

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 and Form I-17 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.

These comments are associated with the Final Rule published in Vol. 91 No. 136, pg. 44976 on Friday, July 17, 2026, RIN 1653-AA95.

A. General Comments

Comments: Multiple commenters raised concerns about the proposed changes to SEVIS and USCIS forms, which they said would increase administrative burdens and require substantial implementation and training costs. Multiple commenters expressed concern that the potential additions of hundreds of thousands of I-539 extension applications annually could conflict with the Paperwork Reduction Act, the E-Government Act of 2002 and other policies requiring administrative simplification.

Multiple commenters expressed concern converting the SEVIS program process into a USCIS-adjudicated EOS process would substantially increase the public burden due to the paperwork expansion required by new or more frequent EOS information collection requirements (*e.g.*, Form I-539/I-539A filings, biometrics appointments, potential interviews). Another commenter stated that the proposed rule's Sufficient Fund Requirement at [8 CFR 214.2\(f\)\(7\)](#) appears burdensome from the perspective of the PRA.

A commenter stated that DHS must provide accurate estimates of the associated burden hours and costs and justify these against proven D/S compliance tools. A commenter stated that the PRA estimate does not reflect the realities of small rural colleges that lack dedicated international staff, writing that the added burden of EOS filings would overwhelm staffing capacity and place the greatest strain on students, who would face increased costs, confusion, and delays. A commenter noted the large amount of work that will be created at larger institutions during the transition, noting specifically work authorizations. Another commenter asserted that the Attorney General has the authority for information collection, in consultation with the Secretary of State and the Secretary of Education.

Response: DHS appreciates the commenters' concerns regarding potential legal issues, administrative burdens, and information collection requirements associated with the proposed rule. However, DHS respectfully disagrees with the assertions made.

Regarding concerns about administrative burdens and the potential conflict with the PRA, DHS has carefully considered the implications of the proposed rule and its associated information collection requirements. DHS has determined that the rule complies with the PRA and does not impose administrative burdens beyond what is required for the implementation of the rule. The PRA requires federal agencies to minimize the paperwork burden for individuals, businesses, and other entities while ensuring the efficient collection of information necessary for the proper performance of agency functions. DHS has conducted an analysis of the information collection requirements and utilized the costs burdens as part of the full Regulatory Impact Analysis. The final RIA concluded that the overall benefits outweigh the total costs of the rule.

DHS conducted a thorough review of all SEVIS functionality to identify modifications necessary to guarantee the systems compliance with the regulatory provisions. These changes include substantive and non-substantive changes to SEVIS to support additional recordkeeping and reporting requirements associated with recommendations for an F-1 student EOS. As these modifications are implemented SEVIS users will be updated via Broadcast Messages and Release Planning Guides once the changes have occurred. DHS acknowledges that these changes may incur implementation and training costs as identified in the RIA. However, DHS believes that the estimated burden is necessary to realize the national security and fraud prevention benefits of this rule.

With respect to the assertion that the Attorney General has the authority for information collections in consultation with the Secretary of State and the Secretary of Education, DHS notes that the Homeland Security Act of 2002 transferred certain authorities and responsibilities from the Attorney General to the Secretary of Homeland Security. Specifically, the Act established

DHS and reassigned functions related to immigration and other areas to the Secretary of Homeland Security. As such, the Secretary of Homeland Security now holds the authority to implement rules and policies within DHS's jurisdiction, including those involving information collections. Furthermore, the consultation referenced in [8 U.S.C. 1372\(a\)\(1\)](#) relates to the initial development of SEVP and SEVIS and does not require consultation for these minimal changes to the existing information collection request; however, DHS did consult with the ED prior to the publication of the NPRM and the final rule.

B. ICE Forms I-20 and I-17

Comments: A commenter stated that the “Extend Program” functionality in the F-1 SEVIS release at the time of their comment restricts the new program end date to no more than 1 year beyond the student's current program end date despite the current EOS regulation under [8 CFR 214.2\(f\)\(7\)](#) not limiting the term of the extension period, and recommended alignment between SEVIS functionality and regulatory provisions.

Multiple commenters had suggestions about the new items proposed on the I-20 and I-17 forms in described in the NPRM. Commenters opined that the proposed substantive and non-substantive changes in SEVIS intended to facilitate the DSOs' recommendations for the EOS are not necessary since DSOs routinely approve extensions of programs under the D/S framework. A commenter suggested SEVIS already collected a program end date and that a graduation/degree conferral date is duplicative and unnecessary. Multiple commenters stated that the DHS proposal to update the list of educational levels in the I-17 is vague. Commenters further added that DSOs have trouble mapping programs to SEVIS categories and inconsistencies between institutional systems and SEVIS definitions could lead to compliance or reporting challenges.

Response: DHS conducted a thorough review of all SEVIS functionality to identify modifications necessary to implement the new regulatory provisions from this rule. As these modifications are implemented, SEVIS users will be updated via Broadcast Messages and Release Planning Guides once the changes have occurred.

DHS appreciates the feedback from commenters regarding the substantive and non-substantive changes to SEVIS. This rule will change the way that a DSO processes the extension of an F student's program of study. Therefore, SEVP is updating SEVIS to accommodate the new EOS process, which will now require DSOs to recommend an extension of an F student's AUD, instead of approving an extension.

With regard to the request to add a field to collect an F student's graduation or degree awarded dates, DHS disagrees with the statement that this new data element is duplicative. Separating a student's program end date from the graduation or degree awarded date will provide DHS with clearer data on whether a student has officially completed their program of study. This distinction is particularly important in cases in which DSOs 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 students' completion status and ensure accurate reporting across SEVP-certified schools.

Additionally, DHS appreciates the commenters' feedback about the proposal to update the list of educational levels in SEVIS. DHS relies on the National Center for Education Statistics' (NCES) definitions of educational levels,¹⁰ which provide a structure for determining whether a nonimmigrant student's program of study reflects upward academic progression. The list of educational levels that schools should use to update their Form I-17, "Petition for Approval of School for Attendance by Nonimmigrant Student," is available on Study in the States. DHS plans to update SEVIS to be consistent and clear on how this list of educational levels should be mapped appropriately with an F student's program of study, thus ensuring consistency with the NCES definitions.

Comments: Multiple commenters expressed support for a separate proposal that would collect additional data through Forms I-20 and I-17, including the integration of program information into Form I-17, thereby replacing the current process of emailing portable document format (PDF) files to SEVP and providing more data and information for DHS to investigate specific cases of concern without the need for the broader changes proposed in the rule.

Response: While DHS appreciates commenters support for ongoing SEVP initiatives to better collect data on the Forms I-20 and I-17 in SEVIS, this subject matter does not fall within the scope of this rule.

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 Update¹¹ on February 20, 2020. The most current System of Records Notice (SORN)¹² 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.

¹⁰ See National Center for Education Statistics, *Digest of Education Statistics*, https://nces.ed.gov/programs/digest/d09/figures/fig_01.asp (last visited Mar. 18, 2026).

¹¹ 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>

¹² 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>.

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 costs¹³

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

¹³ Values may not sum due to rounding.

- 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 records¹⁴

Type of information collection	Form	Number of respondents	Number of responses per DSO	Total annual burden (hours)	Cost (hourly)	Total annual cost
A. Management of student records	1. Form I-20 – Routine	20,890 DSOs	1	560,979	\$50.04 ¹⁵	\$28,071,390
	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				591,746	\$50.04	\$29,610,953
B.	1. Form I-17	20,890	1	302,361 ¹⁶	\$50.04	\$15,130,136

¹⁴ Values may not sum due to rounding.

¹⁵ 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 Employee 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.

Type of information collection	Form	Number of respondents	Number of responses per DSO	Total annual burden (hours)	Cost (hourly)	Total annual cost
Management of school data	SEVP certification/ updates/ recertification	DSOs				
	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
Subtotal – school data				302,361		\$20,345,356
Total student and school data				894,106		\$49,956,309

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.¹⁷
- 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.

¹⁶ Includes 14 hours per respondent for training, research, reports, and professional development annually

¹⁷ 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.

- For approximately 35 percent of these, the data will be loaded using real-time interface RTI¹⁸ 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 seven minutes (0.117 hour). The update time is two minutes (0.033 hour) 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 \$9,636,436; 65 percent of updates will be batch, at an average annual cost of \$5,113,207.
- 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 137,322¹⁹ 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 \$29,610,953.

Management of student data²⁰

¹⁸ 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.

¹⁹ Aug 2025 – 136,315 applications for OPT.

²⁰ 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 (\$)
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 Forms I-20 (batch)	324,624	2.5	0.017	13,526	\$50.04	\$676,841
Updates (RTI)	412,660	4	0.117	192,575	\$50.04	\$9,636,436
Updates (batch)	766,368	4	0.033	102,182	\$50.04	\$5,113,207
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-1/M-1 student forms I-20 and personal info.	Total	Frequency	Burden (hours)	Subtotal (hours)	Cost/hr.	Subtotal (\$)
F-2/M-2 Forms I-20 initial and update	148,201	1	0.0833	12,350	\$50.04	\$617,998
			Total Hours	591,746	Total Cost	\$29,610,953

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 6,778²¹ 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.

²¹ 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).

- 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 information²²

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

²² Values may not sum due to rounding.

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 2025.²³

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),²⁴ 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.

²³ [25_0613_ice_fy26-congressional-budget-justificatin.pdf](#)

²⁴ <https://www.fmjfee.com/i901fee/index.html#>

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, 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 4 times per year), or to change the number of forms that DSOs will receive (currently estimated at 1,179,028 forms, of which 412,660 forms are updated via RTI procedures, and 766,368 forms are updated via batch procedures). DHS estimates that the average annual burden for each DSO of updating Form I-20 increases from 10.3 hours per year to 14.1 hours per year. The total annual hour burden for updating Form I-20 increases by 78,602 hours, from 216,155 hours to 294,757. The total annual burden in dollars for updating Form I-20 increases by \$3,933,239, from \$10,816,406 to \$14,749,644.

Change in Burden Hours and Cost for Updating Form I-20²⁵

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)	165,064	192,575	27,511	\$8,259,803	\$9,636,436	\$1,376,634
Updating (Batch)	51,091	102,182	51,091	\$2,556,604	\$5,113,207	\$2,556,604
Updating (Batch + RTI)	216,155	294,757	78,602	\$10,816,406	\$14,749,644	\$3,933,237

²⁵ Values may not sum due to rounding.

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.