



July 16, 2020

Kevin Saba
Deputy Assistant Secretary for Private Sector Exchange, Acting
Bureau of Educational and Cultural Affairs
U.S. Department of State
Washington, D.C., 20520

Dear Mr. Saba,

CSIET and its members thank the Department for its Monday, July 6 communication regarding guidance for J-1 programs in the Secondary School Student category for the upcoming 2020-2021 academic year. Likewise, CSIET appreciates your continued efforts to maintain safe and healthy environments for J-1 exchange visitors.

We are also in receipt of your July 2 communication (referenced below) thanking J-1 high school programs for their “ongoing” and unwavering support of the Exchange Visitor Program.

The Department thanks the sponsor community for its ongoing support for the EVP and its exchange visitors. When the pandemic struck, you helped those who wished to go home with their often difficult travel arrangements. You have continued to keep informed and you have aided those exchange visitors who either chose to remain on the program or could not repatriate. This vital assistance has been key to ensuring the health, safety, and welfare of thousands of exchange visitors.

The Department’s Demonstration of Support to US Schools: We are encouraged that the Department “will waive, per 22 CFR § 62.8(a), the requirement that sponsors have no fewer than five exchange visitors during the reporting cycle with respect to the placement of any exchange students for the coming academic year.” Despite this relief, the Department’s insistence that the J-1 high school program operate under “business as usual” modus operandi has our members confused and very concerned about the viability of the program in the next year, and years to come. Although the Department clearly states its “confidence in the value of international exchanges” in its July 2 communication to sponsors, U.S. high schools are unaware of the Department’s overall commitment to the viability of the J-1 high school program. From our members, CSIET has collected a list of no fewer than 800 secondary schools/districts who are closing their doors to J-1 high school students in 2020-2021. It is our informed opinion that this attrition is due in large part to a lack of clearly articulated support from the Department of State for the high school program.

To that end, the CSIET community requests that the Department demonstrate its commitment more formally by putting language from your July 2 communication on Department letterhead, followed by signature from the appropriate managing authority. Particularly useful would be the following phrasing:

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We particularly value our sponsor partners during these trying times as we face the challenges of COVID-19 together. The Department's confidence in the value of international exchanges has not been shaken by the pandemic. On the contrary, the need for mutual understanding is stronger than ever, and we believe that the EVP will emerge from this pandemic as a resilient and cohesive public diplomacy tool. [Therefore, circumstances permitting, we encourage you to continue to accept exchange students into your community in 2020-2021 and beyond. The continued viability of the J-1 high school program is critical to the success of our diplomatic mission.]

Placement Deadline: In a March 23 letter from CSIET and The Alliance, we jointly requested that the Department extend the August 31, 2020 placement deadline. We continue to believe that such relief would be universally beneficial to all constituents as a measure to provide a safer, more efficient and effective vetting process. Our programs are concerned that a firm August 31 deadline will compromise the safety and welfare of students, due to the practical consideration of properly recruiting and vetting host families in an extremely truncated season. Further complicating this situation is that the process for securing visas will take longer than expected due to delayed consulate re-opening. CSIET requests that the Department extend the placement deadline to September 30, 2020.

September 30, 2020 Program Start Date: The September 30, 2020 deadline for program start date seems arbitrary and appears to be an entirely new requirement. As written, this requirement does not have a basis in safety or welfare. CSIET and its members believe that as long as a school and host family accept the later arrival, and safety and welfare are not compromised, there should be no limitation to start dates, provided that the student is properly credentialed with a valid J-1 visa. Visa delays have always been endemic to the consular system, resulting in late arrivals of students. CSIET requests that the Department remove the arbitrary September 30, 2020 deadline for program start date.

We thank you for your consideration of these requests and the opportunity to address our concerns for policies that we believe will inflict immediate and long term damage to the J-1 High School Exchange Visitor Program.

We look forward to hearing from you in the near future.

Respectfully,

Academic Foundation for International Cultural Exchange	La Jolla, CA
AFS-USA, Inc.	New York, NY
American Councils for International Education: ACTR/ACCELS, Inc.	Washington, DC
American Cultural Exchange Service	Bellevue, WA
Aspect Foundation	San Francisco, CA
ASSE International Student Exchange Programs	Laguna Beach, CA
ASSIST	Suffield, CT
Ayusa International	San Francisco, CA
CETUSA	Grand Rapids, MI
Children of All Nations	Austin, TX
CIEE	Portland, ME
Cultural Academic Student Exchange	Montclair, NJ
Cultural Homestay International	San Rafael, CA

Education Travel & Culture, Inc.	Portland, OR
Educational Merit Foundation For Student Exchange	Sachse, TX
Educational Resource Development Trust	Santa Monica, CA
Face the World	Petaluma, CA
Foreign Links Around the Globe (FLAG Inc.)	Portage, MI
Forte International Exchange Association	Falls Church, VA
Greenheart International	Chicago, IL
Inter-Ed	Dyersburg, TN
International Fellowship, Inc.	Westfield, NY
International Student Exchange	Bay Shore, NY
Nacel Open Door	St Paul, MN
NW Services, Inc. PEACE Program	Caldwell, ID
OCEAN	Tempe, AZ
Pan Atlantic Foundation	Portland, ME
Rotary International District 7120	Rochester, NY
Rotary Youth Exchange Florida	Tamarac, FL
SCRYE - South Central Rotary Youth Exchange	Webb City, MO
States' 4-H International Exchange Programs	Seattle, WA
STS Foundation	Concord, MA
Student American International	Hollywood, FL
Terra Lingua USA	Terryville, CT
The Foundation for Academic Cultural Exchange	Reno, NV
UCEUS Corp.	Upland, CA
United Studies	Hot Springs, AR
Wise Foundation	Dyersburg, TN
Youth For Understanding USA	Washington, DC