



March 19, 2012

The Honorable Robin Lerner
Deputy Assistant Secretary for Private Sector Exchanges
Bureau of Educational and Cultural Affairs
Department of State
Washington, DC 20520

Re: Comments on 60-Day Notice of Proposed Information Collection: Form DS-7002,
Training/Internship Placement Plan, OMB Control Number 1405-0170

Dear Secretary Lerner:

The Alliance for International Educational and Cultural Exchange appreciates the opportunity to comment on the 60-Day Notice of Proposed Information Collection: Form DS-7002, Training/Internship Placement Plan, OMB Control Number 1405-0170 as published in the Federal Register on January 9th, 2012.

The Alliance is an association of 75 U.S.-based exchange organizations, and serves as the leading collective policy voice of the exchange community. Many of our members are designated sponsors in the Exchange Visitor Program.

While feedback from our members suggests that the DS-7002 works fairly well as currently designed, we believe several changes that would align the form more closely with program regulations are desirable. These include:

Remove the DUNS number. The proposed rule for Subpart A, published in 2009, included a requirement for collecting DUNS numbers. The Alliance strongly opposed this provision, and we understand that this element of the rule generated a large number of negative comments, from the general public and from Congress. A DUNS number adds little value in the process of evaluating host employers. Information in DUNS listings is self-reported and unverified, so the number does little more than verify that a company exists. Because it adds little value and is not required by program rules, the DUNS number should be eliminated from the form.

Add information on Worker's Compensation Policy. Unlike DUNS, verifying worker's compensation is required by the regulations. The 7002 form could include the carrier name and policy number, whether the policy covers the participant, and whether the host organization is exempt from having such a policy.

Strengthen Contract Agreement. The Alliance supports adding language to the Supervisor section stating that the Intern/Trainee is not displacing a full- or part-time, seasonal, or

permanent American worker and is not filling a labor need. Doing so would place this important verification (and responsibility) in the hands of the host employer, the party to the agreement with the actual on-the-ground authority for this element.

Training and internship programs continue to provide young people from around the world with outstanding opportunities to experience the United States and its people while enhancing their professional skills. We look forward to working with you and your staff to enhance the already substantial contributions these programs make to U.S. public diplomacy.

With all best wishes.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael McCarry", with a stylized flourish at the end.

Michael McCarry
Executive Director