OMB Control Number 1615-0040
U.S. Citizenship and Immigration Services, Department of Homeland Security
Docket ID USCIS-2005-0035

I am a PDSO at a large, research institution with 25 years of experience in the field. We have approximately 2200 Active F-1 SEVIS records. I primarily work with F-1 and J-1 students and dependents applying for employment authorization in the following categories:

- (c)(3)(B) Post-Completion Optional Practical Training for F-1 Students
- (c)(3)(C) STEM OPT for F-1 Students
- (c)(3)(A) Pre-Completion Optional Practical Training for F-1 Students
- (c)(3)(ii) Internships with International Organizations for F-1 Students
- (c)(3)(iiI) Economic Hardship for F-1 Students and
- (c)(5) J-2 Dependents

Thank you for the opportunity to provide comments and thank for giving the public 60 days since 111 pages of content were provided. I spent approximately 25 hours reviewing the proposed documents and formulating my comments. Below are a few general comments and attached in a PDF are my specific comments on the Instructions, Form I-765 and Worksheet.

I would like a clear procedure on how and to whom we can make suggestions for interim changes made in between public comment periods.

> Changes are being made to the I-765 on a regular basis without an opportunity for public comments every time a change is made. For example, the inclusion of SSN card applications was welcomed; however, the name fields were drastically shortened and that was problematic. Since there was not a public comment period, I struggled to find an effective way to provide feedback.

Since the instructions refer applicants to the USCIS website, especially for Where to File, please take these website comments into consideration as well.

https://www.uscis.gov/i-765
Where to File
Consider adding "Applicant's Signature" to the bullet list of items that cannot be missing or the application will be rejected.

> I love the filing tips that explain the most common reasons a form is rejected.   It is short and easy to read, although I think it may be worth adding signature as one of the bulleted points. Eyes tend to go just to the bullet list and they may not notice the statement in bold under the bullets.

Consider creating an interactive tool where the applicant could enter the eligibility code and state of residence and the correct mailing address would appear.

> There are so many options and it is a bit clunky (MANY clicks) to get to the right address.
- I was reading in the instructions where to file.
- Then I was sent to the website.
- Then I click on Where to File
- Then I click on "filing locations for Form I-765" hyperlink which is hidden in the middle of a sentence
- Then I click on Foreign Students (which is NOT intuitive if you are the dependent of a J-1 Research Scholar)
- Then I had to find the right category
- Then I click on "USCIS Phoenix and Dallas Lockbox facilities chart" hyperlink
- Then I had to find Kansas in a long list before I got the Phoenix Lock Box address

Document	Page and Section	My Comment	Proposed DHS Wording	My Proposed Change
Instructions	Pages 3-4 **Who May File Form I-765?** **Foreign Students Categories**	**Renumber your groups for accuracy. For example, Paragraphs D ,E, F and G are NOT subcategories of 1. F-1 Optional Practical Training.** Paragraphs A, B & C do fall under 1. F-1 Student Seeking Optional Practical Training. Paragraphs D & E apply to F-1 students; however, they are NOT types of OPT. Paragraph F applies to J-2 and paragraph G applies to M-1 students. Neither should fall under F-1.	1. F-1 Student Seeking Optional Practical Training (OPT) in a Position Directly Related to Major Area of Study A. Pre-Completion OPT - (c)(3)(A) B. Post-Completion OPT - (c)(3)(B) C. 24-Month Extension for STEM Students - (c)(3)(C) D. F-1 Student Offered Off-Campus Employment Under the Sponsorship of a Qualifying Int'l Organization - (c)(3)(ii) E. F-1 Student Seeking Off-Campus Employment Due to Severe Economic Hardship - (c)(3)(iii) F. J-2 Spouse or Minor Child of an Exchange Visitor - (c)(5) G. M-1 Student Seeking Post-Completion OPT After Completiong Studies - (c)(6)	1. F-1 Student Seeking Optional Practical Training (OPT) in a Position Directly Related to Major Area of Study A. Pre-Completion OPT - (c)(3)(A) B. Post-Completion OPT - (c)(3)(B) C. 24-Month OPT Extension for STEM Students - (c)(3)(C) 2. F-1 Student Offered Off-Campus Employment Under the Sponsorship of a Qualifying Int'l Organization - (c)(3)(ii) 3. F-1 Student Seeking Off-Campus Employment Due to Severe Economic Hardship - (c)(3)(iii) 4. J-2 Spouse or Minor Child of an Exchange Visitor - (c)(5) 5. M-1 Student Seeking Post-Completion OPT After Completiong Studies - (c)(6) OR 1.F-1 Students A. F-1 Pre-Completion OPT - (c)(3)(A) B. F-1 Post-Completion OPT - (c)(3)(B) C. F-1 24-Month OPT Extension for STEM Students - (c)(3)(C) D. F-1 Student Offered Off-Campus Employment Under the Sponsorship of a Qualifying Int'l Organization - (c)(3)(ii) E. F-1 Student Seeking Off-Campus Employment Due to Severe Economic Hardship - (c)(3)(iii) 2. J-2 Spouse or Minor Child of an Exchange Visitor - (c)(5) 3. M-1 Student Seeking Post-Completion OPT After Completiong Studies - (c)(6)
Instructions	Pages 3-4 **Who May File Form I-765?** **Foreign Students Categories**	**Use consistent terminology when referring to Form I-20.** Sometimes Form I-20 is used . Sometimes SEVIS Form I-20 is used. Only once is it referred to its full, formal name Certificate of Eligibility of Nonimmigrant Student Status. Form I-20A-B and Form I-20 ID are obsolete now.	**1. F-1 Student Seeking Optional Practical Training (OPT) in a Position Directly Related to Major Area of Study** **A. Pre-Completion OPT--(c)(3)(A)....** You must include a Certificate of Eligibility of Nonimmigrant (F-1) Student Status (Form I-20) endorsed by the Designated School Official (DSO) before filing Form I-765. **B. Post-Completion OPT--(c)(3)(B)...** You must include a Form I-20 endorsed by the DSO within 30 days before filing Form I-765. **C. 24-Month Extension for STEM Students...** You must include a Form I-20A-B or Form I-20D endorsed by the DSO within 60 days before filing Form I-765. **D. F-1 Student Offered Off-Campus Employment Under the Sponsorship of a Qualifying International Organization--(c)(3)(ii).** File.... a SEVIS Form I-20 with the employment page completed by the DSO certifying eligibility for employment. **E. F-1 Student Seeking Off-Campus Employment Due to Severe Economic Hardship--(c)(3)(iii).** File Form I- 765 with a SEVIS Form I-20 that includes the employment page completed by the DSO certifying eligibility for off-campus employment due to severe economic hardship	**1. F-1 Students** In all F-1 categories below, the student must include **Form I-20, Certificate of Eligibiliy for Nonimmigrant Student Status** signed by a Designated School Official (DSO) with a recommendation for the appropriate work authorization category. **A. Pre-Completion OPT--(c)(3)(A)....** You must include a Form I-20 endorsed by the DSO before filing Form I-765. **B. Post-Completion OPT--(c)(3)(B)...** You must include a Form I-20 endorsed by the DSO within 30 days before filing Form I-765. **C. 24-Month Extension for STEM Students...** You must include a Form I-20 endorsed by the DSO within 60 days before filing Form I-765. **D. F-1 Student Offered Off-Campus Employment Under the Sponsorship of a Qualifying International Organization--(c)(3)(ii).** File.... a Form I-20 with the employment page completed by the DSO certifying eligibility for employment. **E. F-1 Student Seeking Off-Campus Employment Due to Severe Economic Hardship--(c)(3)(iii).** File Form I- 765 with a Form I-20 that includes the employment page completed by the DSO certifying eligibility for off-campus employment due to severe economic hardship

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Instructions	Pages 3-4 **Who May File Form I-765?** **Foreign Students Categories**	**Spell out the acronym for DSO in a header paragraph instead of the first eligibility category. Applicants applying under other categories will not be reading the first category if it does not apply to them.** In the first paragraph about pre-completion OPT it is explained a DSO is a Designated School Official; however, most people applying under the other categories (e.g. economic hardship) will not be reading about pre-completion OPT and will not have read the full description.	**1. F-1 Student Seeking Optional Practical Training (OPT) in a Position Directly Related to Major Area of Study** **A. Pre-Completion OPT--(c)(3)(A)….** You must include a Certificate of Eligibility of Nonimmigrant (F-1) Student Status (Form I-20) endorsed by the Designated School Official (DSO) before filing Form I-765. **B. Post-Completion OPT--(c)(3)(B)**… You must include a Form I-20 endorsed by the DSO within 30 days before filing Form I-765. **C. 24-Month Extension for STEM Students**… You must include a Form I-20A-B or Form I-20D endorsed by the DSO within 60 days before filing Form I-765. **D. F-1 Student Offered Off-Campus Employment Under the Sponsorship of a Qualifying International Organization--(c)(3)(ii)**. File Form I-765 with the international organization's letter of certification that the proposed employment is within the scope of its sponsorship and a SEVIS Form I-20 with the employment page completed by the DSO certifying eligibility for employment. **E. F-1 Student Seeking Off-Campus Employment Due to Severe Economic Hardship--(c)(3)(iii)**. File Form I- 765 with a SEVIS Form I-20 that includes the employment	**1. F-1 Students** In all F-1 categories below, the student must include Form I-20, Certificate of Eligibiliy for Nonimmigrant Student Status signed by a **Designated School Official (DSO)** with a recommendation for the appropriate work authorization category. **A. Pre-Completion OPT--(c)(3)(A)….** You must include a Form I-20 endorsed by the DSO before filing Form I-765. **B. Post-Completion OPT--(c)(3)(B)**... You must include a Form I-20 endorsed by the DSO within 30 days before filing Form I-765. **C. 24-Month Extension for STEM Students**... You must include a Form I-20 endorsed by the DSO within 60 days before filing Form I-765. **D. F-1 Student Offered Off-Campus Employment Under the Sponsorship of a Qualifying International Organization--(c)(3)(ii).** File…. a Form I-20 with the employment page completed by the DSO certifying eligibility for employment. **E. F-1 Student Seeking Off-Campus Employment Due to Severe Economic Hardship--(c)(3)(iii).** File Form I- 765 with a Form I-20 that includes the employment page completed by the DSO certifying eligibility for off-campus employment due to severe economic hardship
Instructions	Page 3 **Who May File Form I-765?** **Foreign Students Categories** **Paragraphs 1.A. and 1.B.**	**Remove the request to include all previously used Student and Exchange Visitor Info System (SEVIS) numbers.** This is not required by regulation. I think maybe you want evidence of full-time CPT and OPT since it can impact the eligibility for OPT and these may be tied to a previous SEVIS number. Therefore, it is appropriate to ask for proof of previous full-time CPT and OPT, but not previous SEVIS ID numbers. A student may have had three previous SEVIS ID numbers and never had CPT or OPT. In this case, why would the previous SEVIS ID numbers be necessary?	**A. Pre-Completion OPT--(c)(3)(A)**… Also, include all previously used Student and Exchange Visitor Information System (SEVIS) numbers and evidence of any previously authorized curricular practical training (CPT) or OPT and academic level at which it was authorized. **B Post-Completion OPT--(c)(3)(B)**… Include all previously used SEVIS numbers and evidence of any previously authorized CPT or OPT and the academic level at which it was authorized.	**A. Pre-Completion OPT--(c)(3)(A)**… Include evidence of any previously authorized curricular practical training (CPT) or OPT and academic level at which it was authorized. **B Post-Completion OPT--(c)(3)(B)**… Include evidence of any previously authorized CPT or OPT and the academic level at which it was authorized.
Instructions	Page 3 **Who May File Form I-765?** **Foreign Students Categories** **Paragraphs 1.A. and 1.B.**	**Only request evidence of CPT if it was <u>full</u> time.** Part-time CPT does NOT affect OPT eligibility so the student shouldn't be burdened with providing proof of part-time CPT authorization. Similarly, on-campus work authorization doesn't affect OPT eligibility and you're not asking for proof of on-campus work authorization. It seems only necessary to request work authorizations that can impact OPT eligibility. You can even highlight the word full to emphasize evidence of full time CPT is required.	**A. Pre-Completion OPT--(c)(3)(A)**… Also, include all previously used Student and Exchange Visitor Information System (SEVIS) numbers and evidence of any previously authorized curricular practical training (CPT) or OPT and academic level at which it was authorized. **B Post-Completion OPT--(c)(3)(B)**… Include all previously used SEVIS numbers and evidence of any previously authorized CPT or OPT and the academic level at which it was authorized.	A. Pre-Completion OPT--(c)(3)(A)... Also, include all previously used Student and Exchange Visitor Information System (SEVIS) numbers and evidence of any previously authorized **FULL**-time curricular practical training (CPT) or OPT and academic level at which it was authorized. B Post-Completion OPT--(c)(3)(B)... Include evidence of any previously authorized **FULL**-time CPT or OPT and the academic level at which it was authorized.

Document	Page and Section	My Comment	Proposed DHS Wording	My Proposed Change
Instructions	Page 3 Who May File Form I-765? Foreign Students Categories Paragraphs 1.A.	**Thank you for adding the filing time frame!** Even though we tell students, it is helpful to have the timeframe filing restrictions in the instructions as well since the application fee is accepted and the application is denied if the student files outside the filing timeframe.	**A. Pre-Completion OPT--(c)(3)(A).** File Form I-765 up to 90 days before being enrolled for one full academic year, provided that the period of employment will not start before you have completed one full academic year.	n/a
Instructions	Page 3 Who May File Form I-765? Foreign Students Categories Paragraphs 1.A.	**Mention the I-20 needs to include a recommendation for the OPT.** On the surface, it sounds like a student can include their most recent I-20 endorsed by a DSO, even without an OPT recommendation.	**A. Pre-Completion OPT--(c)(3)(A)….** You must include a Certificate of Eligibility of Nonimmigrant (F-1) Student Status (Form I-20) endorsed by the Designated School Official (DSO) before filing Form I-765.	**A. Pre-Completion OPT--(c)(3)(A)….** You must include a Form I-20 endorsed by the DSO recommending the OPT. OR You must include a Form I-20 with an OPT recommendation endorsed by a DSO.
Instructions	Page 3 Who May File Form I-765? Foreign Students Categories Paragraphs 1.B.	**Thank you for adding the filing time frame!** I appreciate you mentioned the filing timeframe (90 days before-60 days after program end date) AND that you mention that the DSO's signature is only valid for 30 days. It reaffirms what we are telling the students.	**B. Post-Completion OPT--(c)(3)(B).** File Form I-765 up to 90 days before, but no later than 60 days after, your program end date. Include all previously used SEVIS numbers and evidence of any previously authorized CPT or OPT and the academic level at which it was authorized. You must include a Form I-20 endorsed by the DSO within 30 days before filing Form I-765. NOTE: You must file your Form I-765 within 30 days of the date that your DSO enters the recommendation for OPT into your SEVIS record. If you fail to do so, we will deny your OPT request.	n/a
Instructions	Page 3 Who May File Form I-765? Foreign Students Categories Paragraphs 1.B.	**Clarify program end date means the end date in SEVIS.** Students may have a personal program end date in their mind and not realize you are referencing a specific date called Program End Date on the new OPT I-20 and in SEVIS.	**B. Post-Completion OPT--(c)(3)(B).** File Form I-765 up to 90 days before, but no later than 60 days after, your program end date.	**B. Post-Completion OPT--(c)(3)(B).** File Form I-765 up to 90 days before, but no later than 60 days after, your Program End Date, as indicated in SEVIS.
Instructions	Page 3 Who May File Form I-765? Foreign Students Categories Paragraphs 1.C.	**In the bolded description header, add the word "OPT" after 24-Month** It should read 24-Month OPT Extension for STEM Students… It helps to clarify it is an Optional Practical Training Extension.	**C. 24-Month Extension for STEM Students (Students With a Degree in Science, Technology, Engineering, or Mathematics)--(c)(3)(C).**	**C. 24-Month OPT Extension for STEM Students (Students With a Degree in Science, Technology, Engineering, or Mathematics)--(c)(3)(C).**
Instructions	Page 3 Who May File Form I-765? Foreign Students Categories Paragraphs 1.C.	**Remove the comment that the application can be filed "but no later than 60 days after your program is complete"** In the regulations, the deadline you are referencing is for the initial 12 months of post-Completion OPT – not the STEM OPT extension. They need to file 90 days before their current OPT expires. See 8 CFR 214.2(f)(11)(i)(B)&(C).	**C. 24-Month Extension for STEM Students (Students With a Degree in Science, Technology, Engineering, or Mathematics)--(c)(3)(C).** File Form I-765 up to 90 days before the expiration of your current OPT, but no later than 60 days after your program is complete, if you are requesting a 24-month STEM extension.	**C. 24-Month Extension for STEM Students (Students With a Degree in Science, Technology, Engineering, or Mathematics)--(c)(3)(C).** File Form I-765 up to 90 days before the expiration of your current OPT, but no later than 60 days after your program is complete, if you are requesting a 24-month STEM extension.

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Instructions	**Page 3** **Who May File Form I-765?** **Foreign Students Categories** **Paragraphs 1.C.**	Clarify these two sentences: **"Include evidence the degree that is the basis for the current OPT is in one of the degree programs currently listed on the STEM Designated Degree Program List."** and **"NOTE: If you are applying for a STEM OPT extension based on a previously earned STEM degree, you must also include a copy of your prior STEM degree…"** 1) It sounds like you are asking for the same thing twice. I assume you are asking for proof the degree which is the basis for the current application is in a STEM field. I think this could be condensed to one sentence that would apply if the student is applying based on a current or prior STEM degree. 2) In the first sentence, "for the current OPT" should perhaps say "for the OPT extension". It sounds like you are asking for proof the initial 12-months of post-completion OPT (in which the student is currently on) is in a STEM field. That is not accurate. A student can be on 12-months of post-completion OPT based on a non-STEM degree and still be eligible to apply for a 24-month OPT extension based on a prior STEM degree. 3) In the NOTE: you don't need to say "also include a copy of your prior STEM degree". "Include evidence the degree that is the basis for the current OPT" is mentioned in the preceding paragraph. As I mentioned above, it is redundant. You could mention if they are applying based on a prior degree, they also need evidence the institution is accredited and certified by SEVP, but there is no need to mention again you need evidence the degree for the basis of the application is on the STEM list.	**C. 24-Month Extension for STEM Students**… Include evidence the degree that is the basis for the current OPT is in one of the degree programs currently listed on the STEM Designated Degree Program List. NOTE: If you are applying for a STEM OPT extension based on a previously earned STEM degree, you must also include a copy of your prior STEM degree and evidence that the institution is currently accredited by the U.S. Department of Education and certified by the SEVP.	**C. 24-Month Extension for STEM Students…** Include evidence the degree that is the basis for the current OPT **extension application** is in one of the degree programs currently listed on the STEM Designated Degree Program List. NOTE: If you are applying for a STEM OPT extension based on a previously earned STEM degree, you must also include a copy of your prior STEM degree and evidence that the institution is currently accredited by the U.S. Department of Education and certified by the SEVP.

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Instructions	**Page 3** **Who May File Form I-765?** **Foreign Students Categories** **Paragraphs 1.E.**	**Remove the request for items (1)-(6) because a DSO's recommendation in SEVIS certifies all 6 items.** In the opening paragraph, you request a SEVIS Form I-20 including the DSO certifying eligibility. The I-20 is evidence with DSO certification is evidence items 1-6 have been met. A DSO CANNOT recommend a student for employment based on economic hardship unless the DSO clicks a checkbox in SEVIS confirming the student has met the academic year requirement. Additionally, a DSO is bound by regulations to certify the student meets all the criteria mentioned in 1-6. **8CFR 214.2(f)(9)(ii)(D) says:** *(D) Procedure for off-campus employment authorization due to severe economic hardship* . The student must request a recommendation from the DSO for off-campus employment. The DSO at a non-SEVIS school must make such a certification on Form I-538, Certification by Designated School Official. The DSO of a SEVIS school must complete such certification in SEVIS. The DSO may recommend the student for work off-campus for one year intervals by certifying that: (1) The student has been in F-1 status for one full academic year; (2) The student is in good standing as a student and is carrying a full course of study as defined in paragraph (f)(6) of this section; (3) The student has demonstrated that acceptance of employment will not interfere with the student's carrying a full course of study; and (4) The student has demonstrated that the employment is necessary to avoid severe economic hardship due to unforeseen circumstances beyond the student's control pursuant to paragraph (f)(9)(ii)(C) of this section and has demonstrated that employment under paragraph (f)(9)(i) of this section is unavailable or otherwise insufficient to meet the needs that have arisen as a result of the unforeseen circumstances.	**E. F-1 Student Seeking Off-Campus Employment Due to Severe Economic Hardship--(c)(3)(iii).** File Form I- 765 with a SEVIS Form I-20 that includes the employment page completed by the DSO certifying eligibility for off-campus employment due to severe economic hardship caused by unforeseen circumstances beyond your control. Include evidence that: (1) You have been in F-1 status for one full academic year; (2) You are in good standing as a student; (3) You are carrying a full course of study; (4) Acceptance of employment will not interfere with your carrying a full course of study; (5) The employment is necessary to avoid severe economic hardship due to unforeseen circumstances beyond your control; and (6) On-campus employment is unavailable or not sufficient to meet the needs that have arisen due to the unforeseen circumstances.	E. F-1 Student Seeking Off-Campus Employment Due to Severe Economic Hardship--(c)(3)(iii). File Form I- 765 with a SEVIS Form I-20 that includes the employment page completed by the DSO certifying eligibility for off-campus employment due to severe economic hardship caused by unforeseen circumstances beyond your control. ~~Include evidence that:~~ ~~(1) You have been in F-1 status for one full academic year;~~ ~~(2) You are in good standing as a student;~~ ~~(3) You are carrying a full course of study;~~ ~~(4) Acceptance of employment will not interfere with your carrying a full course of study;~~ ~~(5) The employment is necessary to avoid severe economic hardship due to unforeseen circumstances beyond your control; and~~ ~~(6) On-campus employment is unavailable or not sufficient to meet the needs that have arisen due to the unforeseen circumstances.~~

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		8CFR 214.2(f)(9)(ii)(F) reaffirms the DSO's certification: (F) Severe economic hardship application. (1) The applicant should submit the economic hardship application for employment authorization on Form I-765, with the fee required by 8 CFR 103.7(b)(1), to the service center having jurisdiction over his or her place of residence. Applicants at a non-SEVIS school should submit Form I-20, Form I-538, and any other supporting materials such as affidavits which further detail the unforeseen circumstances that require the student to seek employment authorization and the unavailability or insufficiency of employment under paragraph (f)(9)(i) of this section. Students enrolled in a SEVIS school should submit the SEVIS Form I-20 with the employment page demonstrating the DSO's comments and certification.		
Instructions	Page 3 **Who May File Form I-765?** **Foreign Students Categories** **Paragraphs 1.E.**	**Move the NOTE explaining that changing ed levels or transferring terminates OPT to the three sections about OPT. (paragraphs A, B, and C)** Thank you for adding this important note. Unfortunately, it is lost if it is under a paragraph on economic hardship which has nothing to do with OPT.	NOTE: If you are an F-1 student filing for initial or extension of OPT, please note that your OPT and your employment authorization will be automatically terminated if you change educational program levels or transfer to another school. Working in the United States without authorization may result in your removal from the United States or denial of re-entry. Consult your DSO for additional details.	Add this NOTE to the three OPT eligibility categories, (c)(3)(A), (c)(3)(B) and (c)(3)(C). Delete this NOTE from eligibility category (c)(3)(iii).
Instructions	Page 14 **General Instructions** **Validity of Signatures**	**Thank you for adding that the form must be hand-signed, but that a copy of the hand-signed signature is acceptable.** We've always insisted on the original I-765 with original signature, but I can see where, in extenuating circumstances, it may be helpful to send a copy.	**Validity of Signatures.** USCIS will consider a photocopied, faxed, or scanned copy of the original, handwritten signature valid for filing purposes. The photocopy, fax, or scan must be of the original document containing the handwritten, ink signature.	n/a
Instructions	Page 14 **General Instructions** **Copies**	**Thank you for clarifying copies are acceptable (in most cases) and originals should not be submitted or they may be destroyed.** I appreciate your clarity on this issue.	**Copies.** You should submit legible photocopies of documents requested, unless the Instructions specifically state that you must submit an original document. USCIS may request an original document at the time of filing or at any time during processing of an application, petition, or request. If USCIS requests an original document from you, it will be returned to you after USCIS determines it no longer needs your original. NOTE: If you submit original documents when not required or requested by USCIS, your original documents may be immediately destroyed upon receipt.	n/a

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Instructions	Page 14 General Instructions Translations	**Thank you for the clarification on what documention is expected for translated documents.** Clarification of expectations is always helpful.	**Translations.** If you submit a document with information in a foreign language, you must also submit a full English translation. The translator must sign a certification that the English language translation is complete and accurate, and that he or she is competent to translate from the foreign language into English. The certification must include the translator's signature. DHS recommends the certification contain the translator's printed name and the date and the translator's contact information.	n/a
Instructions	Page 15 General Instructions How To Fill Out Form I-765	**Thank you for giving examples of when to use N/A vs None.** In the past it was a little vague when to use each. This helps.	Answer all questions fully and accurately. If a question does not apply to you (for example, if you have never been married and the question asks, "Provide the name of your current spouse"), type or print "N/A" unless otherwise directed. If your answer to a question which requires a numeric response is zero or none (for example, "How many children do you have" or "How many times have you departed the United States"), type or print "None" unless otherwise directed.	n/a
Instructions	Page 15 Specific Instructions Part 1. Reason for Applying Item Number 1.b. NOTE:	**Clarify what section the Replacement for Card Error instructions are in.** It seems odd Form I-765 has more detailed instruction on where to look than the instructions.	NOTE: Replacement (correction) of an employment authorization document due to USCIS error does not require a new Form I-765 and filing fee. Refer to the **Replacement for Card Error** section of these Instructions for further details.	NOTE: Replacement (correction) of an employment authorization document due to USCIS error does not require a new Form I-765 and filing fee. Refer to the **Replacement for Card Error** in the **What is the Filing Fee** section of these Instructions for further details.
Instructions	Page 15 Specific Instructions Part 2. Information About You Item Number 1.a.-1.c.	**Add passport as a source for full legal name.** You mention only birth certificate or legal change of name document. Passport is more commonly used than birth certificate for purposes of the full legal name for F-1 students. I assume the same would be true for most other applicants as well.	**Item Numbers 1.a. - 1.c. Your Full Name.** Provide your full legal name as shown on your birth certificate or legal change of name document in the spaces provided.	**Item Numbers 1.a. - 1.c. Your Full Name.** Provide your full legal name as shown on your passport, birth certificate or legal change of name document in the spaces provided.
Instructions	Page 15 Specific Instructions Part 2. Information About You Item Numbers 1.a.-1.c. Your Full Name	**Clarify if it is appropriate to write None if a person doesn't have a Family, Given or Middle name.** I assume name fields may be typed in by contract workers at the time of receipt and if NONE is in a middle name field, for example, "None" may become part of the applicant's name on the EAD. If so, consider having a checkbox for "No Given Name" and "No Family Name".	**Item Numbers 1.a. - 1.c. Your Full Name.** Provide your full legal name as shown on your birth certificate or legal change of name document in the spaces provided.	**Item Numbers 1.a. - 1.c. Your Full Name.** Provide your full legal name as shown on your birth certificate or legal change of name document in the spaces provided. If you do not have a given or family name, write "None" in the appropiate space.
Instructions	Page 15 Specific Instructions Part 2. Information About You Item Numbers 2.a.-3.c. Other Names Used	**Include "aliases" in instructions.** Since you mention aliases on Form I-765, you should also include aliases in the instructions.	**Item Numbers 2.a. - 3.c. Other Names Used.** Provide other names you have used since birth, including your maiden name, any nicknames, and any names that appear in your documents. If you need extra space, use Part 7. Additional Information to provide other names used.	**Item Numbers 2.a. - 3.c. Other Names Used.** Provide other names you have used since birth, including, aliases, your maiden name, any nicknames, and any names that appear in your documents. If you need extra space, use Part 7. Additional Information to provide other names used.
Instructions	Page 15 Specific Instructions Part 2. Information About You Item Numbers 4.a.-4.f. U.S. Mailing Address	**Explain what "In Care of Name" means and how to use it.** With my F-1 students, I find it is a foreign concept and they have no idea what to put in that field. They often write their own name.	**Item Numbers 4.a. - 4.f. U.S. Mailing Address**… If your mail is sent to someone other than yourself, please include an "In Care Of Name" as part of your mailing address.	**Item Numbers 4.a. - 4.f. U.S. Mailing Address**… If your mail is sent to someone other than yourself, please include the other person's name in the ~~an~~ "In Care Of Name" field as part of your mailing address.

Document	Page and Section	My Comment	Proposed DHS Wording	My Proposed Change
Instructions	Page 15 Specific Instructions Part 2. Information About You Item Numbers 5.-6.e. Physical Address	Clarify if one should write N/A in 6.a. (the physical address) if they mark Yes to question 5 which asks if the current mailing address is the same as the physical address. I assume you want N/A if the applicant indicates their physical and mailing address are the same. Do you expect N/A in all fields 6.a. through 6.e. or is it sufficient to just put it in 6.a.?	Item Numbers 5. - 6.e. Physical Address. Type or print your physical address in the spaces provided.	Item Numbers 5. - 6.e. Physical Address. Type or print your physical address in the spaces provided. In Item Number 5, if you answered "No", provide your physical address in Items 6.a. to 6.e. In Item Number 5, if you answered "Yes", write "N/A" in Item 6.a. and proceed to Item 7.
Instructions	Page 16 Specific Instructions Part 2. Information About You Item Number 7 Alien Registration Number (A-Number)	Clarify if the A-Number should be left blank or if the applicant should be writing "None" or "N/A" if the applicant does not have one. In the How to Fill Out Form I-765 (Item 3) the applicant is instructed to use None or N/A; however, these instructions say to leave it blank. The instructions seem contradictory.	Item Number 7. Alien Registration Number... If you do not have an A-Number or if you cannot remember it, leave this space blank.	Item Number 7. Alien Registration Number... If you do not have an A-Number, write none. If you cannot remember it, leave this space blank.
Instructions	Page 16 Specific Instructions Part 2. Information About You Item Numbers 9.a. - 13.b. Questions regarding Social Security Number (SSN)	Clarify what to do if the person has an SSN but cannot remember the number. The first paragraph says you must enter the SSN from your card; however Form I-765 says (if known).	Item Numbers 9.a. - 13.b. Questions regarding Social Security Number (SSN).... If the SSA ever issued a Social Security card to you in your name or a previously used name such as your maiden name, then you must enter the SSN from your card in Item Number 9.b.	Item Numbers 9.a. - 13.b. Questions regarding Social Security Number (SSN).... If the SSA ever issued a Social Security card to you in your name or a previously used name such as your maiden name, then you must enter the SSN from your card in Item Number 9.b. If you cannot remember it, leave this space blank.
Instructions	Page 16 Specific Instructions Part 2. Information About You Item Numbers 14.a. - 14.d. Country or Countries of Citizenship or Nationality.	Correct the typo from Item 14.d. to 14.b. The instructions address 14.a through 14. d; however, Form I-765 only has a 14.a and a 14.b.	Item Numbers 14.a. - 14.d. Country or Countries of Citizenship or Nationality.	Item Numbers 14.a. - 14.b. Country or Countries of Citizenship or Nationality.
Instructions	Page 16 Specific Instructions Part 2. Information About You Item Numbers 15.1. - 15.d Place of Birth	Move items 1 and 2 (below) from Place of Birth to Country of Citizenship because they seem to apply to country of citizenship and not country of birth: 1. If you are stateless, type or print the name of the country where you were last a citizen or national. 2. If you are a citizen or national of more than one country, type or print the name of the foreign country that issued your last passport.	Item Numbers 15.1. - 15.d Place of Birth... 1. If you are stateless, type or print the name of the country where you were last a citizen or national. 2. If you are a citizen or national of more than one country, type or print the name of the foreign country that issued your last passport.	Item Numbers 14.a. - 14.b. Country or Countries of Citizenship or Nationality.... 1. If you are stateless, type or print the name of the country where you were last a citizen or national. 2. If you are a citizen or national of more than one country, type or print the name of the foreign country that issued your last passport.
Instructions	Page 16 Specific Instructions Part 2. Information About You Item Numbers 16. Date of Birth	Instead of trying to explain how to put a date of birth in the U.S. format (because the rest of the world uses a different order), it would be more fruitful to provide a drop down menu for month, for day and for year or at a minimum have three separate fields: Month Day and Year.	Item Number 16. Date of Birth. Enter your date of birth in mm/dd/yyyy format in the space provided. For example, type or print October 5, 1967 as 10/05/1967.	Item Number 16. Date of Birth. Enter your month, day and year of birth in the appropriate fields.

Document	Page and Section	My Comment	Proposed DHS Wording	My Proposed Change
Instructions	**Page 16** **Specific Instructions** **Part 2. Information About You** **Item Numbers 17. Sex**	**Make the form more inclusive. Ask for gender instead of sex and include a blank for other options to be included.** **Even if you keep "sex" you should include an "other" option.** According to a gallup poll published in January 2017, there are 10 million Americans who identify as gay, lesbian, bisexual or transgender which is about 4.1% of our population. This percent is significant enough it warrants offering more than two options. http://news.gallup.com/poll/201731/lgbt-identification-rises.aspx	**Item Number 17. Sex.** Select the box that indicates whether you are male or female.	**Item Number 17. Gender.** Select the box that indicates whether you indentify as a man or woman. If you do not identify as either a man or a woman, you can choose other and provide a short description for your gender identity.
Instructions	**Page 17** **Specific Instructions** **Part 2. Information About You** **Item Numbers 19. -20.d. Previous Application for Employment Authorization from USCIS.**	**Reiterate you only want authorization granted by USCIS and mention you are only interested if they have filed an I-765.** The Form I-765 asks directly "Have you previously filed Form I-765?" so the form itself is pretty clear; however, the instructions should also clarify the distinction of the type of authorization wanted. This description "Previous Application for Employment Authorization from USCIS" ssems to be a carryover from the old Form I-765 which used to ask: Have you ever before applied for employment authorization from USCIS?	**Item Numbers 19. - 20.d. Previous Application for Employment Authorization from USCIS.** If you have applied for employment authorization in the past, select "Yes" and complete Item Numbers 20.a. - 20.d.	**Item Numbers 19. - 20.d. Previous Application for Employment Authorization from USCIS.** If you have applied for employment authorization from USCIS in the past on Form I-765, select "Yes" and complete Item Numbers 20.a. - 20.d.
Instructions	**Page 17** **Specific Instructions** **Part 2. Information About You** **Item Numbers 19. -20.d. Previous Application for Employment Authorization from USCIS.**	**Consider removing which office adjudicated a previous I-765 since you ask for the receipt number. Or only ask the adjudicating office if the applicatn doens't have the receipt. Perhpas if you really want the appropriate Service Center, include the 3 letter clue in the receipt numbers.** F-1 students mail their appliction to a lockbox and have no idea which service center adjudicated their I-765. If the applicant includes the receipt number, it is obvious which service center adjudicated the application.	**Item Numbers 19. - 20.d. Previous Application for Employment Authorization from USCIS. ..** Provide the receipt number of your most recently filed application for employment authorization application, the USCIS office where the application was adjudicated, the date when the application was adjudicated, and whether the application was approved or denied.	**Item Numbers 19. - 20.d. Previous Application for Employment Authorization from USCIS. ..** Provide the receipt number of your most recently filed application for employment authorization application. The receipt number will start with three letters which is a code for the appropriate service center. Write the service center which adjudicated your I-765 based on the following: LIN: Nebraska Service Center WAC: California Service Center EAC: Vermont Service Center TSC: Texas Service Center PSC or YSC: Potomac Servic Center [plus whatever other options may exist] Also include the date when the application was adjudicated, and whether the application was approved or denied.
Instructions	**Page 17** **Specific Instructions** **Part 2. Information About You** **Item Numbers 21.a. - 21.e. Form I-94 Arrival-Departure Record.**	**Either remove the I-94 expiration date from the instructions or add the I-94 expiration date to the I-765. If you add the expiration date to the I-765, be sure to include a check box for those with D/S instead of a specific departure date.**	**Item Numbers 21.a. - 21.e. Form I-94 Arrival-Departure Record.** If CBP or USCIS issued you a Form I-94, Arrival-Departure Record, provide your Form I-94 number and date that your authorized period of stay expires or expired (as shown on Form I-94). The Form I-94 number also is known as the Departure Number on some versions of Form I-94.	**Item Numbers 21.a. - 21.e. Form I-94 Arrival-Departure Record.** If CBP or USCIS issued you a Form I-94, Arrival-Departure Record, provide your Form I-94 number. The Form I-94 number also is known as the Departure Number on some versions of Form I-94. [IF YOU ADD THE I-94 EXPIRATION DATE TO THE I-765]: Provide the date that your authorized period of stay expires or expired (as shown on Form I-94). If you have "D/S" (Duration of Status) on your I-94 instead of a specific departure date, check the "D/S" box and leave the date blank (or write n/a).

Document	Page and Section	My Comment	Proposed DHS Wording	My Proposed Change
Instructions	Page 17 Specific Instructions Part 2. Information About You Item Numbers 21.a. - 21.e. Form I-94 Arrival-Departure Record.	Separate Passport/Travel Document questions from I-94 questions. They are not the same and don't really make sense to all be labeled "I-94 and grouped together. Clarify what "country that issued passport" means. Often F-1 students think that means the place of issuance, especially if they are renewing their passport in a third country. I think the instructions are a good place to emphasize it is more about who is issuing the document rather than where.	Item Numbers 21.a. - 21.e. Form I-94 Arrival-Departure Record. If CBP or USCIS issued you a Form I-94, Arrival-Departure Record, provide your Form I-94 number and date that your authorized period of stay expires or expired (as shown on Form I-94). … Passport and Travel Document Numbers. If you used a passport or travel document to travel to the United States, enter either the passport or travel document information in the appropriate space on the application, even if the passport or travel document is currently expired.	Item Numbers 21.a. - 21.b. Form I-94 Arrival-Departure Record. If CBP or USCIS issued you a Form I-94, Arrival-Departure Record, provide your Form I-94 number and date that your authorized period of stay expires or expired (as shown on Form I-94).… [The 21.b. assumes you will add I-94 expiration date to the I-765.] Items 22.a. - 22.d. Passport and Travel Document Numbers. If you used a passport or travel document to travel to the United States, enter either the passport or travel document information in the appropriate space on the application, even if the passport or travel document is currently expired. For country that issued your passport, indicate which country issued your passport. If you had a passport issued in a third country, do not list the country where the passport issued, but rather which country issued the passport.
Instructions	Page 17 Specific Instructions Part 2. Information About You Item Numbers 22. Date of Your Last Arrival Into the United States.	You will get more accurate dates if you provide drop down menus or at least separate fields for Month Day and Year. Form I-765 gives more details than the instructions regarding date of last arrival. Consider clarifying it is appropriate to estimate if the exact date is not known. Would you like the applicant to clarify (perhaps via a checkbox) if the date is an estimate?	Item Number 22. Date of Your Last Arrival Into the United States. Provide the date on which you last entered the United States in mm/dd/yyyy format. Form I-765 says Date of Your Last Arrival Into the United States, On or About (mm/dd/yyy)	Item Number 22. Date of Your Last Arrival Into the United States. Provide the date on which you last entered the United States in mm/dd/yyyy format. If you cannot remember the exact date you entered, you can enter the approximate date you entered the U.S.
Instructions	Page 17 Specific Instructions Part 2. Information About You Item Numbers 23 Place of Your Last Arrival Into the United States	Clarify if you really want where they entered the U.S. or where they were inspected? If you want place of inspection, keep in mind many are overseas and do not have a "state". Address if you want entry after visa revalidation to Canada, Mexico or the Caribbean listed even though the I-94 may not reflect the most recent entry.	Item Number 23. Place of Your Last Arrival Into the United States. Provide the location where you last entered the United States.	Item Number 23. Place of Your Last Arrival Into the United States. Provide the location where you last entered the United States. Enter where you first arrived, not necessarily where you were inspected. If you have traveled to Canada, Mexico or the Carribbean under Visa Revalidation and did not get a new I-94 upon re-entry, list your most recent entry even if it is not listed on your I-94.
Instructions	Page 17 Specific Instructions Part 2. Information About You Item Numbers 24. Immigration Status at Your Last Arrival	Be consistent with the instructions and Form I-765. Clarify if you just want the number/letter code or if you want a description as well. The instructions say to only list the code (e.g. "B-1"); however, Form I-765 says to list "B-2 visitor" or "F-1 student" Also, if someone is paroled in, they wont' have a number. They will only have letters. Be consistent with what is requested in Item Number 25.	Item Number 24. Immigration Status at Your Last Arrival. Provide the letter and number that correlates with your status when you last entered the United States. For example, if you last entered the United States as a temporary visitor for business, B-1, enter the code B-1 in the space provided. On Form I-765 it says: 24. Immigration Status at Your Last Arrival (for example, B-2 visitor, F-1 student, or no status)	Item Number 24. Immigration Status at Your Last Arrival. Provide the letter and number that correlates with your status when you last entered the United States. For example, if you last entered the United States as a temporary visitor for business, B-1, enter the code B-1 in the space provided. This will be indicated on the I-94 you received upon entry to the U.S. On Form I-765 it says: 24. Immigration Status at Your Last Arrival (for example, B-2, F-1, or no status)

Document	Page and Section	My Comment	Proposed DHS Wording	My Proposed Change
Instructions	Page 17 Specific Instructions Part 2. Information About You Item Numbers 25. Current Immigration Status or Category.	Be consistent with the instructions and Form I-765. Clarify if you just want the number/letter code or if you want a description as well. The instructions say to only list the code (e.g. "F-1"); however, the form says to list "F-1 student" Also, if someone is paroled in, they wont' have a number. They will only have letters. Be consistent with what is requested in Item Number 24.	Item Number 25. Current Immigration Status or Category. Provide your current immigration status. For example, if your current status is student academic, F-1, enter the code F-1 in the space provided. On Form I-765 it says: 25. Your Current Immigration Status or Category (for example, B-2 visitor, F-1 student, parolee, deferred action, or no status or category)	Item Number 25. Current Immigration Status or Category. Provide your current immigration status. For example, if your current status is student academic, F-1, enter the code F-1 in the space provided. This will be indicated on your most recent I-94. If you have obtained a change of status since your last entry, you should refer to the most recent change of status I-94. On Form I-765 it says: 25. Your Current Immigration Status or Category (for example, B-2, F-1, parolee, deferred action, or no status or category)
Instructions	Page 17 Specific Instructions Part 2. Information About You Item Numbers 26. Student and Exchange Visitor Information System (SEVIS) Number	Clarify if you want the SEVIS ID number if they have ever had one or only if they currently have a SEVIS ID number. Explain that even though N is part of the SEVIS ID number, it should NOT be included. Clarify if you want more than one SEVIS ID if the student has had more than one. Clarify that SEVIS only appplies to people who have had F, M, or J status since 2003.	Item Number 26. Student and Exchange Visitor Information System (SEVIS) Number (if any). If you were issued a SEVIS number, enter it in the space provided.	Item Number 26. Student and Exchange Visitor Information System (SEVIS) Number (if any). If you are currently in F, M or J status, enter your current SEVIS ID Number. The number is 11 digits long and begins with N. Do NOT include the N when entering the number. Only provide the 10 numbers.
Instructions	Page 17 Specific Instructions Part 2. Information About You Item Number 27. Eligibility Category	Again, Form I-765 gives more instructions than the instructions do. Add more detail to the instructions (at least what is included on the form.) Give examples in the instructions.	Item Number 27. Eligibility Category. Refer to the list of the eligibility categories in the Who May File Form I-765 section of these Instructions. Find your eligibility category, and enter it in the space provided. On Form I-765 it says: Eligibility Category. Refer to the Who May File Form I-765 section of the Form I-765 Instructions to determine the appropriate eligibility category for this application. Enter the appropriate letter and number for your eligibility category below (for example, (a)(8), (c)(17)(iii)).	Item Number 27. Eligibility Category. Refer to the list of the eligibility categories in the Who May File Form I-765 section of these Instructions. Enter the appropriate letter and number for your eligibility category below (for example, (a)(8), (c)(17)(iii)).

Document	Page and Section	My Comment	Proposed DHS Wording	My Proposed Change
Instructions	**Page 17** **Specific Instructions** **Part 2. Information About You** **Item Number 27. Eligibility Category**	**Double check with the service center if they REALLY want degree here. We've been told for years to write the CIP Code in where it asks for degree.** If the CIP Code is really what is wanted, you will have to explain what a CIP code is and where to find it on the I-20. It would be helpful to explain the format (e.g. 32.0109) **Clarify the format of an E-Verify Number and explain it is different thatn the company's Tax ID number and EIN.** https://www.uscis.gov/e-verify/questions-and-answers/faq/i-need-my-e-verify-company-id-number-how-do-i-find-it says it is 4-7 numerical characters. Often companies give students the wrong number and the students don't have a clue it is the wrong number. They are trusting their employers to give them a correct E-Verify Number. We've had applications rejected and denied for supplying an incorrect E-Verify number.	**Item Numbers 28.a. - 28.c. (c)(3)(C) Eligibility Category.** If you entered eligibility category (c)(3)(C) in Item Number 27., provide your degree, your employer's name as listed in E-Verify, your employer's E-Verify Company Identification Number or a valid E-Verify Client Company Identification Number in the spaces provided.	**Item Numbers 28.a. - 28.c. (c)(3)(C) Eligibility Category.** If you entered eligibility category (c)(3)(C) in Item Number 27., provide the CIP code for your major, if it is available. For newer I-20s, it is a 6-digit number (e.g. 32.0109) and it listed under your major. If it is not listed on your I-20, you may need to ask your DSO for the appropriate CIP code. Also, include your employer's name as listed in E-Verify, your employer's E-Verify Company Identification Number or a valid E-Verify Client Company Identification Number in the spaces provided. The E-Verify number will be 4-7 numerical characters long.
Instructions	**Page 18** **Specific Instructions** **Part 3. Biographic Information**	**Clarify explicity Biographic Information is optional.** The instructions state that providing this info may reduce the time spent at an AC appointment which implies it is optional. **Clarify F-1 students can skip this section.** Since F-1 students don't get ASC appointments, it seems this info is not necessary for everyone.	**Part 3. Biographic Information** Provide the biographic information requested in Part 3., Item Numbers 1. - 6. Providing this information as part of your application may reduce the time you spend at your USCIS ASC appointment as described in the Biometric Services Appointment section of these Instructions.	**Part 3. Biographic Information (Optional)** Providing this information may reduce the time you spend at your USCIS ASC appointment as described in the Biometric Services Appointment section of these Instructions. Therefore, if you are required to go for a Biometrics screening, you are encouraged to provide the biographic information requested in Part 3., Item Numbers 1. - 6.
Instructions	**Page 18** **Specific Instructions** **Part 4. Applicant's Statement, Contact Information, Declaration, Certification, and Signature** **Item Numbers 1.a. - 7.b.**	**Explain why you are asking for a phone number. Add a NOTE that USCIS will NEVER call and ask for money.** In light of current scams, USCIS has repeatedly said publicly "USCIS will NOT call you". If an applicant has given you their phone number on an application, they are more likely to fall victim to a scam knowing your asked for their phone number in regards to their application. If you insist on collecting a phone number, be explicitily clear USCIS will never call and ask for money or threaten to remove someone over the phone.	**Item Numbers 1.a. - 7.b.** ... Further, you must sign and date your application and provide your daytime telephone number, mobile telephone number (if any), and email address (if any).	**Item Numbers 1.a. - 7.b.** ... Further, you must sign and date your application and provide your daytime telephone number, mobile telephone number (if any), and email address (if any). NOTE: USCIS will NEVER call you and ask you for money or tell you over the phone you are being put in removal proceedings. We only ask for you number in case we have a question about your application.
Instructions	**Page 19** **Required Documentation** **Third paragraph starting "If you are required to show economic necessity..."**	**Clarify if you want the I-765WS for F-1 students Seeking Off-Campus Employment Due to Severe Economic Hardship.** It seems it would be useful to request F-1 students with economic hardship [category (c)C(3)(iii)] to submit the worksheet. If so, it also needs to be mentioned under the Who May File section.	If you are required to show economic necessity for your category, submit a list of your assets, income, and expenses. Provide this financial information on Form I-765WS, Form I-765 Worksheet. If you would like to provide an explanation, complete Part 3. Explanation of the worksheet.	Add this to Who May File section, Foreign Students Categories, 1.E. F-1 Student Seeking Off-Campus Employment Due to Severe Economic hardship - (c)(3)(iii) Provide a list of your assets, income and expenses on the Form I-765 Worksheet.

Document	Page and Section	My Comment	Proposed DHS Wording	My Proposed Change
Instructions	Page 19 Required Documentation Fourth paragraph starting "Assemble the documents in the folliwng order:"	**I believe the check should be attached to the top of the application. If so, switch the order of application and filing fee.** Instructions indicate the fee should come after the application.	Assemble the documents in the following order: 1. Your properly signed application. 2. The appropriate filing fee, if applicable. See the What Is the Filing Fee section of these Instructions for details.	Assemble the documents in the following order: 1. The appropriate filing fee, if applicable. See the What Is the Filing Fee section of these Instructions for details. 2. Your properly signed application.
Instructions	Page 20 Required Documentation 3.A.	**I'm not confident a copy of the I-94 OR passport will be sufficient with any application for an F-1 student.** I've always been told the I-94 is required. By reading this, an F-1 student would only need an I-94 OR a passport. Can you confirm this will be sufficient?	3. If you are mailing your application to USCIS, you must also submit: A. A copy of at least one of the following documents: Form I-94, Arrival-Departure Record (front and back), passport, or other travel document. If you are filing Form I-765 under the (c)(9) category, copies of any of the above are not required.	If an F-1 student can truly submit a copy of the passport instead of an I-94, then it is okay as written.
Instructions	Page 20 Required Documentation 3.A.	**Explain the electronic I-94 in Requied Documentation section and give the URL again on where to receive one.** Most people have an electronic I-94 now and requiring the front and back of the I-94 is only relevant if it is a paper form I-94.	3. If you are mailing your application to USCIS, you must also submit: A. A copy of at least one of the following documents: Form I-94, Arrival-Departure Record (front and back), passport, or other travel document. If you are filing Form I-765 under the (c)(9) category, copies of any of the above are not required.	3. If you are mailing your application to USCIS, you must also submit: A. A copy of at least one of the following documents: Form I-94, Arrival-Departure Record, passport, **or** other travel document. I-94 Note: If you were admitted to the United States by CBP at an airport or seaport after April 30, 2013, CBP may have issued you an electronic Form I-94 instead of a paper Form I-94. You may visit the CBP website at www.cbp.gov/i94 to obtain a paper version of an electronic Form I-94. If you have a paper card form, include copies of the front and back of the I-94. If you are filing Form I-765 under the (c)(9) category, copies of any of the above are not required.
Instructions	Page 20 Required Documentation 3.B	**Clarify that 3.B. is really requiring a photo ID and a previous EAD is preferred.** The first time I read this I stopped after "A copy of your last EAD (front and back.)." Period. One assumes the rest of the paragraph is explaining specs on the last EAD. If should be clarified in the opening sentence that an acceptable photo ID is required. Then the rest of the paragraph can clarify the specific alternative IDs.	A copy of your last EAD (front and back). If you were not previously issued an EAD, you must submit a copy of a government-issued identity document (such as a passport) showing your picture, name, and date of birth; a birth certificate with photo ID; a visa issued by a foreign consulate; or a national ID document with photo and/or fingerprint. The identity document photocopy must clearly show your facial features and contain your biographical information.	A copy of your last EAD (front and back) OR acceptable government issued photo ID: If you were not previously issued an EAD, you must submit a copy of a government-issued identity document (such as a passport) showing your picture, name, and date of birth; a birth certificate with photo ID; a visa issued by a foreign consulate; or a national ID document with photo and/or fingerprint. The identity document photocopy must clearly show your facial features and contain your biographical information.

Document	Page and Section	My Comment	Proposed DHS Wording	My Proposed Change
Instructions	Page 20 **Required Documentation** **3.C. Photographs**	**Remove the redundancy when describing the photo specs.** The following are mentioned twice: two identical passport-style color white to off-white background	You must submit **two identical color passport-style** photographs of yourself taken within 30 days of filing this application. The photos must have a **white to off-white background**, be printed on thin paper with a glossy finish, and be unmounted and unretouched. The **two identical passport-style** photos must be 2 by 2 inches. The photos must be in **color** with full face, frontal view on a **white to off-white background**. Head height should measure 1 to 1 3/8 inches from top of hair to bottom of chin, and eye height is between 1 1/8 to 1 3/8 inches from bottom of photo. Your head must be bare unless you are wearing headwear as required by a religious denomination of which you are a member. Using pencil or felt pen, lightly print your name and A-Number (if any) on the back of the photo.	You must submit two identical color passport-style photographs of yourself taken within 30 days of filing this application. The photos must have a white to off-white background, be printed on thin paper with a glossy finish, and be unmounted and unretouched. The photos must be 2 by 2 inches with full face, frontal view. Head height should measure 1 to 1 3/8 inches from top of hair to bottom of chin, and eye height is between 1 1/8 to 1 3/8 inches from bottom of photo. Your head must be bare unless you are wearing headwear as required by a religious denomination of which you are a member. Using pencil or felt pen, lightly print your name and A-Number (if any) on the back of the photo.
Instructions	Page 20 **Required Documentation** **3.C. Photographs**	**Clarify if you want the I-94 number on the back of the photos if there is no A-Number.** We've always been told to have our F-1 students write their I-94 on the back of the photos.	Using pencil or felt pen, lightly print your name and A-Number (if any) on the back of the photo.	Using pencil or felt pen, lightly print your name and A-Number (if any) on the back of the photo. If you don't have an A-Number, you can write your I-94 number.
Instructions	Page 20 **Required Documentation** **3.C. Photographs**	**Clarify if you really want photos on the bottom and if you prefer to have them in a clear plastic bag.** Going back to the beginning of this section which says "Assemble the documents in the following order". This means that the photographs will be on the bottom of the application. We've been told for years to put the photos in a clear ziplock plastic bag and to put them under the check, before the application.	Assemble the documents in the following order: 1. Your properly signed application. 2. The appropriate filing fee, if applicable. See the What Is the Filing Fee section of these Instructions for details. 3. If you are mailing your application to USCIS, you must also submit: A. A copy of at least one of the following documents: Form I-94, Arrival-Departure Record (front and back), passport, or other travel document. B. A copy of your last EAD (front and back). C. Photographs	Assemble the documents in the following order: 1. The appropriate filing fee, if applicable. See the What Is the Filing Fee section of these Instructions for details. 2. Your properly signed application. 3. If you are mailing your application to USCIS, you must also submit: A. A copy of at least one of the following documents: Form I-94, Arrival-Departure Record (front and back), passport, or other travel document. B. A copy of your last EAD (front and back). C. Photographs. When assembling your application package, insert the photos after the filing fee and before the application, preferably in a clear plastic ziplock baggie.
Instructions	Page 25 **Address Change**	Clarify if an applicant submits a change of address while the I-765 is pending, will the Social Security Administration also be notified of the change in address? If not, instruct the applicant how to notify SSA of the change in address.	An applicant who is not a U.S. citizen must notify USCIS of his or her new address within 10 days of moving from his or her previous residence. For information on filing a change of address, go to the USCIS website at www.uscis.gov/addresschange or contact the USCIS National Customer Service Center at 1-800-375-5283. For TTY (deaf or hard of hearing) call: 1-800-767-1833. NOTE: Do not submit a change of address request to the USCIS Lockbox facilities because the Lockbox does not process change of address requests.	An applicant who is not a U.S. citizen must notify USCIS of his or her new address within 10 days of moving from his or her previous residence. For information on filing a change of address, go to the USCIS website at www.uscis.gov/addresschange or contact the USCIS National Customer Service Center at 1-800-375-5283. For TTY (deaf or hard of hearing) call: 1-800-767-1833. If you are also applying for a social security number, USCIS will not notify the Social Security Administration (SSA) about changes of address submitted to USCIS. You will also need to notify SSA with your new address. NOTE: Do not submit a change of address request to the USCIS Lockbox facilities because the Lockbox does not process change of address requests.

Document	Page and Section	My Comment	Proposed DHS Wording	My Proposed Change
Instructions	**Page 25** **Processing Information** **Initial Processing**	**It is awkward to say the application may be rejected or denied after it is accepted.** I understand you may be hesitant to say "once USCIS receives your application" because maybe you want to preserve the term to reflect once an appliction is receipted. Perhaps you could say "once USICS initially receives." "Accept" and "reject" in the same sentence seems contradictory.	Initial processing. Once USCIS accepts your application, we will check it for completeness. If you do not completely fill out this application, you will not establish a basis for your eligibility and USCIS may reject or deny your application.	Initial processing. Once USCIS intitally receives your application, we will check it for completeness. If you do not completely fill out this application, you will not establish a basis for your eligibility and USCIS may reject or deny your application before it is even receipted.
Form I-765	**Page 1** **START HERE**	**Clarify if blue ink is acceptable.** My undertanding is blue or black ink is acceptable.	START HERE - Type or print in black ink.	START HERE - Type or print in black or blue ink.
Form I-765	**Page 1** **Part 2. Information About You** **Your Full Legal Name**	**Remove "Last" and "First" from name descriptors since cultures are inconsistent in application of putting Family and Given name first.** It is very confusing for a Chinese applicant who puts their Family Name First. When you call the Family Name the same as the Last name, it becomes unclear if the Family Name or the last Name is wanted. Add an (s) to "name" since many cultures have multiple given names and multiple family names. Omit middle name. Middle name can be included as part of a given name. The most common document for official name use is the passport and I can't think of a single example of a passport that singles out "middle" name. **Provide options for individuals with a single name such as a check box for "No Given Name" or "No Family Name"**	1.a. Family Name (Last Name) 1.b. Given Name (First Name) 1.c. Middle Name	1.a. Family Name(s) (Surname) ☐ No Family Name 1.b. Given Name(s) ☐ No Given Name
Form I-765	**Page 1** **Part 2. Information About You** **Other Names Used**	**Again, don't tie Family with Last Name since they often are not the same in many cultures. Likewise, don't association First Name with Given Name since it is culturally confusing.**	2.a. Family Name (Last Name) 2.b. Given Name (First Name) 2.c. Middle Name 3.a. Family Name (Last Name) 3.b. Given Name (First Name) 3c. Middle Name	2.a. Family Name(s) (Surname) 2.b. Given Name(s) 2.a. Family Name(s) (Surname) 2.b. Given Name(s)
Form I-765	**Page 1** **Part 2. Information About You** **Your U.S. Mailing Address**	**Consider adding a brief explanation of what "in care of" is used for.** I see you have added many other "notes" on Form I-765; probably because many people won't bother to read 27 pages of instructions. Therefore, I think "in care of" is such a unique concept, it would be helpful to explain it to applicants on Form I-765, The I-539 currently has an "in care of field" and I see a high number of students putting in their own name in the field.	4.a. In Care of Name	4.a. In Care of Name (If using someone else's address, list their name here)

Document	Page and Section	My Comment	Proposed DHS Wording	My Proposed Change
Form I-765	Page 2 Part 2. Information About You (continued) Your U.S. Mailing Address	Clarify if the applicant marks yes that their physical address is the same as their mailing address they do not need to complete 6.a. to 6.d.	5. Is your current mailing address the same as your physical address? Yes No NOTE: If you answered "No" to Item Number 5., provide your physical address below.	5. Is your current mailing address the same as your physical address? Yes No NOTE: If you answered "No" to Item Number 5., provide your physical address below. If yes, skip 6.a-d and go to 7.
Form I-765	Page 2 Part 2. Information About You (continued) Other Information Father's Name and Mother's Name	Reconsider the Subheaders under Part 2. Information About You. It seems it would be appropriate to add a subheader for Social Security Number and have both the subheaders Father's Name and Mother's Name removed (since they only need to be answered if the applicant is requesting an SSN card.)	Part 2. Information About You (continued) *U.S. Physical Address* *Other Information* *Father's Name* *Mother's Name* *Your Country or Countries of Citizenship for Nationality* *Place of Birth*	Part 2. Information About You (continued) *U.S. Physical Address* *Other Information* *Social Security Number* *Your Country or Countries of Citizenship for Nationality* *Place of Birth*
Form I-765	Page 2 Part 2. Information About You (continued) Father's Name and Mother's Name	Again, don't tie Family with Last Name since they often are not the same in many cultures. Likewise, don't association First Name with Given Name since it is culturally confusing. Also allow for multiple names by adding an "(s)"	12.a. Family Name (Last Name) 12.b. Given Name (First Name) 13.a. Family Name (Last Name) 13.b. Given Name (First Name)	12.a. Family Name(s) (Surname(s)) 12.b. Given Name(s) 13.a. Family Name(s) (Surname(s)) 13.b. Given Name(s)
Form I-765	Page 2 Part 2. Information About You (continued) Place of Birth	Again, provide drop down menus for dates or at least 3 separate fields to avoid confusion of date order since the U.S. is about the only country in the world to use the mm/dd/yyyy format. This also applies to questions 20.c., 21.e. and 22.	16. Date of Birth (mm/dd/yyy) 20.c. Enter the date your Form I-765 was adjudicated (mm/dd/yyyy)	16.a. Month of Birth (drop down name of months) 16.b. Day of Birth (drop down with 1-31) 16.c. Year of Birth 20.c. Month of Adjudication (drop down name of months) 20.d. Day of Adjudication (drop down with 1-31) 20.e. Year of Adjudication etc.
Form I-765	Page 2 Part 2. Information About You (continued) Place of Birth	As I mentioned in the instructions, change the question to Gender and offer "man", "woman" and "other" or at the very least, add "other" as an alternative option to Male and Female for Sex.	17. Sex: Male Female	17. Gender Identity: Man Woman Other
Form I-765	Page 3 Part 2. Information About You (continued) Information About Your Last Arrival in the United States	Re-evaluate the Subheaders used, especially in Part 2. They don't seem to accurately group types of information. For example, "Information About Your Last Arrival in the United States" include passport information which could have change since the point of entry (e.g. passport extension). Also "Current Immigration Status" may not have anything to do with "Your Last Arrival" if you have had a change of status within the U.S. Questions 21.1., 22 and 23 are specifc about last arrival in the U.S. 21.b-21.e. may not apply to the last arrival in the U.S.		
Form I-765	Page 3 Part 2. Information About You (continued) Information About Your Last Arrival in the United States	Tell students to leave the N off the SEVIS ID Number or add another space for the N or preprint the N before the 11 boxes because the N is part of the number.	26. Student and Exchange Visitor Information System (SEVIS) Number (if any) _ _ _ _ _ _ _ _ _ _ _	26. Student and Exchange Visitor Information System (SEVIS) Number (if any) N_ _ _ _ _ _ _ _ _ _

Document	Page and Section	My Comment	Proposed DHS Wording	My Proposed Change
Form I-765	**Page 3** **Part 2. Information About You (continued)** **Information About Your Eligibility Category**	**Clarify if you want Degree or CIP Code for F-1 STEM OPT applicants.** We've been told by the service centers for years to write the CIP code (e.g. 52.0301) in the Degree field. It is not clear if you want the degree title or the ed level or the major. As written, you may get "bachelor of science" or Masters or something else.	28.a. Degree	28.a. Major CIP Code (6-digit number) _ _ . _ _ _ _
Form I-765	**Page 4** **Part 3. Biographic Information About You**	**Clearly state the biographic information is optional.** It is okay to explain how the information is useful and may help the applicant, but it should be clear the info is optional.	Part 3. Biographic Information	Part 3. Biographic Information (Optional)
Form I-765	**Page 4** **Part 4. Applicant's Statement, Contact Information, Declaration, Certification and Signature**	**Remove the phone numbers or clearly explain how they will be used.** With so many scams, the applicant may fall victim if someone poses as a USCIS representative about a USCIS application since the applicant knows they provided their phone number in the application.	Applicant's Contact Information 3. Applicant's Daytime Telephone Number 4. Applicant's Mobile Telephone Number (if any)	Applicant's Contact Information Beware of scams. USCIS will NOT call you and ask you for money over the phone. 3. Applicant's Daytime Telephone Number 4. Applicant's Mobile Telephone Number (if any)
Form I-765	**Page 7** **Part 7. Additional Information**	**Again, don't equate family name with last name and given name with first name. Also, provide the opportunity for multiple names.**	1.a.Family Name (Last Name) 1.b.Given Name (First Name) 1.c. Middle Name	1.a.Family Name(s) (Surname(s)) 1.b.Given Name(s)
Form I-765 Worksheet	**Opening paragraph**	**Consider requesting F-1 Students Applying for Off-Campus Work Authorzation due to Severe Economic Hardship (c)(3)(iii) to also complete the worksheet**	If you are applying for employment authorization under the (c)(14, Deferred Action, or (c)(33), Consideration of Deferred Action for Childhood Arrivals, categories, you must complete this worksheet so we can determine whether you have an economic need to work.	If you are applying for employment authorization under the (c)(14, Deferred Action, (c)(33), Consideration of Deferred Action for Childhood Arrivals, or (c)(3)(iii) F-1 Student Seeking Off-Campus Employment due to Severe Economic Hardship, categories, you must complete this worksheet so we can determine whether you have an economic need to work.
Form I-765 Worksheet	**Part 1. Your Full Name**	**Again, don't equate family name with last name and given name with first name. Also, provide the opportunity for multiple names.**	1.a.Family Name (Last Name) 1.b.Given Name (First Name) 1.c. Middle Name	1.a.Family Name(s) (Surname(s)) 1.b.Given Name(s)