

May 07, 2021

Scott Elmore
PRA Clearance Officer
U.S. Immigrations and Customs Enforcement Bureau
U.S. Department of Homeland Security

Re: OMB Control Number 1653-0038, ICR Reference Number 20201-1653-001, The Student and Exchange Visitor Information System (SEVIS)

Submitted via <https://www.reginfo.gov/public/do/PRAMain>.

Dear PRA Clearance Officer Elmore,

I am submitting this letter as a private individual who has worked with F-1 and J-1 individuals at two private non-profit higher education institutions, and has provided them support for working with USCIS and other government agencies. I currently serve as a Designated School Official (DSO) at a private institution, and have worked in this field for five years.

By submitting this comment letter, I am seeking to address particular items raised in section **Comments** to provide feedback and suggestions regarding SEVIS.

My first item is in relation to point #1 on the collection of information:

1. I believe that recertification is a necessary process for SEVP to hold institutions accountable, however, this process has been flawed in the past. Although I would prefer not to have a recertification fee, if it does lead to faster recertification and response time from SEVP, then it would be worth it. I do think that some of the funding for recertification should be allocated towards upgrading SEVIS functionalities, if it is not already planned that way.

My second items are in relation to point #3 on enhancing the information:

1. I strongly recommend increasing SEVIS functionality for lists and alerts, and increasing the accuracy of the lists and alerts.
 - a. One example is the alert for "Active Students Requiring Status Verification". This alert list is no longer available for me to see in SEVIS, however, when I go into student records for those on OPT or STEM OPT, I see the button to "Verify Status" in the left menu of actions, which means that the student is still being tagged that verification is needed. Unless I go into the student record, I have no way to know who needs to be verified, and that is not always done on OPT since students use the SEVP Portal. The menu option to Verify Status also does not always disappear after I complete a STEM OPT validation, and sometimes I have to manually complete the process. It would make more sense for this to be automatically removed, because the STEM OPT validation requires certain information to be confirmed from the student to the P/DSO that should fulfill the verify status requirements.

- b. Another example is the alert for “Student With a Pending Change of Status Request”. There are students who are on this list in SEVIS dating back to 2003, where there is no Receipt Number or indication about what status they are changing to, such as H1B or PR. That would be helpful information to have to know if any action or support from the P/DSO is needed, such as the Cap-Gap for a change to H1B.
 - c. Another example is the Student List “Students Requesting Reinstatement”. It would be helpful to have this linked to USCIS, similar to OPT and STEM OPT, so that a Receipt Number and a status would appear for the P/DSO.
2. An additional item that would be helpful is a Student List that shows completed Program Extensions from the past 18 months. This is helpful to try and catch students who should be registered in SEVIS after a mid-semester Program Extension and they will not appear on a SEVIS Alert list that they require registration because the last semester registration indicated they were in their final semester.

My final items are in relation to point #4 on collection of information:

- 1. I recommend maintaining the ability for use of a digital signature on the documentation for the I-17 Form, as that can make the process easier at the institution.
- 2. Recertification is a necessary process, but could be improved. My current institution recertified in April 2021, and were pleasantly surprised that the approval came after 8 days. In the previous recertification, it took 439 days for approval, or 1 year, 2 months, and 13 days. That is too long. If the “new” fee provides a regularly shorter period of recertification, that is acceptable, but if it reverts to the previous length of time, then the process must be reviewed for improvement.
 - a. Other institutions have reported that if they recertified early, they lose time from the two year window that SEVP sets for recertification, and this should be changed to ensure that institutions are permitted the full two year period and are not penalized for submitting documentation early.
- 3. I recommend instituting permanently the use of the digital Form I-20. This would permit students, P/DSOs, and other government agencies to be able to provide information, submit applications, and support the student better and faster.
- 4. As City of Birth is a new field, and it is understandable why it has been added, it would be helpful to have this field included in the SEVP Portal as a field that individuals could edit.
- 5. For SEVIS registration, batching is permitted, which is helpful to schools with batch systems. The Mass Registration functionality is fantastic for schools without batching systems. This being said, it feels like there is often an update or release that occurs during high volume registration periods, which sometimes accounts for batch errors. Is there data that exists in SEVIS that can point to high volume periods, such as January/February and August/September, and that can be used to structure timing for updates (except for absolutely needed patches for vulnerabilities)?

In conclusion, I am glad to see ICE is seeking feedback on SEVIS. I hope the feedback from the comments will be used to improve the systems and processes.

Regards,

Emilie Buse