September 5, 2017

Mr. Michael Reynolds, Acting Director  
National Park Service  
1849 C Street, NW  
Washington, DC 20240

Dear Mike:

Concessioners in the national parks are proud partners with the men and women of the National Park Service in serving the more than 300 million visitors to areas managed by your agency. You are aware of the complexities of operating hotels, restaurants, transportation systems and more in locations that are often fragile and remote and where operations are often limited seasonally.

One of our key challenges is to adequately staff our concessions operations. We have an estimated permanent staff of 9,000 that expands to some 25,000 during peak operations. Many of these seasonal hires come from gateway communities. Others result from our outreach to schools and to young persons across the nation, offering the opportunity for some 90 days of working and enjoying one of our national parks. But for many years, we have been unable to fill our posts with solely American workers. We face many obstacles, including:

1) Unwillingness to be separated from families and friends, especially during non-work periods each week;
2) Lack of availability of key infrastructure, including WIFI and cellular service;
3) School calendars which promote early departures while our peak staffing needs continue;  
4) Low unemployment levels which have reduce the attractiveness of distant, short-term jobs.

Our companies have thus made use of the J-1 Summer Work Travel Program to fill key seasonal jobs in and around national parks and at other destinations linked to federal lands. These hires do not displace American workers. There are already regulations in place which prohibit displacement of American workers by J-1 visa holders and limit J-1 workers to entry-level, temporary posts. We further note that the J-1 workers pay fees to participate in the program and gain exposure to America during their stays which creates a high level of interest in returning as visitors. A recent study of Summer Work Travel Program participants showed that participants contribute roughly $500,000,000 annually to the U.S. economy through payments of program expenses (including sponsor fees, visas fees and health insurance) and wages earned during their participation in the program which are spent locally.
We understand that White House Senior Advisor for Policy Stephen Miller is leading a policy group overseeing implementation of the **Buy American, Hire American** Executive Order (BAHA) issued by the President on April 18, 2017. We further understand that the J-1 Visas are being considered for substantial reductions in 2018 and beyond.

Elimination of the J-1 program, or serious reductions in the size of the program, would have serious consequences for your park concessioners. While we are willing to work individually and collectively to increase the hiring of Americans, and especially American youth, for our manpower needs, we do not believe we can accomplish this completely and quickly.

We ask that the National Park Service communicate to the White House our full support for the spirit of BAHA but the importance of an implementation strategy which acknowledges the complexities of certain specific labor needs, including in national parks.

Thank you for considering this request. We are happy to produce data on current J-1 visa use to satisfy park visitor needs.

Sincerely,

Derrick Crandall
Counselor

cc: Teri Austin, Associate Director, National Park Service
Brian Borda, Chief of Commercial Services, National Park Service
NPHA Board of Directors
Summer Work Travel (SWT) Program Review
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Introduction
Among the public diplomacy programs established under the Mutual Educational and Cultural Exchange Act of 1961 (also known as the Fulbright-Hays Act), are several citizen exchange programs designed to build a greater understanding of the American people and culture around the world. A program category of the State Department-administered J-1 Visa Exchange Visitor Program, Summer Work Travel (SWT) is one of these citizen exchange programs. The U.S. State Department selects and oversees various implementing organizations to operate these programs without governmental subsidies. For more than fifty years, the SWT program has brought international college students to the U.S. to share their cultures and ideas with people of the U.S. through temporary work and travel opportunities. In addition to the economic impact this program has on local economies and communities, the program has a significant public diplomacy impact because it promotes authentic cultural exchange opportunities for all participants and the local communities in which they live and work.

SWT is currently the largest public diplomacy program in the U.S., bringing more than 100,000 participants annually for up to a 4-month stay during their home university summer break periods. Through the program, international students live and work in the U.S., gaining deep exposure to American culture and society. Employment in seasonal temporary jobs enables students to underwrite the cost of the program and to cover their living expenses. This is an important element of the program, because it allows the participation of youth from various cultural and socioeconomic backgrounds. The average cost to participate in the SWT program is $2,700, including all fees, health insurance, and travel costs. This is very accessible when compared to a year as an international student at a U.S. college or university, which averages $35,370 at a public institution and $45,370 at a private institution.\(^1\)

The Alliance for the International Exchange commissioned EurekaFacts to conduct primary and secondary research on the SWT program. The Alliance for International Exchange is an association of 90 international exchange implementing organizations comprising the international educational and cultural exchange community in the United States. Twenty one of the 90 organizations are designated SWT sponsors. EurekaFacts is an independent research organization that specializes in social science and policy research, with a background in providing research to international exchange organizations. The research task included:

- Review of the history and current state of the SWT program
- Primary research with SWT past participants
- Primary research with employers participating in SWT program
- Analyses of secondary employment and economic data

The primary goals of the research activities were to:

- Provide a comprehensive review of the program, and the understanding of how the program evolved in response to changes in regulatory and political environments.
- Understand the experiences of the SWT participants in terms of their satisfaction with the program, personal and professional gains as a result of their participation in the program and the extent to which the program achieves its public diplomacy goals.
- Assess experiences of employers participating in the program, including their overall

\(^1\) https://trends.collegeboard.org/college-pricing/figures-tables/average-published-undergraduate-charges-sector-2016-17
satisfaction. The research of employers also sought to understand the reasons for participation, as well as the impact of the program on their businesses both in terms of cultural exchange and economic vitality.

- Estimate the economic impact of the program in terms of the contribution to the overall economy.
- Model local economic and workforce characteristics to assess the impact of the SWT program on local employment and to understand local workforce and economic factors that influence the number of SWT placements in a geographic area.
Executive Summary

The Alliance for International Exchange is an association of 90 international exchange implementing organizations comprising the international educational and cultural exchange community in the United States. SWT is one of the programs that the Alliance members supports. The Alliance commissioned an independent research firm, EurekaFacts, to conduct a comprehensive assessment of the SWT program.

The findings presented in the report are based on:

- The review of material documenting the SWT program as well as interviews with representatives of sponsor organizations implementing the SWT program in the United States.
- A survey of 2,800 SWT alumni was conducted in May 2017 and included SWT participants from program years 2012 through 2016.
- A survey of 460 employers participating in the SWT program was also conducted in May 2017.
- Personal interviews with SWT past participants and representatives of current businesses participating in the program in The Dells in Wisconsin, Ocean City in Maryland or the Jersey Shore in New Jersey.
- Analyses of reported placements of SWT participants in geographical areas, the U.S. Bureau of Labor Statistics (BLS) and U.S. Census Bureau data for the same areas. The analyses are based on the SWT placements during the last five years (2012 to 2016) reported by Alliance members. These represent 60% of all placements reported by the Department of State. Specifically, the analyses modeled the relationship between the number of SWT program participants and youth unemployment and separately the characteristics of the local workforce and demographic characteristics of the areas of placement on the number of SWT placements.

Review of the program concluded that for more than 50 years, the J-1 exchange visitor programs, including the SWT program, have grown and changed in concert with U.S. foreign policy priorities and initiatives. The SWT program is the largest U.S. public diplomacy program, and has experienced unprecedented growth in the past 20 years. This growth led to a need for increased oversight of the sponsor community by the State Department and other program reforms to ensure positive program experiences for participants. The resulting reforms and oversight appear to have had the intended result of refocusing the program on public diplomacy objectives while assuring the safety and welfare of participants.

The findings from the survey of the past SWT participants reinforces the success of the reforms and oversights discussed in the program review. Participants report high levels of overall satisfaction of both the program (91%). The majority of participants also report personal and professional gains as a result of their participation. For example, 93.8% of participants believed that the participation in the program will help their future careers. Most participants (73%) of participants report cultural exchange as their primary motivation for joining the program. Data also show that the SWT program is achieving its public diplomacy goals. Majority of SWT (76.1%) alumni reported that their opinion of the United States improved after participating in the
program. They also report making lasting friendships with American peers (94.3%) and most show a more favorable attitude toward American people (74.1%) and culture (72%) in comparison to before their visit.

Cultural exchange is also an important characteristic of the program to participating employers. Nearly all employers (96.8%) believe that the infusion of international participants into their workforce creates a better work climate for their local employees as well as better service experience for their customers. However, not surprisingly, the employers value the more tangible contribution of the SWT participants to their businesses. Despite earnest attempts to hire locally for seasonal help, almost all employers (96.8%) report seasonal labor shortages. SWT participants thus fill the critical labor gap. Based on the survey data, the absence of SWT participants would have a negative impact on employers in terms of revenue (50.8%), ability to operate at full capacity (44.8%) and customer satisfaction (90%). More than a quarter of employers surveyed (27.6%) in fact report that without the SWT program they would not be open during the tourist season and a similar percentage (28.7%) report that they would have to lay off some of their permanent staff.

Based on review of the BLS reports and data, the seasonal labor shortage can in part be explained by the changing patterns in summer time employment by American youth. Those enrolled in schools or colleges are increasingly placing more value on other summer time activities like academic pursuits or internships. On the other hand, with an improving economy, youth who are not enrolled in school are finding permanent year-round jobs and are also not interested in seasonal employment. This pattern partly explains the reason why employers surveyed might have difficulty finding seasonal employees locally.

The economic impact analysis estimated that SWT participants contribute roughly 500MM dollars to the U.S. economy accounting for U.S. based program expenses (e.g., sponsor fees, visas fees and health insurance) and wages earned during their participation in the program and spent locally. A model looking at the relationship between the number of SWT participants and local youth unemployment rates showed that the number of SWT participants had no relationship with local youth unemployment rates, which are best explained by the overall economic health of the geographic area. A separate model exploring the relationships between workforce characteristics and the number of SWT placements showed that the number of SWT placements are related to the factors indicative of a labor shortage. For example, more SWT participants were placed in the areas with higher overall workforce participation, fewer residents attending institutions of higher learning, and a lower percentage of workforce involved in the hospitality industry. The results of this analysis reinforce the employers’ concerns with seasonal labor shortages. It also suggests that the SWT program is unlikely to compete with American jobs.
Key Findings

**SWT participants come to learn about and experience life in the U.S.**

- Most (73.1%) SWT participants reported cultural exchange as their top reason for participating in the programs. In contrast, only 26.9% participants stated learning specific work skills, gaining experience for a degree program, or earning money as the top reasons for participating in the program.

**SWT participants hold favorable views toward the SWT program.**

- Nearly all (90.9%) SWT program participants reported being either satisfied (39.6%) or very satisfied (51.3%) with their experience.
- Similarly, nearly all (93.8%) SWT participants indicated that they were either likely (23.1%) or very likely (70.7%) to recommend the program to their friends.
- When asked about whether participants had already recommended the SWT program to their friends, an overwhelming majority (98.0%) said yes.

**SWT participants express positive opinions regarding the U.S., and indicate that their overall perceptions of the U.S. improved after participating in the program.**

- Overall, SWT participants reported a positive experience while in the U.S. A majority (85.7%) of respondents indicated that their experience in the U.S. was either very good (33.3%) or excellent (52.4%).
- After participating in the SWT program, individuals reported a positive change in their views about several aspects of the U.S., including:
  - **The U.S. in general**: Over three fourths (76.1%) of SWT participants reported a positive change in views regarding the U.S.
  - **American culture**: Slightly under three fourths (72.0%) of SWT participants reported a positive change in their view of American culture.
  - **American people**: A similar percentage (74.1%) of SWT participants reported a positive change in how they view American people.
  - **American companies**: Over half (61.5%) of SWT participants reported a positive change in how they perceive American companies.
  - **American way of doing business**: A similar percentage (63.9%) of SWT participants reported a higher opinion about how Americans conduct business.

**SWT participants gained better understanding of the U.S.**

- Most participants (86.9%) agreed that the SWT experiences helped improve their English.
- Nearly all (90.9%) agreed that they had a better understanding of American culture, and many (79.3%) agreed they had gained a better understanding of the American way of doing business.

**SWT participants felt they obtained skills and knowledge that will help them in the future.**

- Almost all (93.8%) SWT participants agreed or strongly agreed that the experience would help them in the future.
Most agreed or strongly agreed that the program provided a valuable work experience (78.4%) and taught them specific work skills (78.6%).

A majority (82.2%) of participants felt that their SWT experience would help their career.

Currently employed SWT participants thought the SWT experience helped with their career.

Nearly two thirds (63.5%) of participants who were currently employed full time stated that their SWT experience has helped somewhat or a lot in obtaining their current job.

A majority of SWT alumni reported that certain skills learned during the program, such as learning to interact with people different from themselves (90.4%) and being able to adjust to different situations/be more flexible (96.1%), helped somewhat or a lot in obtaining their current job.

SWT alumni reported making friends with Americans and staying in touch with those friends after they left the U.S.

Nearly all (94.3%) SWT participants reported making friends with Americans.

A majority (87.7%) of SWT participants who reported having made American friends indicated that they kept in touch with some of them after they left the U.S.

Employers are satisfied with the program.

Nearly all employers (90.9%) were either satisfied or very satisfied with the SWT Program.

The majority (90.6%) said they would be likely or very likely to recommend the program.

Most employers (70.6%) said they would be very likely to recommend the program to another business or organization in seasonal areas.

Employers feel that SWT participants positively contribute to the workplace.

Nearly all (98.2%) employers reported that SWT program participants interact well or very well with members of the community.

A vast majority (92.1%) of employers agreed or strongly agreed that SWT program participants contributed to a positive culture in the workplace.

Most (96.8%) felt that SWT participants brought fresh ideas and innovative solutions.

According to employers participating in the SWT program, there is a seasonal labor shortage and absence of the program would have a negative impact on business.

Almost all (96.8%) employers reported experiencing a shortage of seasonal workers, with more seasonal jobs available than workers to fill them.

Half (50.8%) of the employers surveyed stated that the absence of SWT participants would have a big negative impact on their revenues.

Participating employers indicated that their businesses would suffer without the SWT program.
● One quarter (27.6%) of employers reported that it was likely or very likely that they would not be able to stay open during the season.
● Roughly half (44.8%) of employers said that it was likely or very likely that they would have to reduce hours of operation.
● Slightly over one quarter (28.7%) of employers reported that it was likely or very likely that they would have to lay off permanent staff after the season.

**SWT participants contribute to local economies:**

● The total estimated contribution of SWT exchange visitor participants to the U.S. economy in 2016 was about $509 million.
● That roughly equals $5,300 per participant.

**The downward trend in youth employment is best explained by competing priorities of American youth enrolled in school rather than the SWT program.**

● BLS reports that summer work participation among American youth has been declining consistently since 1990. Although the trend is affected by adverse economic conditions, it does not recover after recessions.
● BLS reports higher summer school enrollment during the same time period.\(^2\) Similarly, a Pew Research report notes community volunteerism and internship programs have become alternatives to seasonal employment.
● Whereas summer employment for youth not enrolled in school has also declined, BLS notes that participation of this group in the workforce increased at the same time. This finding suggests that youth not enrolled in school are more likely to be employed in year-round work and therefore less likely to seek seasonal employment.\(^4\)

**There was no statistical relationship between the number of SWT participants and youth unemployment rates. That is, there is no evidence indicating that SWT participants compete for local jobs.**

● Regression analyses examining the factors influencing youth unemployment rates showed no relationship between youth unemployment rates and the number of SWT participants (standardized coefficient -.005 p=.342).
● Youth unemployment rates were related to indicators of a community’s economic health such as the overall unemployment rate.

**Analysis suggests that SWT participants supplement the existing workforce rather than compete for existing jobs with local workers.**

● Regression analysis examining the factors influencing areas where SWT participants worked showed a relationship between the number of SWT placements in a community and factors related to seasonal labor shortages.
  o SWT placement was higher in locations with fewer people ages 18-24 enrolled in institutions of higher learning (standardized coefficient= -.01


Given the short-term nature of these jobs and that college students are potential candidates for seasonal jobs, these findings show that there are more SWT participants in areas where there are fewer college students.

- There were more SWT participants in areas with higher workforce participation (standardized coefficient= -.029, p=.001), suggesting higher levels of competition with other businesses in similar industries for seasonal employees.

- SWT placement was positively related with commute time to work (standardized coefficient= -.022, p=.001), meaning seasonal areas with longer work commute times from neighboring cities had higher SWT participation.