



October 24, 2014

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

Re: Public Notice: 8888 – Form DS-7002 (comments)

Dear DAS Lerner,

On behalf of InterExchange, Inc., a designated sponsor of the Intern (P-4-11837) and Trainee (P-4-05739) programs, we submit the following comments and concerns regarding pending changes and improvements to the Form DS-7002:

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The option to identify whether a participant is an intern, trainee, or student intern has been removed and may make it more difficult for the embassy/consulate to evaluate candidates according to their category. We recommend continuing to identify participant along such classifications.

A place to indicate one general supervisor as well as one general location for the program should remain. Additional supervisors and locations for subsequent phases could be so stated by the host as appropriate to indicate. [Note: Adding extra supervisors will require considerable data reformatting in our internal system and will be complicated by participants that arrive late whereby phases need to be shortened or amended. Similarly, the new phase field on page 3 through which additional employees are identified as participating in providing training/supervision seems to make the addition of a new supervisor for each phase unnecessary.]

Change from "Number of Years Experience in Field" to "Experience in Field" may cause confusion if the goal is to learn total number years of relatable experience rather than elicit a yes/no response or description of said experience.

"Number of FT Employees" should specify *employees on-site at location* as one means to determine suitability for a training location. A host may have 20 employees but if most work remotely or at another site the participant may not have access to sufficient oversight or American work-place experience and interaction.

The Participant Agreement section is weak on participant accountability. At a minimum, participants should be obligated to contact the sponsor if the plan isn't being followed so that the sponsor may address any issues/concerns with the host employer. Similarly, participants should be obligated to meet the other requirements and expectations set forth by program

regulations and sponsor guidelines, which are intended to ensure an appropriate and legitimate training experience. Participants should also be expected to respond to all inquiries and monitoring activities from the sponsor.

Page 2

The use of "ensure" is problematic and difficult to gauge and transfers responsibility unfairly to the sponsor. Language should be rewritten to indicate that the sponsor will work with the host organization to ensure the program is being conducted appropriately, or alternately the sponsor can ensure that there is the opportunity to obtain skills, knowledge and competencies, etc. by evaluating the information provided in the T/IPP by the host organization. Similarly, if participants are not obligated to report dissatisfaction to the sponsor, the sponsor cannot, in most cases, actually know if the participant feels the plan isn't being followed. This removes too much responsibility from the host organization to do their part in offering adequate training and supervision.

Page 3

Provide more space for knowledge, skills, and techniques section. Sponsors rely on this section to evaluate what exactly the participant will be doing in the phase and indicates to the employer that they should add considerable detail to demonstrate the scope of the proposed training.

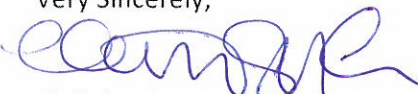
The new questions regarding who else will be assisting with the training as well as the extra remarks section are really great additions to the form and should be kept in the final version.

Page 4


The use of "assist" in the line in the Employer Agreement section is insufficient in imparting the crucial role of the host employer's responsibility to a successful training program. Host organizations must be made to agree to adhere to the written terms set forth by the sponsor to uphold the regulations. In effect, hosts must adhere to the regulations. The program cannot exist without host organizations, but if they are to provide the training, they must also be prepared to accept greater accountability. By removing more responsibility from the host organization, we are increasing the potential for more abuse by host organizations who can now push all responsibility back onto the sponsor, despite what they agreed to in their written agreements with the sponsor.

Thank you in advance for your consideration of and attention to our comments. Please don't hesitate to contact us for clarification on any of the above.

Very Sincerely,



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