



The Professional Organization for Immigration Lawyers
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Governor Jerry Brown
State of California
c/o State Capitol, Suite 1173
Sacramento, CA 95814

Re: Detrimental Impact of DMV Regulations on International Students and Scholars
Request for Regulatory Review and Amendment

Dear Governor Brown:

The American Immigration Lawyers Association ("AILA") submits this letter as a request for your support in reviewing and amending existing Department of Motor Vehicles ("DMV") regulations in the State of California as those regulations pertain to driver's license applicants who are foreign born.

AILA is a voluntary bar association of more than 14,000 attorneys and law professors practicing, researching, and teaching in the field of immigration and nationality law. Our mission includes the advancement of the law pertaining to immigration and nationality and the facilitation of justice in the field. AILA members regularly advise and represent businesses, U.S. citizens, lawful permanent residents, and foreign nationals regarding the application and interpretation of U.S. immigration laws. AILA appreciates the opportunity to present our opinion in relation to the current State of California driver's license programs and believes that our members' collective expertise makes us particularly well-qualified to offer views that we believe will mutually benefit the public and the government.

At the outset, AILA would like to commend State of California congressional leaders, the Governor's Office, and the DMV for recognizing the inherent safety concerns, which necessitated that persons without lawful presence documentation under federal law be permitted to attain California driver's licenses. The AB 60 legislation marked a much needed improvement to existing law. Unfortunately, however, current state regulations have failed to take into consideration the licensing requirements that impact an entirely separate but equally important class of persons, those who *are* lawfully present under federal law but are nonetheless effectively prohibited from attaining full privilege driver's license renewals in this State. Absent amendment to the existing regulations, these classes of individuals are often unfairly

penalized by being required to choose between applying for an AB 60 license, or not possessing a license at all. As explained below, requiring lawfully present persons to apply for AB 60 licenses imposes unjustifiable safety and personal liberty risks. Furthermore, the latter alternative would obviously circumvent the purpose of AB 60, which was to ensure that all drivers on the state roadways be licensed to operate motor vehicles.

There are many stakeholders detrimentally impacted by the current licensing requirements imposed on lawfully present foreign born persons in the State of California that your office should be made aware of, including but not limited to, institutions of higher education and their students, international faculty, researchers and other employees, as well as private employers and their employees. For purposes of this correspondence, however, AILA is specifically raising the issues that are impacting California's higher education institutions and their affiliate entities. Note that AILA intends to submit additional information to your office addressing the concerns raised by public and private employers with respect to licensing requirements that impact lawfully present nonimmigrant employees in the State of California in a subsequent correspondence.

The international student population has brought an economic benefit of over \$4 billion and created an estimated 47,707 jobs for the State of California in the 2013-2014 academic year alone.¹ Accordingly, protecting the interests of the international student and scholar population in our State should be made a priority as a matter of public interest. We are therefore providing specific examples to illustrate the licensing issues faced by these classes of lawfully present persons, with the hope that your office will seek immediate action to require the regulatory amendment and policy changes necessary to protect these classes.

I. Summary of Relevant Vehicle Code and Existing DMV Regulations

Existing law at Vehicle Code (VC) § 12801.5(a) provides that *“Except as provided in Section 12801.9, the department shall require an applicant for an original driver’s license or identification card to submit satisfactory proof that the applicant’s presence in the United States is authorized under federal law.”* Section 12801.5(a), therefore, sets forth the requirement that driver’s license applicants must prove lawful presence for a full-privilege California driver’s license.

VC § 12801.9, which was recently codified pursuant to AB 60, provides that *“...the department shall issue an original driver’s license to a person who is unable to submit satisfactory proof that the applicant’s presence in the United States is authorized under federal law if he or she meets all other qualifications for licensure and provides satisfactory proof to the department of his or her identity and California residency.”* Section 12801.9, therefore, implements the AB 60 license program to ensure that foreign born persons who are unlawfully present are able to obtain driver’s privilege licenses within this State.

VC § 12801.8(b) clarifies that in the case of driver’s license renewals for lawfully present nonimmigrants, prior to the expiration of the existing license, applicants may *“...request an extension of the term of the driver’s license by submitting to the department satisfactory proof that the applicant’s presence in the United States has been reauthorized or extended under federal law.”* This same section mandates that *“the department shall adjust the expiration date of the driver’s license so that it does not exceed the expiration date of the revised federal document...”* Section 12801.8,

¹ See The International Student Economic Value Tool, NAFSA, selecting “California” available online at http://www.nafsa.org/Explore_International_Education/Impact/Data_And_Statistics/The_International_Student_Economic_Value_Tool/, accessed 5/1/2015.

therefore, establishes the state licensing policy for driver's license renewals as applicable to lawfully present nonimmigrant classes.

The DMV regulations at 13 CCR §§ 15(d) and 15(e) enumerate the various ways in which a nonimmigrant may prove legal presence for purposes of satisfying the requirements for an original driver's license pursuant to VC § 12801.5(a). Among those documents listed, those of most relevance here are Forms I-94 Arrival/Departure Record, Employment Authorization Card ("EAD") and Notice of Action (I-797) Approved Petition. See 13 CCR §§ 15(d)(5), 15(e)(3) and 15(e)(7).

II. Instances in which International Students and Scholars are Lawfully Present under Federal Law yet Ineligible for Full Privilege Driver's License Renewals

The regulatory framework set forth at 13 CCR §§ 15(d) and 15(e) fails to capture several instances in which a nonimmigrant international student or scholar may indeed be lawfully present under federal law. As you will see, notably absent from the list of acceptable documents at 13 CCR §§ 15(d) and 15(e) are Notice of Action (I-797C) Receipt Notice, Forms I-20 and DS-2019, which are all potential status documents at times issued to F-1 nonimmigrant students, J-1 international students and scholars, and F-2 and J-2 dependents. In actuality, DMV does accept Forms I-20 and DS-2019, in conjunction with other status documents such as a valid I-94 to issue driver's licenses. Nonetheless, the absence of these documents in the state regulation and the lack of a clear policy as to which validity dates control the validity of the driver's license duration have resulted in unfair and restrictive licensing requirements on California's international students and scholars.

The paragraphs that follow will provide specific examples in which international students and scholars in this State are prevented by regulation from attaining a renewed full privilege driver's license simply because appropriate documents are not listed within the regulation or because of DMV's application of the regulation at a policy level. The unfortunate consequence of the regulatory scheme has been an issue for our international students and scholars for years, but as explained below the issue is now exacerbated by AB 60. AB 60 now effectively requires these lawfully present individuals to choose between applying for an AB 60 license, or risk driving without a license. As explained below, requiring lawfully present students and scholars to apply for AB 60 licenses is not always a solution and more importantly imposes unjustifiable safety and personal liberty risks, which will only serve to deter application for licensure all together in the below circumstances. This consequence would obviously circumvent the purpose of AB 60 in its entirety, which was to ensure that all drivers on the State roadways be licensed to operate motor vehicles.

a. Nonimmigrant F-1 Students with an authorized Grace Period

International students typically hold F-1 nonimmigrant status. F-1 students are admitted to the U.S. for duration of status ("D/S"), which is defined as completion of the course of study and any authorized practical training following completion of studies, as iterated on the Form I-20, plus 60 days.² The state regulation itself does not list Form I-20 as an acceptable document to prove lawful presence.³ However, apparently as a matter of DMV policy the agency does accept Form I-94 Arrival/Departure record with D/S validity in conjunction with the Form I-20 to verify lawful presence and issue a full privilege driver's license. DMV presently matches the expiration of the

² 8 CFR § 214.2(f)(5)(iv)

³ It is unclear where DMV's acceptance of Form I-20 originated from, as these documents are not iterated within the regulation as acceptable documents. It is possible that the policy of accepting these documents originated from past guidance issued by Immigration and Customs Enforcement (ICE) regarding licensing of nonimmigrant students and exchange visitors.

student's driver's license to the end date of the F-1 program listed on page 1 of the Form I-20. DMV does not add the 60 day grace period into the license validity. Note that Immigration and Customs Enforcement ("ICE"), the agency which acts as administrator over the Student and Exchange Visitor Program ("SEVP"), has confirmed that the SAVE database through which DMV verifies status does account for the grace period.⁴ Therefore, the limitation of the driver's license to the end date of the F-1 program listed on page 1 of the Form I-20 appears to be a discretionary policy level decision at DMV. Students in this situation are effectively required to choose between applying for an AB 60 license or driving without a license for the 60 day grace period, despite their possession of documentary evidence that their stay is authorized under federal law as required by VC § 12801.5(a).

b. Nonimmigrant J-1 Students and Scholars with an authorized Grace Period

Many of the state's higher education institutions and their affiliates employ international students and scholars in J-1 nonimmigrant status. J-1 nonimmigrants are admitted to the U.S. for D/S validity, which is defined as completion of the J program as iterated on the DS-2019, plus 30 days.⁵ Similar to the Form I-20 description above, the State regulation itself does not list DS-2019 as an acceptable document to prove lawful presence.⁶ However, apparently as a matter of DMV policy the agency does accept Form I-94 Arrival/Departure record with D/S validity in conjunction with the Form DS-2019 to verify lawful presence and issue a full privilege driver's license. DMV presently matches the expiration of the driver's license to the end date of the J-1 program listed on page 1 of the DS-2019, rather than adding the 30 day grace period into the license validity. Note that ICE has confirmed that the SAVE database through which DMV verifies status does account for the grace period.⁷ Therefore, the limitation of the driver's license to the end date of the J-1 program listed on page 1 of the Form DS-2019 appears to be a discretionary policy level decision at DMV. J-1 students and scholars, and their J-2 dependents, in this situation are effectively required to choose between applying for an AB 60 license or driving without a license for the 30 day grace period, despite their possession of documentary evidence that their stay is authorized under federal law as required by VC § 12801.5(a).

c. F-1 Students relying on CAP GAP

F-1 students are admitted to the U.S. for D/S pursuant to 8 CFR § 214.2(f)(5). Students who have completed their academic program of study as listed on the Form I-20, as well as the accompanying period of post-completion optional practical training ("OPT") and/or science, technology, engineering or math ("STEM") extensions, are sometimes dependent upon CAP GAP protection as described at 8 CFR § 214.2(f)(5)(vi)(A). CAP GAP benefits pursuant to this provision essentially extend the D/S (and in certain instances, employment authorization) through September 30th (i.e., the remainder of the existing fiscal year) if the student is the beneficiary of a timely filed H-1B petition requesting a change in status.

⁴ U.S. Immigration and Customs Enforcement, SEVP Fact Sheet 1103-02, available online at http://www.ice.gov/doclib/sevis/pdf/dmv_factsheet.pdf, accessed 05/01/2015.

⁵ 8 CFR § 214.2(j)(1)(ii)

⁶ It is unclear where DMV's acceptance of Form DS-2019 originated from, as these documents are not iterated within the regulation as acceptable documents. It is possible that the policy of accepting these documents originated from past guidance issued by Immigration and Customs Enforcement (ICE) regarding licensing of nonimmigrant students and exchange visitors.

⁷ U.S. Immigration and Customs Enforcement, SEVP Fact Sheet 1103-02, available online at http://www.ice.gov/doclib/sevis/pdf/dmv_factsheet.pdf, accessed 05/01/2015.

Inherently, F-1 students dependent upon CAP GAP will be in possession of an I-94 Arrival/Departure record endorsed D/S and a Form I-20 endorsed on page 3 by the designated school official (“DSO”) as extending status through September 30th of the current fiscal year. However, new EAD cards are not issued to students by Department of Homeland Security (“DHS”) in a period of stay authorized by CAP GAP. These F-1 students, despite their continuation of authorized stay through September 30th under federal law and their ability to present endorsed Form I-20’s showing the extended period of stay are often unable to renew their driver’s licenses because the program of study on page 1 of the Form I-20 has concluded and they are no longer in possession of a valid EAD.

The result is that these F-1 students, despite their continuation of authorized stay and extended employment authorization under federal law, are effectively required to choose between applying for an AB 60 license or driving without a license for the CAP GAP period despite their possession of evidence that their renewed status is in compliance with VC § 12801.8(b).

d. F-1 Students with Pending STEM Extensions

F-1 students are admitted to the U.S. for D/S pursuant to 8 CFR § 214.2(f)(5). Students who have completed their academic program of study in a field of STEM and are offered employment with an E-Verify employer, have an option to apply for a 17 month STEM extension of Post-Completion OPT pursuant to 8 CFR 214.2(f)(11)(i)(C). Provided that the extension was timely filed prior to the expiration of the post-completion optional practical training EAD, the student’s existing EAD is automatically extended while the application remains pending for a period not to exceed 180 days or the date of decision, whichever is sooner.⁸ A new EAD is not issued in the interim as proof of extended work authorization. Rather, F-1 students dependent upon the timely filed STEM extension will be in possession of an I-94 Arrival/Departure record with D/S validity and a Form I-20 endorsed by the school DSO on page 3 reflecting the STEM extension. However, the new EAD may not be available for several months thereafter. The result is that these F-1 students, despite their continuation of authorized stay and extended employment authorization under federal law, are effectively required to choose between applying for an AB 60 license or driving without a license throughout the period that the STEM extension is pending, despite their possession of evidence that their renewed status is lawful under federal law and in compliance with VC § 12801.8(b).

e. Certain Nonimmigrant Scholars with Timely Filed Requests for Extensions of Stay

Many of the State’s higher education institutions employ international scholars that are dependent upon visas such as the H-1B, TN, O-1, etc. These are each nonimmigrant visa categories which are specifically identified in federal regulations at 8 CFR § 274a.12(b)(20) as being eligible to remain in the U.S. and continue lawful employment upon the timely filing of an extension of stay. Specifically, this provision states that such persons continue to maintain a lawful period of stay for a period not to exceed 240 days beginning on the date of the expiration of the authorized period of stay. The only evidence that such a nonimmigrant receives from the DHS verifying the timely filing of an extension of stay is a Notice of Action (I-797C) Receipt Notice. Accordingly, the above listed employment authorized classes cannot prove lawful presence under 13 CCR § 15(e)(7) until the date that the Notice of Action (I-797) Approved Petition is issued. The result is that these scholars and their families, despite their continuation of authorized stay and extended

employment authorization under federal law, are effectively required to choose between applying for an AB 60 license or driving without a license throughout the period that the extension is pending, despite their possession of evidence that their renewed status is lawful under federal law and in compliance with VC § 12801.8(b).

f. Other Classifications with Timely Filed Requests for Extensions of Stay or Change in Nonimmigrant Status

It is not uncommon for derivative beneficiaries, such as H-4 nonimmigrant spouses, to lawfully attend university programs of study without changing to F-1 student status. When an individual in this and other specified nonimmigrant class has a timely filed⁹ extension of stay or change in nonimmigrant status pending, the statute tolls calculation of unlawful presence for a period of 120 days.¹⁰ As a matter of official DHS policy, the 120 day period is extended to cover the entire period during which an application for extension of stay or change in status is pending.¹¹ The only evidence that such a nonimmigrant receives from the DHS verifying the timely filing of an extension of stay is an Notice of Action (I-797C) Receipt Notice. Accordingly, the above listed class of persons is cannot prove lawful presence under 13 CCR § 15(e)(7) and therefore are unable to obtain a driver's license renewal. The result is that these students, despite their continuation of authorized stay under federal law, are effectively required to choose between applying for an AB 60 license or driving without a license throughout the period that the extension or change of status is pending, despite their possession of evidence that their renewed status is lawful under federal law and in compliance with VC § 12801.8(b).

III. AB 60 Licensing Fails to Address Regulatory Shortcomings and Imposes Significant Safety and Personal Liberty Risks on International Students and Scholars

Summarily, while AB 60 was no doubt a much needed improvement to existing law, establishment of the AB 60 license unjustly places the unlawfully present population in a seemingly better situation than many classes of lawfully present persons, such as international students and scholars. As evident by the foregoing examples, there are many instances in which international students and scholars who are lawfully present under federal law and/or policy are prevented from obtaining driver's license renewals in the State of California.

It appears that DMV recognized this dilemma and believed that AB 60 could help resolve the issues by enabling these lawfully present persons to apply for an AB 60 license, since the AB 60 document options explicitly list Forms I-20 and DS-2019 as acceptable identity documents. In most instances, applying for an AB 60 license as an alternative to a full privilege driver's license would not even resolve the issue. These individuals would actually have to first allow their full privilege driver's licenses to expire prior to even becoming eligible to apply for an AB 60 license. And, as a matter of common practice, DMV field offices have been routinely referring applicants who previously held full privilege driver's licenses to secondary review pursuant to 13 CCR § 16.06. AB 60 applicants referred to secondary review are not eligible for an interim temporary license pursuant to 13 CCR § 16.14, and so these applicants are essentially required to wait several

⁸ 8 CFR § 274a.12(b)(6)(iv)

⁹ Timely filing for purposes of this section requires filing the request for extension of stay or change of nonimmigrant status prior to the expiry of the individual's previous I-94 admission period.

¹⁰ INA § 212(a)(9)(B)(iv)

¹¹ USCIS Interoffice Memorandum from Donald Neufeld et al, "Consolidation of Guidance Concerning Unlawful Presence for Purposes of Sections 212(a)(9)(B)(i) and 212(a)(9)(C)(i)(I) of the Act", May 6, 2009.

months for secondary review to clear in order to even obtain an AB 60 license. Such an occurrence circumvents the purpose of AB 60, which was to ensure that all drivers on the State roadways be licensed to operate motor vehicles.

It is important to also note that even if the AB 60 license were a practical solution for these classes, carrying the AB 60 license imposes significant safety and personal liberty risks to lawfully present individuals. It has already been acknowledged by the California Congressional Delegation that foreign born persons present in the U.S. are primary targets for scams, discrimination, retaliation, extortion and comparable vulnerabilities.¹² Requiring lawfully present foreign born persons to carry the AB 60 license will no doubt lead to assumption that such individuals are unlawfully present and will unnecessarily increase such risk factors.

Furthermore, although the language of the statute expressly prohibits use of the AB 60 license as a means to consider an individual's citizenship or immigration status as a basis for a criminal investigation, arrest or detention,¹³ it is impossible for the State of California to enforce such a prohibition in other jurisdictions. Given that neighboring jurisdictions have vastly differing state laws regarding the criminal investigation, arrest and detention of individuals based on actual or presumed immigration status, any international students or scholars who are lawfully present under federal law but opt to carry an AB 60 license and travel to neighboring jurisdictions would be at a heightened risk of improper detention and loss of personal liberty.

Finally, although the language of AB 60 explicitly prohibits public disclosure of information collected by the DMV in the course of the licensing program, the statute does allow for other disclosures "*as required by law.*"¹⁴ It would be virtually impossible for the State of California to foresee all such circumstances in which federal law may mandate information sharing with federal agencies, and to the extent that information sharing does occur how that information may be used. For example, in the instance of information shared with DHS, it is at least plausible that the mere past possession of an AB 60 license could support DHS in presuming that a violation of status has occurred and could potentially result in denial of future immigration benefits.

IV. Prospective Implications of Real ID on International Students and Scholars

As California continues down the path of preparedness to implement the Real ID Act ("Real ID"), we further feel that it is appropriate to highlight stakeholder concerns of the future implications of Real ID as those requirements impact international students and scholars. Specifically, in relation to international students and scholars and their dependents, Real ID will make licenses available to those in possession of "*a valid, unexpired nonimmigrant visa or nonimmigrant visa status for entry into the United States.*"¹⁵

Real ID delegates DHS the authority to determine what documents can be accepted to prove identity and lawful status for purposes of obtaining a Real ID license. The DHS regulation lists only two conceivable ways in which these individuals could satisfy the proof of identity requirement for a Real ID license: i) possession of an unexpired EAD¹⁶ or ii) possession of an unexpired foreign

¹² See California Congressional Delegation letter to Jeh Johnson, Secretary of the U.S. Department of Homeland Security, regarding implementation of AB 60 and REAL ID compliance, dated May 9, 2014, available online at <https://www.aclunc.org/news/california-congressmembers-push-back-dhs-over-driver%E2%80%99s-licenses-immigrants>. Accessed May 4, 2015.

¹³ VC § 12801(c)(3)

¹⁴ VC § 12801.9(j)

¹⁵ Real ID Act, HR 1268, Title II, Section 202(c)(2)(B)(v)

¹⁶ 6 CFR § 37.11(c)(1)(v)

passport with a valid, unexpired U.S. visa affixed accompanied by the approved I-94 form documenting the applicant's most recent admittance into the U.S.¹⁷

As explained in the foregoing paragraphs, there are many instances in which an F-1 student may not possess a valid EAD, such as instances of ongoing program enrollment and ineligibility for employment authorization, post-completion CAP GAP, and post-completion STEM extensions. Moreover, it is extremely common for international students and scholars to possess a valid passport, I-94 with D/S validity, and Form I-20s or DS-2019, respectively, yet *not* be in possession of a valid visa stamp.

Visa stamps are not required to maintain nonimmigrant status while foreign born persons are physically present in the U.S., rather they are only required in the instance of international travel to facilitate a subsequent U.S. re-entry. As a result, the visa stamps of international students and scholars often expire during the course of the program(s) of study or employment, even though the individual continues to maintain lawful nonimmigrant status. There are additionally some nationalities, such as Canadians, who are visa-exempt and would almost never be in possession of a visa stamp, but for specific nonimmigrant classes. Moreover, requiring international students and scholars to have valid U.S. visa stamps for the purposes of Real ID would be extremely costly and overly burdensome as this would require individuals to travel abroad to obtain the visa stamp since there is no longer state-side visa processing.

The DHS regulation implementing Real ID allows for a state exceptions process, which enables a state DMV to establish another process for persons who, for reasons beyond their control, are unable to present all necessary documents and must rely on alternate documents to establish identity or date of birth.¹⁸ In light of the documented disadvantages that will be posed to the international students and scholar population in our state, we request your action in requiring the DMV to implement an appropriate state exceptions process to resolve the outlined issue presented by the proof of identity requirement prior to fully implementing Real ID.

V. Conclusion

As noted, AILA commends our State of California congressional leaders, the Governor's Office, and the DMV for recognizing the inherent safety concerns which necessitated that persons without lawful presence documentation under federal law be permitted to attain California driver's licenses. The AB 60 marked a much needed improvement to existing law. However, absent regulatory amendment and policy changes at the DMV, there are many instances in which lawfully present international students and scholars in our state are unfairly penalized by being required to choose between applying for an AB 60 license, or not possess a license at all.

Not only will applying for an AB 60 license fail to resolve the existing issues, requiring lawfully present classes to apply for an AB 60 license in order to drive on our State roadways presents too many unjustifiable safety and personal liberty risks. Such risks should not be imposed on the international population that is documented as having generated over \$4 billion and created an estimated 47,702 jobs for the State of California in the 2013-2014 academic year alone.¹⁹

¹⁷ 6 CFR § 37.11(c)(1)(vi)

¹⁸ 6 CFR § 37.11(h)

¹⁹ See The International Student Economic Value Tool, NAFSA, available online at http://www.nafsa.org/Explore_International_Education/Impact/Data_And_Statistics/The_International_Student_Economic_Value_Tool/, accessed 05/01/2015.

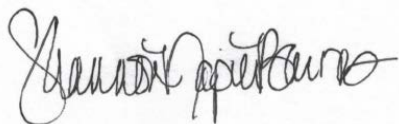
Accordingly, we trust you will agree that protecting the interests of the international student and scholar population in our state should be made a priority as a matter of public interest.

We appreciate the opportunity to present our opinion in relation to the current State of California driver's licensing programs. We at AILA would very much appreciate the opportunity to review the foregoing issues with your office to assist in establishing a resolution to the licensing dilemmas that continue to detrimentally impact our international students and scholars. To arrange a meeting or discussion to further explore these issues, please contact Shannon Napier Barnes by e-mail at shannon@mehlmanbarnes.com or by telephone at (858) 546-4333.

Kind regards,



Victor D. Nieblas Pradis
AILA President-Elect



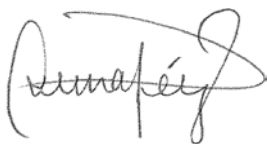
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cc: Members of the California State Senate
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