



To: Department of Education

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

July 31, 2026

The American Academy of Religion (AAR) submits this comment on the proposed rule International Education Programs and Fulbright-Hays Program; Recission of Regulations (Docket ID ED-2026-OPE-0991), published July 1, 2026. The AAR is the world's largest association of religious studies professionals, representing more than 6,000 members across all 50 US states and territories, including scholars employed in colleges and universities, seminaries, K–12 schools, museums, archives, libraries, government agencies, and other institutions. Our members as well as students in the institutions our members serve have long benefited from and contributed to Title VI International Education Programs and the Fulbright-Hays Programs, which strengthen the nation's capacity in foreign languages, area studies, international research, and global engagement. The AAR is concerned that the proposal could weaken the long-term stability of programs that support the nation's research enterprise and the development of international expertise.

Title VI and Fulbright-Hays programs provide critical support for humanities disciplines through foreign language instruction and educational exchanges that enable scholars to conduct research. These programs are essential to research, teaching, and public scholarship in many areas, including religious studies. The proposed change would eliminate legally binding procedural safeguards that, in many instances, provide the sole guarantee that proposals and applications will be assessed on their merits and with input from academic specialists. The rule would reduce scholars' ability to produce the evidence-based scholarship that informs education, public policy, cultural institutions, and public understanding of religion and culture.

The Department has not demonstrated that rescinding the regulations governing the Title VI International Education Programs and Fulbright-Hays Programs would improve program administration or better fulfill the statutory purposes established by Congress. Instead, the proposal would eliminate longstanding regulations that promote transparency, fair competition, and accountability while creating significant uncertainty for institutions that rely on these programs to develop the nation's international expertise.

While the Notice of Proposed Rulemaking argues that the current regulations are more prescriptive than the underlying statutes and that eliminating them would provide greater flexibility for both the department and grantees, the proposal provides little evidence that the existing regulations have prevented the department from adapting these programs to changing priorities or emerging national needs. Nor does it identify specific regulatory provisions that have imposed significant administrative burdens or explain why targeted revisions would be insufficient.

In fact, the department has long exercised substantial flexibility within the existing regulatory framework. Through Notices Inviting Applications, the department has established priorities, identified languages and world regions of national need, refined selection criteria, and responded to changing geopolitical and educational circumstances. These competition-specific priorities have allowed the department to encourage innovation while maintaining a stable, transparent regulatory structure. The department, therefore, already has significant discretion to shape program implementation without eliminating the regulations entirely.

The existing regulations also provide common expectations for applicants, reviewers, and grantees regarding program purposes, allowable activities, application requirements, and grant administration. As these expectations remain fairly constant over time, they allow institutions to make longer-range plans and investments in faculty, language instruction, international partnerships and related administrative capacities. Removing the regulations without replacing them with a revised framework renders the future uncertain and makes longer term planning significantly more difficult. While some flexibility is to be welcomed and indeed currently exists, it should not override consistent fair and transparent administration that is essential to protect the integrity of these programs.

While the department states the rescission would reduce administrative burden, it includes little evidence of what burdens or how they would be eliminated. In the absence of an analysis that discusses cost-benefit or indicates other measurable costs or administrative burdens, the rescission does not appear prudent, as rescission of all regulations would result in lack of transparency and reduced clarity and fairness for applicants.

In sum, the proposal would eliminate longstanding regulations that provide transparency, consistency, and accountability without adequately explaining how their removal would improve program administration. For these reasons, AAR respectfully urges the department to withdraw the proposed wholesale rescission of Parts 655 through 664 and 669. Thank you for considering these comments.