



Comment submission (11/03/2025) from EnglishUSA

Proposed Rule: Agency Information Collection Activities: Student and Exchange Visitor Information System (SEVIS); Revision of a Currently Approved Collection

OMB Control Number: 1653-0038

Docket Number: ICEB-2021-0001

EnglishUSA (<http://englishusa.org>), the largest association of 200+ intensive, pathways and ESL support programs in the US, wishes to provide comment on the proposed revisions to information collected by the Department of Homeland Security (DHS) on both the Form I-17 and Form I-20.

We agree with portions of the proposal that indicate a modernization of SEVIS data fields, specifically:

- collection of information on guardians of minor F students;
- inclusion of alternate contact information of both schools and DSOs;
- elimination of the fax number field; and
- ability to select 'weeks' as an academic term length.

However, other portions appear unduly onerous, redundant or unnecessary as they appear to serve little benefit, increase the reporting burden of DSOs, and are incongruous with the Paperwork Reduction Act (PRA).

Redundant Information:

Collection of previous school codes associated with the school and/ or owner

This information is already maintained by SEVP when a branch opens, when a branch becomes the primary location on the I-17, or when ownership changes. Including this information again on Form I-17 offers no added benefit, as SEVP already retains these records. Furthermore, P/DSOs may not be aware of prior school codes due to staffing changes. Many institutions have retained the same school code since SEVIS implementation in 2003, while multi-site institutions may have had several codes due to ownership transfers, school closures, or consolidations. **Because SEVP adjudicates these changes and assigns new codes, we recommend this proposal be removed.**

Details on the source and type of financial support

DSOs are required to collect, review, and retain financial documentation and the Financial Information section on the I-20 already has fields to identify personal funds vs those from other sources, including funds from the school or other source (such as a sponsor). It is unclear what additional information could be provided by the DSO, considering the Consular Officer (if applying for a new visa) or USCIS (if applying for change of status) already review the student's evidence of financial support and seek clarification in real time. Additionally, if the source or amount of funding changes, students are expected to inform their DSO and the I-20 is updated as appropriate. **We recommend DHS either remove this proposal due to its redundancy or clarify what additional information relative to financial information is to be recorded. DHS should provide clear definitions and implementation guidance for this new data before finalizing it.**

Unnecessary Information:

Specification on whether the program of study is conducted primarily online

In accordance with [8 CFR 214.2\(f\)\(6\)\(G\)](#), “F-1 students enrolled in classes for credit or classroom hours, **no more than the equivalent of one class or three credits per session, term, semester, trimester, or quarter may be counted toward the full course of study requirement if the class is taken on-line or through distance education and does not require the student's physical attendance for classes, examination or other purposes integral to completion of the class. An on-line or distance education course is a course that is offered principally through the use of television, audio, or computer transmission including open broadcast, closed circuit, cable, microwave, or satellite, audio conferencing, or computer conferencing. If the F-1 student's course of study is in a language study [training] program, no on-line or distance education classes may be considered to count toward a student's full course of study requirement.**”

It is unclear why this information would need to be collected since there are already limitations on when and to whom it can apply. The proposed change would result in additional reporting requirements by the DSO with limited benefit. [8 CFR 214.2\(f\)\(6\)\(G\)](#) does not permit language training students to take online classes. **We recommend this proposal be removed for language training students or, at minimum, be noted through a simple check box or alternate option in SEVIS. DSOs could then utilize this checkbox only when and if the F1 student is engaged in online classes as permitted in the regulations.**

Requiring DSOs to provide separate numbers for domestic and international students

SEVIS is a database for F (and J) students, all of whom must be “international” (i.e., it is not possible to issue an I-20 to a US national). It is unclear how a school would define and report “international students” if they admit students in other immigration classifications which permit study incidental to status, such as B visitors, F Dependents, and many other categories (e.g., A, E, L, O, etc.). It would not be appropriate to include these individuals in a count of “Domestic” students. Since these individuals, as well as Domestic students, are exempt from SEVP purview,

we recommend this proposal be removed in its entirety as there is no added benefit to reporting these numbers and the reporting burden on DSOs would be exceptionally high for schools which admit students (in some cases, numbering into the tens of thousands) in all categories. Otherwise, significant clarification is needed on who counts as a Domestic student for this data reporting purpose.

Further, we believe English language training should be exempt from providing this information since it is distinct from degree study. Such information may be useful for DHS in determining the percentage of F and J students enrolled in undergraduate and graduate programs at a particular program, but language training, by its very nature, should not have enrollment caps for international students. It is common and appropriate for English language training programs to primarily serve F-1 students.

Requirement to indicate whether the DSOs works full- or part-time

According to [8 CFR 214.3 \(l\)\(1\)](#), a Designated School Official (DSO) or Principal Designated School Official (PDSO) must be “a regularly employed member of the school administration whose office is located at the school and whose compensation does not come from commissions for recruitment of foreign students.” There is no stipulation the P/DSO must be either full- or part-time and requiring this to be reported will increase the burden on PDSOs to gather and update employment status in cases where an institution may need to reclassify an employee for internal purposes such as staff redundancies, furloughs, temporary job reassignment, etc. It also requires the input of other departments (i.e., human resources, office of personnel services), who are not involved with matters of F1 students, and places an undue burden on the PDSO to collect and maintain this information. If DHS feels it is necessary to distinguish between full-time and part-time DSOs for this unclear purpose, the regulation must be updated to provide a definition on what it means to be “regularly employed”.

Onerous Information:

Annual cost of program of study or degree level

Collecting, reporting and updating the annual cost of each program of study or degree level would result in a significant reporting burden given the wide variety and number of programs offered at SEVP-approved schools. In the case of a college or university, this could reach into the hundreds or thousands of programs and would likely need to be updated on at least an annual basis. If this change requires adjudication or becomes part of the bi-annual recertification, the additional time needed to review and approve the changes could significantly extend certification wait times, during which the I-17 is locked, when this is already a process which takes at minimum 6 months and in other cases, well over a year. Providing an annual *estimate* of program costs (based on an aggregate average across all courses) has proven effective and the benefit of including individual program costs would appear to be outweighed by the burden this would place on schools as well as SEVP adjudicators, and we recommend this proposal be rescinded.

[Federal Register: Agency Information Collection Activities: Student and Exchange Visitor Information System \(SEVIS\); Revision of a Currently Approved Collection](#)*Date of graduation/ degree awarded*

The Form I-20 already captures the program start and program end dates, as well as the start and end of each academic session. The benefit of reporting the *graduation* date is unclear as this can be significantly different from the program end date; clarification is needed on whether this means the last day of studies, the date the student departs the program, or the date on which their degree/ diploma/ certificate is issued. In addition, how are English language training programs to report this when typically no degree is issued? As DHS recognizes, there is no nationally recognized standard of completion for English language training. English language training programs do not confer degrees and therefore should be exempt from this requirement. Further, we believe reporting the specific degree awarded is onerous and redundant, due to the Program of Study and Major/ Minor fields of study already being listed on the I-20.

It is our opinion that much of the proposal appears to be at odds with the [Paperwork Reduction Act](#) (PRA), the overall goal of which is to “*maximize the practical use of information that is collected, maintained, or used by the Federal government; minimize burden to the public when collecting information; and ensure information collected is not duplicative of ongoing collection efforts.*” **EnglishUSA therefore recommends removing any proposed modifications that duplicate existing SEVP data, lack practical benefit, or impose unnecessary administrative burdens on institutions, DSOs, and SEVP officials.**