



March 25, 2024

Tim Duvall, Senior Program Officer  
U.S. Department of Education  
400 Maryland Ave. SW  
Room 5C105  
Washington, DC 20202

Re: Proposed Rule, National Resource Centers (NRC) Program, Assistance Listing Number 84.015A, and the Foreign Language and Area Studies (FLAS) Fellowships Program, Assistance Listing Number 84.015B

Dear Mr. Duvall,

On behalf of the American Council on Education and the undersigned higher education associations, I write to offer comments on the proposed rule regarding the National Resource Centers (NRC) Program, Assistance Listing Number 84.015A, and the Foreign Language and Area Studies (FLAS) Fellowships Program, Assistance Listing Number 84.015B. While we appreciate the opportunity to comment on this proposed rule, we wish to express concern that the Department only provided a 30-day comment period for the proposed rule, which is a short time to review complicated changes to such an important program. In addition, the Department did not engage at all with the stakeholder community regarding these changes before issuing this proposed rule. We hope that the Department will take these comments seriously and meet with stakeholders regarding these proposed changes before issuing a final rule.

One of the lessons from the COVID-19 pandemic is that the world is smaller and more interconnected than ever before. In order to address issues of national and indeed global importance, the U.S. must provide a global education for our postsecondary students. And to address national security concerns, global education will be needed to prepare the next generation of Americans to engage with the larger world. A 2007 National Academies report on “International Education and Foreign Languages: Keys to Securing America’s Future” begins by stating: “A pervasive lack of knowledge about foreign cultures and foreign languages threatens the security of the United States as well as its ability to compete in the global marketplace and produce an informed citizenry.”<sup>1</sup> The Title VI international programs are the federal government’s most comprehensive programs for developing national capacity in international and foreign language education. These programs help to educate individuals whose abilities ensure successful international engagement among America’s education, government, and business sectors. Title VI programs demonstrate a strong commitment by the federal government to increasing our knowledge of, and engagement with, the world

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<sup>1</sup> 2007 National Academies of Science, Engineering, and Medicine, “International Education and Foreign Languages, Keys to Securing America’s Future”: <http://nap.nationalacademies.org/11841>

beyond our borders.

In regards to the proposed rule, we support the added flexibility for additional grants to the centers and we appreciate the further definitions of terms such as “diverse perspectives”. Section 656.4 would create a new standalone section that addresses these grants and clarifies that they can be used for maintaining appropriate library collections, outreach grants, and summer institutes that will support the work of those centers. We also support the further clarification of the definition of “diverse perspectives” (Sec 655.4), which would be defined as “a variety of viewpoints relevant to understanding global or international issues in context, especially those derived from scholarly research or sustained professional activities and community engagement abroad, and relevant to building multi-faceted knowledge and expertise in area studies, international studies, and the international aspects of professional studies, including issues related to world regions, foreign languages, and international affairs, among stakeholders.” This definition will help to clarify the requirement in Section 602 of the Higher Education Act that grants reflect “diverse perspectives” as authorized by Congress.

Within the proposed rules, we are deeply concerned with the proposed changes to the “National Resource Centers” program in Section 656, specifically the proposed change to Section 656.3: “The current regulation allows international studies centers to declare a thematic focus with no geographically defined referent. The proposed regulation would require all Centers to have a geographically defined focus.” This would result in major changes for the NRC program, including the elimination of some or all the NRC international centers, many of which have been operating successfully at our institutions for many years. The proposed rule states that “this change in policy would better support the program purpose.” However, it is clear that in previous competitions the Department allowed institutions to apply for international centers with no geographic change. For instance, the current FAQ document for Title VI applications states: “the International NRC category is for centers that are doing work that spans the globe and is not confined to a particular world region.”<sup>2</sup> We urge the Department not to finalize this change without greater engagement with the stakeholder community to understand how this will impact the Title VI NRC centers.

Proposed Section 657.5 would make a substantial change to the Foreign Language and Area Studies (FLAS) Fellowships by “eliminating the institutional payment as a component of fellowships.” FLAS grants are awarded to individual institutions of higher education to fund academic year and summer fellowships to assist “meritorious undergraduate students and graduate students undergoing training in modern foreign languages and related area or international studies.” Currently, each individual fellowship includes an institutional payment and a subsistence allowance. The proposed rule would remove the institutional payments and create one stipend to be awarded to the student. The reasoning is that “the proposed change would establish predictable unit costs for fellowships, which would promote the efficient allocation and administration of fellowships” and would allow institutions to “increase the number of meritorious students who apply for a fellowship because of the potential for larger stipend payments.” The proposed rule further states that “reported amounts of financial support are subject to wide variation for reasons unrelated to an institution's actual level of commitment... Financial support for students may reflect an IHE's tuition rates, which vary

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<sup>2</sup> See 2022 U.S. Department of Education FAQs, page 8: <https://www2.ed.gov/programs/iegpsnrc/final-consolidated-faqs-fy2022-nrc-flas.pdf>

widely across institutions.” Since 2014, the Department has required centers to prioritize awards to students who qualify for federal student aid under the Free Application for Federal Student Aid (FAFSA). This proposed change, and elimination of the institutional payment, is problematic because colleges and universities may have different procedures for processing the institutional payments. This could have a negative impact on both the institution and fellow, including higher tuition fees for the student and in some cases loss of health insurance. We urge the Department to reject this proposed change to the FLAS program.

In conclusion, we are concerned that the proposed changes to the NRC and FLAS programs will make substantial and historic changes that will have long and deep impacts on these important, and successful, programs. We urge the Department to make changes to these proposed rules before finalizing them, and engage with stakeholders to update regulations regarding Title VI international programs. We look forward to working with you on these important issues.

Sincerely,



Ted Mitchell  
President

On behalf of:

American Association of Colleges and Universities  
American Association of Collegiate Registrars and Admissions Officers  
American Association of State Colleges and Universities  
American Council on Education  
American Dental Education Association  
Association of American Universities  
Association of Catholic Colleges and Universities  
Association of Governing Boards of Universities and Colleges  
Association of Jesuit Colleges and Universities  
Association of Public and Land-grant Universities  
Association of Research Libraries  
Coalition for International Education  
Council for Christian Colleges & Universities  
Council of Graduate Schools  
Hispanic Association of Colleges and Universities  
NAFSA: Association of International Educators  
National Association of Independent Colleges and Universities