



July 31, 2026

The Honorable David Barker
Assistant Secretary, Office of Postsecondary Education
U.S. Department of Education
400 Maryland Avenue SW
Washington, DC 20202

Dear Assistant Secretary Barker,

RE: International Education Programs and Fulbright-Hays Program; Proposed Recission of Regulations.
Docket ID, ED-2026-OPE-0991

On behalf of the Association of Public and Land-grant Universities (APLU), we appreciate the opportunity to provide feedback on the notice of proposed rulemaking entitled, “International Education Programs and Fulbright-Hays Program; Recission of Regulations,” published by the U.S. Department of Education on July 1, 2026.

While periodic review of federal programs and regulations is an important and healthy component of good governance, and it is appropriate to assess whether programs continue to meet evolving national priorities, APLU is concerned about a wholesale rescission without a replacement regulatory regime in place to guide programs of such vital importance to the nation. If the Department moves forward with a rescission of regulations, APLU encourages it to establish a clear replacement framework that preserves the programs' core statutory mission of developing the deep language and area expertise necessary to serve the nation's interests. APLU welcomes opportunities to work collaboratively with the Department to ensure Title VI and Fulbright Hays programs can resume operations in a manner consistent with congressional intent, fulfill key administration priorities, and are responsive to the national needs they were designed to address.

APLU's U.S. membership consists of more than 240 land-grant institutions, public research universities, and state university systems spanning all 50 states, the District of Columbia, and six U.S. territories. For decades, many of these institutions have been trusted partners with the federal government through the Title VI International Education Programs and the Fulbright-Hays Program by building capacity in the critical languages, area studies expertise, and international business knowledge necessary to advance U.S. interests at home and abroad. Through this work, APLU member institutions have prepared a reliable pipeline of students for service in government, education, and industry while sustaining the deep pool of international experts and researchers that are a backbone of domestic capacity.

Congress established and funds these programs because the “security, stability, and economic vitality of the United States in a complex global era depend upon American experts in and citizens knowledgeable about world regions, foreign languages, and international affairs, as well as upon a strong research base in these areas.” A clear and predictable framework is necessary to sustain the talent required to fulfill this purpose.

A regulatory framework to operationalize the programs should provide institutions with the guidance and predictability needed to make sustained and long-term decisions in international expertise. To serve

as effective partners, institutions must recruit and retain specialized faculty, develop academic programs that cultivate deep language, regional, and international business knowledge, and build student cohorts prepared to meet national needs. Predictability also enables institutions to be stronger partners with the federal government by allowing them to anticipate competitions, plan to apply individually or by assembling consortiums, and thoughtfully develop proposals that reflect federal priorities. Recent changes in program priorities and the limited application timeline for the Centers Aligned with Areas for National Need (CAANN) competition have underscored the importance of a framework that supports institutional planning and collaboration.

A distinguishing strength of Title VI has been its sustained investment in developing deep expertise. Achieving advanced proficiency in strategically important languages and acquiring a meaningful understanding of world regions requires sustained academic study, mentorship by expert faculty, immersive learning opportunities, and interdisciplinary coursework developed over the course of an undergraduate education and often continued through graduate study. This comprehensive preparation enables graduates to understand complex global issues and apply their expertise in support of U.S. interests. The resulting expertise has long been recognized as a defining strength of the Title VI programs that prepare graduates to serve as leaders in government, academia, and industry.

While some national needs in language and areas are predictable, others are not. It is the sustained investment and continuity of programs that ensures the U.S. has the capacity to fulfill current needs and is prepared for the needs yet unknown. As an example, at the University of North Carolina at Chapel Hill, the Carolina Asia Center has built a multi-year training partnership with Fort Bragg, one of the world's largest military bases, located just an hour from campus. Center faculty and staff have provided language and cultural training to special operations forces studying Indonesian, delivered lectures on the base for civil affairs units preparing for engagement in Asia, and hosted soldiers on campus to practice language skills with native speakers. This work—which also includes supporting military-affiliated students at UNC preparing for national security careers—exists only because sustained Title VI investment enables area studies centers to maintain the deep regional expertise our armed forces cannot generate on their own. Sustained investments in Title VI build the capacity necessary to respond to national needs as they arrive.

Accordingly, we encourage the Department to ensure that any replacement framework preserves the core focus of these programs that is aligned with congressional intent: to address national needs for expertise in world languages, international affairs, and global economic engagement. APLU appreciates the Department's consideration of these comments and encourages establishing a regulatory framework that provides the clarity and predictability necessary for institutions to sustain the deep expertise needed to continue serving national priorities.

Please consider APLU a partner in advancing shared goals in serving students and national interests. We are eager to be a resource as the Department considers its next steps.

Respectfully submitted,



Waded Cruzado
President, Association of Public and Land-grant Universities (APLU)

ⁱ Section 601 of the Higher Education Act of 1965, as amended (20 U.S.C. § 1121)