

## I-765 Comment 2

From: Adam Beals <[ABeals@greenriver.edu](mailto:ABeals@greenriver.edu)>

Sent: Monday, March 12, 2018 8:50 PM

To: FN-OMB-OIRA-Desk Officer for DHS

Subject: [EXTERNAL] U.S. Citizenship and Immigration Services Revision of Form I-765; DHS Docket No. 1615-0040

Speaking personally, as a DSO who routinely assists F-1 international students with the preparation of their employment applications for Optional Practical Training, I hereby submit the following comments on the proposed changes to the I-765.

### Collection of Biometric Information

I recommend that in Part 3 of I-765, Applicant's Declaration and Certification, USCIS specifies the eligibility categories for biometric services. Currently, the USCIS website lists:

You must also pay an \$85 biometric services fee, for a total of \$495, if you are filing with one of the following eligibility categories:

- (c)(33) Requesting consideration of Deferred Action for Childhood Arrivals (DACA);
- (c)(35) A beneficiary of an approved employment-based immigrant petition and you are facing compelling circumstances; or
- (c)(36) A spouse or unmarried dependent child of a beneficiary of an employment-based immigrant petition who is facing compelling circumstances.

There is no biometric services fee for any other eligibility category.

International students on F or M visas already provide certain information, such as fingerprints or photographs, to receive their visas and upon entrance to the United States through Customs and Border Protection. An additional biometrics appointment would increase the hour burden per response and the total public burden in terms of cost and hours, in addition to the burden on the student, and seems unlikely to produce useful information for the Department. I recommend that the eligibility categories are clarified or this section is removed from the I-765 form and retained on the website.

### Authorized Release of Information

I encourage the Department to eliminate the proposed addition to Part 3 of I-765, Applicant's Declaration and Certification, that authorizes the release of the application, all supporting documents, and USCIS records to other entities and persons where necessary for the administration and enforcement of US immigration law. In the previous paragraph of that same section, the applicant is already asked to authorize the release of all records needed to determine his/her eligibility for employment. I-765 is the Application for Employment Authorization, and only documents and parties necessary to determine eligibility should be authorized. The Application for Employment Authorization should not be coupled with other declarations.

Thank you for the opportunity to provide input concerning your proposed revision of Form I-765 and its instructions.

Adam Beals | Director of International Student Advising Green River Community College | Auburn,  
Washington USA Phone 253-288-3493 | | Email [abeals@greenriver.edu](mailto:abeals@greenriver.edu)<<mailto:abeals@greenriver.edu>>  
Current students: book an appointment with me online at  
><http://meetme.so/AdamBealsGRCC><  
Web site: >[www.greenriver.edu/international](http://www.greenriver.edu/international)<