



CDS International, Inc.
440 Park Avenue South, 2nd Fl.
New York, NY 10016
Tel +1.212.497.3500
Fax +1.212.497.3535

Washington, DC
Ann Arbor, MI
Berlin, Germany
www.cdsintl.org

April 2, 2009

Mr. Stanley Colvin
Deputy Assistant Secretary
Office of Private Sector Exchange
Bureau of Educational and Cultural Affairs
Department of State
301 4th Street, SW
Washington, DC 20547

**RE: Public Notice 6507, Form DS-7002, Training/Internship Placement Plan,
OMB Control Number 1405-0170**

Dear Secretary Colvin:

CDS International, Inc. (CDS) submits the attached comments in response to Public Notice 6507, concerning revisions to the standardized Training/Internship Placement Plan, Form DS-7002.

CDS is a nonprofit 501(c)(3) organization dedicated to advancing global understanding through international professional development programs. As a designated J-1 Exchange Visitor Program sponsor in the Intern and Trainee categories, CDS brings over 2,000 individuals from 80 countries into the U.S. annually to train at over 800 host companies. Our programs also include internships abroad for Americans, professional fellowships, study tours, and public diplomacy initiatives.

We support the introduction of a new DS-7002 and feel that the proposed form is a clear improvement over the previous version. However, we do hope that a few irregularities will be addressed before the form is released. In the pages that follow, CDS proposes minor revisions to each section of the form. We believe that these revisions, if implemented, would result in more consistent information collection while better conveying to Host Organizations, Sponsors, and Interns/Trainees the intent of the Exchange Visitor Program and associated responsibilities of each party – goals that we are confident we share with the Department of State.

Thank you for the opportunity to provide comments on the new DS-7002. We are available to clarify any of the comments that follow and look forward to utilizing the final version of the form.

Sincerely,

A handwritten signature in black ink that reads 'Robert Fenstermacher'. The signature is written in a cursive, flowing style.

Robert Fenstermacher
Executive Director

Suggested Revisions to Form DS-7002

Submitted by CDS International, Designated Sponsor for Intern/Trainee Categories Exchange Visitor Program

Participant Information

U.S. Telephone Number – CDS suggests eliminating this field, as Interns/Trainees would typically not yet have a U.S. telephone number at the time DS-7002 is filled out.

Cell Phone Number – CDS suggests eliminating this field as well, since Interns/Trainees typically do not use their home country cell phones while in the U.S., and would not yet have a U.S. cell phone at the time the DS-7002 is filled out.

Additionally, we suggest that the following fields be renamed to capture the varying educational backgrounds of Interns and Trainees:

- Change *Level of Degree (if graduate)* to *Type of Degree/Certificate*;
- Change *Date Awarded* to *Date Awarded/Expected*;
- Change *Field of Study (Current Student/Graduate)* to *Field of Study*.

Site of Activity Information

Third Party or Sponsor Host Organization Name – We are concerned that this wording is confusing; *Host Organization Name* would be simpler.

Contract Agreement

Typically, Sponsors are far more familiar with the regulations than are Supervisors at Host Organizations. Therefore, we feel it would be beneficial that the signed statements for Supervisors spell out the contents of the regulations in detail, while the statements for Sponsors might refer to the regulations in the abstract or as a whole. We suggest the following revisions:

- *Supervisor* - Here, we recommend moving Item 2, which refers to the Intern/Trainee regulations as a whole, to the Sponsor section. We feel that the Supervisor's responsibilities should ideally be spelled out in greater detail here, and this could be accomplished as described below.
- *Sponsor* - To reinforce the responsibilities of the Supervisor, we suggest that Items 1, 2, 3 and 4 be moved to the Supervisor section, as these concerns are under the Supervisor's direct control. Although CDS as Sponsor does everything in our power to see that these items are fulfilled, we are not present at the internship/training site on a daily basis, and therefore, it would be sound to ask the Supervisor to sign a statement attesting to these conditions on an official federal form.
- Additionally, we would suggest that the false certification statement be reworded to include all signatories of the form, not only the sponsor. It would be helpful if this statement named the sponsoring organization and host organization as the primarily liable parties rather than the individuals who sign the form.

Suggested Revisions to Form DS-7002

***Submitted by CDS International, Designated Sponsor for Intern/Trainee Categories
Exchange Visitor Program***

Page 2

On the second page of the form, we support many of the revisions suggested by our fellow members of the Alliance for International Educational and Cultural Exchange.

Specifically, the form states in the preamble of this section that both training and internship plans require phases, when in fact the regulations do not require phases for intern programs. We recommend that this preamble be replaced with the following language:

“Each Training/Internship Placement Plan should cover the entire duration of the training/internship program and should provide a clear sense of expected outcomes and of methods for tracking progress and providing oversight. An Internship Program need only consist of a one-page Placement Plan; a Training Program, however, must consist of multiple phases to reflect the Trainee’s exposure to different functional areas and projects and his/her overall progression throughout the program.”

This language draws a distinction between the Intern and Trainee categories, and sets clear expectations for the content of a completed form for each.

In the last two sections, we would recommend that the parenthetical notes indicating which section is to be filled out only for Interns and which only for Trainees be made more prominent. The revised prompts would read as follows:

For Training Programs Only

Methodology of Training Used During this Phase and Chronology or Syllabus for this Phase

For Internship Programs Only

Role of Intern in the Organization and Specific Tasks and Activities to be Completed for this Program

Thank you again for considering CDS International’s comments on the DS-7002.