



December 11, 2017

Samantha Deshombres  
Chief, Regulatory Coordination Division  
Office of Policy and Strategy  
U.S. Citizenship and Immigration Services  
Department of Homeland Security  
20 Massachusetts Avenue, NW  
Washington, DC 20529

Re: U.S. Citizenship and Immigration Services Revision of Form I-765; DHS Docket No.  
USCIS-2005-0035

Dear Ms. Deshombres:

NAFSA: Association of International Educators commends the United States Citizenship and Immigration Services (USCIS) for its efforts to revise Form I-765 “Application for Employment Authorization” to streamline the process for obtaining a Social Security number in addition to the Employment Authorization Document. NAFSA is the world’s largest association of international education professionals with over 10,000 members, many of whom work with international students, faculty, and researchers who may be eligible to file Form I-765. We offer several specific suggestions that we believe will improve the proposed revised form.

**Expand the Name Fields**

NAFSA urges USCIS to expand the number of characters that can be entered in the field “Your Full Legal Name” (Part 2, items 1.a., 1.b., and 1.c.). We recommend that the Department take the same approach for Form I-765 that it took for the Student and Exchange Visitor Information System (SEVIS), allowing forty characters for each field: forty for family name; forty for given name; and forty for middle name ([https://www.ice.gov/doclib/sevis/pdf/batch\\_api\\_6.35\\_073117\\_main.pdf](https://www.ice.gov/doclib/sevis/pdf/batch_api_6.35_073117_main.pdf)). Allowing applicants to enter their names fully and accurately will help ensure that their names appear accurately and consistently across a wide range of government forms such as immigration forms and records, Social Security cards, and driver licenses. We also encourage the Department to include in the instructions to Form I-765, guidelines for truncating names that will not fit into the form’s fields, and to share these guidelines with other federal and state agencies so that nonimmigrants are not denied benefits which they are due simply to name mismatches caused by the limits of Form I-765.

**Eliminate the Ethnicity and Race Questions**

NAFSA strongly encourages the Department to eliminate the proposed questions concerning “Ethnicity” and “Race” (Part 3, items 1 and 2). These questions are unrelated to an applicant’s eligibility, may be confusing for applicants, and seem unlikely to produce useful information for the Department. If the Department believes that biographic data of this nature is useful, applicants should be given the opportunity to report it but not required to report it. These fields should be optional if on the form at all. Furthermore, we would encourage the Department, if it decides to collect such information, to take a more nuanced approach such as that used by the Department of Education: [https://nces.ed.gov/ipeds/Section/collecting\\_re](https://nces.ed.gov/ipeds/Section/collecting_re).

**Revise the Options for Reporting Prior SSN**

NAFSA recommends revising the options for reporting a prior Social Security number to allow an applicant to indicate that although a number was obtained, the applicant no longer knows the number (items 9 and 10 in Part 2 “Other Information”). For example, an alien may have been assigned a number years ago, but have lived abroad for an extended period and forgotten the number. Since 9.b. is labeled “Provide your Social Security Number (SSN) (if known),” the Department has already contemplated that someone may have been issued a number but no longer recall it. Adding an item 9.c. allowing the applicant to clearly indicate that she or he has forgotten the number will allow the applicant to clarify this.

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

Sincerely,

Sheila K. Schulte  
Deputy Executive Director  
Leadership and Professional Development Services