



Wednesday, December 17, 2014

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

Via Email Attachment to: [jexchanges@state.gov](mailto:jexchanges@state.gov)  
Title of Information Collection: Annual Report-J-NONIMMIGRANT Exchange Visitor Program  
OMB Control Number: 1405-0151

Dear Secretary Lerner:

This letter constitutes the official comment of CIEE for the Notice of Proposed Information Collection: Annual Report-J-NONIMMIGRANT Exchange Visitor Program (Form DS-3097) published on October 22<sup>nd</sup>, 2014.

The Council on International Educational Exchange (CIEE) has been providing opportunities for youth from around the world to experience and learn from other cultures for more than 65 years. Our activities are guided by our mission “to help people gain understanding, acquire knowledge, and develop skills for living in a globally interdependent and culturally diverse world.” Our mission aligns with the purpose and intent of the Fulbright-Hays Act.

Thus, CIEE is proud to be designated by the Department of State for six J-1 categories within the Exchange Visitor Program: Camp, Intern, Trainee, Secondary School, Research Scholar and Summer Work/Travel.

Overall, CIEE supports the proposed revisions to the Annual Report (Form DS-3097), as the new language does not materially change the meaning of the information being requested. There is only one exception, which is the change to question regarding Cross-Cultural Activities (currently question 3, proposed as question 4). We feel the new wording fails to capture all cultural aspects of the programs.

**Current Question 3:** Provide a summary of the cross-cultural activities provided for its exchange visitors during the reporting year.

**Proposed Question 4:** Cross-Cultural Activities: Provide a summary of the cross-cultural activities you as a sponsor provided for your exchange visitors during the reporting year.



The current wording for the cross-cultural question is more inclusive and encompasses all cultural components of an exchange visitor's program. The modified language appears to be asking for only those cultural activities that were directly provided by the sponsor. In-person, sponsor-organized cultural activities are only one part of a sponsor's cultural programming. We feel this narrower view of the cultural component will not provide the Department with the wealth of information that could be collected, or capture all of the efforts a sponsor undertakes to provide cultural activities.

While we do directly provide cultural activities, such as our Summer Work Travel Connect USA events or Civic Leadership Summit, there are many other ways in which we actively support and facilitate the cultural engagement of our exchange visitors. We have summarized a few of these areas below:

### **Host Employer/Family Engagement**

Host employers and families have the greatest interaction with exchange visitors throughout their programs. A quality host is crucial for a successful program and it is the sponsor's responsibility to assess a host's suitability for the program. This requires careful screening and expectation-setting to ensure the host understands the cultural intent of the J-1 programs. Sponsors must screen out bad actors, as well as well-meaning hosts who do not fully embrace and support the cultural aspects of the program. Sponsors, therefore, strengthen the cultural offerings of participants through ensuring suitable placements.

Additionally, sponsors work to develop and train hosts to develop their cultural programming. For example, our annual SWT Employer Forum is an opportunity for us to provide employers with best practices around cultural activities and offer feedback on their international staff programming. This year, we added an intercultural training to our forum to provide employers with more skills for assessing their cultural understanding and connecting with participants. These types of efforts indirectly contribute to a richer cultural experience for our exchange visitors.

### **Community Involvement**

A supportive community is invaluable to sponsors for ensuring the health, safety, and welfare of participants. An engaged community also means greater events and activities that allow exchange visitors the opportunity to meet and interact with the people of the community. Sponsors initially screen placement locations to ensure a safe and supportive community environment.

Additionally, sponsors educate community members and organizations on the purpose of the Exchange Visitor Program and assist them in developing community resources. CIEE does this in many ways, including assistance with the development of community outreach groups (e.g., ISOPs), financial investment in chambers of commerce, and involvement in community-sponsored cultural activities. By working with community groups and city-level government offices, we increase participant opportunities for interaction with Americans and to experience U.S. culture.



### **Participant Expectation-Setting**

A sponsor must carefully screen and select their exchange visitors and choose participants who intend to fully immerse themselves in U.S. culture. We further set clear expectations that these programs are cultural exchange programs first, with a work or study component. We have worked with our Marketing & Communications team, as well as outside consultants, to develop clear and consistent messaging. This may seem like a minor detail, but consistently setting expectations around the purpose of the program is an essential step in creating a successful experience for the participant.

### **Cultural Resources**

Participant interest in activities as well as their availability for participation will vary widely throughout their programs. It is important to provide participants with information on cultural opportunities and resources for continuing their cultural immersion during their free time. We do this many ways for different program categories, such as arrival information on local communities, targeted emails about cultural destinations in their region, or a year-long subscription to our Culture Guide USA highlighting relevant cultural information about America. By communicating available opportunities, we are offering access to culture that lasts longer than a single planned event.

As summarized above, the cultural nature must be embedded in all areas of a program platform to have the greatest impact. Focusing only on sponsor-arranged activities excludes the cultural opportunities offered by the host school, family, or employer. It also excludes the efforts on the sponsor's part to engage hosts and the local community to provide a richer cultural experience for the participant.

We recommend keeping the focus on the participant experience by asking for the activities that were provided to them throughout their program experience. If the goal of this revision was to hold sponsors accountable for active participation in the cultural component, we believe this could be achieved by expanding this question to include the many aspects of successful cultural programming.

### **Recommendation: We suggest that §62.15(a) be rephrased as follows:**

(3) Cross-cultural activities. Provide a summary of the cross-cultural activities you as a sponsor provided for your exchange visitors during the reporting year, other cross-cultural activities reported by your exchange visitors, and your efforts as a sponsor to ensure cultural exchange for your exchange visitors.



We fully support the efforts you are undertaking to improve all aspects of the J-1 Exchange Visitor Programs. Thank you, once again, for soliciting our input as part of the process.

Sincerely,

A handwritten signature in black ink, appearing to read "E. O'Neill", set against a light gray rectangular background.

Elizabeth O'Neill  
Executive Vice President, International Exchange Programs  
CIEE: Council on International Educational Exchange

Cc: James Pellow, President & CEO, CIEE  
Anna Fincke, Vice President, Work Exchange Programs, CIEE  
Vickie McCormack, Vice President, Global High School, CIEE  
Mary Anne Higgins, Compliance & Policy Manager, Work Exchange Programs, CIEE