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**Sent:** Thursday, January 11, 2018 4:55 PM  
**To:** FN-OMB-OIRA-Desk Officer for DHS <[DHSDeskOfficer@omb.eop.gov](mailto:DHSDeskOfficer@omb.eop.gov)>  
**Subject:** [EXTERNAL] Comment, Form I-17, OMB #1653-0038

OMB Desk Officer  
US Department ICE  
Department of Homeland Security  
Washington, DC

REF: OMB Control Number 1653-0038  
Call for Comments, Federal Register

Dear Sir or Madam,

I am writing in response to the call for comments regarding the form I-17 for schools. During our most recent recertification process, we became aware that the form section 2.2 asking for fields of study is not appropriate for the K-12 community. In requiring us to list all of the subjects taught *with the exception of* English, we are omitting information. Currently, any mention of English in this section of the I-17 is viewed as falling under language training only, not as a bona fide subject taught in American primary and secondary schools as part of their normal curriculum. We are concerned that the omission of English as a subject could cause those courses not to be countable as part of a full course of study, or cause an issue for a student in the future.

We hope that the form can be modified in some way to allow K-12 institutions to reflect accurately the full extent of the offerings that student can (and must, in most cases) take in order to graduate, without triggering the language training assumption. We appreciate the opportunity that the comment period allows for us to voice this concern. Thank you for your kind attention.

Sincerely,  
Jennifer O'Connor  
PDSO

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