



July 30, 2026

Linda E. McMahon
Secretary of Education
U.S. Department of Education
400 Maryland Ave, SW
Washington, DC 20202

Re: ED-2026-OPE-0991, International Education Programs and Fulbright-Hays Program; Recission of Regulations

Dear Secretary McMahon,

The American Political Science Association (APSA) is writing to submit a comment to the [proposed rescission](#) of the regulatory structure overseeing international education and foreign language studies programs at the Department of Education – the Title VI Program and Fulbright-Hays Program – announced by the Department on July 1, 2026. APSA expresses strong opposition to the proposed rescission of several regulations within [Title 34 of the Code of Federal Regulations](#), specifically all provisions from 34 CFR Part 655 through 34 CFR Part 669.

APSA is a professional organization with more than 11,000 members. APSA's core mission is to promote scholarly understanding of political ideas, behaviors, and institutions to inform public choices about government, politics, and public policy; and to enhance the capacity of political scientists to conduct research, improve teaching, and communicate their findings to wider publics.

The preamble of the proposed rule claims the regulatory structure overseeing the Title VI and Fulbright-Hays programs imposes inflexibility of administering the grants, creates excessive administrative burden for grantees, and contradicts the intended purpose of the programs. In actuality, dismantling these regulations will introduce uncertainty and instability to a well-established and codified system that has helped scholars access funding for decades. APSA urges the Department to maintain the current system of regulations for the Title VI and Fulbright-Hays Programs that will continue to advance the U.S. expertise and competitive edge on strategic regions and languages.

Rescission of Program Regulations

APSA strongly disagrees with the rescission of the general provisions set forth in 34 CFR Part 655. The proposed rule claims that the Education Department General Administrative Regulations (EDGAR) are sufficient for administering international education programs and that additional regulations are unnecessary. However, there are several crucial provisions in 34 CFR Part 655 that provide clarity and structure to the purpose and processes of the international education programs that do not exist in EDGAR. Subpart A of the general provisions provides the framework for international education programs, including foundations such as definitions of terms, purposes of the programs, and which regulations are applicable to these programs. Subpart B provides clarifications for the kind of projects the Department should fund

through the programs. Subpart D provides guidance to the Department on the procedures of evaluating applications and selecting awardees. The proposed rule erroneously claims that there is little flexibility in the current regulations afforded to the Department in selecting awards deemed to be in service of national priorities, and claims that the regulation is far stricter than the language included in the Higher Education Act establishing these programs. The existing language provides ample flexibility for the Department to make award selections based on certain strategic priorities in line with the statutory purpose of the International Education programs.

The proposed rule further claims that rescission of these regulations would remove burdens for grantees. These guidelines have been well-tested and only revised occasionally over decades of the programs' duration. Prospective award grantees and their institutions that support them are accustomed to these requirements. Removing this structure of regulation would do little to clarify or simplify the proposal process; rather, it would likely have the opposite effect by requiring far more administrative time to understanding how to tailor their applications to the EDGAR guidelines. This added burden would be more pronounced for applicants with weaker institutional support, especially applicants from smaller institutions.

The rule calls for the full rescission of the regulation rather than replacing or reforming existing regulations to better suit the needs of the programs. Subparts A of 34 CFR Part 656, 657, and 669 and Subparts B of 34 CFR Part 658, 660 and 661 all provide specific definitions for terminology relevant to the programs as well as eligibility requirements, and general selection criteria for each program. A full rescission of these basic provisions would leave the programs without any defining characteristics, clear guidance or consistent expectations for applicants to follow, and may have the result of changing the eligibility and criteria for these programs entirely. It also would remove any sort of guardrails to hold the Department accountable to make awards to grant proposals that align with the purpose of these programs as stated in Title VI of the Higher Education Act of 1961, potentially reducing relevance or merit compared with the programs' intended purpose. The rescission risks watering down the peer review process in making awards. Despite the rule's claims that the regulations impose "unnecessary administrative burden and reduce institutional flexibility," the rule fails to provide evidence showing this to be the case. APSA encourages the Department to document specific examples of how the regulatory structure acts as an administrative burden before engaging in substantial deregulation, if such data exists.

Regulatory Impact Analysis

APSA strongly disagrees with the conclusions made in the Regulatory Impact Analysis. The proposed rule cites adherence to Executive Orders 14192, 12866, and 13563 as justifications for the program rescissions guiding the implementation of international education and Fulbright-Hays programs despite numerous legal challenges that have been levied at these executive actions. Furthermore, the determination that the removal of the regulation would not adversely affect any sector of the economy in a material way is simplistic. Several universities and fields of academic study, in particular disciplines focused on the politics, socioeconomics, and language of specific regions and cultures rely on these programs for funding. Furthermore, the proposed rule would remove the regulations administering the Business and International Education Program, a program intended to develop talent pipelines from institutions of higher education to businesses aiming at engaging in international business activities. Blanket repeal of these regulations could alter grant eligibility and criteria, undermine the economic viability of some academic disciplines, and shrink the talent pool available to businesses pursuing international opportunities.

Sincerely,
The American Political Science Association (APSA)