



UNITED STATES DEPARTMENT OF EDUCATION
OFFICE OF POSTSECONDARY EDUCATION

June 24, 2016

Miriam K. Kazanjian, Consultant
The Coalition for International Education
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Dear Ms. Kazanjian:

Thank you for the April 26, 2016 email and memorandum sent to Ted Mitchell, Under Secretary of Education, Lynn B. Mahaffie, Acting Assistant Secretary for Postsecondary Education, and me, on behalf of the Coalition for International Education (the Coalition). My colleagues have asked me to respond, and I am pleased to do so. A copy of this letter will be sent to James Cole, Jr., the Department's General Counsel, who was copied on your April 26 memorandum.

In the April 26 memorandum, the Coalition expressed concerns about the Department's grant administration requirements for institutions receiving Foreign Language and Area Studies (FLAS) fellowships. Its concerns stemmed from guidance in a memorandum dated March 8, 2016 from the office of International and Foreign Language Education (IFLE) that required grantees to obtain prior approval before awarding FLAS fellowships to graduate students for beginning-level study of less commonly taught languages (LCTLs). The Coalition believes that the prior approval requirement represented a change from a long-standing policy that permitted grantees to award academic year and summer fellowships to graduate students for beginning-level language training in the less commonly taught languages (LCTLs).

We appreciate your concern and acknowledge that a categorical prohibition on the use of FLAS fellowships for the study of LCTLs at the beginning level could materially affect FLAS institutions' capacity to support meritorious graduate students, particularly those who had matriculated from undergraduate programs that did not offer area studies courses and world language programs, and therefore, would not have had an opportunity to learn LCTLs prior to matriculating at the graduate level. This was not our intent. The intent was to notify grantees that we need to review requests for beginning-level fellowships in cases in which a meritorious graduate student does not have proficiency in a language of the region.

We view the implementation of this requirement as an extra assurance that beginning-level fellowships promote the statutory purpose of Title VI, and not as a means to prohibit beginning-level fellowships altogether. In addition, it offers a means for the Department to gain a sense of how many beginning-level fellowships grantees are awarding from their overall allocations.

Another issue that the Coalition raised in its memorandum was the perception that the guidance in the 2014 Program Administration Manual (PAM) regarding the approval of beginning-level FLAS fellowships to meritorious graduate students for the study of a second LCTL of a world region was entirely new to grantees.

The approval procedure for a second LCTL has been included in program information guides and program administrative manuals for the FY's 2003-2005, 2006-2009, and 2010-2013 grant cycles. In

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these previous manuals, the guidance was described in a section entitled, “FLAS Fellowships for Non-Traditional Languages”. An example cited in these manuals was the potential approval of a FLAS fellowship for a student to study Dutch as a second LCTL because it was relevant to the Southeast Asia world region specialization, and the student had achieved proficiency in Indonesian. IFLE program officers have also cited similar examples in FLAS administration Power Point slides and webinars. The March 8, 2016 memo does not change this practice.

IFLE’s review of requests to use beginning-level fellowships to attend overseas language programs is also unchanged by our memo. In accordance with §657.33 of the FLAS program regulations, grantees are required to obtain prior approval if a student intends to use a fellowship for a beginning-level language program overseas. If a grantee’s justification is sound, we grant approval. Our approval, however, is not obligatory, as suggested in the Coalition’s letter. Section 657.33 of the FLAS program regulations states, “the Secretary *may* approve the use of a fellowship outside the United States....” Previous cycles’ administration manuals also included guidance regarding the use of beginning-level summer fellowships to attend programs outside the United States.

The analysis of FLAS data in our International Resource Information System underscores the necessity of these prior review and approval requirements and our oversight responsibilities. We analyzed the FLAS data for 105 institutions for calendar year 2014-2015 to determine the percentage of beginning-level fellowships that grantees had awarded. Of a total of 1,453 fellowships (academic year 2014-2015 and summer 2015 fellowships), 235 fellowships or 16% were for beginning-level LCTLs and, in some cases, for beginning-level non-LCTLs. When we looked more closely at the percentages for specific institutions among the 105, we observed that some institutions had awarded high percentages of their total fellowships to graduate students studying a language at the beginning level, one as high as 79%.

Another issue voiced in the Coalition’s memo expressed a concern that the Department’s interpretation of “advanced training” is inconsistent with Title VI section 602(b) statutory language.

The Coalition’s interpretation of the Title VI legislation excludes language training from the scope and definition of the term “advanced training”. The Coalition interprets the phrase “to mean students in advanced training in general, and not specifically in certain subjects.” The Department interprets section 602(b) to include language training in the term “advanced training”, and IFLE administers the FLAS program to align with the Department’s interpretation. From a performance monitoring perspective, this approach allows grantees and the IFLE office to demonstrate the extent to which the Title VI FLAS Fellowships program contributes to building the U.S. capacity to produce a cadre of world-region experts who are highly proficient in LCTLs and who are prepared to respond to national needs whenever and wherever these needs arise.

Additionally, Part A, section 601 of the HEA expresses Congress’s findings and the purposes of the Title VI programs, among which are “to support centers, programs, and fellowships in institutions of higher education in the United States for producing increased numbers of trained personnel and research in foreign languages, area studies, and other international studies”, and “to develop a pool of international experts to meet national needs.” While FLAS institutions may contend that there are justifiable and even necessary reasons for awarding FLAS fellowships for studying LCTLs at the beginning level, we are concerned that the extensive use of FLAS fellowships for this purpose could potentially weaken support for the FLAS program.

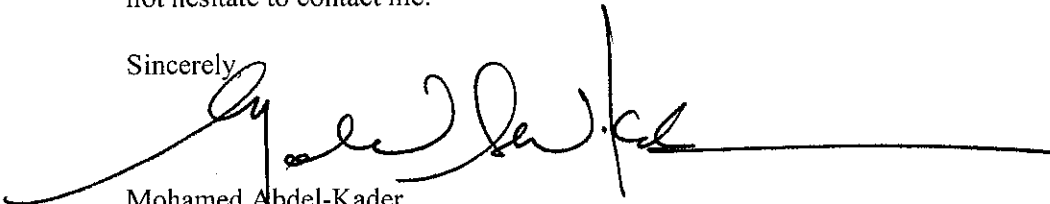
I have taken the Coalition’s concerns under consideration, and based on those concerns, IFLE will allow grantees to award beginning-level FLAS fellowships to graduate students with advanced proficiency in a second language of the world area without prior approval. We will also maintain the requirement that all other beginning-level FLAS fellowships for graduate students be awarded only after prior approval is

obtained from the grantee's respective program officer in writing. These operational procedures provide grantees sufficient flexibility to submit their beginning-level FLAS requests, and for IFLE to ensure that we are reviewing all requests in a consistent and transparent way in order to recommend the appropriate action.

The Coalition, institutions of higher education, and the Department are all stakeholders in the international education enterprise, and we grapple with the same fundamental challenge of using limited resources to meet the goals and objectives of the international education programs and to demonstrate their impact on the constituencies served. Meeting this challenge requires our shared commitment to ensure that these programs remain viable and accessible.

Thank you for all you do for the international education community. If you have any questions, please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read 'Mohamed Abdel-Kader', with a long horizontal line extending to the right.

Mohamed Abdel-Kader
Deputy Assistant Secretary
International and Foreign Language Education

cc: James Cole, Jr., General Counsel