

**SUPPORTING STATEMENT FOR  
PAPERWORK REDUCTION ACT SUBMISSION  
OMB No. 1405-0170  
Training/Internship Placement Plan  
Form DS-7002**

A. Justification:

1. The U.S. Department of State administers the Exchange Visitor Program under the provisions of the Mutual Educational and Cultural Exchange Act of 1961 (also known as the Fulbright-Hays Act), as amended. This program enables U.S. Government agencies and public and private organizations as Department designated program sponsors, to conduct a variety of educational and cultural exchange activities whereby foreign nationals enter the United States for the purposes of teaching, instructing, studying, observing, conducting research, consulting, demonstrating special skills, or receiving specialized training. Furthermore, Title 8, Section 101(a)(15)(J) of the Immigration and Nationality Act, and the Mutual Educational and Cultural Exchange Act, authorize the exchange programs that permit foreign nationals to enter the United States for the purpose of participation in designated training and internship programs.

Current regulations set forth at 22 CFR Part 62 govern exchange visitor programs, including trainee and intern programs. Department of State designated sponsors of trainee and intern programs are required to ensure that the participants obtain skills, knowledge, and competencies through structured activities such as classroom training, seminars, and on-the-job training. 22 CFR 62.22(i) requires program sponsors to develop a training or internship plan for each trainee or intern (Form DS-7002). Form DS-7002 has streamlined the training plan process for sponsors, exchange visitors and the Department.

2. The information on the Form DS-7002 sets forth the terms and conditions of the training or internship program, and serves to document the obligations of the three parties that are involved - the trainee or intern, sponsor, and the third party placement organization, if a third party organization is used in the conduct of the training or internship.

Sponsors of programs under the trainee or intern category must complete Form DS-7002 for each prospective trainee or intern. Form DS-7002 is to be

completed and signed by the sponsor and signed by the third party supervisor, prior to the issuance of Form DS-2019 (Certificate of Eligibility for Exchange Visitor Status, OMB # 1405-0119). When completed, Form DS-7002 is sent to the prospective exchange visitor abroad who takes it to the U.S.

Embassy/Consulate, along with his/her Form DS-2019, to apply for an Exchange Visitor Program (J-NONIMMIGRANT) visa. The completed DS-7002 provides the information that the consular official needs in order to determine whether the individual named on Form DS-2019 will be participating in a bona fide training or internship program. With a favorable determination of eligibility, a J-NONIMMIGRANT visa may be issued.

The information collected will be used by Department officials responsible for the administrative oversight of the Exchange Visitor Program – specifically to monitor the compliance of designated sponsors of trainee and intern programs with the Exchange Visitor Program regulations (22 CFR Part 62)..

3. Pursuant to the provisions established in Subtitle D, Section 641 of the Illegal Immigration Reform and Immigrant Responsibility Act of 1996 (IIRIRA) (Public Law 104-208), as amended, the Department worked with the Department of Homeland Security (DHS) in 2003 to meet a Congressional mandate to develop an electronic system, the Student and Exchange Visitor Information System or SEVIS, to collect and submit information on foreign nationals entering the United States on F, J, and M (nonimmigrant) visas. This system is currently being expanded to achieve better efficiencies and functionality. Form DS-7002 is integrated into SEVIS so that all data may be collected electronically and so that updates to the form may be made through edits to the previous submission, thereby saving time and reducing paperwork

4. Form DS-7002 does not duplicate other collections of information.

5. There is minimal impact on small business or entities. The Department of State estimates that the circa 120 program sponsors, which are usually small business entities, use Form DS-7002. The information collected is only that which is required by the Department of State or DHS to meet legislative and regulatory requirements. The data entered through the electronic form by sponsors will be stored electronically, thus making it possible for the user to make adjustments to specific fields of information on the Form, as needed, without having the user complete a new form in its entirety.

6. After more than six years of use, Form DS-7002 and the data collection therein have brought certainty, clarity and uniformity to facilitation of training and internship programs conducted under the aegis of the Mutual Educational and Cultural Exchange Act of 1961, as amended. Form DS-7002 must be completed prior to issuance of Form DS-2019 and has streamlined the process to the benefit of the exchange visitor, sponsor and the Department. Sponsors must have a completed Form DS-7002 for each trainee or intern accepted into their program and must maintain Form DS-7002 for a minimum of three years following completion of the exchange participant's exchange program. The Department reviews these forms during in responding to a complaint or compliance issue.

7. There are no special circumstances associated with Form DS-7002.

8. The Department published a 60-day notice in the *Federal Register* on September 29, 2014 to solicit public comments. *See* 79 FR 58400. Changes were made to the collection based on eight comment letters received. These included noting that the Name field must match the passport name, adding a box for Program Category, adding a numerical value for the Experience in Field block, adding a main point of contact supervisor space on the form, adding a field on the form to reflect non-monetary types of support for the internship/traineeship, changes in the FLSA and Migrant statements on the certification section, altering fields to indicate which fields apply to each *phase* of training, adding a line to the Workers' Compensation field, indicating that the number of full-time employees *onsite at location* is requested on the form, not overall employees of the training organization, and altering fields requesting descriptions of tasks to be learned by and taught to the intern/trainee. Form DS-7002 is also being made electronic within the SEVIS system. Sponsors, who already use a fillable PDF format for the T/IPP (DS-7002) form, may fill out the form within the SEVIS system as of June 30, 2014. A link in the SEVIS system between the form DS-2019 and Form DS-7002 will make sure that a form DS-2019 cannot be issued to a Trainee/Intern who does not have a completed training plan. It also will help populate certain fields on the DS-7002 automatically so that the sponsor will not need to take time to type these. Sponsors already have received information on batch schema in order to be able to adapt their systems to this change. A major benefit of the change is that, formerly, although sponsors were able to type the training plan using a fillable PDF format, they could not easily make updates to the form. Having the DS-7002 within SEVIS will mean that sponsors will be able to make updates to the form while creating the form, then issue the

DS-2019, and then make updates to the DS-7002 again after exchange visitor validation upon arrival in the U.S. No complete retyping of the form by sponsors will now be necessary because the original and changes will be saved within the SEVIS system. Sponsors also may cut and paste from Word or PDF documents into the SEVIS in order to create the T/IPP form, thereby reducing paperwork. A checklist of comments received on different aspects of Form DS-7002 and the Departments response to them is appended.

9. Respondents are not provided with any gifts or payments.

10. There are no assurances of confidentiality of the information provided in connection with the Exchange Visitor Program regulations other than those provided in applicable statutes such as the Privacy Act.

11. There are no questions of a sensitive nature on the Form DS-7002.

12. Each year, 120 sponsors will be responsible for completing a Form DS-7002 for each of the 30,000 prospective exchange visitors in the trainee and intern categories. Each form takes approximately one-and-a-half (1.5) hours to complete. Based on these figures it is estimated that the annual hour burden on respondents will be 45,000 hours (1.5 hours x 30,000 responses). The annualized labor cost to respondents is estimated at \$11,340 (120 sponsors x \$63 weighted wage x 1.5 hours).

13. We estimate that there will be no cost to the respondents. No fee is charged in connection with this form. The respondents are required to fill out the form, keep a copy for their files and provide a copy to the exchange visitor program participant and third party, if applicable. It is expected that respondents currently have full capacity to complete, process, and send the form to participants electronically as part of their current usual and customary business practices. Prior approvals for this collection indicated a mailing cost. It is anticipated that all materials will be submitted electronically resulting in no cost for mailing.

14. It is estimated that the annualized cost to the Federal Government is confined to the salary and benefits of Department officials responsible for the administrative oversight of the training and internship sponsors submitting this information. The total estimated annual cost to the Federal Government is \$6,300. Three employees (GS-9 to GS-13) with an average hourly weighted wage of \$63.00, will spend approximately five percent of their time,

or 100 hours, processing the forms (reviewing them for accuracy and inputting data into the database). This yields an annual cost of \$6,300.00 (100 hours x \$63.00 weighted hourly wage). Costs for equipment, overhead, printing, or other costs associated with the processing of this information collection are expected to be negligible.

15. There are no adjustments to burden or number of respondents. Changes to the form are noted in item 8.

16. The Department will not publish the information collected.

17. The Department will display the OMB expiration date.

18. The Department is not requesting any exceptions to the certification.

#### **B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS.**

This collection does not employ statistical methods.

## Appendix

<b>Comment</b>	<b>Made by</b>	<b>Action</b>	<b>Notes</b>
Providing the SEVIS schema	CIEE	This information was provided to sponsors in early December 2014	
Link between Form DS-2019 and T/IPP serves no purpose	BU	No change made for reasons noted.	The link is important because it makes sure that a DS-2019 cannot be issued to an Intern/Trainee who does not have a completed training plan.
Changing batch process is too time-consuming and complex and change comes at a peak time in the exchange year	BU, AIC, CIEE	No change made.	The Department believes that 7 months is enough time for sponsors to change their systems over to the electronic version and to institute batch processes. The electronic version will go into effect on June 30, 2015.
Add to Surname/Primary Name(s) block (must match passport)	AIC	Added to revised form	
Would like at least six months to change batch process	Cultural Vistas	This will occur; see note	Organizations will have between 6 and 7 months to make these changes
Make sure form prints on 8.5 x 11 paper	AIC	This has been taken into account in electronic format	SEVIS team will watch out for this, so that the form prints on regular paper.
Add box for Program Category (Trainee, Intern, and Student Intern)	Cultural Vistas, Alliance, CIEE, InterExchange	Added to revised form	
Re-typing information into T/IPP form is complex and costly unless a cut-and-paste option is available	AIC	Taken into account in the electronic format; see note.	A cut and paste option will be available, and some blocks will automatically populate.
General form functionality and saving T/IPP form	Alliance	Taken into account in	T/IPP form may be saved, and then updated in electronic

		electronic format	version after verification of exchange visitor arrival
Change occupational category field	CIEE	Not changed	A dropdown menu of occupational fields already exists in SEVIS based on a broad variety of occupational fields, and there is an additional option of "other."
Make clear that a numerical value (number of years) is required for Experience in Field block	Cultural Vistas, AIC, Alliance, CIEE, InterExchange	Added to revised form	
Program number should not be on the form	Alliance, CIEE	Not changed on form	The regulation that they cite [22. CFR 62.9(d)(4)] applies to using the program number for recruitment and advertising purposes, not to those papers that enable the program participants to have their actual placements.
Main point of contact supervisor space needed	Cultural Vistas, CIEE, InterExchange	Added to revised form	
Add space to reflect non-monetary forms of support for the internship/traineeship	Cultural Vistas	Added to revised form	
Add additional material as suggested to Intern/trainee, Sponsor, and Host Organization Certification statements	Cultural Vistas, AIC, UPenn, InterExchange	Added all comment suggestions for these fields to revised form	
Change FLSA and Migrant statements with certification so that FLSA applies to all Interns/Trainees, or retain original language	UPenn	Changed to make intent clearer on revised form	
Indicate more clearly that the "penalty of perjury" statement applies to both Intern/Trainee and sponsor certification	AIC, UPenn	Changed on form	Statement added to each individual certification to make clearer; removed from overall heading of this section, which ran over two pages and thus made it seem that it applied to the Intern/Trainee only.
Remove repetitive Site Name and Site Address	Cultural Vistas, Alliance	Not added to form; we need these	These areas identify the host site on both T/IPP pages and will populate automatically

		identifiers on each form page; they populate automatically in any case. See note.	anyway from sheet to sheet. In addition, the user manual will be updated to indicate what should be placed in each block of this form.
Make start and end dates apply to the phase of training	Cultural Vistas, Alliance	Added to form	
Make clear which blocks apply to individual training phases	CIEE	Phase added to multiple blocks in form to clarify	
Listing names and titles of additional potential supervisors	Cultural Vistas, AIC, UPenn	Not changed on form	There may well be additional supervisors working with the Trainee/Intern and the sponsor should know who they are and what qualifications they bring; if there are not multiple supervisors, the host organization may leave this section blank. The Department believes that what is requested in this block is clearly articulated.
Adapt language on form to indicate primary supervisor qualifications	CIEE	Not changed on form; this is already asked on form.	This continues to be required information on the form for the primary supervisor, along with noting the qualifications for all other non-main supervisors
Write out Compensation for Comp	AIC, Alliance	Added to form	
Remove line between the two Workers' Compensation blocks	AIC	Not changed on form; see note	The Department believes this is more clear by having two blocks, which better ensure that sponsors can check that all information is filled out by the host organizations
Add a line for No, Additional Coverage under Workers' Compensation	CIEE	Added to form	
Change FT to spell out Full-Time	AIC	Not changed on form	The Department believes this abbreviation is clear as it is and the abbreviation saves space



Add FT employees <i>on site at location</i>	InterExchange	Added to form	
Add additional space per block	AIC	Not changed on form	There will be more room available on the electronic form than is reflected in the paper form
Remove Phase Name block	AIC	Not changed on form	Some sponsors and host organizations find this block for Phase Name useful.
Eliminate block for description of Trainee/Intern's role	AIC	Not changed on form	Some sponsors and host organizations find this block for Phase Name useful; Department also needs to know how the host organization views the trainee or intern's role there because this is an important perspective that defines the intern's/trainee's function in the host organization.
Make clear what tasks are to be learned, what tasks will be taught, and what knowledge or skills will be transferred.	AIC, CIEE	Changed on form	First question now on what is to be learned, second on what is to be taught and how.
Revise question order re training plan section in #4	CIEE	Not changed on form	The Department believes the flow of these questions is already in the most logical and useful format
Continue to use the paper DS-7002 form, or if this is not possible, then separate the DS-7002 process from the DS-2019 process in SEVIS	NYU	Not changed	One purpose in having the DS-7002 within SEVIS is that a DS-2019 cannot be finalized for an intern or trainee unless that exchange visitor has a completed training plan as indicated on the DS-7002.
Universities should be allowed to use the paper Form DS-7002 until their vendors develop software that will link the DS-7002 to their batch process for DS-2019.	NYU	Not changed	There is a transition period of seven months that universities have to instruct their vendors in making this addition to their system; SEVIS has already given the batch process method to schools so that they can see what the changeover will entail. In the meantime, the paper form may also be used, and schools can cut and paste from PDF

			format into the online DS-7002.
Field numbering	CIEE	Not changed on form	There are so many other series of numbers on this form that the Department feels numbering the blocks would make the form more confusing