



March 19, 2012

Ms. Robin Lerner  
Deputy Assistant Secretary for Private Sector Exchanges  
Bureau of Educational and Cultural Affairs  
Department of State  
Washington, D.C. 20520

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

Dear Ms. Lerner:

This letter is in response to the 60-Day Notice of Proposed Information Collection: Form DS-7002, Training/Internship Placement Plan, OMB Control Number 1405-0170 as presented in the Federal Register on January 9th, 2012.

CIEE handles approximately 27,000 J-1 Exchange Visitors each year on Summer Work Travel, Secondary School, Intern, Trainee, and Research Scholar programs. Over the last decade, we've sponsored close to 300,000 program participants. As a non-profit, non-governmental, tax-exempt, mission-driven organization, CIEE's goal in all programs is to fulfill our mission "to help people gain understanding, acquire knowledge, and develop skills for living in a globally interdependent and culturally diverse world". Our mission is in line with the purposes and goals of the Exchange Visitor Program.

#### **Content of the DS-7002**

Generally, the DS-7002 is effective. Small modifications could be made that would help sponsors by collecting information that is required by the regulations. Descriptions could also be revised to elicit more useful information from Host Organizations. These are "nice to have" improvements on a currently adequate form. With that context, we have a handful of suggested changes.

I will organize our comments into three categories. First, changes to align the content of the form with the current regulations; second, the order of the sections on the form; and third, other information that is helpful to collect but is not required by regulations.

#### **1. Changes to align the content with current regulations**

- Add "Worker's Compensation"

We are required to collect this information. Ideally, the DS-7002 would include the following:

Does your organization have a Worker's Compensation policy? Y/N

Carrier \_\_\_\_\_ Policy Number \_\_\_\_\_

Will your WC policy cover the intern/trainee? Y/N

If your organization does not have a Worker's Compensation policy, are you exempt from having one? Y/N

- Add "Number of Full-time employees"

This provides a sense of the size of the organization and whether or not a Site Visit will be required. Site Visits are required if the company has fewer than 25 employees or \$3M in revenue.

- Add "Annual revenue (company-wide)"

This is required to determine if a Site Visit is necessary. This can be asked as "\$0 - \$3M, \$3M - \$10M, etc." Employers will be reluctant to give a specific number but will more readily indicate their total revenue within a range.

- Add language to the "Contract Agreement" section

CIEE 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.

- Remove DUNS number

The form currently includes space for a DUNS number. This is no longer part of the regulations. We have found Dun & Bradstreet information to be unreliable because it is reported by the company itself. There are other resources we use to establish company legitimacy. We suggest this box be removed.

## 2. The order of sections on the form

As currently drafted, the specifics of the training plan are laid out in this order:

- Brief description of Trainee/Intern's role for this Program or for this Phase
- Specific Tasks and Activities to be Completed for this Program or for this Phase (Interns) or Methodology of Training and Chronology/Syllabus for this Phase (Trainees)
- Specific Goals and Objectives for this Program or for this Phase
- Knowledge, Skills, or Techniques to be Imparted During this Program or During this Phase
- Methods of Performance Evaluation and Methods of Supervision for this Program or for this Phase

In practice, when reviewing a T/IPP, it helps to start with the Description, followed by the Goals and Objectives. This order allows the reader to understand the big picture before assessing the details. In addition, it would help Host Organizations to focus on the over-arching training, not jump right into the detail of an Intern or Trainee's daily activity. As a result, we suggest the following order:

- Brief description of Trainee/Intern's role for this Program or for this Phase
- Specific Goals and Objectives for this Program or for this Phase
- Knowledge, Skills, or Techniques to be Imparted During this Program or During this Phase
- Specific Tasks and Activities to be Completed for this Program or for this Phase (Interns) or Methodology of Training and Chronology/Syllabus for this Phase (Trainees)
- Methods of Performance Evaluation and Methods of Supervision for this Program or for this Phase

This suggested order enables the Host Company to describe the proposed program in broad terms and then provide more specifics and detail as they move down the page.

In addition to changing the order, revisions should be considered for two sections. First, "Knowledge, Skills or Techniques" are generally described in the "Goals and Objectives" section. It is rare that this question

generates new information. Consider wrapping it into the “Goals” or eliminating it. Second, “Methods of Performance Evaluation” and “Methods of Supervision” are two different things. Breaking this section into two would place more emphasis on supervision and evaluation and would ensure sufficient thought, time and energy are put into each by the Host Organization and Intern / Trainee.

### 3. Additional information

In addition to the information already captured on the DS-7002, there is a fair amount more that is needed to assess a Host Organization’s suitability. We find it very helpful to collect additional information about the Company and Supervisor. We do this through an additional page which we include as part of the DS-7002. I include it for your information and also in support of comments other Sponsors might make that suggest inclusion of any of this information on the DS-7002.

CIEE requires the following supplementary information:

- Company Activities – this allows us to assess if the training is consistent with the primary activity of the business or not
- Parent Company (if applicable) – this makes it easier to identify a company and gives us additional areas for research as we get to know the host organization
- d/b/a (if applicable) – this assists us with vetting the host organization
- Year Founded – companies recently founded warrant more scrutiny
- Number of employees in department in which intern/trainee will be placed – provides a sense of the training environment
- Number of interns/trainees other than this one who will also be training in department(s) – important information when assessing company resources available for providing training
- If the Host Organization will provide any of the following, please indicate approximate value of each per month: Housing, Board, Transportation, Other – provides clarity for all parties on what total compensation will be
- Primary Supervisor Information: Name, Years of Experience in this field, Length of time working at this organization, Brief description of experience in this field – this is important as we assess whether the Supervisor is capable of providing the training proposed
- Alternate contact at Host Organization: Name, Title, Email, Telephone – provides another point of contact in case we are not able to reach the Supervisor at any point during the participant’s program
- Applicant Interview – documents that the Host Organization has interviewed the Intern/Trainee themselves

While most or all of this information could be collected and documented as part of the verification and review of the Plan, we find it helpful to have it in advance. It allows us to have a more complete picture of the organization, its resources and the credentials of the Supervisor. Moreover, it is valuable to have it in writing. I have included a sample Additional Host Organization Information page with this comment letter.

I want to thank you for the opportunity to comment on the DS-7002. I hope that the information and perspective provided in this letter contributes to refining the process of collecting and reviewing professional

development opportunities for Interns and Trainees. Should you have any questions about the information and suggestions we have offered, please do not hesitate to contact me.

We support and admire the efforts you are undertaking to improve all aspects of the J-1 Exchange Visitor Programs. As we navigate these times of change, it is important to remember the truly life-changing experiences the programs have created in their long and largely successful history. With collaboration, prudent rule-making and enforcement, we can make it possible for participants to have access to these opportunities for many years to come.

Thank you, once again, for soliciting our input as part of the process.

Sincerely,

A handwritten signature in cursive script, appearing to read "Anna Fincke".

Anna Fincke  
Responsible Officer, Intern P-3-05133 and Trainee P-3-11217  
General Manager, Work Exchange Programs  
CIEE: Council on International Educational Exchange

Encl: Additional Host Organization Information Page

Cc: James Pellow, CEO