

April 7, 2004

The Honorable Judd Gregg
United States Senate
Committee on Health, Education, Labor & Pensions, Chair
428 Dirksen Senate Office Building
Washington, DC 20510-6300

Dear Senator Gregg:

On behalf of the governing Council of the American Political Science Association, I write to express our deep concern about one section of HR 3077, the Higher Education Act, whose renewal is before your committee and the Congress. While we find much to applaud in the bill, we remain deeply concerned about the International Education Advisory Board (IEAB) proposed in this legislation.

1. The IEAB, as it stands, undermines and threatens the very objectives the Board is supposed to advance: to increase excellence and expertise in Title VI language and regional studies programs in support of America's knowledgeable engagement with the world. It does so by enabling a Board of political appointees to circumvent, interfere with, and undermine existing Department of Education triennial Title VI review boards. These DOE review boards have always been composed of recognized experts drawn from a wide range of academic and policy making institutions, and they have established an exception record of rigorous program review.

2. Section 633(b) allows and encourages the IEAB to circumvent and vitiate the crucially important safeguard added to the Bill providing that "Nothing in this title shall be construed to authorize the International Advisory Board to mandate, direct, or control an institution of higher education's specific instructional content, curriculum, or program of instruction." Specifically, Section 633:

A. Endows the Board with essentially unchecked, unaccountable power to hold hearings, make recommendations, issue directives, and intervene concerning particular grants, subjects, and individual applicants without making these determinations public or being held publicly accountable for them.

B. Authorizes the IEAB to "secure information, suggestions, estimates, and statistics" from any "executive" body while failing to require the Board to seek input from experts throughout all sectors of the federal government, state and local governments, the higher education community, foundations, non-governmental organizations, labor, business and agriculture.

3. Inclusion of the Board entails wasteful and unnecessarily expensive additional federal bureaucracy. Specifically, Section 633:

A. Creates a politically appointed bureaucracy at considerable expense to perform functions more independently and professionally conducted by the General Accounting Office.

APSA Council, 2003-2004

Susanne Hoeber Rudolph,
President
University of Chicago

Margaret Levi, *President-Elect*
University of Washington

Rodney E. Hero, *Vice President*
University of Notre Dame

Ira Katznelson, *Vice President*
Columbia University

Gary King, *Vice President*
Harvard University

Judith L. Goldstein, *Secretary*
Stanford University

Henry E. Brady, *Treasurer*
University of California-Berkeley

John Aldrich
Duke University

Manuel Avalos
Arizona State University West

Robert Axelrod
University of Michigan

Judith Baer
Texas A&M University

Martha Crenshaw
Wesleyan University

Christian Davenport
University of Maryland

Shirley M. Geiger
Savannah State University

Frances Hagopian
University of Notre Dame

John W. Harbeson
CUNY-City College and The
Graduate Center

Marion Orr
Brown University

Marsha Pripstein Posusney
Bryant College

Wilbur C. Rich
Wellesley College

Joanna Vecchiarelli Scott
Eastern Michigan University

Gary Segura
University of Iowa

Jack Snyder
Columbia University

Jeff Spinner-Halev
University of Nebraska-Lincoln

Atul Kohli, Princeton University
Anne Norton, U of Pennsylvania
Annual Meeting Program Co-Chairs

Lee Sigelman, *Editor*,
American Political Science Review
The George Washington University

Jennifer L. Hochschild, *Editor*,
Perspectives on Politics
Harvard University

Michael Brintnall
Executive Director

B. Allows expenditure of funds better to support fellowship and other programs for developing language and regional expertise that Title VI exists to advance.

In short, as it stands, Section 633 of HR3077, establishing International Education Advisory Board, directly threatens the very objectives of high quality international education, which it is the bill's stated purpose to advance, by undermining the integrity of academic programs and infringing academic freedom constitutionally protected under the First Amendment.

On behalf of our association, I thank you and your committee in advance for your attention to these, our serious concerns regarding HR 3077. Our association, and I myself, remain available to assist your committee in any way possible to help secure the objectives of academic integrity and quality in higher education.

Yours sincerely,

A handwritten signature in cursive script, appearing to read "Susanne Rudolph".

Susanne Rudolph
President
William Benton Distinguished Service Prof. Emeritus
University of Chicago

cc:

The Honorable Edward M. Kennedy
United States Senate
Ranking Minority Member, Committee on Health, Education, Labor, & Pensions