compensation: Civilian workers, by major occupational and industry group (March 19, 2020), available at: https://www.bls.gov/news.release/archives/ecec_03192020.pdf. Figures on the number of DSOs, certified schools, number of certified schools, and OPT and CPT approval used throughout this supporting statement reflect data from SEVIS at a Glance, Nov 2020.

¹⁴ 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
	3. Recertification fees	3,000 schools	\$1,250 + \$655 x 0.5 (site visit)			\$4,732,500
Subtotal – school data				681,366		\$34,390,868
Total student and school data				1,064,757		\$50,807,659

Annual burden of reporting: collection, updating, and management of prospective and continuing F and M nonimmigrant data by DSOs in SEVIS.

The management of student data by DSOs in SEVIS includes the issuance of Forms I-20; gathering, updating, and reporting student information; and the correction of identified errors in student information.

- The 3-year average number of active student records in SEVIS is estimated to total 900,000 for each year.¹⁵
- SEVP anticipates that an average of 382,756 initial F-1/M-1 students will enroll at SEVP-certified schools annually. Typically, applicants will apply to more than one school, requiring development of an average of 2.5 Forms I-20 per applicant.
- For approximately 35 percent of these, the data will be loaded using real-time interface RTI¹⁶ procedures, at 32 minutes (0.53 hour) each to complete. At \$42.82 per hour for 177,504 hours, the cost for RTI-loaded initial Forms I-20 will be \$7,600,705.
- For approximately 65 percent of these, the data will be loaded using batch procedures, at one minute (0.017 hour) each to complete. At \$42.82 per hour for 10,574 hours, the cost for batch-loaded initial Forms I-20 will be \$452,762
- DSOs must update Form I-20 information on students on an ongoing basis. These updates can be for several reasons but, because the data fields populated during initial Form I-20

¹⁵ For Nov 2020, the total number of active F-1 and M-1 students in SEVIS was 900,000. SEVP projects no change over the next three years covered by this supporting statement (i.e., 900,000. students for CY 2020 and the same amount for CY 2021 and CY 2022). Estimates for active F-2/M-2 dependents, initial F-2/M-2 dependents, and participants in OPT are calculated in the same way. Student and School actual numbers are provided by SEVP's "SEVIS at a Glance," Nov 2020. Forecast initial F-1/M-1 students are 397,914 for CY 2020; 381,312 for CY 2021; 369,041; average 382,756. Forecast STEM OPT participants is 66,565.

¹⁶ 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.

loading are pre-populated for updates, the update using RTI method is seven minutes (0.117 hour). The update time is two minutes using the batch method. On average, students receive three updates to their records annually. An estimated 35 percent of updates will be RTI, at an average annual cost of \$4,720,905; 65 percent of updates will be batch, at an average annual cost of \$2,530,020.

- SEVP anticipates the 3-year average of active F-2/M-2 dependent records in SEVIS to be 62,730 and anticipates 13,770 initial F-2/M-2 dependent records each year. Each dependent requires an individual Form I-20. Most data on the dependent initial Form I-20 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 \$262,050.
- 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 132,019¹⁷ and each recommendation will require about six minutes. For students recommended off-campus or OPT employment, the cost is \$565,310.
- SEVP anticipates that an average of 66,565 students will apply for STEM OPT. DSOs have the additional burden to make a recommendation update to the student SEVIS record. Each recommendation will require about six minutes. For students recommended for STEM OPT, the additional annual cost will be \$285,031.
- The total cost for management of student data is \$16,416,791.

Management of student data

F-1/M-1 student forms I-20 and personal info.	Total	Frequency	Burden (hours)	Subtotal (hours)	Cost/hr.	Subtotal (\$) ¹⁸
Active F-1/M-1 students	900,000					
Initial F-1/M-1 students	382,756					
Initial Forms I-20 (RTI)	133,96	2.5	0.53	177,504	\$42.82	\$7,600,705

¹⁷ Nov 2020 – 109,960 applications for OPT.

¹⁸ 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 (\$)
	5					
Initial Forms I-20 (batch)	248,791	2.5	0.017	10,574	\$42.82	\$452,762
Updates (RTI)	315,000	3	0.117	110,250	\$42.82	\$4,720,905
Updates (batch)	585,000	3	0.034	59,085	\$42.82	\$2,530,020
Off-campus and OPT employment	132,019	1	0.1	13,202	\$42.82	\$565,310
STEM OPT	66,565	1	0.1	6,656	\$42.82	\$285,031
Active F-2/M-2 dependents	62,730					
Initial F-2/M-2 dependents	13,770					
F-2/M-2 Forms I-20 initial and update	76,500	1	0.08	6,120	\$42.82	\$262,058
			Total Hours	383,391	Total Cost	\$16,416,791

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

- The maintenance of school information by SEVP-certified schools includes the initial certification, periodic recertification, and updates (i.e., on-request submission of Forms I-17, reporting of changes, and correction of identified errors).
- Computed costs include expenses incurred by SEVP-certified schools and the time 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 Nov 2020, there were 8,005¹⁹ SEVP-certified schools. SEVP anticipates an average of 112 schools to petition for initial certification annually in each of the next three years.

¹⁹ For Nov 2020, and as reported in SEVIS By the Numbers, the total number of SEVP-certified schools was 8,005. SEVP projects 112 schools will receive SEVP certification during each of the next three years covered by this supporting statement; negligible change for each of these years (i.e., 8,005. schools from CY 2020 through CY 2022).

- On average, a DSO at a school will need four hours to complete an initial petition for SEVP certification, to include obtaining access to SEVIS, data entry and the SEVP site visit, 112 schools x 4 hours each = \$19,183, aggregate cost.
- An average of 50 percent of the 8,005 schools, or 4,002 schools, will provide updates to their SEVIS school information annually.²⁰ Updates to school information will average five minutes (0.08 hours) each, 320 hours an aggregate cost of \$13,709
- An average of 3,000 schools will petition for SEVP recertification annually. A principal DSO at a school petitioning for recertification will need four hours at an aggregate annual cost of \$513,840.
- All documents necessary for the initial petition and recertification are collected electronically.
- SEVP estimates DSO DHS-related personal development (e.g., training, research, reports, and professional development) at 14 hours per DSO annually, 47,757 DSOs x 14 hours = 668,598 total hours at an aggregate cost to schools of \$28,629,366.

Management of school information

SEVP-certified Form I-17 school information	Number	Frequency	Burden (hours)	Subtotal (hours)	Cost/ hr.	Subtotal (\$) ²¹
SEVP-certified schools	8,005					
1. Initial school certification	112	1	4	448	\$42.82	\$19,183
2. Updates to Form I-17 school information	4,002	1	0.08	320	\$42.82	\$13,709
3. School recertification	3,000	1	4	12,000	\$42.82	\$513,840
4. DSO professional development.	47,757	1	14	668,598	\$42.82	\$28,629,366
			School Data Total hours	681,366	Total cost	\$29,176,098

²⁰ Updates of DSO personal information are no longer part of this process. Also, a significant number of updates are being implemented as part of recertification. These changes reduce the previous volume of updates.

²¹ Values may not sum due to rounding.

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 \$77,015.

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

14. Annual government burden and cost.

The total cost projection for SEVP for fiscal year (FY) 2019 was \$186,610,000 and for FY 2020 was \$188,405,000.²² This included current services for SEVP and supporting both the Counterterrorism and Criminal Exploitation Unit and Homeland Security Investigations Domestic Operations personnel in FY 2019 (\$74.45 million) and FY 2020 (\$74.45 million). It also included enhancements and other costs, which included investigative analysis, SEVIS modernization, increased numbers of adjudication personnel, and annualized inflation.

As a fee funded entity, there is no net ongoing cost to the federal government for SEVP and SEVIS. SEVP is mandated by law to be fully fee-funded (see Item 1). Section 286(m) of the Act, 8 U.S.C. 1356(m), provides that fees must be set at a level that will ensure the recovery of all costs of providing adjudication services. That section, together with Title V of the Independent Offices Appropriations Act of 1952, 31 U.S.C. 9701, and the OMB Circular No. A-25, Revised requires that a fee be set at an amount enough to recover the full cost to the federal government. Fees are developed at a level projected to cover the aggregate of SEVP operating costs. Expenditures are restricted from exceeding the actual amount of revenue received.

Section 641 of IIRIRA, 8 U.S.C. §1372, in directing DHS to collect information relating to academic nonimmigrant students (F-1) and vocational nonimmigrant students (M-1), as well as their accompanying dependents (F-2 or M-2), also provides for the collection of a fee to cover the costs of this program. Through the Form I-901, Fee Remittance for Certain F, J and M Nonimmigrants, (OMB #1653-0034),²³ SEVP collects its fees. The Form I-901/fmjfee.com

²² *Adjusting Program Fees for the Student and Exchange Visitor Program* [83 FR33762 (July 17, 2018), proposed; 84 FR 23930 (May 23, 2019), final]

²³ <https://www.fmjfee.com/i901fee/index.html#>

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.

This information collection has been revised to reflect changes proposed by the Duration of Status Notice of Proposed Rulemaking. The revision is to add fields to facilitate a DSO recommendation for an F student Extension of Stay, add a field to collect graduation/degree conferral date, update the list of educational levels, and update the Form I-20 instructions page. The new fields are expected to increase the time burden on DSOs for updating student records for Form I-20 by one minute, increasing the burden per update from 6 minutes to 7 minutes for updates via real-time interface (RTI) procedures, and from 1 minute to 2 minutes for updates via batch procedures. DHS does not expect this rule to change the number of annual updates per student form (currently estimated at 3 times per year), or to change the number of forms that DSOs will receive (currently estimated at 900,000 forms, of 315,000 forms are updated via RTI procedures, and 585,000 forms are updated via batch procedures). DHS estimates that the average annual burden for each DSO of updating Form I-20 increases from 2.6 hours per year to 3.5 hours per year. The total annual hour burden for updating Form I-20 increases by 45,000 hours, from 124,335 hours to 169,335. The total annual burden in dollars for updating Form I-20 increases by \$1,926,900, from \$5,324,025 to \$7,250,925.

Change in Burden Hours and Cost for Updating Form I-20

Management of Student Data Activity	Hours Currently on OMB Inventory	New Hours	Hour Difference	Cost Currently on OMB Inventory	New Cost	Cost Difference
Updating (RTI)	94,500	110,250	15,750	\$4,046,490	\$4,720,905	\$674,415
Updating (Batch)	29,835	59,085	29,250	\$1,277,535	\$2,530,020	\$1,252,485
Updating (Batch + RTI)	124,335	169,335	45,000	\$5,324,025	7,250,925	\$1,926,900

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.