Report of Comments Received on the Draft of the 6th edition of the *Standards of Good Practice for Education Abroad*

Public Comment Period Open: June 1-30, 2019
Draft version of document available here.

Total number of commenters: 29

Comments received:

"I think these revisions are an important and positive step to making the Standards more inclusive of a variety of education abroad programs and better highlighting the inherently collaborative nature of any study abroad program.

Recommendations:

I would like to see the fundamental nature of study abroad as collaboration more explicitly stated. This could be done in the opening and/or the specific standard. Defining who does what in a collaborative partnership is fundamental and an important addition to the standards.

In addition, while I understand the idea of weaving risk management throughout the document, given the complexity, I would recommend creating it's own section to more easily be able to point at the minimum risk management protocols we should all have in place. This is especially important as we advocate with internal and external constituents to ensure sufficient attention and resources are given to this. Right now it could be seen as buried in the text when seen by those outside our own offices.

Lastly, while I understand that the structure of these standards are based on existing models, I urge the Forum to consider interactive and visually accessible formats, perhaps cross referenced by themes or applicable, in order to increase the impact and reach of these important standards.

Many thanks!"

"Pg 2. Consider adding: How to Use the Standards: Training new professionals and as an educational tool for stakeholders (e.g. faculty, parents, students, etc.)

Pg. 2: I like the designation of shall, should and can to guide expectations but curious as to the specific word choices? Are these from ANSI?   While I haven't spent a lot of time playing with the idea of these words, at initial glance these three seem like they could be confusing or easily mixed up and required many, many references to the footers during the read through. And there is a whole lot of research around the language of "should" from psychology (namely, to avoid the "shoulds"), which gives me pause to consider this as a key phrase in the Standards. And Should and Shall are synonyms, which could get quite confusing for non-native English speakers potentially. Were any other words considered?   (e.g. consider; ought;

Definitions are useful, glad they will appear in the Glossary.

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Pg. 7 definition of critical incident seems narrow. In teaching and use of common texts in the field it usually refers to an event that causes stress. (A critical incident can be defined as any event that has a stressful impact sufficient enough to overwhelm the usually effective coping skills of an individual. Critical incidents are abrupt, powerful events that fall outside the range of ordinary human experiences. Source) – maybe that is too broad given its use in the guiding principles, but a point of consideration as to 'scale" expected.

Where section 4 begins on pg 12, will there be a document/publication or version that jumps in here directly with the other information appearing as links online or in other places? The other information is useful for the first read and as a reference, but it seems clunky if you have to go to page 12 to get into the Guiding Principles each time you are referencing the Standards.

I value the addition of 4.4. Diversity, Inclusion & Equity. I wonder if this will seem overwhelming to members, particularly one-person offices in the US, faculty-leaders, and non-US based organizations that may interpret and norm issues around diversity, inclusion and equity from a different cultural perspective? I realize most are "should" not "shall" so that leaves room for opportunities to improve and grow.

Pg. 15 Section 6. "Supporting" sounds inconsistent with the rest of the titles of the Guiding Principles, as this is a verb and the others are nouns. Consider "Student Learning and Development" or "Student Learning & Development Support" instead.

Pg. 16 – 6.1.5 is unclear to me how this works in practice across different program types. Considering faculty-led programs-- as a faculty-leader, for example, I have to put together a proposal for a course that is then reviewed by a Dean and a Committee for approval. Upon that approval, then it goes to a Global Operations Committee for additional review. I plan the course/course #, #credits, activities, assessment, etc. – following the established policies and guidelines of my program, college and university. I can engage students to educate them about the courses, credits, academic structure, assessment and grading but this seems to suggest they are engaged in the planning of? Unclear to me.

General comments: It would be helpful to have a brief broad descriptor for each of the Guiding Principles (what can one expect to find in the Administrative Framework section, for example, vs. the Supporting Student Learning & Dev)?"

The proposed draft of the 6th edition of the Standards of Good Practice for Education Abroad is well laid out and is focused on each aspect of education abroad.

"Congratulations - this is a very well structured, easy to comprehend and comprehensive edition!

Clearly, the intent to create high standards for the program and for the students who go abroad is fully achieved in a very thoughtful and balanced way.

Paragraph 6.2.5 and 6.2.6 seems to me and probably other EU based staff most important. Here I would like to switch a bit the perspective, i.e. the standards should help to make the

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program successful to the students and the program, but more emphasize should be given to the reciprocity of the interaction with host city/host country and it's people and the impact the program has on the hosts, the local reality. I wish for a slight shift in perspective ... maybe something like:

""Responsible parties shall support students to interact in a respectful, mindful and sustainable way in the new cultural geopolitical environment?""

I think it should be more than just supporting students to "reflect" on the cultural, ethical, and environmental impact ... I believe the students and the programs should become "aware of their cultural economic and social impact" and be to a certain degree "responsible" about their interaction while in the host country."

"Comments on 6th edition of the Standards draft

3.1.5. Communicate: Should this entry also make reference to other forms of communication existing now and in the future email?

4.2.3 Partners shall collaborate to: (first bullet) align mission and goals et. What might be missing here is that that there is some intended outcome. Realizing that the Standards should not articulate what that outcome should be is realistic, but I feel like there should be some kind of why? The mission and goals are not aligned simply for the sake of doing so.

4.3.1. Ethics. There is a high likelihood that the Code of Ethics may be reproduced with a different title, such as "Ethical Guidelines" or "Ethical Principles"

4.4.2. Diversity, Equity, and Inclusion: I'm not opposed to this concept, but I'm questioning whether diversity, inclusion, and equity should be "central to a program's….learning outcomes" in all instances?

5.1.9. Sustainable environmental practices seems like an add on

5.2.2. Staff shall be equitably remunerated (for their respective roles) (Is this mitigated by 5.2.2.1.?)

6.1.1. "to see it as an option" is awkward word choice

6.1.3. "the context(s) for each program" seems incomplete…is it the context for each program, or the context for each program's location(s)?

6.1.11 I need to look elsewhere in the document to see if there is more guidance around sharing details of a participant's disability, but I'm wondering if there should be more in this point about collecting, storing, and sharing this information with privacy/security in mind

6.1.14.1 This point would benefit from adding the word "procurement"."

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"While I understand that the 5th edition of the Standards might be regarded as having swung too far in the direction of paring the text down to bare essentials, I find the draft rather legalistic in tone and cumbersome in expression. In particular, I do not find the much-emphasized ""shall = minimum requirement/should = recommendation/can = possibility"" distinction helpful. I am no lawyer, but it is my understanding that 'shall' is obsolete in legal terminology, precisely because of its ambiguity. I feel that we should revert to the 5th edition's present tense, which allow for flexibility of interpretation, depending on the nature of the organization under study: the current 'shall' and 'should' could both be expressed in this way, while the relatively uncommon 'can' standards could easily be removed entirely, or perhaps absorbed into other clauses, since they are little more than some examples of current good but not essential practice. A surprisingly large number of the 'should' standards refer to preservation of the environment and resources, and it would be sad to seem to make this area merely optional.

The introduction of 'organization' and 'responsible parties' as the subject of most of the sentences of the standards is confusing, and clutters up the language. It is not at all clear why one term or the other is chosen on any occasion.

I would also hope that the current numbering of the Standards is retained, rather than integrate the standards into a larger document, as it now stands. I do like the idea of re-ordering the sections so that they start with Guiding Principles. Nevertheless, "Collaboration and Transparency" seems thin to me; both topics are covered under Administrative Framework. But if that section is retained, here are a few smaller comments. I am not sure that 4.2.2 is useful and needs to be included; why would mutual benefit of a collaboration only be recommended, when the preamble says that partnerships 'shall' be equitable? Similarly with 4.2.3.1: if the objectives of the partnership, as in the preamble, are articulated, surely that has to be in writing?

In 4.1.2, 'constituents' are not defined; this would seem to be a useful item for the Terms & Definitions, especially if such elementary terms as 'communicate' and 'support' are defined.

In 4.4.3, the final sentence offers an opinion and justification, which is contrary to the practice elsewhere in the draft.

In 4.4.6, "disaggregate data" sounds too much like jargon. I also don't see that "and/or" adds anything useful to a simple "and."

Similarly, in 6.1.8.3, "prepare participants to negotiate their intersecting identities" is jargon, and doesn't add much to the previous clause.

In the Terms and Definitions, a lot of effort has been spent on making entries as comprehensive as possible, but it is inevitable that something will be left out. For 3.1.1, there is no explicit explicit reference to an independent (program) provider, although I suppose it could be understood as coming under 'partner.' I am not sure that university, college, and business school (better professional school?) need their own separate lines. Similarly, in 3.2.19, do we really need a breakdown of the various kinds of faculty who might teach EA courses?

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Under Program (3.1.4), we seem to be missing the university enrollment type of experience, which is often packaged as a program by the host university.

In 3.2.2 and 3.2.3, couldn't these two entries be combined?

Does 'communicate' 3.2.5 really need an entry?

3.2.7 would 'record' be better than 'reflect'?

in 3.2.13, "they" is used as the gender-neutral pronoun for a singular participant, which is fine, but the sentence should conclude with 'a full-time student.'

In 3.2.15, I have problems with the definition of equity. I don't know the AAC&U original text, but I would suggest rephrasing to "creation of opportunities for all populations, including those historically under-represented, to have equal access...." But I also don't find the phrasing of "equal access to and support to" very elegant or clear.

In 3.2.23, again, I don't know how much of the text comes from the AAC&U definition, but everything after the dash (--- in ways that ..." seems redundant.

In 3.2.9 I think we need a more refined definition, that helps distinguish between goals, objectives, and outcomes. Pedantically, I am not sure that an objective can, strictly speaking, be defined as a statement.

In 3.2.39, it might be clearer to reorder and reword note 1: ""Also known as higher or tertiary education, post-secondary education is in the US taken ...""

In 3.24.40, add "in the event of" after "including"?

Thanks for considering these points, which I hope do not seem terribly petty to you. An amazing amount of hard work and sharp thinking has obviously gone into the new draft."

"The format of this version of the Standards is incredibly difficult to read and use as compared to the last version. It is written like a contract or legal document, and as such makes it impractical to use as a guide or manual to assess our overall program. We have been using the 5th edition extensively this summer as we went through strategic planning, and the 6th edition does not lend itself to that work at all. I would hope to see a revised edition that communicates the same general content of items (standards?) 4-6, but communicated in a way that is useful to all levels of administrators, not just those with a legal background. The tone this edition sets is one of liability and risk management rather than best practices or guiding principles."

"Quick note to start: unfortunately I was unable to take part in the listening sessions mentioned on p. 2 of the draft, so it is unclear to me what the impetus was for this significant revision of the Standards. This also means that some of my comments may relate to issues that were previously clarified by Forum staff and/or members of the Standards Update Working group during those sessions, and if so, my apologies!

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I have a couple of overarching concerns about the new Standards:

-        They have reverted to being a bit unwieldy. The current edition (5) was a big improvement over the first iteration in that it was significantly streamlined, making it much easier to use as a working reference document. By contrast, this new version seems more lawyerly and less accessible. While some of this is likely due to my unfamiliarity with it, I have read it through several times and so far my concern remains.

-        More important, the substance of the Standards seems to have changed significantly, in a way that appears to downplay the central role of the academic experience in education abroad. For example, section 4.1.3 mentions educational objectives, but it falls short of requiring that "specific learning goals" be "articulated for each of the organization's individual programs (as Standard 1 does in the current version). Similarly, the current Standard 2 requires that "educational objectives remain central to program design and management," and "regular evaluations are conducted to assess student learning and development," whereas the new version mentions assessment of student learning in section 4.4.6 only in relation to "equitable outcomes for all students" (a much more limited scope). The current Standards further emphasize the centrality of learning through requiring that "organizations seek to create and maintain continuity with student learning and development on the home campus" (current Standard 2); the new version mentions this in 6.3.3 but as a "should," not a "shall" (and the emphasis is not on pre-, during, and post- continuity, but only on the connection to "future learning"). Finally, the curricular connections and the unique learning environment of education abroad also seem to be emphasized somewhat less than in the current Standards. The current Standard 3 requires that the "curriculum supports the program's stated goals and leverages the unique learning opportunities offered by the host context," whereas the new version simply states the requirement that organizations have guidelines for program design "including site-specific learning opportunities" (5.1.3). This is a slight difference, but it results in less clarity about what is expected in terms of academic framework.

What follows is my feedback about particular sections of the draft.

Section 3, Terms and Definitions:

First, it is not clear why the definitions are split into two subsections, particularly when the second subsection has the same title as the overarching section ("Terms and Definitions").

Second, it wasn't until I got to 3.2.22 "including" that a major concern was addressed (namely, why some of the lists earlier in the document were not even close to being all-inclusive or exhaustive). It would be helpful either to revert back to using "including, but not limited to" as appropriate, or to list at the beginning of the section (not midway through it) the note about how "including" is being used.

Third, I question the need for definitions for so many words that are commonly used not just in the higher education context, but also by the wider public (and therefore presumably broadly understood). Specifically, it is not clear why the document needs to contain definitions for

"communicate," "support," "credit," "ethics," "faculty," "goal," "guideline," "not for credit," "policy," "procedures," "process," and "student" (noting especially that some definitions are taken from dictionaries, and that the definitions take up more pages than the actual Standards themselves). I also noted that some words are listed more than once, which likewise does not seem necessary; these include "support" (3.1.6 and 3.2.49); "communicate" (3.1.5 and 3.2.5); "learning and development outcome" (3.2.26), cross-referenced as "outcome, student learning" (3.2.31); "program outcome" (3.2.43), cross-referenced as "outcome, program/programmatic" (3.2.32); "partner" (3.1.3 and 3.2.34); "program" (3.1.4 and 3.2.42); "responsible organization" (3.1.1 and 3.2.45); and "responsible party" (3.1.2 and 3.2.46).

Fourth – and conversely, there are some words used in the document that could benefit from being defined but that are not included in the list of definitions. Examples include "intersecting identities" (6.1.8.3) and "intrapersonal and psychosocial adjustment" (6.3.4.1).

Fifth, feedback about specific definitions:

- 3.1.1: Should Note 2 to entry also include a reference to partner (3.1.3)?

- 3.1.6: The third point under Note 1 to entry doesn't seem to constitute "support"

- 3.2.9: "…or other event that requires a response by program personnel or first responders" is somewhat vague; there are many events that require a response from program personnel, but they are not all serious enough to be called "critical incidents"

- 3.2.16: as a peer reviewer, I wonder whether it is possible to objectively assess a staff member or institution's "mindedness"

- 3.2.33: I'm concerned that the definition here of "participant" includes on-site administrators and faculty leaders; it is my experience that organizations typically differentiate between participants (students) and faculty/staff, and this could cause confusion in writing (and understanding) self-studies and peer review reports

- 3.2.50: this definition of "sustainability" could also cause some confusion, given that it is often used in education abroad to refer to overall program sustainability in a different way, e.g., proposals for new partnerships often include a question about plans for making the partnership "sustainable" (meaning what steps will be taken to ensure program longevity)

Section 4, Guiding Principles:

4.2 Not all education abroad programs involve partnerships, so it is unclear why partner relations now merits its own separate standard.

4.2 Collaboration and Transparency, in the first sentence ("Partnerships shall be equitable…"), "equitable" doesn't seem to be used as indicated in definition 3.2.14.

4.2.3.1 Seems this could be a "shall" instead of a "should."

4.3 Should the section on Ethics also reference marketing practices?

4.4.2 Given the definition of "diversity" (3.2.12) to include "ability" and the definition of "abilities" (3.2.1) to include "intellectual power to do or accomplish something," it may not be possible for all programs to make diversity central to their design (again, as defined here). Not all programs can accommodate students with differing intellectual abilities. The issue is with the specificity of the definitions, not with the overall goal of focusing on diversity and inclusion. However, one could argue that while responsible parties should be concerned with overarching issues of diversity, inclusion, and equity in program design and implementation, it is not as clear that these concepts can or should always be central to learning outcomes, which seem to be related more to (often highly individual) institutional or program missions.

5.2.1 It is not clear what "commit to" entails. Also, should this perhaps be a "shall" instead of a "should"? Continuous improvement gets at the very heart of the Standards.

5.2.2 As in 4.2, the use of "equitable" here seems to be broader than defined in 3.2.15. Also, should this section reference workload? The current Standard 7 requires that programs have "workloads that enable faculty and staff to support the educational goals of the program and devote sufficient time to their students." This has sometimes been an important point in past QUIP reviews.

5.2.5 Should this be a "shall" instead of a "should"? "Providing a safe environment" should be a minimum requirement, not a recommendation.

6.1.8 and 6.2.5 Both sections reference "reciprocally-beneficial activities." My concern here is that – while this is a laudable goal in some ways – not all program types (or locations) lend themselves to these types of activities.

6.1.11 Should this section also mention the need for clear communication when specific needs cannot be met, along with a minimum requirement that responsible parties work to help students find alternative program options whenever possible?

6.1.12.1 Should this be a "should" instead of a "can," given how challenging it can be for many students to fund education abroad?

6.2 Should "…student development" be "…student learning and development"?

6.3.3 Should the "should" be a "shall"? Again, continuity of learning is a key focus in the current version of the Standards. This is especially striking given that 6.3.4 – the provision of resources related to student mental and physical well-being – is a "shall." This is another case where the new version of the Standards seems to deemphasize the academic aspect of education abroad, as I mentioned above.

6.3.4.1 It is not at all clear what is expected in terms of supporting "intrapersonal and psychosocial adjustment."

6.3.7 Should this be a "can" instead of a "should"?"

"It's difficult to write over this medium. In a sense I can say there is some dissonance in the direction of the final new COE product given that the new Standards draft has a very explicit Ethics section already written in the Guiding Principles area. Although the WG understands that it's the Forum's wish/direction that each individual provide feedback on the draft through the comments section, I would be negligent if I didn't mention that the COE WG members wished that there was an opportunity for dialogue directly with the Standards Committee/WG. I have advised all members of the COE WG to provide direct feedback through this online form.

However, at a macro level, the Forum (as an institution) convened the COE WG and has asked this group of members to re-draft the document. Looking at what was written about Ethics in the Standards draft I think there is a general wish/unease that the Standards Committee and COE group didn't/have not had a chance to at least discuss wording as two entities convened by the same body. For example, "4.3.1. Each organization shall adopt The Forum on Education Abroad's Code of Ethics for Education Abroad or use its own code of ethics for its education abroad programming." Although this point uses the directive "shall" it also seems to allow an institution to completely put the Forum COE aside instead of more inclusive language integrating or considering the Forum COE in conjunction with an organizations' own COE. Similarly, "4.3.6. Each organization shall promote respect for the cultures and values of all involved, including the communities from which the participants come and the communities in which they operate." Is definitely a worthwhile statement, but could be more robust and reflective of the direction the new COE is taking if it were drafted taking into account some of the points I think the new COE will address or shed light on.

Finally, we note that environmental impact is noted in several sections of the new draft, giving it a "special call out", but not other forms of impact such as aspects of cultural and economic sustainability and impact.

In a sense, it feels like the scope and parameters of the yet to be drafted revised COE are being set in place for the COE WG by virtue of the fact that Ethics are explicitly addressed in the new draft of the standards. I'm not trying to whine or be difficult here, but just want to point out some of the limitations of the process (timing perhaps) as seen by the COE WG. As I said, this is difficult to express in an email, but I'd welcome your reflections and thoughts on these sentiments when you have time."

I am very concerned that these new standards have gone too far afield from what we have been using for years. I would hope to have more understanding of how we got here, because it seems that we made a wrong turn somewhere. I unfortunately don't see these being useful in any way at my institution. I need to speak in general terms because it isn't useful for me to cite specifics at this point.

"Community impact is not included in the standards - I think it should be."

"•   Preferred having the queries but found the new standards to be more in depth

•   Previous standards seemed easier to manage since they were more segmented

•   4.4.2 as a should- the word central shouldn't be there if it is a shall.

•   Change 4.4.4 to a shall

•   4.2.3. Partners shall collaborate to: Align partners' missions and goals – This isn't clear as an achievable required standard, either change to should or re-word

•   6.1.12 take out savings

•   6.1.15.1 perhaps being a should- with regards to providing information – what does the word support mean in this context?

•   Do we need to have cans, should we remove cans and make into should statements

•   5.1.5 add diversity statement training

•   Diversity not mentioned in hiring practices either in 4.4 or 5.2.3

•   6.1.1. Defining value of study abroad – it isn't clear what the value or intended value is in this current writing

•   6.2.1. how are we supporting the underrepresented students, should there be a should statement added

•   5.1.4. is not strong enough to replace previous standard of recruitment and selection process are fair, ethical and transparent"

"I have read the document twice and I think that the Committee did an outstanding job in developing this. Not only is it very comprehensive but it also an "easy read" which most documents of this type usually are not. Great job."

"A few additional thoughts.

1. I applaud the inclusion of a Diversity, Inclusion and Equity section. I find it a little thin and would like to see a little more work to flesh this out. The term "equity-minded" policy, for example is vague. The terms diversity, equity and inclusion are all defined in the glossary, although not fully in my opinion. Nevertheless, in the standards these terms are not each fleshed out in a way that each of the standards clearly ties back to the overall goal. Sometimes I am left wondering if the terms are used correctly. We have, for example, 4.4.1 that states the policies shall be "equity-minded" but, one presumes, designed to also be inclusive as well? A policy requiring every student purchase a meal plan is equitable perhaps but if there is only one option and it excludes students due to cost or the meal components, it is probably not a very inclusive policy. So do we mean only "equitable" or also ""inclusive"". Teasing out with these

standards exactly where we mean "equitable"; "inclusive"; and "diverse" so that it's easier for an external person to provide feedback about whether a particular policy or program component meets the standard would help. I would find it difficult to provide external feedback on this section without substantial interpretation on my part.

2. There are a few areas where jargon is used. Finding ways to eliminate jargon will make the standards more accessible and easier for other cultures to use. For example, I find the term "intersectionality" in 6.1.8.3 unhelpful. It began as a sociological concept in the literature to refer to overlapping identities, but it's come to mean quite a lot of different people. I think the idea the drafters of the document are trying to get at is a good one, but my recommendation is to say it in plain language. ""Historically underserved"" is very specific as well. That might be said a little more broadly or explained in the glossary.

3. Ethics is a bit like diversity. I am pleased to see the section, but I feel it needs a little more meat. On the one hand, the document refers to the more complete Forum Code of Ethics. On the other hand, there is a standard present. It's not so convenient to be given somewhat vague standards and then referred elsewhere. Fleshing out what ethics means to the Forum would be helpful. I am not sure I could provide feedback on 4.3.3. ""shall conduct ...activities and advise students in an ethically responsible manner"", for example without imposing my own definition. I don't know what that might look like objectively against a Forum set of principles, while I am sure I would be able to judge that from my own set of ethical principles. Perhaps import more content from the Code and have that document as an additional reference?"

"Revising the standards is a big job and I am grateful for the work of all concerned in bringing these standards up to date.

After having read through these several times, my primary thought is that these would read better, and would be more effective, with some material edited out. Below are some suggestions in this regard:

Could we move the "can" statements out of the standards and into the toolbox? Stylistically, having "cans" for only a few of the clauses breaks up the flow of the document. An additional reason to do this is that by including only these "cans" and excluding all others, my fear is that these "cans" will tend to become "shoulds" or even "shalls" in the minds of those doing Quips reviews. Putting them in the toolbox would lessen the chance of this happening and also allow the ability to add many more "cans" in the future.

There are four places in the standards where the need to protect the environment is mentioned. I am in all favor of protecting the environment, but I'd also like students to think about social justice issues, gender equality and several other social issues. My fear is that including a single issue, like the environment, will prompt others like me to ask "why not include my issues as well?" The standards could try to incorporate all of these issues, of course, but this is impractical. The better option, I believe, would be to drop reference to any specific issues and instead encompass the concerns in a single broad statement (like 4.3.6).

Similarly, I think there is a danger in including any reference to specific academic topics as is done in 6.1.3 and 6.2.3. There will be very good international experiences where covering the topics raised in these statements, in addition to all else that needs to be learned on the program, is just not practical. Moreover, one could easily argue that the clause should read "Responsible parties shall communicate the importance of understanding the context(s) for each program, including: flora, fauna, geographical features, and sub terrain geology" or any other list of academic subjects. This apparent bias in favor of the social sciences could be eliminated by replacing 6.1.3 with something like "Responsible parties shall communicate the importance of understanding the local context(s) for each program" or, alternatively, dropping 6.1.3 altogether and relying on 6.1.4 to get to the same point.

For section 6, I found the before, during and after structure to be unnecessarily repetitive. I would prefer that once an issue is raised that the before, during and after aspects of the issue be included in a single statement rather than coming out in three different statements. For example, health is mentioned in 6.1.9, 6.2.8, and 6.3.4. But couldn't we just have a single statement that says something like , "Responsible parties shall provide resources related to student mental and physical well-being before the program starts, during the program and once the students are back and are adjusting to their home culture?"

One final general observation: If most campuses are like mine (and from what I can tell they are in this regard) the study abroad office has very little actual authority to dictate the academic content or teaching on programs. An academic unit is going to deal with these issues and will be governed in this regard by an accrediting body. So when it comes to issues like learning outcomes (4.4.2), course placement (6.1.6) and grading (4.4.6), there are going to be limits to what the study abroad office can realistically do. Something like "Responsible parties will work with academic units to ensure that the learning outcomes and assessment of courses taught on programs can be achieved in the program location," could replace 4.4.6 and 4.4.2 and maybe also 6.1.6, and would better reflect the role of the study abroad office.

Apart from these general observations, I have a few other suggestions:

Section 1 Scope – If it is necessary to include 6.1.1, I think it would fit better here than in section 6. But I would argue for leaving 6.1.1 out altogether. After all, isn't it just stating the job description of everyone working in international education?

Is there that much difference between 4.3.2 and 4.3.4 or 4.3.5? Couldn't all three of these statements be contained in a single statement like: "Responsible parties shall train its personnel and students on ethical practices in international education and shall encourage its participants to abide by these practices while abroad"? If all three statements are going to be kept, I'd suggest tweaking 4.3.2 so it is clear which students we are talking about. As written, it could be interpreted to mean that the study abroad office is responsible for all of the ethical training of all of students who go on international programs.

In addition to my comments above, I am not sure what 4.4.2 adds that is not already included in 4.4.1 and 4.4.3.

Stylistically, it is a bit jarring to have a bunch of declarative statements and then suddenly have a justifying statement as is done in 4.4.3. To be stylistically consistent we should either provide a justifying statement for all of the requirements (which I would make the standards really long) or drop the second sentence of 4.4.3.

Section 5 is very well done, concise and helpful. The committee did a good job on this section.

6.1.2. and 6.1.2.1 could be combined into a single statement without loss of force.   And I also wonder what 6.1.2 adds that is not already covered by 4.4.4.

6.1.8 on its own is very good. I am not sure that adding 6.1.8.1, 6.1.8.2, 6.1.8.3 strengthens the statement much more.

6.1.12 – Are we really going to require that study abroad office advise all students on their financial situations? I don't know many institutions that have the resources to do this. And what about students who don't want any financial advice?"

"I want to submit some edits for the Working Group's consideration:

PAGE 4. NORMATIVE REFERENCE   Should the word on the second sentence be "updated" instead of "undated"?

PAGE 5. 3.1.4. PROGRAM Can we add an extra bullet to include general semester academic offerings that don't include a faculty leader and are not reciprocal exchange?   -academic studies in specific terms (i.e., Semester and Summer).

PAGE 5 3.1.5. COMMUNICATE using the word "may" denotes just a possibility, and it is critical for responsible parties to communicate. So in Note 1, it could read: Appropriate methods of communicating information about education abroad programs "should" include several of the following.

PAGE 6 3.1.6. SUPPORT to assist, to help, to facilitate

PAGE 10 3.2.36. PERSONNEL add -on-site logistics providers (guides, chauffeurs, etc.)

　　　　3.2.37. POLICY -academic

PAGE 12 3.2.50 SUSTAINABILITY minimizing the adverse effects of education abroad on natural resources, the environment, and social impact while balancing the use of financial resources and promoting the continuity and value of the program.

PAGE 12 4.2 COLLABORATION AND TRANSPARENCY Partnerships shall be equitable, transparent, and articulate the objectives of the partnership and the distribution of responsibilities to each partner and clarifying the responsible party for each task of program design.

PAGE 13 4.3.7. Each organization should consider the social, economic, and environmental impacts of its education abroad programming.

4.4 DIVERSITY, INCLUSION, RECIPROCITY AND EQUITY

4.4.5 Each organization should design its programs to provide opportunities for students to interact reciprocally with broadly diverse peers, personnel, and members of local communities.

PAGE 15 5.2.5. Responsible parties should ensure that facilities, administrative support platform, infrastructure, including housing, are suited to the goals of the program, providing a safe environment that supports learning for all students.

6.1.4. Responsible parties shall prepare students to engage with the curricular and co-curricular aspects of each program, taking into account possible pedagogical model and academic policies differences in host institutions.

PAGE 18 6.2.8.   (add a bullet) -Country-specific reccommendations"

"Overall sequencing: putting the definitions at the end of the document could create a more user-friendly experience as readers may refer to the definitions as needed once the standards are read instead of prior to reading them.

Structuring the document so shall, should and can are more clear within the standard would help users understand more quickly which ones are required versus those that are encouraged or aspirational. It would be difficult to have a shall, should, can level for each one and with some there are not three or even two levels but where there are, having that structure would be helpful.

4.3.2: in educational institutions do we train students or educate them? We could train personnel and educate students.

6.1.1: The phrasing of this standard seems awkward. Perhaps ""Responsible parties shall communicate the value of education abroad."" is all that needs to be stated here because guide students to see it as an option is inherent in communicating the value (or it should be if it is not).

6.1.15: Changing the terminology to receiving country or host country immigration status would clarify that responsible parties are communicating about that citizenship status of the destination and not that of the home institution's country.

6.2.9: This standard talks about abilities (which is a great way to say it). 3.2.44 talks about disabilities and seems to align with ADA standards. Are they meant to align with each other? Are there other statuses not protected under the ADA, like gender identification for example, that need accommodation attention?

General comment: Our institution has been having a lot of dialogue around equity and inclusion and the framing of it. The terms underrepresented and underserved are frequently included in the conversation but the terms overrepresented and overserved are not. To have a complete conversation around equity and inclusion, there needs to be a dialogue around how overrepresentation is the other side. Just correcting underrepresentation is not going to correct the systemic problems that allow overrepresentation to continue. This document references underserved populations and could forward the dialogue if it also referenced overserved ones."

"4.4.3. - I don't understand what the second sentence is referring to: "These create inequities in students' education abroad experiences and learning outcomes." I don't understand how that second sentence relates to the first sentence, and I don't know what "these" is referring to.

5.1.8. - just an idea: should partnerships include some sort of "dispute resolution" and/or "annual review of compliance." Basically, I'm thinking how do you make sure you are reviewing partnerships, making sure you follow the terms that you originally agreed to, and dealing with any challenges.

5.2.2.3. - "In-depth experience" is a bit unclear to me. I am more used to seeing and considering phrases like ""related experience"" or "relevant experience."

6.1.5. and 6.3.2. - should there be mention of a grade dispute process? I'm not sure what the best practice is. If a student tries to make a case that they were graded unfairly abroad for some reason, what should be done?"

"My initial commentary has to do with the definitions section; since those definitions shape what follows, that section needs to be clear. In section 3.1, "Communicate" and "Support" are not entities (the title of the section), and the definitions are dictionary definitions; in other words these definitions don't belong in this section, and they're too basic for the document. If the document doesn't require a professional definition beyond what Webster's dictionary says, then the word either doesn't need to be defined (i.e. professionals in the field all know what it means) or a more specific definition needs to be developed to serve the purposes of the document.

3.2 Guideline (3.2.21), Procedure (3.2.40) and Process (3.2.41) -- the guideline definition is another dictionary definition, but for the purposes of this document, these three items are relational. In other words, if the document takes the time to define them and is not using them interchangeably, readers will want to know what the difference is between a guideline, a procedure and a process. A guideline is a set of recommended practices and considerations to apply to achieve an end. Is the crucial difference between process and procedure that a procedure has to be followed in order whereas process is viewed as more flexible? Do there need to be two different definitions for these?

3.2 Goal (3.2.20), Objective (3.2.29) and Outcome -- Goal and Objective are synonymous; they both mean something that you set out to do or attain. The definition offered for objective is better suited to the measures piece in the assessment definition (3.2.3). I'd also suggest creating one entry for Outcome with sub-entries for student learning outcomes and program outcomes instead of having 3.2.31 and 3.2.32 pointing elsewhere in the document.

A couple of further questions:

4.1.3 What does "support the mission and goals" refer back to? "Responsible parties" or "educational objectives". There's a lot packed into that sentence; it might be better to divide it into two.

Section 6

6.1.2. This statement sounds like the only students programs should be recruiting are underserved students, and although I don't think that's the intent, I think the "shall" statement should be broader in scope. i.e. Responsible parties shall recruit and advise students from all segments of their campus population including students who are historically underserved by their organization's programs.

A general comment on shall, should and can statements: it might be better in each section to re-order so that the shalls all come first, then the shoulds, then the cans (unless a should or a can is a subsection of a shall). That would make clearer what's required, what's recommended and what's suggested."

"Thank you for tackling this huge task. In many ways, this is clear, focused, and norm-setting. I particularly like the distinctions between "shall," "should," and "can," though I may disagree with some of the choices made in that regard. I a part of the working group that's looking at the Code of Ethics, and it seems to me that these two processes need to work in tandem -- we may reformat or rethink things that would then affect how the Standards are defined and presented. For example, this draft has "transparency" (4.2) and "ethics" (4.3) separated, but they are related in the Code of Ethics. I like that ethics is a "guiding principle," and separate from operations, because ethics should guide operations (at least in part).

There are a few word choices that I find stiff and awkward (such as "participant conduct management" -- participants are not robots).

I could focus on more details, but because I am involved in the Code of Ethics revision, I'll only ask that this process not be finalized until we've had a chance to reflect thoughtfully on the two documents as a pair. I understand the "Standards" are the central document here, but I think they can be improved by the careful thinking that is going into the "Code of Ethics.""

"Perhaps consider adding something along the lines of: "Each organization should consider the impact of their programming on the local community" maybe in the Ethics section (4.3).

Something that would get at the importance of considering how your program affects those in the community where you are operating. This largely applies to programs in lower-resource settings.

Perhaps under 5.2 Financial and Human Resources, consider adding something along the lines of: "Each organization should consider what percentage of their money spent remains in the local community where their program takes place."

I know that both of these refer to things that are in the new guidelines on engaging with local communities, but it may be nice to have them referenced here."

"My comment is about 3.2.13 - the definition of education abroad. I propose that the qualified "full-time" be removed so that the definition reads:

education abroad: education abroad that occurs outside the participant's home country or the country in which they are enrolled in as students.

This revision would expand the definition to be more representative of students and programs in an open access institutions such as the one that I represent, where full or part time status does not impact a student's ability to access study abroad."

"Hello,

Related to point: 6.2.9. Responsible parties shall support students with accommodation needs related to

abilities and determine how their needs may be met on the program.

.... can identity-based accommodations or something similar be added to this point? To restrict accommodations to "related to abilities" seems narrow, and is particularly jarring as the immediately preceding line is "identity-based discrimination".

Thank you for considering this perspective."

"There were a few items that I didn't understand:

- 4.3.2 - how do we train our students to make ethical decisions? This seems very lofty

- 5.1.9 - I didn't understand what this meant?

I think overall these are great and I can easily ready it and understand. It was succinct and flowed better. I did get a few moments of overwhelming anxiety as to how to incorporate all of the items to students since we know they don't read and a long in person orientation will put them to sleep if we have to share everything under the sun. I understand it is better to disclose than not, but at what cost to losing the student's interest/seeing it as a barrier to have to do all

of this work? I think we need to be realistic with what universities and organizations can actually do and provide very easy to replicate examples as I know we don't have the man power to initiate all of this."

I believe Standard 6 that takes place during program should address the question of student impact on the local community. There is some treatment of this topic in the code of ethics, but I believe there should be some minimum standards for working with local communities to minimize negative impact and maximize positive impacts of collaboration.

Well done! I think this reads well and captures all of the important elements of responsible education abroad programming. Easy to read and understand! This is a very helpful tool for offices.

"I find this a bit confusing on what is needed to be done:

4.4.6. Responsible parties should assess student learning related to portfolio and/or program learning goals and disaggregate data to check for equitable outcomes for all students.

I would like more in 5.1.9. on what you mean be sustainable environmental practices? Does this go beyond scope of what some organizations can do?

5.2.2.3. Should this also include an equity statement?

In section 6-it feels like career integration is missing throughout the before and during program sections. It is mentioned in 6.3.5, but they need to do work prior to it as well if it is going to be meaningful after.

6.1.5 should it be credit and credit articulation vs transfer?

6.3.2 Again, should this be credit articulation process? It is not a transfer process at our campus and I could see this being confused elsewhere.

6.3.6.1. I find this an interesting addition throughout and am not sure how feasible it is...

Will there still be queries? Given some of the areas included, I think they would still be useful."

"There are two areas that I think need further clarification:

partnerships and code of ethics.

For partnerships, we need to stress that education abroad is by its very nature collaborative and that the leadership of US institutions and programs may not always be aware of this. These are not always formal partnerships, but working relationships (with travel agents, or local transportation providers, for example) that need to be vetted in terms of the standards of good practice, too.

On the question of ethics, the stress here is to encourage people to use the Forum's Code of Ethics. If the institution has its own code of ethics, but one that is not as thorough as that of the Forum, we need to encourage the institution to consider replicating the Forum's version."

"4.2. By using the word "partnerships" instead of "collaborations" we are missing an important point, namely that ALL Education Abroad shall be a joint effort. In the current way of putting it, US universities may think that this (and other) standard(s) only applies for developing academic partnerships between universities, not in the case of other types of collaboration, such as faculty-led programs, for example. In my opinion Education Abroad is ALWAYS a joint effort – US institutions cannot do it on their own. They will always be working with others (local actors). Those "others" can be some of the responsible parties and responsible organizations in the process. These broader collaborations (and not just partnerships between universities) should meet the standards.

 4.3.1 Organizations may have their own general Codes of Ethics, but in many cases these do not specify all that the Forum´s Code of Ethics is mentioning specifically with regards to Education Abroad. By giving institutions the option of "simply" using their own CoE, there is a high risk that these CoE's do not deal with specific EA issues. Therefore my suggestion is that if institutions use their own CoE, these should be in line with/inspired by the Forum CoE in order to promote inclusion of EA related information."