

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

AMERICAN COUNCIL OF LEARNED
SOCIETIES, *et al.*,

Plaintiffs,
v.

ADAM WOLFSON, 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; and 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 had 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. To attempt to mitigate some of the damage resulting from the termination of this cooperative agreement, the Mellon Foundation agreed to provide seed funds for the project (now called “Doctoral Futures”) in April 2025. Despite this support, the project suffered six months of lost progress during a year that witnessed historically unprecedented cuts to doctoral funding in the humanities. The loss of the NEH as a cooperative partner has damaged the program’s distinctiveness as a publicly funded and endorsed initiative capable of drawing on the Endowment’s reputation, scholarly networks, and staff expertise. The loss has significantly undermined our efforts to gain buy-in from faculty, graduate students, and university administrators.

18. Were the cooperative agreement to be restored, the ACLS, AHA, and MLA would have staff capacity and the national visibility to engage a larger and more representative pool of participants in advisory groups, committees, and focus groups. It would enjoy the mandate and the capacity to engage masters’ programs, a large and important area which falls beyond the remit of the Mellon Foundation grant. We would be better able to engage a broader national audience for the final report and recommendations, including the Humanities Council and education accreditors.

19. In addition to the NEH-ACLS Graduate Education project, ACLS had also been 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.

20. 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.

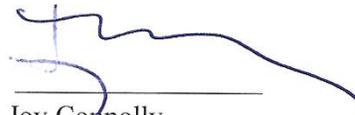
21. The program supports the expert study of China across all disciplines in the humanities, which enriches understanding of China's politics, culture, and language – all crucial elements of effective diplomacy and national security. It consists of fellowships and community-building activities designed 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.

22. The abrupt termination of this grant directly disrupted ACLS's ability to fulfill commitments to fellows whose awards were made in good faith. To offset the shortfall, ACLS was compelled to draw on discretionary funds this year that had been earmarked to support other aspects of the China Studies program, including mentorship activities, travel grants, and professional development opportunities for early-career scholars — creating a cascading effect that extends the damage done by this single grant termination far beyond the individual awardees. The loss of federal funding represents an ongoing strain on our organizational resources in an area key to national security and prosperity.

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

Executed on March 5, 2025 in New York City.



Joy Connolly
President
American Council of Learned Societies