



August 18, 2008

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Memorandum For: Members and Organizations applying for CSIET listing

From CSIET Board of Directors

**Subject: New CSIET Evaluation Process for listing
in the 2009-2010 *Advisory List***

For almost 25 years, CSIET has published an *Advisory List*. The purpose of this listing is to provide parents, high school administrators and state athletic/activities associations with information about youth exchange programs. Listing of a program has been seen as a “stamp of quality” awarded in accordance with standards promulgated by CSIET. These standards were developed over many years in conjunction with schools, athletic/activities associations and youth exchange programs.

In 2006, CSIET made important revisions in its program evaluation process. The primary change was moving from a self-study and questionnaire-based methodology for evaluation to a third party, CPA-led audit of program standards. The purpose of this change was two-fold. First, there was a belief that given the growth in the size of programs and the task of evaluation, a well-designed, independently conducted audit of programs would provide the best possible information upon which to base evaluations of program quality. Second, the U.S. Department of State (USDOS), which has regulatory control and oversight of programs, was changing its re-designation process for sponsors so that ultimately every sponsor would be required to complete a statutory audit. This environment prompted CSIET to change its own evaluation of programs to more closely resemble the regulatory process USDOS will adopt in the near future. The changes in the evaluation process greatly support CSIET’s mission of identifying quality youth exchange programs, but it also makes regulatory compliance processes more efficient for programs. As USDOS finalizes the compliance audit procedures and enhances its oversight of these programs, CSIET will further adapt its process to the changes in Federal oversight.

For the program year September 1, 2007 to June 30, 2008, CSIET received 69 program audits. These audits represent more than 32,000 in-bound and out-bound, high school exchange student visitors. In order to provide guidance to all programs involved in this process, CSIET developed and implemented an audit template and supplementary advisory documents from which auditors were informed how to conduct the audit and report their findings. Included in the information provided to programs/auditors was a document called the “Agreed Upon Procedures” report. This was designed to assure that the programs being audited and conducting the audit followed agreed-upon methods in evaluating the programs.

All programs that completed an audit in 2008 were given a listing for the 2008-2009 academic year on the same basis as their prior listing. The vast majority completed were thorough and consistent with the template and followed the policies and procedures CSIET outlined. In order to address any concerns in the first cycle, CSIET has prepared a memo (copy attached) which addresses areas determined to be in need of clarification.

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While 2007-08 was a transition cycle, CSIET must now look to the future to establish the means by which programs will be evaluated in the 2008-09 cycle and beyond. CSIET's intent is to take advantage of the new and more thorough types of information made available by an audit-style evaluation, while retaining some of the methodology employed in former evaluation cycles.

The new CSIET audit review process will incorporate the "step-ladder" approach to evaluation utilized by CSIET in the past and clearly provide criteria which must be met for listing. The intent of this new system is to conduct a fair and transparent listing process.

Transition Plan for New Evaluation Process

Year 1 (For listing in the 2009-2010 *Advisory List* – 2008-2009 program cycle):

Programs must submit a transition year audit .Listing in the 2009-2010 *Advisory List* would be conferred upon review.

Year 2: (For listing in the 2010-2011 *Advisory List* – 2009-2010 program cycle):

Programs must meet each of the following three criteria in order to avoid being issued one or more advisories. Advisories serve as a precursor to a potential conditional listing in the subsequent cycle, and are not available for public review. Programs that are issued advisories in Year 2 will receive a full listing in Year 2.

Requirement A: Programs must score an overall average minimum of 85% or better for all audit questions.

AND

Requirement B: Programs must score an 85% or better on each of the following critical program issues:

- High School Enrollment: Items #2, #15, #16, #17, #19
- Host Family Screening - application, CBC, interviews, references: Items #25, #26, #28, #29, #30, #33, CSIET items # 5 and #6
- Monthly Contact: Item #9
- Staff/Volunteer Screening, CBC: Item #6

AND

Requirement C: Programs must score a minimum of 75% or above on each individual audit question.

Year 3 (For listing in the 2011-2012 *Advisory List* – 2010-11 program cycle):

Programs that do not meet one or more of the Requirements in Year 2 must meet all three in order to receive a full listing in Year 3. For instance, if a program fails to meet Requirement A in Year 2, the program must meet Requirements A, B and C in Year 3 in order to receive a full listing. If one or more of the requirements are not met, the program will be issued a conditional listing in Year 3.

Programs that receive a full listing with no advisories in Year 2 may receive a full listing with advisories should Requirements A, B or C not be met in Year 3.

Year 4 (For listing in the 2012-2013 *Advisory List* – 2011-12 program cycle):

Programs that receive a conditional listing in Year 3 must meet Requirements A, B and C in Year 4 to receive a full listing. If a program with a Year 3 conditional listing does not meet the three requirements in Year 4, they will be excluded from the *Advisory List*.

Programs that were issued full listing with advisories in Year 3 must meet Requirements A, B and C in year 4 in order to receive a full listing. If all three requirements are not met by the program in year 4, the program will receive a conditional listing.

The same “step-ladder” approach will be applied to the evaluation process in the subsequent years.

CSIET reserves the option to consider issuing a Conditional listing, or denying listing when an audit includes compliance rates considerably below the above-stated criteria or problems so pervasive, that there is evidence of blatant and/or serious disregard of the standards which could cause harm to students.

Provisional Listing for New Listing Applicants

Provisional listing is for new programs or programs which did not submit an audit in February 2008.

A program can achieve provisional listing by meeting Requirements A, B and C listed in the Year 2 criteria. A program must achieve provisional listing for two years in a row before being granted a full or conditional listing. (This mirrors the previous evaluation process by which a program had to have two consecutive provisional listings in order to be judged by the same criteria as established programs.)

Once a program is granted full or conditional listing, it is evaluated by the general criteria described above.

Audit Review and Listing Process

Step 1 – Initial Audit Review and Evaluation

CSIET staff will conduct the initial review and data compilation process to tabulate all audit results and accompanying documents to determine which audits fall below the statistical thresholds for full listing. Following this review, the staff will have the authority to grant Full or Provisional listing and issue Advisories, similar to the powers of the former CSIET Evaluation Committee.

All recommendations for either Conditional listing or Denial will be forwarded to the Accreditation Committee for final action.

Step 2 – Accreditation Committee

The Accreditation Committee, comprised of five members of the CSIET Board of Directors with the majority representing educational institutions/organizations, will review all staff recommendations for denial or Conditional listing to determine listing status. Programs will have the opportunity to submit both written and in-person responses for consideration. Committee members will be bound by confidentiality/conflict of interest agreements, and programs will also have an opportunity to request that a specific member not review their audit (once a conflict of interest has been established).

Appeals Process

The adoption of specific, percentage-based criteria in the evaluation process should reduce the number of appeals made each year by programs initially receiving conditional and/or denial of listing. However, any program that is recommended for a conditional listing or denial is likely to want to appeal this outcome. Therefore, CSIET has established the following due process procedure to ensure that all stakeholders in the listing process are fairly treated.

Step 1 – Accreditation Committee

A program recommended for less than full listing can appeal the decision to the Accreditation Committee. Examples of issues that may justify the conditional listing or delisting to be overturned include:

- An auditor’s misinterpretation of the template or supplementary material that produces audit results that may not accurately represent program quality or compliance.
- Evidence that the program’s failure to meet Requirement C is not indicative of significant operational, compliance or safety standards. Factors taken into consideration in such an appeal would include:
 1. Is the area of compliance in direct control of the program? (For instance, distribution of flight letters by the Foreign Partner versus distribution of orientation material to host families.)
 2. Does deficiency in the area of compliance effect student well-being or safety? (For instance, background check screening versus collection of double placement paperwork)
 3. Does the deficiency in the area of compliance reflect an aberration in the program’s operations? For instance, does the program have a historic pattern of failing to conduct host family orientations or is it a problem relating to one particular year and is there data that substantiates that claim.

Step Two – Due Process Review Committee

If the Program maintains that the Accreditation Committee did not follow the above criteria in making a listing decision, they can present their case to the Due Process Review Committee. This committee, comprised of five persons, shall be chosen annually by the Board of Directors from among its members. At least two persons shall represent travel and exchange programs and two shall represent the education community. No member of the Due Process Review Committee shall have been a member of the Accreditation Committee in the same evaluation cycle.

The Due Process Review Committee shall conduct appeals, made upon written petition by the appealing organization, of the decisions made by the Accreditation Committee, and grant a hearing to the appealing organization at which both written and oral presentations may be offered by the appealing organization. If the Due Process Committee concludes that there has been a due process violation, then it will reverse the decision of the Accreditation Committee and grant the applicant full listing, with the understanding that the applicant’s application will then be reviewed with greater scrutiny during the next evaluation process.

Conclusion:

Based on the 69 audits received to date, very few fell below the standards outlined above and almost all of these deficiencies appear to result more from uneven application of the audit template by those new to the process rather than substantive matters related to poorly run programs. The new audit procedure seems to have worked well in helping youth exchange programs and all related parties continue the CSIET legacy of quality program implementation. CSIET is confident that the evaluation process will be universally strengthened by adopting an independent CPA-conducted audit and more straightforward evaluation criteria.

- Attachments:**
- 1) Memo providing Guidance on Agreed Upon Procedures (8-18-08)
 - 2) Proposal to Amend the CSIET Bylaws (8-15-08)