

July 28, 2026

To: Department of Education**Re: International Education Programs and Fulbright-Hays Program; Recission of Regulations [Docket ID ED-2026-OPE-0991]**

The American Historical Association (AHA) submits this comment on the proposed rule International Education Programs and Fulbright-Hays Program; Recission of Regulations (Docket ID ED-2026-OPE-0991), published July 1, 2026. The AHA is the world's largest association of professional historians, representing 10,000 members across all 50 US states and territories, including historians employed in colleges and universities, K–12 schools, museums, archives, libraries, government agencies, and other institutions. Our members have long benefited from and contributed to Title VI International Education Programs and the Fulbright-Hays Programs, which strengthen the nation's capacity in foreign languages, area studies, international research, and global engagement.

The Department has not demonstrated that rescinding the regulations governing the Title VI International Education Programs and Fulbright-Hays Programs would improve program administration or better fulfill the statutory purposes established by Congress. Instead, the proposal would eliminate longstanding regulations that promote transparency, fair competition, and accountability while creating significant uncertainty for institutions that rely on these programs to develop the nation's international expertise.

The Department of Education's Title VI and Fulbright-Hays Programs are the nation's foundational programs for international education, research, and foreign language studies, especially for less commonly taught languages and areas of the world that hold special strategic interest for US diplomatic presence, national security, and global economic competitiveness. The AHA is concerned that the proposal could weaken the long-term stability of programs that support the nation's research enterprise and the development of international expertise. In the historical discipline, the rule would reduce this nation's ability to produce the evidence-based scholarship that informs education, public policy, cultural institutions, and public understanding of the past. Language study is fundamental to the work of historians, particularly those who study regions beyond the United States, and is a prerequisite for rigorous historical research. Title VI and Fulbright-Hays programs provide critical support for foreign language instruction and educational exchanges that enable historians to conduct research, interpret sources, and contribute new knowledge about the past.

The proposal would eliminate longstanding regulations that provide transparency, consistency, and accountability without adequately explaining how their removal would improve program administration. As such, we request that the Department of Education retain the existing regulations and not finalize changes to 34 CFR Parts 655, 656, 657, 658, 660, 661, 662, 663, 664, and 669.

I. The Value of International Education Programs and Fulbright-Hays Program

All historians—not solely those who research other parts of the world—benefit from international exchanges. State-sponsored exchanges first arose in the aftermath of World War II and during the Cold War, when the

United States and its allies promoted international education with the goal of sharing knowledge between nations, strengthening international ties, and promoting global stability, all in the interest of national security and diplomacy.

Congress established Title VI and Fulbright-Hays Programs to strengthen the nation's capacity in foreign languages, area studies, and international education. Training in these areas serves important educational, diplomatic, and national security interests, and prepares students for careers in government, business, education, and public service.

Participating in international exchanges makes American students more [desirable to employers](#) and [better prepared](#) to enter the global economy. Increasing globalization of the economy has encouraged students to seek out educational programs that teach skills necessary to engage in a global workforce, including language competency and cultural awareness.

A 2017 [study](#) by New American Economy found that in 2015, employers posted approximately 630,000 job listings seeking bilingual applicants, a 162.5% increase from 2010, particularly for positions in customer service, sales, medicine, financial services, and business administration.

In a 2017 Institute of International Education study, alumni in STEM fields credited their study abroad experiences with helping them to acquire skills in problem-solving, adaptability, and cultural awareness, which gave them a hiring advantage over peers with similar credentials but no study abroad experience.

International exchanges serve core national diplomatic and security interests. Programs focusing on critical languages and area studies ensure there are American experts in the languages and cultures of global regions that have [historically](#) been identified as key to national security strategy, including China, the Middle East, North Africa, and Russia.

By increasing contacts between ordinary Americans and individuals of other nationalities, international exchanges encourage goodwill toward the United States and its people. They challenge negative and uninformed stereotypes of Americans. American students and scholars serve as unofficial ambassadors abroad, and many American students [report greater appreciation](#) for the United States and American culture upon returning from study abroad.

In its July 1, 2025, [letter](#) to the Congressional committees on appropriations, the Coalition for International Education wrote, "GAO reports in recent years have cited shortfalls of language and culture skills in several federal agencies, finding that our nation's language deficit could threaten our priorities and missions around the world. . . . That these programs are crucial for American interests, such as the safety and prosperity of our nation and its citizens, is not an overstatement in today's world. They represent a strategic federal investment in workforce development, innovation, and informed policymaking." Ensuring the stable and predictable administration of these programs should remain a top priority for the Department.

II. The Department Has Not Demonstrated That Existing Regulations Impose Unnecessary Burdens

The proposal repeatedly states that existing regulations are unnecessarily burdensome but does not identify which provisions are problematic, nor does it quantify the burdens they impose or explain why targeted amendments would not adequately address those concerns. The rescission of many requirements for these programs would eliminate the sole legally binding requirements that the Department assess proposals and programs on their academic merits. The removal of part 662 governing Fulbright-Hays, for instance, would

eliminate requirements to obtain input from qualified peer reviewers, assess the quality of proposal materials, or weigh the specific academic and linguistic qualifications of applicants. These are not merely burdensome regulations; these are the very foundational guarantees of fairness, rigor, and merit.

Under the Administrative Procedure Act, agencies should provide a reasoned explanation for significant regulatory changes. While the Department states that rescission will reduce burden and increase flexibility, it does not identify specific regulatory provisions that have prevented institutions from fulfilling statutory purposes, nor does it document measurable costs associated with compliance. Likewise, the rule's cost-benefit discussion does not quantify the burdens that would be eliminated or explain why targeted amendments would be insufficient.

Without evidence demonstrating that existing regulations have impeded effective program administration, the Department has not established that complete rescission is preferable to revising individual provisions.

III. Existing Regulations Promote Transparency, Fair Competition, and Predictability

The current regulations establish clear expectations for institutions seeking Title VI and Fulbright-Hays funding. Institutions invest substantial time and institutional resources in developing competitive applications, hiring faculty, establishing language and area studies programs, and sustaining long-term international partnerships.

Predictable regulatory requirements enable institutions to plan years in advance and align their proposals with both statutory objectives and Department priorities. Publicly available regulations also provide transparency regarding evaluation criteria and permissible program activities, helping ensure that competitions are conducted fairly and consistently.

Regulations also promote accountability by ensuring that applicants, reviewers, Congress, and the public understand the standards governing the expenditure of federal funds. Public regulations reduce uncertainty, promote consistent administration across competitions, and help ensure that program decisions are made according to publicly available criteria rather than changing administrative preferences.

Institutions make substantial long-term investments in faculty, language instruction, international partnerships, and graduate training in reliance on the stable administration of these programs. Abrupt elimination of the governing regulations without a replacement framework introduces uncertainty that may discourage those investments, particularly for programs in less commonly taught languages that depend on sustained federal support.

Removing these regulations without replacing them with updated standards creates uncertainty for applicants regarding how competitions will be structured, how proposals will be evaluated, and how statutory priorities will be implemented.

IV. Existing Regulations Already Provide Considerable Flexibility

The Department argues that a full rescission is necessary to permit greater flexibility and responsiveness to changing geopolitical circumstances. However, Title VI and Fulbright-Hays programs already provide substantial flexibility through annual Notices Inviting Applications, competition priorities, and discretionary grant administration.

Recent competitions demonstrate that the Department already possesses significant flexibility to establish new priorities and adapt competitions to evolving national needs within the existing regulatory framework. If particular provisions have proven unnecessarily restrictive, the more appropriate approach would be to identify those provisions and propose targeted revisions through notice-and-comment rulemaking rather than rescinding the entire regulatory structure.

V. The Proposal Creates Uncertainty Regarding Program Administration

The Department states that rescission would permit alternative mechanisms for delivering program services, including contracts or subgrants, rather than competitive discretionary grants. However, the proposal provides little explanation regarding how these alternative mechanisms would operate or how they would continue to fulfill the statutory purposes established by Congress.

Similarly, the proposed rule does not explain how application review, selection criteria, peer review, or program oversight would function after rescission. Institutions and prospective applicants deserve greater clarity regarding how the Department intends to administer these congressionally authorized programs if the existing regulations are eliminated.

Such uncertainty is particularly significant because Title VI and Fulbright-Hays programs support long-term investments in foreign language instruction, area studies expertise, international research, and institutional partnerships that often require planning across multiple years.

VI. Conclusion

The American Historical Association respectfully urges the Department to withdraw the proposed rule.

If the Department determines that specific provisions should be revised, it should identify those provisions, explain why they are no longer effective, and propose targeted amendments through notice-and-comment rulemaking. That approach would preserve the transparency, predictability, and accountability that have long supported the success of these congressionally authorized programs while allowing the Department to address demonstrated administrative concerns. Eliminating the entire regulatory framework without replacing it with updated standards risks reducing transparency, creating uncertainty for applicants, and weakening the consistent administration of programs that Congress established to advance the nation's long-term international education, language, and research capacity, all of which support our nation's national security, industry leadership, and scholarly rigor.

Respectfully submitted,

A handwritten signature in cursive script, reading "Sarah Weicksel".

Sarah Weicksel
Executive Director