



July 11, 2024

U.S. Department of State  
Private Sector Exchange Directorate (ECA/EC)  
SA-5, 2200 C Street NW  
Washington, DC 20522-0505

Via Email Attachment to: [jexchanges@state.gov](mailto:jexchanges@state.gov)  
OMB Control Number 1405-0170: Training/Internship Placement Plan  
Form Number: DS-7002

Dear Private Sector Exchange Directorate,

This letter constitutes the official comment of CIEE on form DS-7002, Training/Internship Placement Plan (OMB Control Number 1405-0170).

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 75 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,” and our mission aligns with the purpose and intent of the Fulbright-Hays Act:

...to increase mutual understanding between the people of the United States and the people of other countries by means of educational and cultural exchange.... and thus to assist in the development of friendly, sympathetic, and peaceful relations between the United States and the other countries of the world.

CIEE is proud to be designated by the Department of State as a sponsor for the Summer Work Travel, Camp Counselor, Intern, Trainee, Research Scholar (including Short-Term Scholar, Professor, and Specialist), and Secondary Student categories. We know first-hand the power of these people-to-people exchanges for fostering diplomacy, building bridges, and protecting national security interests and appreciate the Department’s continued communication and collaboration.

As a designated sponsor for the Intern and Trainee categories, CIEE works closely with participants and host organizations on completion of the DS-7002 form on a daily basis, and this experience has allowed us some insight into potential updates that could streamline the form. We welcome this opportunity for comment and believe that the recommendations that follow have the strong potential to enhance the experience of participants and host organizations as they write the training plans that will structure their programs. Our recommendations are outlined below, organized by form section for clarity.



## **Section 2: Host Organization Information**

We would first recommend a small change to *Section 2: Host Organization Information*. The “Compensation” portion of Section 2 includes a request for information about an intern or trainee’s “stipend.” We would recommend that the word “stipend” be removed from this section as this language tends to confuse third parties, who are often unsure about the definition of stipend in the context of the DS-7002 form. Keeping the rest of the section intact, including the yes/no checkbox, as well as the amount and frequency of payments, would allow for compensation to be reported while reducing the need for additional clarification regarding the definition of a stipend.

## **Section 4: Training/Internship Placement Plan**

We would also recommend some minor enhancements to *Section 4: Training/Internship Placement Plan*. These include a change to the “Supervisor Contact Information” section, which includes a request for the supervisor’s fax number. As most host organizations utilize e-mail or phone communication rather than fax, this information is often unavailable and generally not utilized during the participant’s program. For this reason, we would recommend removing the request for a fax number from the form.

We would also make some recommendations regarding the “Phase Information” section of the form DS-7002 as we have identified opportunities to streamline the way in which information is requested in this portion of the document.

The fourth question in the “Phase Information” section is “What plans are in place for the Trainee/Intern to participate in cultural activities while in the United States?” This question is currently in the middle of the series of questions for each phase, and, given that the questions immediately before and after this one pertain specifically to the supervision of the trainee or intern and the knowledge, skills, or techniques they will learn, the location of the question about cultural activities requires respondents to shift their focus multiple times. We believe that moving the question regarding cultural activities to the end of the series of phase questions would enhance the flow of these questions and therefore streamline the process of completing the form.

Another form item that we would recommend updating is the third question in the “Phase Information” section, which states:

Please list the names and titles of those who will provide continuous (for example, daily) supervision of the Trainee/Intern, including the primary supervisor. What are these persons' qualifications to teach the planned learning?

Earlier in the “Phase Information” section, the form requests the primary phase supervisor’s name, contact information, and title. Because the majority of the information required to answer this question is equivalent to the information provided earlier in the form, we would recommend removing this



question. Then, to ensure that all of the necessary information is still being gathered, we would recommend adding a request for the phase supervisor's qualifications as well as information about any other individuals who would be providing continuous supervision to the intern or trainee to the earlier portion of the "Phase Information" section where the primary phase supervisor's name and contact information is already being requested.

In addition to the small changes and enhancements recommended above, CIEE also welcomes this opportunity to share some additional, larger recommendations for enhancements that we feel would further build upon the effectiveness of the DS-7002 form. These recommendations pertain to Section 4: Training/Internship Placement Plan.

### ***Phase Questions***

We recommend that several related questions be combined into one single question with the goal of allowing host organizations and participants to fully elaborate on these interrelated topics in a single response. The questions that we feel could be consolidated into one are:

- Description of Trainee/Intern's role for this program or phase
- Specific goals and objectives for this program or phase
- What specific knowledge, skills, or techniques will be learned
- How specifically will these knowledge, skills, or techniques be taught?

Potential wording for this question could be "Describe the Trainee/Intern's role, including the specific knowledge, skills, or techniques to be learned, the approaches that will be used to teach the aforementioned knowledge, skills, or techniques, and the overarching goals or objectives for this program."

Combining the questions in this way may encourage more complete and cohesive responses as the wording supports participants and host organizations in considering the interactions between the interrelated factors of the intern or trainee's role, the phase goals, the content to be learned, and the ways in which it will be taught.

### ***Phase Dates***

Finally, we would recommend that consideration be given to the usefulness of the phase dates. The use of precise dates in this section presents a challenge to participants and host organizations as they aim to predict the exact dates for phases well into the future. We would suggest that perhaps outlining the percentage of the entire program length that each phase is intended to last rather than the precise dates might allow some flexibility for host organizations and participants while still clearly delineating expectations for each phase of the EV's program.

We would like to express our gratitude to the Department for taking the time to consider the above comments. BridgeUSA Internship and Trainee programs have served U.S. public diplomacy objectives for



many years and have afforded many thousands of people around the world an in-depth cultural exchange opportunity. These programs are essential to the efforts of the Department and CIEE in promoting intercultural understanding, global awareness and strengthening peaceful relations between countries. We appreciate this opportunity for comment regarding the DS-7002 form and are hopeful that the recommendations shared herein may prove useful as the Department reviews the language and organization of this essential document, which guides the content and direction of each intern or trainee's program. We appreciate the Department's time in considering these recommendations and welcome any opportunity for further discussion.

Best regards,

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Vice President, Participant Services  
CIEE: Council on International Educational Exchange