

March 10, 2011

Mr. Stanley S. Colvin
Deputy Assistant Secretary
U.S. Department of State
Office of Private Sector Exchange, SA-5, 5th Floor
2200 C Street, NW.,
Washington, DC 20522
Email: JExchanges@state.gov

Re: Comment Letter on Proposed Information Collection: Certificate of Eligibility for Exchange Visitor (J-1) Status; Form DS-2019, OMB No. 1405-0119. 76 Fed. Reg. 2190 (Jan. 12, 2011)

Dear Mr. Colvin:

On behalf of the Massachusetts Institute of Technology (MIT), I am writing to comment on the proposed information collection regarding the Certificate of Eligibility for Exchange Visitor (J-1) status (Forms DS-2019) issued by the Department of State (DOS) in the Federal Register on January 12, 2011.

Each year MIT's J-1 Exchange Program P-1-00040 sponsors research scholars, professors and short term scholars and, very rarely, specialists. While other visa types are used when appropriate, the majority of MIT's international scholar population is best served by the particular characteristics of the Exchange Visitor Program. The international scholar population is an integral part of MIT's dynamic and global research and teaching activities, and the Exchange Visitor Program is of critical importance to its mission.

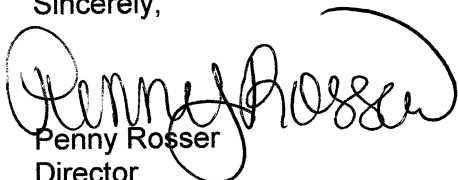
We are grateful to have this opportunity to comment on the Form DS-2019. Following is a list of recommended modifications:

- 1) **Bar Code**: It is unclear whether the bar code on the upper right-hand side of the form is currently being used. We have not been informed by our J-1 exchange visitors that their DS-2019s are being scanned at the port of entry. If this bar code will not be in the future, it is recommended that this bar code be eliminated from the form to provide more space for other critical fields.
- 2) **Box 1, EV's Family Name**: The space for the EV's name is not big enough to enter the complete name(s) when the EV has a long name or multiple family names. In order for the name(s) on the form to match the name as listed in the passport, we recommended that the new DS-2019 form have a larger Box 1, so that the complete name(s) can be written, in two lines if necessary.
- 3) **"Position"** (in the biographical information section): Many EVs think "Position" means their current position at their J-1 sponsoring institution. Therefore, if this can be changed to "Last Position in Home Country", it would clarify the field and eliminate confusion on the EV's end.

- 4) **Box 3 and 5, Program dates and funding**: Currently, when an extension DS-2019 is issued, the start date on the form remains unchanged, and the new funding information is added to the existing information. This is helpful because one can always tell the original program start date by looking at any of the DS-2019 forms. However, it makes it difficult to know the funding source/amount for the extension period just by looking at the form. Similarly, the funding information on transfer DS-2019s can be confusing. Although the start date doesn't change, the transfer-in program sponsor can only list funding for its own program on the new DS-2019, and the funding that was received during the previous J program disappears from Box 5. If SEVIS could generate an extension or transfer DS-2019 for the specific period of the extension or stay at the "transfer in" school, the funding information on each form would reflect only the period covered by the form and each DS-2019 would have the most accurate information.
- 5) **Box 5, Funding information**: More than one line should be provided for the description of "Other Organization Funding". Many EVs receive more than one source of "other organization" over a several-year period, however, program sponsors can only enter a limited amount of information. In addition, more space should be provided to enter the specific sources of an "Exchange Visitor's Government Funding." Although Box 5 on the printed form is large, SEVIS does not provide enough space in its fields to list adequate information about funding.
- 6) **Subject/Field Code**: Currently, this section only shows the CIP code number, not the name of the specific academic field. Program sponsors are able to write free text in the "Subject/Field Code remarks" section, however some prefer to list the name of the university department or other information in "Subject/Field code remarks." By eliminating the bar code and other unused sections on the DS-1029 form mentioned below, space could be provided for other relevant information, such as the official "field" corresponding to the Subject/Field Code. It would clarify the primary field of activity under the current J-1 program and make the field clear when an EV is transferring from one J-1 program to another (EV must be pursuing the same research objective).
- 7) **Box 8, Statement of Responsible Officer for Releasing Sponsor (For Transfer of Program)**: In the past, when the Certificate of Eligibility was Form IAP-66, the RO/ARO of the transfer-out school had to physically sign the form to authorize the transfer. Because program transfers are now done through SEVIS, Form DS-2019 no longer requires the signature of the RO/ARO. The signature section could be eliminated, freeing up space for more useful information.

Although the notice in the Federal Register was for routine "information collection," it is an opportunity to provide comments on a form we generate for many J-1 scholars. Thank you for your consideration of these suggestions.

Sincerely,



Penny Rosser

Director

Responsible Officer, Program P-1-00040