



**Association of International Education Administrators**  
*Leaders in International Higher Education*

The Honorable Miguel A. Cardona  
US Department of Education  
Washington, DC 20202

Dear Secretary Cardona:

As members of the Association of International Education Administrators (AIEA) and as senior leaders of several higher education institutions and organizations that support international higher education in the US and abroad, we are writing to express our concern over the [US Department of Education's February 15th letter regarding higher education institutions' use of third-party servicers \(TPS\)](#).

If permitted to take effect "as is," the expanded definition of TPS would cause significant harm to existing programs at US institutions. This expanded definition of TPS would prohibit institutions contracting with a servicer or subcontractor located outside the United States, and that restriction pertains to "any aspect of an institution's participation in a Title IV program." This means that institutions simultaneously contracting with overseas entities and enrolling Title IV students will not be in compliance with this new guidance. This guidance is counter to best practices for study abroad and international education for a number of reasons:

1. It negates using the people and institutions that are experts in the culture, knowledge and other content taught on study abroad programs. Not integrating local experts to design the curriculum is not allowing students to learn from the true experts.
2. It places our students at higher risk due to not hiring local experts to plan itineraries, book knowledgeable, safe charter transportation services, and housing. This guidance is counter to basic international risk management.
3. Title IV funds are used by American students who cannot independently fund their study abroad experiences, as outlined in [The Federal Student Aid Handbook, Volume 2, Chapter 2](#). If students cannot use Title IV funds for study abroad, the opportunity becomes out of reach for all but the wealthiest of Americans who do not receive federal aid. Study abroad is often limited due to a lack of social competency and confidence in embracing international travel for our students from backgrounds dependent on financial aid to earn a college degree. Removing access to financial aid will only further expand socioeconomic void in access to high impact learning practices.
4. Study abroad is workforce development as we prepare students to work in an increasingly global economy. We need a workforce that is both sensitive to non-US thought and that is knowledgeable about collaboration across borders in both social and policy means. Direct exchanges set the groundwork for potential future leaders (whether they be in the academic, business, or nonprofit sector) to want to come to the US for careers.
5. This guidance will have a significant economic impact. If students at all levels of global mobility see this guidance as an impediment to long-term partnerships and collaborative research, they, too, will choose to go elsewhere for their global training. That, in turn, as we all know, will cost the US billions of dollars in lost revenue.



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6. The Department of State has long touted the power of students traveling and learning as a means to diplomacy. Not allowing higher education institutions to contract with international entities or creating barriers is counter to the diplomatic goals of the United States.
7. It also creates a scenario in which universities, still reeling from the impacts of COVID-19, would have to relocate already stressed staffing levels to oversee these international relationship clearances.

We respectfully urge the Department to rescind the February 15, 2023 published guidance. If this is not granted, we request that the Department clarify that study abroad programs, international partnerships and international student recruitment and retention to not be covered by this new TPS guidance.

Please contact AIEA for any follow-up questions or concerns.

Sincerely,

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