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 commenters[1] 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 commenters[2] expressed partial support, endorsing updates to improve program integrity and modernize SEVIS, such as removing outdated form fields and adding emergency contact information for DSOs, while opposing changes they viewed as duplicative or overly burdensome. Commenters[3] 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

[1] [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]

[2] [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]

[3] [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 commenters[4] 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 commenter[5] 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 commenters[6] 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 commenters[7] stated that clarification is needed regarding the term "educational level" and how levels are to be

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[4] 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]

[5] [ICEB-2021-0001-0057]

[6] [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]

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

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 commenter[8] 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 commenter[9] 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 at https://studyinthestates.dhs.gov/sevis-help-hub..

Burden accuracy

Several commenters[10] 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.

One commenter[11] 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

[8] [ICEB-2021-0001-0105]
[9] [ICEB-2021-0001-0107]
[10] [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]
[11] [ICEB-2021-0001-0110]

updates, leading to additional delays in adjudication by SEVP. Another commenter[12] 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 commenter[13] 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 commenter[14] 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.

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 commenter[15] urges DHS to include explicit assurances regarding how newly collected information will be stored, protected, and shared. The commenter emphasized the importance of

[12] [ICEB-2021-0001-0060]
[13] [ICEB-2021-0001-0059]
[14] [ICEB-2021-0001-0105]
[15] [ICEB-2021-0001-0109]

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 commenters[16] 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.

Form I-17 Changes

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

One commenter[17] 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

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

commenter[18] 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

Commenters[19] 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 commenters[20] 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 commenter[21] 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 commenters[22] supported removing this outdated field on the Form I-17.

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 commenters[23] 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,

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[18] [ICEB-2021-0001-0060]

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

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

[21] [ICEB-2021-0001-0108]

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

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

other commenters[24] raised concerns about the redesign and the additional data that would be collected. One commenter[25] 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 commenter[26] 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 commenter[27] 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 commenter[28] 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 commenter[29] 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 commenter[30] stated that the proposed changes raise serious feasibility concerns. Most institutions maintain this information across multiple systems, encompassing the registrar, institutional research, accreditation, and academic affairs, rather than in a single unified database. A commenter[31] 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

[24] [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]
[25] [ICEB-2021-0001-0111]
[26] [ICEB-2021-0001-0093]
[27] [ICEB-2021-0001-0057]
[28] [ICEB-2021-0001-0070]
[29] [ICEB-2021-0001-0071]
[30] [ICEB-2021-0001-0075]
[31] [ICEB-2021-0001-0092]

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 commenters[32] criticized the proposed requirement to designate program-level CIP codes, noting it would impose unsustainable workloads on institutions and delay adjudications. Other commenters[33] 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 commenter[34] 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).

[32] [ICEB-2021-0001-0034], [ICEB-2021-0001-0037], [ICEB-2021-0001-0042], [ICEB-2021-0001-0108]
[33] [ICEB-2021-0001-0116], [ICEB-2021-0001-0116], [ICEB-2021-0001-0107], [ICEB-2021-0001-0094]
[34] [ICEB-2021-0001-0105]

The commenters emphasized the need for alignment of program and CIP code data across systems. One commenter[35] 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 commenter[36] 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 commenter[37] 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 commenter[38] 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 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)

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[35] [ICEB-2021-0001-0055]
[36] [ICEB-2021-0001-0105]
[37] [ICEB-2021-0001-0076]
[38] [ICEB-2021-0001-0077]

Many commenters[39] 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 commenter[40] 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

Commenters[41] 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 commenters[42] stated that institutions already enter CPT data into SEVIS for accurate tracking of work authorization. One commenter[43] 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 commenters[44] expressed concerns about the potential impact of requiring adjudication and approval from SEVP for CPT components before students can participate. One commenter[45] 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 commenters[46] stated that CPT is often an optional or elective

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[39] [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]

[40] ICEB-2021-0001-0055]

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

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

[43] [ICEB-2021-0001-0052]

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

[45] [ICEB-2021-0001-0055]

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

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 commenter[47] recommended that SEVP consider more specific data collection points, such as identifying graduate programs that require immediate participation in experiential learning.

One commenter[48] stated that DHS should recognize that CPT is student-specific, program-specific, and variable over time; reporting requirements must accommodate this flexibility. Another commenter[49] 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 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 commenters[50] 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 commenter[51] 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.

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[47] [ICEB-2021-0001-0107]

[48] [ICEB-2021-0001-0057]

[49] [ICEB-2021-0001-0077]

[50] [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]

[51] [ICEB-2021-0001-0056]

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

One commenter[52] 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 commenters[53] 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 commenters[54] 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 commenter[55] 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 concerns regarding the relevancy of the information and its inclusion on the Form I-17 as a required field. One commenter[56] 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 commenters[57] stated that this information is already available to DHS through SEVIS and IPEDS, making this request redundant and unnecessary. Additional commenters[58] 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 commenter[59] noted that demographic information reported on the Form I-17, such as average number of

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[52] [ICEB-2021-0001-0096]

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

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

[55] ([ICEB-2021-0001-0102])

[56] [ICEB-2021-0001-0095]

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

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

[59][IEB-2021-0001-0077]

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 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 commenters[60] 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 commenter[61] 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 commenter[62] stated that the designation for part-time or full-time is reasonable but that the definitions and update process must be clear.

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

[61] [ICEB-2021-0001-0097]

[62] [ICEB-2021-0001-0056]

Other commenters[63] 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 commenter[64] 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 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

[63] [ICEB-2021-0001-0108] [ICEB-2021-0001-0107]
[64] [ICEB-2021-0001-0105]

Many commenters[65] 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 commenter[66] 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 commenter[67] 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 commenter[68] 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 commenter[69] 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 collect and record the data provided. Another commenter[70] 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

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[65] [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]

[66] [ICEB-2021-0001-0105]

[67] [ICEB-2021-0001-0107]

[68] [ICEB-2021-0001-0093]

[69] [ICEB-2021-0001-0096]

[70] [ICEB-2021-0001-0108]

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

Many commenters[71] 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 commenter[72] 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 commenter[73] 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 commenter[74] 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 commenters[75] 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,

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[71] [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]

[72] [ICEB-2021-0001-0096]

[73] [ICEB-2021-0001-0077]

[74] [ICEB-2021-0001-0070]

[75] [ICEB-2021-0001-0116], [ICEB-2021-0001-0115], [ICEB-2021-0001-0095], [ICEB-2021-0001-0094])

commencement, or diploma issuance. Other commenters[76] 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 commenter[77] 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 commenter[78] 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 commenter[79] 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 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

[76] ([ICEB-2021-0001-0110], [ICEB-2021-0001-0098]
[77] [ICEB-2021-0001-0102]
[78] [ICEB-2021-0001-0076]
[79] [ICEB-2021-0001-0054]

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 commenter[80] 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,[81] 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 commenter[82] 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 practices of Consular Affairs (U.S. Department of State) and U.S. Citizenship and Immigration Services (U.S. Department of Homeland Security). A commenter[83] noted that the proposal provides no specificity beyond what is already collected and lacks rationale or justification for the public to respond to.

Several commenters[84] 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 commenter[85] noted that data on annual cost by program already exists in SEVIS and on individual Forms I-20. Another commenter[86] 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 commenter[87] 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.

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[80] [ICEB-2021-0001-0054]

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

[82] [ICEB-2021-0001-0059]

[83] [ICEB-2021-0001-0093]

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

[85] [ICEB-2021-0001-0056]

[86] [ICEB-2021-0001-0096]

[87] [ICEB-2021-0001-0076]

Several commenters[88] 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 commenter[89] 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 commenter[90] 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.

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.

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

[89] [ICEB-2021-0001-0107]

[90] [ICEB-2021-0001-0077]

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 commenters[91] 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 commenter[92] additionally recommended that DHS address the definition of "distance education" to help schools in monitoring compliance.

Other commenters[93] 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 commenters[94] 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 commenter[95] 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

[91] [ICEB-2021-0001-0110, ICEB-2021-0001-0105]
[92] [ICEB-2021-0001-0105]
[93] [ICEB-2021-0001-0054, ICEB-2021-0001-0058, ICEB-2021-0001-0102, ICEB-2021-0001-0097]
[94] [ICEB-2021-0001-0070, ICEB-2021-0001-0079, ICEB-2021-0001-0072, ICEB-2021-0001-0076]
[95] [ICEB-2021-0001-0057]

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

Many commenters[96] opposed reporting F-1 on-campus employment on the Form I-20, citing significant administrative burdens and regulatory overreach. Several commenters[97] 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 commenters[98] 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 commenter[99] further stated that this introduces a new reporting requirement through an information collections notice rather than formal notice-and-comment rulemaking.

One commenter[100] 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 commenter[101] argued that reporting on-campus employment is extra regulatory and unnecessary. One commenter[102] questioned the practical utility of knowing whether a student is working on-campus or remotely.

A commenter[103] 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

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[96] ([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])

[97] ([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])

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

[99] [ICEB-2021-0001-0079]

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

[101] [ICEB-2021-0001-0058]

[102] [ICEB-2021-0001-0107]

[103] [ICEB-2021-0001-0061]

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 commenter[104] noted that at their school, student employment decisions are decentralized across colleges and departments. Implementing a centralized reporting system would therefore 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 commenters[105] 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 commenter[106] considered the collection of this information to be useful for reflecting modern work arrangements. One commenter[107] 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

[104] [ICEB-2021-0001-0096]
[105] [ICEB-2021-0001-0108], [ICEB-2021-0001-0105]
[106] [ICEB-2021-0001-0103]
[107] [ICEB-2021-0001-0096]

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

Several commenters[108] 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 commenter[109] asked what the term "predominantly" in reference to online classes means?

Another commenter[110] 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 commenter[111] stated that academic programs are dynamic, making reporting misleading or outdated. Another commenter[112] argued that tracking each student's class modality would not be feasible and that students could change class sections during a quarter. A commenter[113]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 commenter[114] 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

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

[109] [ICEB-2021-0001-0059]

[110] [ICEB-2021-0001-0058]

[111] [ICEB-2021-0001-0053]

[112] [ICEB-2021-0001-0053]

[113] ICEB-2021-0001-0061]

[114] [ICEB-2021-0001-0058]

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.

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 commenters[115] 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 commenter[116] 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 commenter[117] 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

[115] [ICEB-2021-0001-0059, ICEB-2021-0001-0070]
[116] [ICEB-2021-0001-0107]
[117] [ICEB-2021-0001-0076]

collect employment-related information directly in SEVIS or through the SEVP Portal to streamline processes and minimize redundancy.