

Assistant Secretary Lerner
U.S. Department of State
ECA/EC, SA-5, Floor 5
2200 C Street NW
Washington, DC 20522-0505

RE: 60-Day Notice of Proposed Information Collection: Training/Internship Placement Plan (comment period thru 11/28/2014)

Dear Assistant Secretary Lerner,

We appreciate your efforts to solicit public comments on the proposed information collection related to that Training and Internship Plan (T/IPP) Form DS-7002. While we do not see any changes to the time estimates on information collection and reporting burdens listed related to the paper form, we do have concerns that these time estimates and reporting burdens will be impacted with the release of SEVIS 6.18 (anticipated release in June 2015) when the Student and Exchange Program (SEVP) plans to add functionality to complete the T/IPP directly in SEVIS.

We believe that the functionality to collect and maintain the data required for the T/IPP in SEVIS is an improvement to the current paper system and we appreciate SEVP's efforts to incorporate this important document into SEVIS. However, we are concerned with the proposed updates to the SEVIS process that were outlined in the *Training/Internship Placement Plan (T/IPP) in SEVIS Webinar (August 22, 2014)* and the subsequent FAQ's. **There appears to be an unintentional design flaw requiring program sponsors to simultaneously create the T/IPP and the Form DS-2019. The proposed link between Form DS-2019 and T/IPP creation is of no benefit to either program sponsors or SEVP and it will not only lesson our ability to insure program compliance but it will also increase the administrative burden on program sponsors as follows:**

- **Increase concerns related to process, communication and compliance vulnerabilities:** As a program sponsor, we believe that the best way to insure accurate internship terms and compliance with the upcoming changes to SEVIS validation (T/IPP signatures will be linked to program validation in SEVIS) is to obtain the completed and signed T/IPP PRIOR to issuing the Form DS-2019. If the forms must be simultaneously prepared in SEVIS, compliance will become more difficult, particularly for batch schools, where there is not an option to batch the Form DS-2019 to 'draft' status. The new system, as proposed, will create vulnerabilities in our ability to have the best communication and compliance for student interns as we will lose opportunities for verification and clarification related to T/IPP details and other program information.

In addition, as a large school, hosting nearly 800 J-1 Exchange Visitors in several categories, we rely on our detailed and consistent internal processes and procedures to insure compliance for all Exchange Visitors. The proposed updates to SEVIS would require us to create separate internal processes for our Exchange Visitors in the student intern category,

thus creating processing inconsistencies between the student interns and the rest of our J-1 Exchange Visitor population.

- **Add administrative/processing burden for batch dependent schools:** Given our large Exchange Visitor population, we rely on our batch system for our day to day processing, document issuance, and reporting. If the T/IPP and Form DS-2019 are linked together in SEVIS, **this would require us to process both the T/IPP and DS-2019 via RTI.** We understand that RTI may be required for the T/IPP, either temporarily or permanently depending on relevant updates to our batch software. We can certainly accommodate T/IPP creation via RTI, as this mirrors our current process for completing the paper T/IPP. However, the additional burden of having to create the Form DS-2019 via RTI would require us to re-enter the information in our internal system manually, thus adding 1-2 extra hours for each student intern we process and increasing the possibility of data entry errors.
- **No added benefit to SEVP by requiring creation of T/IPP and Form DS-2019 to be simultaneous:** If the records can be linked based on the SEVIS ID number, the information will be easily assessable in the system. This, there seems to be no need to link the creation of the two documents together and program sponsors will have more flexibility to work within their current system capabilities and internal processing / procedures.

Do to these concerns, we request that you consider re-designing the currently proposed SEVIS 6.18 updates to allow for non-simultaneous creation of the T/IPP and Form DS-2019 in SEVIS. This will not only allow program sponsors more processing flexibility, but will also insure greater compliance in the student intern category.

Thank you for the opportunity to submit these comments.



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