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African Studies Association Opposes ED's Proposed Rescission of International Education Program Regulations

The African Studies Association (ASA) strongly opposes the Department of Education's [proposal to rescind the regulations governing Title VI and Fulbright-Hays programs](#). ASA is the largest organization devoted to enhancing the exchange of information related to Africa and its diasporas, representing more than 2,000 members across disciplines and professions including scholars, students, teachers, development professionals, policymakers, and journalists. Federal support has helped countless ASA members—and the field as a whole—thrive through National Resource Centers, Foreign language and Area Studies (FLAS) fellowships, Language Resource Centers, and Fulbright-Hays awards. All of these vital resources are governed under the regulatory frameworks the Department now proposes to rescind.

Rescinding these regulations would put at risk decades of strategic federal investment in area studies education, research, and language instruction, particularly in less commonly taught languages. It would weaken the national capacity to educate the next generation of experts and erode deep reservoirs of knowledge and linguistic expertise that the U.S. relies upon to understand and respond to developments in regions of profound geopolitical and strategic importance. The existing program regulations provide the stability, transparency, and predictability that institutions of higher education require to make responsible, long-term investments in language and area studies programming and to compete for federal funding on a fair and equitable basis. They also allow institutions to develop multi-year programs, recruit and train faculty, establish language curricula, support students, and build the sustained expertise that the nation requires. This infrastructure reaches far beyond the university. It provides professional opportunities and curricular resources for K-12 teachers, learning opportunities for community college students, and support for local economies by investing in knowledge and expertise for businesses. At a time when the U.S. faces increasingly complex global challenges, dismantling the infrastructure that produces this expertise is directly contrary to the national interest and a serious threat to national security.

Clear, consistent, transparent, and publicly posted regulations are indispensable to the integrity and effectiveness of the Title VI and Fulbright-Hays programs. ASA shares the Department's sentiment that these programs should remain responsive to changing national needs. As many ASA members who have administered these programs can attest, the existing regulations do not prevent the Department from responding to shifting national priorities. The Department of Education already possesses substantial flexibility to establish competitive priorities, identify languages and geographic areas of national need, and establish selection criteria under the current regulatory frameworks. Furthermore, the Department has failed to identify specific regulatory provisions that impede efficient and effective administration or demonstrate that rescission would improve processes or programs. The characterization of these regulations as "burdensome regulations that hinder effective government services" is premature, if not entirely misguided without a more comprehensive and data-informed analysis.

The Department's stated interest in a more flexible and time-sensitive approach to program administration also fails to recognize Title VI's central purpose and strategic value. The program was created precisely to establish and sustain a standing national infrastructure of regional experts and language specialists capable of responding



to emerging and immediate national needs and security threats. This infrastructure is a national asset. It allows the U.S. to draw upon decades of accumulated knowledge, evidence-based research, and expertise when geopolitical circumstances change, often with little warning. The Department has not demonstrated how regulatory rescission would better meet the statutory purposes established by Congress. The proposal to administer these programs primarily according to “the current geopolitical context” instead threatens to dismantle this foundational infrastructure in favor of short-term, reactionary national response.

ASA is particularly alarmed by the Department’s proposal to potentially “pursue non-grant options... such as through contracts and subgrants” that would not be subject to the established peer review process. Moving away from a rigorous peer review system would compromise the integrity and accountability of these programs. Peer review conducted according to clear, standardized criteria is not an administrative obstacle; it is a fundamental safeguard that ensures federal resources are directed to the strongest programs and most qualified applicants. Applicants are best able to prepare rigorous and responsive proposals when expectations and processes are clearly and publicly communicated in advance. Any effort to circumvent or weaken this process would undermine public confidence in these programs and jeopardize their longstanding reputation for excellence.

Title VI and Fulbright-Hays programs have served national security, defense, public health, and economic interests for decades. The existing regulations have provided a transparent and stable framework that has consistently responded to shifting national priorities all while ensuring applicant competitiveness and responsible stewardship of federal funds. The Department’s cost-benefit analysis in the proposal does not sufficiently quantify the burdens that would be eliminated if the regulations are rescinded or explain why targeted amendments would be insufficient. In short, without concrete evidence supporting the notion that existing regulations are detrimental to program administration, the Department has no basis for pursuing complete rescission over targeted revisions to individual provisions.

ASA respectfully urges the Department to withdraw the proposal to rescind the program regulations. We encourage the Department to preserve and strengthen the regulatory and peer review processes that have enabled these programs to serve our nation. Maintaining this infrastructure is an essential investment in U.S. national security, economic competitiveness, diplomatic capacity, and long-term strategic preparedness.