

# CSIET Standards for Long-Term, Inbound International Student Exchange Programs

These standards are intended for use in evaluating inbound international student exchange programs of eight or more weeks' duration.

**Agent**: Individual or organization authorized to represent or act on behalf of the organization in administering one or more aspects of the program, for example, an overseas partner.

**Organization**: Entity that operates international student exchange programs.

**Program:** Organized international student exchange activity that begins with participant recruitment and selection, includes the components outlined in the standards that follow, and terminates when the participant returns to his or her point of origin or otherwise severs the relationship with the program. Programs applying for CSIET listing must have a minimum of one current international student exchange participant in each cycle that is being evaluated for each program (i.e. J-1/F-1 inbound).

**Volunteer:** 1. A representative who is compensated for out-of-pocket expenses only. If a representative receives regular compensation, such as a per student placement fee, this individual cannot be considered a volunteer. 2. A host family that provides room and board gratis to a student.

**Federal Waivers:** The CSIET Board of Directors has ruled that if the State Department or an agency of the U.S. government provides an exception that may affect compliance with CSIET standards, the organization to which the waiver has been granted may operate under that exemption upon written presentation of such waiver to CSIET upon application for CSIET listing.

### STANDARD 1: EDUCATIONAL PERSPECTIVE

- A. Programs shall be designed to fulfill educational purposes related to an international experience.
- B. The organization operating the program shall have clearly established goals and learning objectives to fulfill the educational purposes of its programs.

# STANDARD 2: ORGANIZATIONAL PROFILE

- A. The structure and administration of the organization shall be clearly defined.
- B. The organization shall have the personnel needed to administer its programs effectively.
  - 1. The organization is accountable for the full scope of the programs it administers, including actions taken and representations made by its agents, and maintains responsibility for its students both within the United States and abroad.
  - 2. The organization shall maintain direct, hands-on control of the placement and supervision of inbound students and the hiring, firing, and remuneration of local representatives. It may not

enter into a relationship with another entity that appears to exercise such control.

- C. The organization shall be organized under the laws of one of the 50 states of the United States or the District of Columbia.
- D. The organization shall demonstrate success in international student exchange through at least one full year since its incorporation.

### Supplemental Guideline: Date of Incorporation

The CSIET Board of Directors has determined that the intent of this Standard is to ensure that programs have participants on international student exchange for the Evaluation Committee to review in the current cycle. Accordingly, compliance with Standard 2D could be demonstrated if the applying organization documents one year of incorporation by the final Evaluation Committee meeting of the current cycle.

### STANDARD 3: FINANCIAL RESPONSIBILITY

- A. The organization shall be capable of discharging its financial responsibilities to all participants.
- B. The organization shall have sufficient financial backing to protect all monies paid by participants and to ensure fulfillment of all responsibilities to participants.
- C. The organization shall have an independent Certified Public Accountant annually prepare an audited or review financial statement.

# **STANDARD 4: PROMOTION**

- A. The organization's promotional materials shall professionally, ethically, and accurately reflect its purposes and activities.
- B. The organization shall not publicize the need for host families via any public media with announcements, notices, advertisements, etc., that:
  - 1. are not sufficiently in advance of the student's arrival
  - 2. appeal to public pity or guilt
  - 3. imply in any way that a student will be denied participation if a host family is not found immediately
  - 4. identify photos of individual students and include an appeal for an immediate family.

# Supplemental Guideline: Public Media Advertisements

CSIET has found the following words or phrases to be unacceptable: Urgently Needed, Don't let me be homeless, This is an emergency...

CSIET has found the following words or phrases to be acceptable: Open your hearts and homes, Host an International Exchange Student...

It is permissible to use a picture of a student, a first name, age, country of origin, and a composite or generic listing of interests in an advertisement in order to demonstrate the personal nature of the program and the types of interests that students have. It is not permissible to use an actual photograph of the student seeking placement. It is also not permissible to identify that specific student as needing a home, nor is it permissible to refer to a student's athletic ability or accomplishments. Written waivers must be obtained for the use of any student photographs.

- C. The organization shall not promote or recruit for its programs in any way that compromises the privacy, safety or security of participants, families or schools. Specifically, programs shall not include personal student data or contact information (including address, phone or email addresses) on websites or other promotional materials.
- D. All promotional materials/activities shall distinguish the program and the sponsoring organization from others operating under:
  - 1. affiliated or related corporate structures
  - 2. the same or similar names or symbols.
- E. The organization shall fully disclose all fees, including school tuition, host family reimbursements, and other required or optional costs to prospective students and their natural families before enrollment. (If host families provide room and board gratis to the students, publicity should state that fees cover "selection and placement in host families" and not imply in any way that the fees paid by the students cover "room and board.")
- F. Neither the organization nor its agents shall promote its programs as providing opportunities for school athletic participation, high school graduation, or driver's education instruction unless specifically authorized to do so by the organization's school partners, and then only on a school-by-school basis;

Neither the organization nor its agents shall allow any student on its program to engage in household domestic service, childcare, employment, or other activities that are either prohibited by law or regulation, or might compromise the student, program or school;

The word "promote" as it is used in Standard 4F includes any specific focus on or prominence of pictures and/or text depicting these activities. No prominent pictures and/or text will be considered to be in compliance.

G. The organization shall not state or imply in its promotional materials/activities that persons who are compensated other than out-of-pocket expenses are volunteers.

#### STANDARD 5: STUDENT SELECTION AND ORIENTATION

A. The organization shall screen and select student participants on the basis of criteria appropriate to the program.

# Supplemental Guideline: Athletic Participation in the United States

The following statement must be included on either the student application or other written rules documents: "Athletic eligibility or participation is not guaranteed."

- B. Screening procedures shall include personal interviews with student applicants.
- C. Selection shall be completed sufficiently in advance of the student's departure to ensure adequate time for preparation and orientation.
- D. Students shall be given a suitable orientation before departure and after arrival in the host country, including information on how to identify and report cases of suspected student abuse.
- E. All inbound students enrolled in a U.S. high school must have adequate English language proficiency to function successfully.
- F. All inbound students enrolled in school must have adequate academic preparation to function successfully.

#### STANDARD 6: STUDENT PLACEMENT

- A. For programs that include a homestay, the organization shall:
  - 1. select host families on the basis of criteria appropriate to the program
  - 2. conduct an in-person interview with all family members residing in the home where the student will be living
  - 3. match students and host families on the basis of criteria appropriate to the program
  - 4. complete placement arrangements sufficiently in advance of the student's departure from home to ensure adequate time for preparation and orientation of the host family (Whenever possible, a student should be placed with a host family who has made a long-term commitment to host the student prior to the student's departure from his/her home country. In cases where this is not possible, a student may be placed with a short-term host family until long-term arrangements can be made. All short-term families must be selected and oriented according to the same criteria as are long-term families. The short-term nature of the host family placement must be fully disclosed in advance to the student, his/her natural parents, and the school principal and be acceptable to them. Short-term families may, of course, also be utilized when a host family placement has not worked out and a new family must be found).
  - 5. provide suitable orientation and training to the host family (When a family expresses an interest in hosting a student and a representative makes the initial home visit to explain the program, this is not to be considered the "host family orientation." CSIET suggests that host family orientation include information on the student's expectations about family and school life, customs, religion, and mores of the student's native country, the academic program in which the student will be enrolled, potential problems in hosting international exchange students, and suggestions on how to cope with such problems).
  - 6. vet all adult members of the U.S. host family residing in the home through a national criminal background check in the United States.

### Supplemental Guideline: Criminal Background Checks in the United States

Criminal background checks must be based on Social Security # and include a search of the Department of Justice's National Sex Offender Public Registry.

B. Organizations shall not knowingly be party to a placement (inclusive of direct placements) based on athletic abilities, whether initiated by a student, a natural or host family, a school, or any other interested party. J-VISA Direct Placements must be reported to the particular school and the National Federation of State High School Associations. F-VISA placements must be reported as Direct Placements to the National Federation of State High School Associations only if interscholastic varsity athletics was a known motivating factor at the time of application. An initial/first report is due by August 1st. A final report is due immediately prior to the first day of classes. The reports to the NFHS should clearly delineate the type of VISA.

# Supplemental Guideline: J-1 and F-1 Distinction

The CSIET Board of Directors has provided additional guidelines regarding the definition of the term direct placement:

- J-1: A Direct Placement is one in which either the student or the sending organization in the foreign country is party to an arrangement with any other party, including school personnel, for the student to attend a particular school or live with a particular host family; however,
- F-1: The term Direct Placement, in the context of the original J-1 definition, does not apply because federal regulation requires all international students to "apply and be accepted by an SEVP approved school" prior to applying for the F-1 visa. Therefore, in its continuing effort to facilitate the needs of its partners at state associations, CSIET asks that programs provide transparency and report to the NFHS any F-1 student for whom participation in

interscholastic varsity athletics was a known motivating factor at the time of application.

The intent of the Board in requiring these placement reports to be sent to the National Federation is to provide each state athletic association with additional information to assist in the determination of athletic eligibility of each international exchange student.

### Report Format

Reports should be sorted by U.S. state and include the following information:

U.S. State:

Name of Student:

Country of Origin:

Local Rep Name/Number:

Name/City of U.S. Host School:

*Nature of the Direct Placement:* 

*Visa Type (J or F):* 

Reports should be emailed to: CSIETREPORT@NFHS.ORG

- C. For programs that include accommodations other than a homestay, the organization shall:
  - 1. arrange accommodations on the basis of criteria appropriate to the program
  - 2. ensure the adequacy of the accommodations with respect to location, cleanliness, safety, nutrition, and supervision
  - 3. confirm the accommodations sufficiently in advance of the student's departure from home.
- D. For programs that include enrollment in U.S. high schools, the organization shall:
  - 1. secure written, student-specific acceptance from the school principal or other designated responsible school administrator prior to the international exchange student's departure from his or her home country.
  - 2. provide the school with the following information about the student:
    - a. academic history, including
      - i. academic records, translated into English or other language as appropriate
      - ii. number of years of school completed prior to arrival and number of years required in home country for the completion of secondary school
    - b. level of English language proficiency
    - c. appropriate background information
    - e. expectations regarding school experience.

### **STANDARD 7: OPERATIONS**

- A. The organization shall ensure adequate care and supervision of students.
- B. Local representatives of the organization shall maintain regular personal contact with students and host families. (Contact should be initiated by the organization's representative at least once a month be it by telephone, a visit to the home, personal contact at a gathering or other means. Regular contact, which should be monthly, is to include separate communication with the student and the host family in order to provide each with the opportunity to discuss issues they might not raise in the presence of the other. CSIET expects that there be formal documentation of this contact such as a monthly form, written journal, written log, etc. This is not to imply that representatives have to record every interaction. Rather it is to provide a record for the organization's office of the pattern of student and host family adjustments, activities, and relationships through at least monthly contact with each student and host family.)
- C. The organization shall notify the student, host family, and/or other supervisor of accommodations regarding the travel itinerary sufficiently in advance of the student's departure from the home country.

- D. The organization shall provide adequate support services at the local level to assist with program-related needs and problems, for example, counseling services, travel, medical care, language problems, changes in host family, emergencies.
- E. The organization shall maintain an effective system of screening (including a national criminal background check for U.S. representatives with direct in-person contact with student participants), selecting, training, and supervising program representatives and group leaders.

# Supplemental Guideline: Criminal Background Checks in the United States

Criminal background checks must be based on Social Security # and include a search of the Department of Justice's National Sex Offender Public Registry.

- F. The organization shall provide all students with an identification card that includes the student's name; the host family's name, address, and telephone; the local representative's name, address, and telephone; the address and telephone of the organization's appropriate national office.
- G. For programs involving school enrollment, the organization shall maintain regular communication with school authorities.
- H. The organization shall provide an opportunity to the student, host family, and school to participate in a post-exchange evaluation.
- I. The organization shall have in place adequate plans and procedures for dealing with emergency situations that may arise during the program.
- J. The organization shall respond in a timely and appropriate fashion to complaints received from students, families, schools or others concerned with the program and its quality.
- K. For programs utilizing electronic or automated program databases to demonstrate compliance with CSIET Standards, such entries must identify the date and user recording the data. Programs shall also maintain a backup system. To prevent online access to sensitive student information by unauthorized persons, program databases need to be secured by an initial screening prior to issuance of a unique username and password.

#### **STANDARD 8: STUDENT INSURANCE**

- A. The organization shall guarantee that every student is covered with adequate health and accident insurance. Such insurance shall:
  - 1. Protect students for the duration of their program
  - 2. Provide for the return of the student to his/her home in the event of serious illness, accident, or death during the program.
- B. The organization shall provide students, host families, and appropriate supervisor(s) with detailed printed information regarding the terms and limits of insurance coverage and procedures for filing a claim.
- C. Compensated officials and employees of the organization shall not receive compensation from the sale of insurance to its participants.

#### STANDARD 9: ADHERENCE TO GOVERNMENT REGULATIONS

A. The organization shall comply with all appropriate government regulations regarding international student exchange.

B. It shall be the responsibility of the organization to notify the Council of any change in status with respect to government designation, acknowledgment, acceptance, endorsement and/or sanction. It shall also be the responsibility of the organization to notify the Council of any current year deficiency in compliance with appropriate governmental regulations.

# Supplemental Guideline: Program Transparency

Programs shall inform CSIET if they:

- 1. Cease operation
- 2. *Merge with or become acquired by another organization*
- 3. Receive a notice of intent to sanction, or have/received sanctions by the US Department of State or any other government agency (including but not limited to letter of reprimand, probation, suspension, and/or forms reduction.)

As revised by the Board of Directors, April 2020