

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

AMERICAN COUNCIL OF LEARNED
SOCIETIES, et al.,

Plaintiffs,
v.

MICHAEL MCDONALD, in his official
capacity as Acting Chairman of the National
Endowment of the Humanities, et al.,

Defendants.

Case No. 1:25-cv-03657

DECLARATION OF JOY CONNOLLY

1. I am Joy Connolly, President of the American Council of Learned Societies (“ACLS”). I have served in this capacity since July 1, 2019. Previously, I served as provost and interim president of The Graduate Center at the City University of New York, where I was also Distinguished Professor of Classics. My prior faculty appointments were at New York University, where I served as Dean for the Humanities from 2012-16, Stanford University, and the University of Washington. I was elected a fellow of the American Academy of Arts and Sciences in 2021.

2. ACLS is a nonprofit organization whose members include 81 scholarly organizations, 45 members of the ACLS Research University Consortium, and 158 members of the Associates network. ACLS was founded in 1919 and is headquartered in New York, NY. It is focused on supporting the creation and dissemination of knowledge that advances understanding of humanity and human endeavors in an effort to improve the human experience. ACLS undertakes this mission through its work directly and through providing funding. ACLS supports the creation and circulation of knowledge that advances understanding of humanity and human

endeavors in the past, present, and future, with a view toward improving human experience. The objects and purposes of ACLS are the advancement of humanistic studies in all fields of learning and the maintenance and strengthening of relations among the national societies devoted to such studies.

Importance of NEH to ACLS

3. **National Endowment for the Humanities (“NEH”)** funding sets the agenda for the humanities across the United States. Its advice and grantmaking guide teachers and researchers in cultural and educational institutions of all kinds, including K-12 schools, libraries, community colleges, and research universities. Its presence in every state and territory reminds public and private colleges and universities of the importance of investment in the humanities. The nation benefits from the NEH’s work to encourage institutions and scholars to orient humanistic study toward the public good across the full political and social spectrum. The demonstrable value of humanities teaching and research in our stressed and polarized time lends urgency to the work of the NEH.

4. Like the National Science Foundation and the National Institutes of Health, the NEH’s stature gives it distinctive capacity to support and legitimize innovations in research and teaching. It has substantially advanced the state of public knowledge through its advocacy and support for public humanities and digital humanities, areas where institutions of higher education have been slow to develop strength. Loss of the NEH’s work in these two areas does clear damage to the nation-wide production and circulation of expert knowledge about history, literature, language, philosophy, culture, religion, politics, and society in America and the world. Publicly engaged humanists make the nation stronger by directly enriching public understanding and dialogues across cultural and political differences. They work with communities to conserve

objects crucial to the understanding of the nation's complex, plural history in museums, galleries, and community centers; they engage underserved populations in prisons and rural communities; they contribute humanistic expertise to workers and policymakers in healthcare, economic policy, and social policy; they co-design research and outreach projects with scientists and communities outside academia.

5. The NEH offers funding opportunities to pursue time sensitive research involving oral histories of elderly populations and groups whose health and wellbeing are at severe risk. Recent projects include interviews with survivors of war and disease, from veterans affected by Agent Orange to Ukrainian refugees. Archaeological and archival material at very high risk includes Civil War buildings and artifacts, decaying photographs and newspapers (particularly important for understanding nineteenth and early twentieth century American history), and excavation sites in zones affected by war and climate change.

6. NEH funding is the most important broadly accessible source of funding for advanced academic professional development for middle school and high school teachers in the humanities. Many NEH-funded programs gather faculty from K-12 in summer institutes and workshops together with university faculty, strengthening a crucial relationship that in the United States has been badly under-served for many decades.

7. Until recently, humanities disciplines have been slow to integrate career training for undergraduates into departmental curricula. ACLS member institutions use NEH funds to kindle innovation in this area. Open grants in 2025 offered experiential training to undergraduates that prepares them for careers in museums, higher education, media, conservation, and a range of careers in finance and public policy. These programs help diversify

professions that have historically been limited to well-off and well-connected graduates of highly selective elite universities.

8. NEH funding for curricular and extracurricular programming helps keep humanities programs alive and relevant at a time when digital technology, cultural change, economic turmoil, and misinformation about the value of a humanities degree are all contributing to declines in undergraduate study in these areas. Degree programs (majors and minors) in interdisciplinary areas like medical humanities require not only intensive curricular preparation but also collaboration across traditionally siloed faculties. The endorsement of a public national agency is a key accelerant of collaboration in these circumstances. Other examples of programs that benefit from NEH incentivization include programs in digital technology, environmental studies, and visual culture. Many NEH funded programs offer training opportunities and internships to undergraduates, improving their chances of finding good jobs after graduation. Societies and institutions lose funding for public humanities research opportunities that enrich public knowledge and advance the careers of their own individual members, typically faculty and graduate students. These include projects in digital archives, excavations, and community history. The NEH also plays a nationally important role in fostering research into under-studied topics across the humanities – projects akin to research in the sciences, whose immediate pay-off may not be clear but which emerge as foundational years or decades later.

NEH Grants to ACLS

9. ACLS recently received two NEH grants, both of which were abruptly terminated in April 2025. First, on April 2, ACLS lost \$500,000 in support for a cooperative agreement with the NEH on a National Convening on Graduate Education in the Humanities. Competition for this award opened in May 2024, and the decision was announced in January 2025.

10. The proposal for this project was written by ACLS leadership in collaboration with the leaders of three ACLS members, the American Historical Association (AHA), the Modern Language Association (MLA), and the Society of Biblical Literature (SBL). Collaboration across associations is unusual and time-consuming: writing the grant absorbed from five to twelve hours of work per week from June 1 through August 6, 2024. The time invested in it by each organization represented time lost to other important and pressing projects.

11. Due to the termination, this work will not be completed under the auspices of the NEH. As originally planned, the project entailed a three-year cooperative agreement involving the direct participation of NEH staff. An NEH program officer, John Cox, was assigned to serve on the Steering Committee for the duration of the project. His expertise and authority as a national figure, a representative from a public agency devoted to the flourishing of the humanities, was crucial to its success. The NEH-ACLS Graduate Education project was designed to respond to three challenges.

12. First, many individual students suffer from the persistence of policies and culture that in many cases took shape decades ago.

13. Second, viewed at scale, graduate education in the humanities is not meeting the needs of the nation: each year, many more PhDs seek employment than there are available full-time academic posts, and doctoral programs continue to struggle to prepare students to be effective teachers.

14. Third, systemic reform of graduate education remains elusive. American higher education is a system-less system: a large constellation of people in private and public institutions that compete for resources in a prestige economy. Many positive experiments in humanities graduate education have taken place, bolstered by the attempts of academic

associations to encourage change, driven by efforts to envision a more inclusive professoriate and more humane processes of training and professionalization. But competitive fragmentation presents serious obstacles to sharing successful innovations, such as better approaches to recruiting and preparing diverse and socioeconomically disadvantaged students for graduate school and various post-degree paths.

15. The NEH-ACLS Graduate Education project represented the most ambitious effort to date to undertake an overhaul of American graduate education in the humanities. The leadership of the NEH was crucial to its success. Only the NEH, the public face of the nation's investment in the humanities, has the influence and authority to bring about change. The NEH-ACLS collaborative agreement would have mobilized cross-institutional professional associations, the members of ACLS that set norms for teaching and research across the country, to address equip the next generation of the American professoriate to be stronger teachers and publicly responsive researchers – more effective at securing a robust future for the humanities in the form of larger numbers of undergraduate students and a broader audience for expert knowledge in the humanities.

16. The funding was intended to bring together constituencies that do not typically work together – faculty and administrators, professional academic societies, national organizations, and thought leaders – to inventory and assess past research into and efforts to improve humanities graduate education, conducting additional new research as needed; provide a comprehensive survey of reforms that deserve general implementation; outline steps to encouraging their adoption; engage decision-makers across the country inside and outside academia whose participation or approval is required for adoption of those reforms; develop methods of assessing progress on implementation, including by involving accreditors; and

showcase the benefits of graduate education in the humanities for the culture and the economy of the United States.

17. In addition to the NEH-ACLS Graduate Education project, ACLS was also recently awarded \$312,000 from NEH to support postdoctoral research fellowships in China Studies over a three-year period beginning January 1, 2024 and ending June 30, 2027. The program provides supplemental fellowship support and corresponding competition related costs (peer review) for three competitions with awards made in Spring 2024, 2025, and 2026.

18. ACLS completed all Year 1 activities and received NEH funds in the amount of \$74,000 for this work. The Year 2 competition and peer review were completed in February 2025 and provisional awards were determined in early March 2025. All NEH-eligible awards were accepted by March 12, 2025. On April 2, when we received notification that the grant was cancelled, \$208,000 remained to be funded. By that date, \$100,000 had been provisionally awarded to three 2025 fellows. On May 9, 2025, ACLS received a \$4,000 payment for Year 2 peer review expenses as per the approved budget, with a note from the NEH stating that the payment was approved because it was submitted prior to the grant termination date. The termination of the grant communicates that the remaining award funding will not be provided by the NEH according to the terms of the grant.

19. The program supports the expert study of China across all disciplines in the humanities, which enriches understanding of China's politics, culture, and language – all crucial elements of effective diplomacy and national security. It consists of fellowships and community-building activities designed to promote and sustain excellence in research on China in the United States, with a special emphasis on scholars at the early career stage, within eight years of earning the PhD. Members of the rising generation of Sinologists receive opportunities to build the

international scholarly networks now essential for effective research on and in China, particularly in light of increased tension in relations between China and the United States. It has been critically important to distribute these opportunities widely, because retrenchments in federal funding and constrictions in university finances have particularly disadvantaged outstanding young scholars at less well-resourced institutions. The program has a proven record of success in its aim of supporting research that leads to significant scholarly products. ACLS anticipated applying for a three-year renewal of funding in summer 2025; however, the program is now listed on the NEH website as cancelled and not accepting future applications. ,

On April 2, 2025 ACLS received two emails from

Grant_Notifications@NEHemail.onmicrosoft.com informing us that our NEH grants were being terminated.

20. The notifications appeared to be form letters and did not include any specific information about why the grants were terminated or how to appeal the decisions.

Effect of NEH's Dismantling on ACLS's mission

21. The recent dismantling of NEH—including the shutting down of entire NEH offices and divisions—will harm ACLS in a number of ways. For example, I understand that NEH has effectively eliminated the Office of Digital Humanities. This office has fostered the development of tools, infrastructure, and content that enable humanities archives, teaching, and methods of scholarship to serve the public with 21st century methods and around 21st century issues. With NEH support, the online platform Pop-Up Archive developed a way to organize and archive audio files to make them searchable, discoverable, and reusable. A grant to Claremont McKenna College allowed researchers to study Virtual Territories: War and the State

in a Digital Age. A Vanderbilt project built a searchable database for collections of the builders and defenders of Nashville's Civil War Fortifications.

22. Over the years, the Office of Digital Humanities has both funded and attracted additional funding for projects like the Digital Public Library of America, which provides simple and free access to the digital collections of libraries across the country. Users can search more than 52 million images, texts, audio, and video files held by hundreds of libraries and archives.

23. A Chairman's grant that originated in the Office of Digital Humanities initiated the convening of the ACLS Commission that made recommendations about fostering and sustaining digital scholarly endeavors, resulting in the report *Other Stories to Tell*. Office of Digital Humanities programs that supported open access publishing of scholarly books provided models for ACLS programs to amplify humanistic scholarship, including the Arcadia Open Access Book Prizes and the wide collaboration behind JSTOR's *Path to Open*.

24. Another office that has been effectively eliminated—the Office of Data and Evaluation—also played an important role at NEH for ACLS and its members. Just established in 2023, the office was designed to support urgently needed data collection and research on the impact and value of the humanities in the United States. The data collected and analyzed by the Office of Data and Evaluation would have helped faculty and administrators design practical solutions to address the crisis of falling enrollments and majors across the humanities.

Taken together, the recent decisions at NEH have destroyed or done serious damage to its grantmaking across a broad range of areas—time sensitive historical research; high-risk archival material; training for teachers, faculty, and graduate students; undergraduate career training and curriculum development; research on matters of the common good; and fellowships and grants for foundational research.

Termination of Funding Opportunities

25. NEH has also eliminated funding opportunities that ACLS was planning to pursue. In December 2023, the NEH played a key role in advancing the national state of humanities funding through a Chairs grant to ACLS that enabled us to gather philanthropic funders of humanistic scholarship and teaching in New York City. This historic day-long convening led to an agreement to meet yearly and to consider joint funding and other activities. We met most recently in January 2025 and are meeting again in person next month. As the agency embodying public investment in the humanities, the NEH is uniquely positioned to lead public-private partnerships in support of the humanities on a national scale. We had anticipated requesting additional funds from the NEH to support this work, but given the recent terminations at NEH, such funding is unlikely to be available.

26. NEH staff in the Research and Education divisions also regularly attended meetings of ACLS and the National Humanities Conference, co-organized by the National Humanities Alliance and the Federation of State Humanities Councils. They brought a distinctive national perspective on the various sectors of humanistic activity on and off American campuses, including colleges, universities, public libraries, local history museums, and more. As no other foundation or organization does, they have knowledge of the many types of institutions of higher education in the US where work in the humanities takes place: e.g. community colleges, regional comprehensive universities, liberal arts colleges, research universities. They play a key role in ensuring that a diverse range of institutions have access to funding – not only from the NEH but from ACLS and our member societies and philanthropic foundations. The NEH's detailed knowledge of humanistic activity across all US states and territories guides the development of our grant opportunities and the design of our competitions and evaluation criteria. Loss of their

guidance weakens the efforts of grants program directors and officers at ACLS and other grantmaking organizations to keep funding accessible around the country and across the political spectrum.

27. We will also likely lose access to funding opportunities from grants issued by the Office of Digital Humanities. A Chair's grant in 2021 for \$30,000 launched a national commission of scholars, archivists, administrators, and funders to make a set of recommendations concerning how best to support and sustain digital scholarship. The Chair's grant was later supplemented by the Mellon Foundation with an expanded charge as the Commission for Fostering and Sustaining Diverse Digital Scholarship. We anticipated future grants to support the implementation of the recommendations in the Commission's report.

28. The Office of Digital Humanities also instigated a series of subsidies that enabled books produced by NEH fellows to be published open access. This program served as a key model to open access publishing programs like Towards an Open Monograph Ecosystem (TOME) and JSTOR's Path to Open. Support from the Office of Digital Humanities was key to the increasing free access to humanities scholarship. Without it, the effort to increase access to knowledge is faltering.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on May 14, 2025 in Washington, DC.



Joy Connolly
President
American Council of Learned Societies