

November 20, 2017

G. Kevin Saba

Acting Deputy Assistant Secretary of State for Private Sector Exchanges
U.S. Department of State
2200 C Street NW
ECA/EC, SA-5, Floor 5
Washington, DC 20522-0505

**Re: Comments on 60-Day Notice of Proposed Information Collection: Form DS-7002,
Training/Internship Placement Plan (OMB Control # 1405-0170), published on
September 20, 2017**

Dear Acting Deputy Assistant Secretary Saba:

The Council for Global Immigration (CFGI) is pleased to submit these comments regarding the proposed Form DS-7002, Training/Internship Placement Plan.

CFGI is a nonprofit trade association comprised of over 240 leading multinational corporations, universities, and research institutions committed to advancing the employment-based immigration of high-skilled professionals. CFGI bridges the public and private sectors to promote sensible, forward-thinking policies that foster innovation and global talent mobility.

Since 1981, CFGI has been designated as a sponsor for internship and training programs. CFGI's J-1 programs are exclusively for member organizations that have pre-identified potential training and internship program candidates, and all Host Organizations must be a member (or a subsidiary company or affiliate of a member organization) to utilize CFGI's J-1 program designations.

In addition to our own J-1 programs, many of our member corporations, universities and research institutions have their own internal J-1 programs or sponsor J-1 programs via umbrella sponsors. The most common categories used by our members are Intern, Research Scholar/Professor, Short Term Scholar, Trainee, Specialist, and College/University Student.

COMMENTS AND RECOMMENDATIONS

CFGI most recently submitted comments on the Form DS-7002 in January 2015, and we were pleased that several of our comments and recommendations around form usability were incorporated into the final version. However, we believe the Form DS-7002 can continue to be enhanced. Please find below our recommendations regarding the SEVIS system and the Form DS-7002's integration into SEVIS, along with our recommended changes to the proposed Form DS-7002:

I. SEVP should mitigate sponsor burdens by allowing sponsors to import PDFs of Form DS-7002 into SEVIS

We appreciate and share SEVP and the Department of State's continued interest in improving efficiency with administering exchange visitor programs. At the same time, we strongly urge the agencies to consider implementing new technological measures to help the sponsor community more effectively manage the Form DS-7002 and inputting its content into SEVIS.

The reported burden on sponsors for both the current version of Form DS-7002 and the proposed form is 1.5 hours per form. While this time may reflect the time needed for host organizations to create the DS-7002, it does not adequately reflect the additional time needed by sponsors given the requirement to enter the DS-7002 into SEVIS. Sponsors are required to collect data from the intern/trainee and host organization and then enter that information into the online Form DS-7002 in SEVIS. To achieve this, sponsors have had to implement mechanisms for collecting that information that will be entered manually into SEVIS.

Based on our own experience and that of our member organizations, we estimate that the time required for sponsors working in Real Time Interface to enter each Form DS-7002 into SEVIS is between 30-45 minutes. The cumulative effect is substantial. For example, an organization that sponsors 1,000 J-1 programs per year would have an additional 500 to 750 hours of work per year – the equivalent of 12.5 to 18.75 work weeks per year for an employee working 40 hours per week. For sponsors that have to process J-1 programs in SEVIS using real-time interface (RTI), the integration of the Form DS-7002 into SEVIS has required a significant investment of staff time in order to meet this requirement. Since the integration of the Form DS-7002 into SEVIS in 2015, many sponsors have been required to hire additional staff in order to manage the input of the Form DS-7002 into SEVIS. With typical salary and benefits packages in the range of \$65,000, this integration has resulted in significant additional costs for many sponsors.

The resource impact of the Form DS-7002 and its integration into SEVIS could be greatly reduced with an import function, which would allow a sponsor to collect information into Form DS-7002 directly and import it into SEVIS. Functionally, a sponsor could provide a PDF populated online or scanned as a PDF and upload it into the SEVIS infrastructure. This would accomplish SEVP's goal of allowing its officers to access the form in SEVIS while minimizing any additional burden on sponsors. We strongly urge the agency to implement an import function.

II. Form-specific issues:

We recommend that the following items specific to the new proposed form be addressed by the Department of State:

Form Functionality

One of the major issues sponsors currently face with the Form DS-7002 is that the PDF and web forms provided by the Department of State pose functionality challenges. These include limited space for fully entering details in areas such as the salary/stipend field, on the site of activity address on page 4, and on each of the phase-specific questions. We recommend that the Department review and address these in its new PDF version. We also recommend that the Department provide a Microsoft Word Document version of the Form DS-7002 that can be used by sponsors and host organizations for filling out the form prior to obtaining signatures.

Section 1: Additional Exchange Visitor Information

Occupational Category: The proposed form requires inclusion of an Occupational Category in Section 1. The inclusion of this field has created confusion for host organizations or participants completing the PDF version that are unfamiliar with the different occupational categories. This confusion adds additional processing time for sponsors having to rectify host organization or participant errors. As this information is entered into SEVIS by the sponsor, we would either recommend eliminating potential errors by removing this from Form DS-7002 or adding a drop-down list on the PDF version with the approved wording for each occupational category.

Section 2: Compensation

Title: This section contains far more information than just compensation-related items, and the current title could create confusion for individuals completing the form. We recommend changing this to “Host Organization Information” to mirror what is listed in Section 1.

Address: On the current form, it is not clear that the address required in Section 2 is that of the site of activity (as is the case on the SEVIS generated form). As a result, host organizations can try and put a standardized company address, usually their organization’s U.S. headquarters, on page 1 and then only list the appropriate site of activity address on page 3. As a result, this requires additional time and follow-up to get the address corrected. This confusion could be remedied by tweaking the wording of the header to say “Phase Site Address.”

Compensation: While we greatly appreciate the changes incorporated in this section with the 2015 form, the format of this section is still confusing and the limited space in this section creates issues for individuals completing the form. We recommend reorganizing this section into three parts: stipend information and dollar amount, additional compensation information

and amount, and listing of total compensation encompassing both the stipend and additional compensation. Including a total compensation line is critical for ensuring that the amount listed on the Form DS-7002 can correspond with what is noted in SEVIS and on the Form DS-2019.

Non-Monetary Compensation: This term is vaguely defined and does not provide a clear indication on what items should be included within this total figure. This can result in confusion for a host organization completing the form. We recommend that the Bureau consider building out this question so that it provides check boxes of commonly provided non-stipend compensation (housing, transportation, per diem, etc.) and a box for listing other significant benefits that are being provided.

Workers Compensation: In order to maintain consistency, we recommend changing “If so, Name of Carrier” to “If Yes, Name of Carrier.”

Section 4: Training/Internship Placement Plan

Program Number: Requiring the program number in Section 4 creates a redundancy as this information is already entered by sponsors into Section 3. We recommend removing this field from Section 4.

Main Program Supervisor: We recommend changing “POC” to Point of Contact” in order to prevent potential confusion if people do not understand the abbreviation.

Phase Site Name: One of the challenges with the current form has been that with this field it is not entirely clear what information is being sought here. In the SEVIS form this is supposed to represent the Host Organization name, but given the vagueness of the header the host organizations will often list something different here. We would recommend updating to say “Host Organization Name” to match the wording on the SEVIS Form DS-7002.

Phase Site Address: With the address, additional space is needed on the PDF version as the room provided is not sufficient to encompass the full address information required for a site of activity and only prints with partial information.

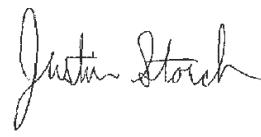
Phase Questions: To streamline the form and enhance its efficiency, we would recommend moving the “What specific knowledge, skills, or techniques” and “How specifically will these knowledge, skills, or techniques be taught” questions so that they follow the “Specific goals and objectives for this program or phase” question. In addition, we recommend providing additional space for the “How specifically will these knowledge, skills, or techniques be taught” question as the limited space in the proposed form will not provide sufficient space for Host Organizations to outline this information.

Thank you for this opportunity to comment on this proposed form, as it will affect us as an umbrella sponsor and our members with their own designations. We would be pleased to provide additional information and feedback at any time.

Sincerely,



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