



American Council of
Learned Societies
633 Third Avenue
New York, NY
10017-6795
jc@acls.org
www.acls.org

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To: Department of Education

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

The American Council of Learned Societies (ACLS) submits the following comment on the Department of Education's Notice of Proposed Rulemaking, which proposes to rescind the regulations governing the Higher Education Act's Title VI international education programs and the Fulbright-Hays programs.

Founded in 1919, ACLS is a federation of 85 professional academic societies whose membership includes over 200 colleges, universities, research libraries, research centers, and other national organizations supporting humanistic scholarship and the liberal arts. We distribute approximately \$25 million in competitive grants and fellowships to hundreds of scholars each year, including support for areas like the study of China; we work to increase the resilience of academic policy and culture in the humanities and social sciences; and we advocate for the value of humanistic research and teaching.

ACLS urges the Department of Education not to rescind the regulations governing Title VI and Fulbright-Hays programs. We share with the Department the goal of ensuring that all programs operate efficiently and transparently. We believe that the Department has failed to demonstrate that rescinding the regulations would improve administration or help the programs fulfill the statutory purposes established by Congress. On the contrary, the proposal would eliminate clear, consistent, and time-tested regulations that promote sustainability, transparency, fair competition, and accountability.

The proposed change affects all the disciplines, fields, and area studies represented by ACLS member societies, including but not limited to the study of languages, literatures, religion, history, and political science. The scholarship conducted in all the fields we represent helps educate a better informed and skilled citizenry and produces experts best prepared to make policy for American diplomacy, security, health, economic competitiveness, and other national interests.

By authorizing these programs, Congress signaled its understanding that ignorance cultivates fear and distrust, where advanced knowledge fosters understanding, collaboration and thriving on a global scale. ACLS itself was founded in 1919 to promote scholarly exchange across national borders after the devastation of the first World War. The United States began fostering state-sponsored exchanges in the aftermath of World War II and during the Cold War. The goal of these endeavors was and is to share knowledge around the world, strengthen international ties, and promote peace and stability, advancing national interests and security.

The Department of Education's Title VI and Fulbright-Hays Programs are the fruit of the nation's investment in international education, research, and foreign language studies, especially for less-commonly taught languages and areas of the world that hold special strategic value. Training in all these areas serves important educational, diplomatic, and national security interests, and prepares students for careers in government, business, education, and public service.

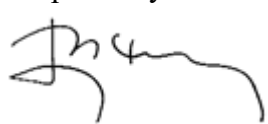
Language study is fundamental to mutual understanding across borders, and it is a prerequisite for rigorous research in any humanistic field. Title VI and Fulbright-Hays programs provide critical support for foreign language instruction and educational exchanges that enable scholars to conduct research, interpret sources, and contribute new knowledge about the past and present.

By improving language competency and knowledge of other cultures, international education improves American students' success in securing employment and better prepares them to understand and participate in the global economy. International exchanges also serve key 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 identified as key to national security strategy, including China, the Middle East, North Africa, and Russia.

The proposal would eliminate the current clear and consistent regulations without adequately explaining how their removal would improve program administration. The students, scholars, and institutions that rely on these programs to develop the nation's expertise in cultures, languages, and histories beyond the borders of the United States would face conditions of uncertainty that make it impossible to plan, hire, teach, and conduct research. In sum, the proposed change would weaken the stability and long-term impact of programs that support the development of international expertise.

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.

Respectfully submitted,

A handwritten signature in dark ink, appearing to read "Joy Connolly", written over a horizontal line.

Joy Connolly