

This proposed change is somewhat unclear. In the "Overview of this Information Collection" section, there is an explanation of what SEVIS is, followed by a sentence that starts with "Additionally". That sentence proposes the change to add the city of birth to the information collection system. It is unclear from the document if this is the only change requested, complicated by the use of the term "additionally."

If the only additional information collected will be a student or exchange visitor's city of birth, this change does not seem burdensome for future immigrant arrivals under this system. However, since this change will affect all student and exchange visitors, I suggest that the change be limited to new entries in the information collection system, rather than a request for all current SEVIS users to enter in additional data. In particular, because students and exchange visitors have temporary stay status, the additional information (city of birth) could be phased out as old users change immigration status or return to their countries of origin.

Many students and exchange visitors, as well as university program administrators (especially for SEVP), struggle to keep up with such changes and information collection systems. COVID-19 has further complicated students' and universities' abilities to implement changes, so would best be implemented as a change for all future, rather than current, students and exchange visitors.