

**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 for the Humanities, et al.,

Defendants.

Case No. 1:25-cv-03657

DECLARATION OF JAMES GROSSMAN

1. I, James Grossman, am Executive Director at the American Historical Association (AHA). I am a professional historian (PhD, University of California, Berkeley, 1982), and recipient of various NEH grants over the course of my career. I have served on peer review panels in the NEH Divisions of Education, Research, Preservation and Access, and Public Programs. I have also organized peer review panels on behalf of the NEH in my former capacity as the Vice President of the Newberry Library, a longtime participant in the NEH's Fellowships Programs at Independent Research Institutions. The statements made in this declaration are based on my personal knowledge and understanding of information made available to me pursuant to my duties at the American Historical Association.

2. The American Historical Association was founded in 1884 and incorporated by Congress in 1889. The AHA promotes historical work and the importance of historical thinking in public life. Its mission to enhance the work of historians also encompasses professional standards and ethics, innovative scholarship and teaching, academic freedom, and international

collaboration. As the largest membership association of historians in the world (more than 10,000 members), the AHA serves historians in a wide variety of professions, and represents every historical era and geographical area.

3. I have been executive director of the AHA since 2010, and a member since 1988. Before becoming executive director, I served as member or chair of major AHA committees and was a regular participant in the association's annual conference. I therefore have a comprehensive understanding of how the association has evolved over the past four decades, including the significance of collaboration with and support from the NEH since my arrival as executive director. In recent years the AHA has turned increasingly towards various aspects of professional development for its constituencies; this development has benefitted substantially from not only NEH financial support but also conversations with, and insights from, NEH staff.

Effect of NEH's Dismantling on AHA's Mission

4. The overall dismantling of the NEH will have dire consequences for the American Historical Association and its more than 130 affiliates. The NEH does more than fund the work of the thousands of historians who belong to the AHA and these affiliated societies. The agency is, in essence, the convener of humanities disciplines. Because of its resources, the professionalism and intellect of its staff, and its prestige, the NEH regularly convenes representatives of scholarly associations, higher education institutions, state humanities councils, museums, and other organizations. We learn not only from NEH staff, but from one another in ways that are impossible through publications or even online.

5. For example, the Office of Digital Humanities works not only across disciplines, but also across institutional genre, size, and location. This kind of cross-fertilization enables

learning among people who *produce* digital humanities scholarship in different ways, and people who *use* that work also in different modes and for different purposes.

6. In addition to this role as a convener, the NEH provides historians doing innovative work with legitimacy. Three decades ago, I was the project director for the first urban encyclopedia to plan simultaneous digital (at a time when only a few people had even *heard* of the “World Wide Web”) and paper publication. We were able to raise \$1 million in the private sector because grants from the NEH early in the process assured corporations and foundations that a rigorous peer review process had reviewed and approved our innovative (at the time rather daring) plan. This happens repeatedly for the AHA’s thousands of members who rely on the NEH to affirm both the intellectual rigor of their questions and research plans, but also the public interest in their work.

7. Because only the National Endowment for the Humanities has the resources and prestige to convene and legitimate in this way, the evisceration of its staff and structure will cause irreparable harm to AHA specifically and the historical discipline more broadly. The community of historians represented by the AHA, the thousands of members of the Association and its affiliates have no entity to replace the essential functions of the NEH. Teaching and research in history will lose the major source of vitality, innovation, and popular diffusion. This harm would be widespread and irrevocable.

8. As the entity uniquely chartered by the United States Congress “for the promotion of historical studies,” the American Historical Association would be uniquely harmed by the extreme diminishment of the agency that has provided the institutional foundation for its work and the work of its members for six decades.

9. The American Historical Association has been the recipient of 50 awards since the NEH was founded in 1965. Since 2019, AHA has received 6 NEH awards:

- History, the Past and Public Culture: An Exploratory Survey, 2019–2021, \$208,093
- Confronting a Pandemic: Historians and COVID-19, 2020–2021, \$235,000
- Sustaining and Advancing Historical Work in Post-Pandemic America: Grants to Organizations, 2021–2023, \$2,893,604
- Teaching Things: Material Culture in the History Classroom, 2022–2023, \$199,808
- Africa in World History, 2024–2025, \$191,619
- Change across the Land: Nineteenth- and Twentieth-Century United States Environmental History and Policy, 2025–2026, \$194,261

Termination of Grants

10. AHA staff invested substantial time developing proposals for two grants that were terminated—an Institute for K-12 Educators (Africa in World History) and an Institute for Higher Education Faculty (Change across the Land: Nineteenth- and Twentieth-Century United States Environmental History and Policy)—as well as another grant proposal for a program that was terminated. This extensive work included research, curriculum planning, recruitment of faculty, making logistical arrangements, planning site visits and tours, and developing budgets. Each grant application required dozens of hours of staff time to develop, gather feedback from NEH staff, and further refine. Consultation with NEH staff was essential to developing the grant proposals. They provided advice to ensure the proposals met NEH’s guidelines and offered constructive recommendations to strengthen the proposals and the positive impact the institutes would have had on their participants and their students.

11. The award notification for our grant proposals for an NEH Institute for Higher Education faculty entitled “Change Across the Land: Nineteenth- and Twentieth-Century United States Environmental History and Policy,” was received by email in August 2025. We received official notification of the award on March 11, 2025. Award notification for our grant for an

NEH Institute for K-12 Educators, on “Africa in World History,” was received on September 17, 2024. Each of these institutes responded to indications from teachers of strong demand from their institutions for the broad subject, interest among students, and inadequate preparation in these topics on the part of the instructors. Because the NEH’s program for institutes for teachers does not have a required topical focus, it enables the AHA and other organizations to respond to the needs of our constituencies.

12. After being awarded the NEH grant to support the two Institutes, AHA staff undertook significant work to organize both programs, including: designing project websites and incorporating feedback from NEH staff and peer reviewers, creating application guidelines, revising budgets, marketing the programs to generate interest and applications, coordinating among the institute’s faculty, creating an application review rubric, and recruiting review panelists. Staff created syllabi, reading lists and the institute schedule, began gathering sources for inclusion in projects, researched accommodations and transportation for participants, responded to applicant queries, processed financial paperwork, and attended required NEH webinars. Together with outside reviewers, AHA senior staff reviewed and ranked a combined total of 220 applications to select 30 participants for the K-12 Institute and 25 participants for the Higher Ed Institute.

13. On April 1, 2025, the AHA received emails from the NEH reminding us to notify all applicants on April 2 as to whether they had been accepted, waitlisted, or rejected for participation in the institutes. On April 2, the AHA sent notifications to all applicants.

14. On April 3, the AHA received two emails from Grant_Notifications@NEHemail.onmicrosoft.com informing us that the grants were being terminated.

15. The notifications appeared to be form letters. These letters were not in the NEH's grants management system, eGMS.

16. The notifications did not include any specific information about why the grants were terminated or how to appeal the decisions.

17. The AHA emailed its NEH Higher Ed Institute grants officer to inquire as to the validity of the email terminating received from

Grant_Notifications@NEHemail.onmicrosoft.com

18. On April 4, AHA staff received from institutes@neh.gov emails pertaining to both of our summer institutes. The emails included the following text:

Due to a change in the Administration's funding priorities, DOGE has made the decision to terminate NEH awards, including 2025 professional development programs. We are aware that some award recipients have already received termination letters. At this time, NEH does not know the full scope of which awards have been terminated and who has been notified. We know that this action affects the participants you recently notified about their summer 2025 participation. If you received a termination letter, the following message can be sent to those successful applicants and applicants on your waitlist.

Dear Participant,

The NEH has provided the following statement:

We regret to inform you that this NEH [Institutes or Landmarks] program will no longer be offered due to DOGE's termination of the grant award. We do not have any more information to share at this time.

Effects of Grant Termination

19. Upon receiving grant termination notices, the AHA had to terminate all planned programming, notify all accepted applicants, institutional partners, and Institute faculty of the program's termination, and respond to accepted applicants' queries about the termination. The termination notices also created significant and detrimental budget ramifications for the remainder of the AHA's current and upcoming fiscal years. AHA had relied on revenue from

these grants, and portions of staff salaries and indirect costs no longer covered by the grants have had to be absorbed into the AHA's operating budget. This has reduced the AHA's capacity to complete everyday business operations, contributed to an overall organizational budget deficit for the current fiscal year, and jeopardizes the ability to retain staff for the upcoming year unless other grant funds are secured.

20. As a result of the grant terminations, the AHA's mission, finances, and reputation have been harmed. As the Association increasingly directs energies towards professional development, NEH Institutes provide both useful experience and valuable credibility in the broader marketplace for resources for in-service teachers. Like other scholarly associations traditionally reliant on revenue from publications and conferences, the AHA has begun to pivot towards a more diversified income model. Professional development for history teachers at various levels is a major part of this new approach and NEH institutes build both reputation and constituency. They also provide opportunities for AHA staff to learn what is happening in classrooms across the country, enabling us to generate new and related projects such as the *American Lesson Plan*, the most thorough analysis in the 21st century of what is actually taught in secondary school history and social studies classes. NEH Institutes, whether for secondary or college teachers are intellectual hothouses, benefitting participants, faculty, and staff.

21. Upon award of the grants, AHA staff time and resources were reallocated to enable the development of the Institute programs.

22. The termination of the AHA's grants diminishes our organization's reputation among higher ed faculty and K-12 educators. An NEH institute enhances the visibility and prestige of an organization's professional development program, in part because of the rigorous peer review process, and in part because of the professionalism required to develop and

administer NEH sponsored gatherings. The termination of a grant does precisely the opposite, diminishing our ability to continue to build and broaden our overall professional development initiative. Furthermore, the termination of the grants forced the AHA to rescind 55 educators' professional development opportunities within 48 hours of their initial acceptance, thereby diminishing the reputation of our organization in the eyes of our constituency.

23. The termination of the Institute program itself more broadly diminishes AHA's work. The AHA planned to build on the Institutes to offer future programming for educators. The cancellation of these grants eliminates this knowledge base for the AHA, making it more difficult to develop programming in the future and attract teaching faculty and participants. NEH Institutes support innovation in format as well as content to produce high-quality professional development opportunities for educators. Without the NEH's leadership in this arena, organizations like ours have limited capacity to experiment and work collaboratively with educators to explore new ways to more effectively meet the classroom needs of students across the country. I led an NEH summer seminar for teachers and oversaw countless more over two decades at the Newberry Library. The competition to participate in these programs is an indication of their value to teachers of the humanities at all levels.

24. The AHA has also suffered harm as the result of the termination of funds awarded to the American Council of Learned Societies to support a cooperative agreement with the NEH on a National Convening on Graduate Education in the Humanities. This project's proposal was written by ACLS leadership in collaboration with the AHA, the Modern Language Association, and the Society of Biblical Literature. The AHA invested significant time on the proposal from June 1 through August 6, 2024.

25. Due to the termination of this grant, the work will not be completed under the auspices of the NEH. This work would have been greatly enhanced by the involvement of the NEH's knowledgeable staff.

Termination of Funding Opportunity

26. In addition to the terminated grants, the AHA had an active grant application for which the funding opportunity was canceled. On February 12, AHA submitted an application for the Institutes for Advanced Topics in the Digital Humanities funding opportunity. This application required hours of staff time to research and write the proposal and to consult with NEH staff in the Office of Digital Humanities and incorporate their thoughtful insights. This process began months before the application was due. Preparing the proposal also required identifying, connecting with, and soliciting letters of support from prospective Institute faculty. The institute would have offered professional development opportunities and advanced training in digital methods to historians across the United States. The preparation, planning, and implementation of the Institute would also provide comparable learning experiences to AHA staff.

27. On April 10, AHA staff received an email from odh@neh.gov, the Office of Digital Humanities, informing us that our recent NEH Grant Application had "been withdrawn by the NEH." It was accompanied by the following message:

"Unfortunately, all the programs under the Office of Digital Humanities have been cancelled. So we are unable to review your proposal and have marked it as Withdrawn by Agency in our system. I realize that writing a proposal takes a long time and I'm so sorry we can't fund your excellent work anymore."

28. As a result of the cancellation of the grant program, the AHA will no longer have the opportunity to offer the proposed project, and therefore to provide professional development opportunities that are central to our mission. The AHA has long been a proponent of the digital humanities, and hosting an NEH Institute for digital scholars would have elevated the AHA's position as a leading organization in the field. Because of the cancellation of this overall NEH initiative the AHA has irrevocably lost the opportunity to have the NEH's imprimatur on its work supporting digital humanists, which irreparably harms the AHA's reputation in a growing and important field.

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

Executed on May 14, 2025, in Washington, DC.

A handwritten signature in black ink, appearing to read "James R. Grossman", is positioned above a horizontal line.

James R. Grossman
Executive Director
American Historical Association