Originally issued: August 11, 2010

Guidance Directive 2010-07

Secondary School Student Program: On-Site Reviews

With the start of the new academic year fast approaching, I would like to take this opportunity to recognize the vital role your organization plays in carrying out the Secondary School Student program. This academic year, some 25,000 international high school students will be entrusted to our care. Your commitment to this program and to the public diplomacy goals of the Department of State is deeply appreciated.

I would also like to provide you an update regarding the On-Site Reviews (OSR) that the Department initiated this Spring. These reviews have proven to be a positive development for the oversight of this program activity, as they have strengthened the lines of communication between the Department and the sponsor community. To date, OSRs have been completed for 39 sponsor organizations. We are finalizing our evaluations of these OSRs and expect to share the results of our findings with you within the next few weeks. We will also soon begin to conduct an electronic version of the OSR for all remaining sponsor organizations. Once completed, we expect that the results of these OSRs (and their electronic equivalents) will assist in our identification of industry "Best Practices" which we will, in turn, publish for your reference as a Guidance Letter.

In the interim, we encourage you to examine your internal controls to ensure that your organization's program administration furthers and supports the underlying public diplomacy objectives of the Secondary School Student program, and that your organization is also in full compliance with the regulatory requirements of the program.

In examining your organization's internal controls and student placements you may wish to ask the question, "How does my organization…"

- **Ask the right questions.** As an exchange professional, would you or a member of your staff object to the placement of your our own child or relative with a potential host family that your organization has screened?

- **Find the right placements.** Are we satisfied that the potential host family and student match is correct? When should we cancel a student's placement rather than go forward with a less than optimal placement? Given the potential for student disappointment, difficulties with our

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foreign partners, and the complications of refunding student payments, who within our organization should make this decision?

- **Support our local coordinators.** Does my organization have a designated employee or officer who reviews the work of local coordinators? Is this reviewing official objective and adequately trained to perform these duties? Does this employee personally know the family involved or have a personal relationship with the local coordinator whose work he or she is reviewing? Are sufficient controls in place to detect falsified reports from rogue local coordinators?

- **Review criminal background check reports**. Do we understand fully the information that is provided in the required criminal background check? Have we researched the codes utilized in these reports and the information that is being provided? Do we select alternative vendors and seek information from additional databases if the report raises any concerns? Do we have controls in place that would immediately disqualify from hosting a sexual predator or an individual with a felony record?

- **Consider a family's capacity to host students.** Have we adequately evaluated the potential host parents' employment, the number of children for whom they provide support, and the types of activities and hobbies described in the host family application? Does this family realistically have sufficient resources to host an exchange student?

- **Locate the right school for our students**. Have we placed all students in accredited schools that offer a full range of extra-curricular activities and a full range of traditional high school classes? Have we secured written confirmation from natural parents for placements in religious or single-curriculum schools that may not match the student's beliefs or interests prior to the student's enrollment in that school?

- **Err on the side of caution if a placement appears problematic.** Do we remove students from potentially dangerous situations at the first sign of credible complaints or of alleged exploitation or abuse? Do we report incidents immediately? Are there controls in place to

ensure that reporting is timely, complete, and accurate? Does our corporate culture encourage reporting and full disclosure?

Finally, I encourage you to contact the Director of the Office of Designation, Ms. Sally Lawrence, the Chief of the Private Sector Programs Division, Ms. Karen Hawkins, or the Secondary School Student Program Officer, Ms. Maha Ammar, if you have any questions about whether a placement is appropriate. We are here to assist you and are willing to offer individual guidance and to work with you to ensure that this is a great year for youth exchange programs.

Stanley S. Colvin
Deputy Assistant Secretary
  for Private Sector Exchange