

**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
for the Humanities, *et al.*,

Defendants.

Case No. 1:25-cv-03657

DECLARATION OF PAULA M. KREBS

1. I, Paula M. Krebs, am the Executive Director of the Modern Language Association of America (MLA). I became Executive Director of the MLA in 2017, after twenty years as a faculty member in the English department at Wheaton College, in Norton, Massachusetts, and five years as dean of the College of Humanities and Social Sciences at Bridgewater State University, in Bridgewater, Massachusetts. My PhD is in English, from Indiana University, and my fields of research and publishing expertise include Victorian literature and culture and U.S. higher education. I have served as the president and board chair of the National Humanities Alliance since 2023. I have been a member of the MLA since I was a graduate student in the 1990s.

2. The MLA is the professional organization for researchers and teachers of languages, literatures, writing, and culture. The organization was founded in 1883 and has close to 20,000 members. As the largest membership association in the humanities, the MLA represents researchers and teachers in a large number of humanities fields, including world

languages and literatures, English language and literature, film studies, folklore, writing studies, linguistics, theater and performance studies, and many more.

3. The MLA is a membership organization that includes faculty members in high schools, colleges and universities; graduate students; independent scholars and writers; and people who do writing and research for businesses, community groups, and nonprofits. Our institutional membership network includes 30 doctoral institutions across the country that are committed to the value of the humanities. These institutions enroll all their graduate students in the MLA as well as enrolling their departments in the MLA Academic Program Services (MAPS) network.

4. MAPS, which includes approximately 850 languages, literature, and writing programs and departments, connects department heads and program leaders from across the country and is an essential way the MLA stays in touch with the trends and patterns in humanities education nationally. The MAPS network is further represented by two entities that exist under MLA's umbrella: the Association of Departments of English (ADE) and the Association of Language Departments (ALD), each of which has a twelve-member executive committee that represents the needs and interests of department chairs and program leaders across the United States and Canada. Because of our wide individual, institutional, and departmental membership networks, the MLA can attest to the impact of the NEH on the humanities across US higher education.

5. The MLA publishes both research and teaching-focused work by our members, for our members. We publish twenty books per year addressing teaching in our fields, including volumes about teaching particular works and authors as well as texts and their translations. We publish *PMLA*, the flagship journal in language and literary study, five times per year. We

produce the humanities' most extensive research database, the *MLA International Bibliography*, a subscription product purchased by thousands of university, college, and public libraries all over the world. The bibliography is used by students and researchers at all levels to get access to the most accurate information about publications in their area. The MLA also publishes the *MLA Handbook*, a style guide on how to handle citation in writing. The Bibliography and the Handbook together mark the MLA's national leadership in information literacy, in assuring accuracy of information and teaching writers how to use sources correctly, how to verify that sources are authentic and credible, and how to write so that they can be understood and so that their readers can trust the arguments they make and the information they cite.

6. The MLA's services to members include an annual convention that draws 4,000 or more attendees from all specialties in language, literature, writing, and culture. The MAPS network provides professional development for department chairs and program leaders in our fields and in fields throughout the humanities, including folklore, religious studies, and art history. The MLA has the most extensive professional development program in the humanities, offering training in student recruitment, retention, and career preparation, hiring, budgeting, strategic planning, and more.

Historical Importance of the NEH MLA's Mission and Members

7. The MLA and its members have benefited from NEH grants and programs since the endowment's founding. The MLA has received 45 grants from the NEH, including grants to support our national census of enrollments in modern languages, which, approximately every five years, surveys thousands of language departments about their enrollments in every language offered in US higher education, receiving a return rate of more than 90 percent and thus assuring the accuracy with which it reveals trends in the study of languages in the country over time.

8. The MLA has long been a leader in Digital Humanities (DH), and the NEH has long been the primary funder of DH research. The loss of the Office of Digital Humanities undermines the ability for humanities scholars to participate in the crucial discussions of our age. The MLA has shaped the consideration of AI in teaching, with an NEH grant having made possible a series of important publications and workshops that have allowed thousands of humanities professors and teachers to approach AI in their teaching thoughtfully and in full possession of the knowledge they need to make the right decisions for and with their students. Most advances in the humanities in the last decades have sprung from work in which the NEH has had a hand. This includes the thousands of books and articles made possible by research grants as well as the hundreds of programs that help MLA members and others improve curriculum and classroom practice in the humanities and help us to assess the work we do. The NEH has played the central role in the improvement of teaching in humanities disciplines, including those of the MLA through funding consortia, campuses, and individuals. Grant programs such as Humanities Connections enabled departments in language, literature, writing, and culture to pair up with departments from non-humanities fields, “including but not limited to the physical and natural sciences; pre-service or professional programs, including law and business; or computer science, data science, and other technology-driven fields,” (<https://www.neh.gov/grants/education/humanities-connections>) to develop new curricula and resources for students.

9. The loss of the NEH’s Humanities Connections is a permanent loss of federal funding that has for years created for college students a richer preparation for a wide variety of careers in the sciences, the professions, and the huge range of businesses, for-profit and nonprofit, into which humanities graduates enter.

10. MLA members, and the humanities themselves, benefit from Federal funding for humanities research. Thousands of articles, books, and digital humanities projects have been made possible by NEH funding for research, influencing all the scholarship that followed. It is impossible to estimate the value and importance of such works as the Walt Whitman Archive, the Catharine Maria Sedgwick Online Letters, and MLA's own International Bibliography of work in language and literature. Each of these projects, and many more, made possible new lines of research in their subfields, new understanding of our cultural heritage, and new ways of thinking about the power of word and image in human experience. Research grants and fellowships from the NEH are the only federal mechanism for supporting humanities research in the United States.

11. NEH grants and fellowships are important credentials in the fields the MLA represents, advancing the careers of their recipients beyond allowing funding to pursue for research. The loss of entire grant programs and the termination of awards directly impacts scholars' and institutions' recognition, ranking, and competitiveness within the higher education marketplace, bringing direct harm to scholars and institutions alike. Receiving an NEH award is a recognition by one's peers of research achievement and promise, a credential that directly contributes to career advancement, promotion, and (in appropriate cases) tenure for the researchers, scholars, and teachers who receive them. Indeed, NEH awards are proportionately much harder to win than their analogous Federal research awards in the sciences, where research funding is proportionately much greater, so NEH awards are especially valuable peer recognition. The termination of awards directly harms MLA institutional and individual members' reputation and professional advancement.

12. In addition, NEH grants and fellowships have played an important role in institutional recognition. For colleges and universities, certain designations, such as the Carnegie classifications that designate whether a university is research-intensive, or membership in the prestigious Association of American Universities (AAU) is determined in part by receipt of federal funding and grants, including NEH awards. The termination of grants and access to federal funding for the humanities can directly harm the humanities departments within institutions as well. For example, one rationale used to cut or eliminate programs at West Virginia University was a lack of \$1 million in federal funding for departments.

13. NEH fellowships are the only national mechanism to allow scholars at underfunded, teaching-focused institutions such as regional public colleges and universities to pursue scholarship they would not otherwise have been able to pursue. Our members have cited NEH fellowships as crucial in maintaining their ability to contribute to their disciplines and to their teaching, allowing students at teaching-oriented institutions to benefit from the latest scholarship. The combination of eliminating individual research fellowships and restricting any education programs to the narrow list now indicated by the NEH means permanent harm to those who reach the most students—high school teachers and faculty members at regional public institutions, small private colleges, and community colleges.

14. The number of students whose classrooms have been enriched by the NEH's Division of Education programs is so large it is impossible to estimate. Institutes sponsored by the NEH have for decades brought top scholars in humanities fields together with high school and college teachers to study together in otherwise-unavailable ways. The institutes have allowed teachers who would not otherwise have the opportunity to pursue research in their fields—high school teachers, community college teachers, and faculty members from institutions with heavy

teaching responsibilities—to devote six or eight weeks to seminar-style learning engagement with the newest and most significant research in a topic area, led by scholars who are at institutions where they are privileged enough to pursue such research. A dozen teachers from all over the country and from all kinds of schools and colleges gather weekly to delve deeply into the research on a topic they teach. The opportunity for time and space to do this work is life-changing for teachers from institutions that don't have the resources to allow time off for research, and the feedback from participants has been stellar. Termination of awards in this program directly harms both the grant recipients who provide the programs and the teachers who would have participated in them.

15. The real impact, however, goes beyond the faculty members who participate in the seminars and institutes. The real impact of the work is on the tens of thousands of students who have been reached by the teaching innovation inspired by the NEH seminars and institutes. NEH institutes are the only national structure designed to translate research into teaching and, ultimately, teaching into research: many participants pursue publication after their seminars for the teaching projects that arise from them. (Indeed, when I was a journal editor, I published such a teaching-focused article, by Purdue North Central's Barbara Lootens, who had participated in an NEH seminar on Feminist Criticism and Female Literary Traditions in the First Half of the 20th Century, with Susan Gubar, then the preeminent scholar in her field.) The harm of not making available institutes such as the Rust Belt Humanities Lab project out of Ursuline College in Cleveland, run by MLA member Katherine Trostel, is harm not only to education but also to the communities in which the colleges are based. The Rust Belt Lab NEH institute educated faculty members from throughout the Rust Belt about the history and culture of that important region of the US, focusing on the importance of regional storytelling in fostering a sense of

place. The project has been instrumental in helping colleges and universities work in their cities to build a sense of community and pride across the Rust Belt. It created new curricula and community engagement programs and birthed a journal, *Rust Belt Studies*. Community engagement was so successful as a result of the institute's work that Trostel was named by *Crain's Cleveland Business* as one of Cleveland's "Forty Under 40" for her Rust Belt work.

Receipt and Termination of MLA's NEH Awards

16. Applying for an NEH grant is a months-long process. The application writing process requires days of work, typically involving not just the project director but collaborators and administrative support from the applicant institution, and often including involvement from university leadership. The process requires outlining the justification, intellectual rationale, and humanities significance for the proposal, which often requires considerable research. Project proposals required detailed planning in advance, providing clear work plans, curricula for workshops, agendas for meetings, and clear financial justifications for the budget. Once submitted, NEH staff and grant peer review—essential elements at the heart of why NEH grants are widely recognized and valued—takes place over months. In short, the timeline from beginning an application to receiving an award can take anywhere from 6 to 9 months. The work leading up to an award is uncompensated labor, and NEH grants rarely cover the full cost of work even when they are received. In short, applicants must invest a considerable amount of time and intellectual labor into the process.

17. As of April 2, 2025, MLA was working under two active NEH awards. Grant DE30783925, "The Current and Future State of Humanities Data," was a \$30,000 Chair's Grant through the Office of Data and Evaluation. Applying for the award involved 4 staff members from MLA in the writing and revision process over the course of several weeks, as well as

support in crafting the budget and submitting the award from the Authorized Organizational Representative (AOR) Terrance Callaghan. Significant research was necessary to scope out the framing that outlined the current state of humanities data that provided the intellectual rationale and humanities significance for the proposal. A pre-proposal was submitted following NEH practice, and staff met with NEH staff to receive feedback, all of which was used throughout the proposal revision process prior to submission.

18. The grant was meant to support a convening and research effort to determine what data currently collected (private, federal, state, and otherwise) informs—or in some cases, perhaps misinforms—public understandings of the humanities. This work builds on years of MLA research efforts, which include:

- our survey of the status of language study in the United States since 1958 through a census of language enrollments;
- our annual study of job market for language and literature PhDs; and
- broader studies related to the humanities academic workforce and working conditions.

19. These efforts employ two full-time and three part-time employees, and include the work of several other employees. The aims of this grant included setting the agenda for the next five years of research on the humanities in higher education, including establishing partnerships across the humanities to help identify common needs, concerns, and opportunities. The grant would have allowed the MLA to build toward the national project of collecting data in the humanities, and the MLA and NEH had both understood how crucial that effort was toward ensuring the future of the humanities in the US. The wasted effort diverted MLA staff time from

other priorities, and the loss of the grant derailed a research direction that would have benefitted humanities departments across the country.

20. Grant ASB29233023, “Reimagining Humanities Coursework for Career Readiness: A Virtual Workshop for Teachers of Languages and Literature,” was a \$58,201 award issued by NEH’s Division of Education Programs in June 2023 to support a two-year development workshop series for college faculty to reimagine humanities coursework to better prepare graduates for careers.

21. Preparation to apply for the award involved 6 staff from MLA in the writing process over the course of several weeks, as well as support in crafting the budget and submitting the award from the Authorized Organizational Representative (AOR) Terrance Callaghan. It required recruiting 7 external workshop facilitators from 7 different organizations, developing a review process for participant applications (100 applications were received for 18 available slots), and crafting a detailed curriculum, work plan, and evaluation strategy at time of application. A pre-proposal was submitted following NEH practice, and staff met with NEH staff to receive feedback, all of which was used throughout the proposal revision process prior to submission.

22. MLA’s subaward in ACLS’s Grant through the Office of Challenge Grants involved at least four staff members.

23. MLA had started an application for the now terminated program “State and Impact of the Humanities” in the Office of Data and Evaluation. Two staff members had drafted a pre-proposal, which was reviewed by two senior staff members. The pre-proposal was submitted according to NEH policy and reviewed by NEH staff. MLA spent several hours

preparing the pre-proposal and planning for the final proposal submission prior to the cancellation of the grant program.

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

25. The did not include any specific information about the grants or how to appeal and appeared to be form letters.

Effects of the Grant Terminations

26. The termination of the NEH award for “The Current and Future State of Humanities Data” and the related elimination of the NEH Office of Data & Evaluation (ODE) harms our organization, the fields we represent, and the broader humanities. The termination of this NEH award halted the planned convening and associated research that would have strengthened collaborative approaches to data sharing across the humanities higher education ecosystem. The loss of the NEH grant brings fiscal harm to the MLA, impacting future funding for a staff position and wasting invested time spent in pursuing the grant (including multiple hours in meetings and drafting several versions of the proposal). The termination of the grant disrupts ongoing efforts in our office of research; the activities and meeting were intended to 1) to strengthen our mutual understanding of what data we have – and lack – in efforts to advance our disciplines in the midst of ongoing budget crises, under-enrollment, and prevailing narratives about the relative value of the humanities, and 2) to identify areas where the humanities are disadvantaged due to data gaps or because of how existing data structures lead to an undervaluing of the contributions of humanities disciplines. This meeting was built on decades of the MLA’s work as a leader in data and analysis in the humanities. The termination of the grant

and erasure of the Office of Data & Evaluation further harms the field, as it prevents the correction of a longstanding lack of data and evaluation across humanities fields, which has disproportionately disadvantaged the humanities relative to our peers in science, technology, engineering, and mathematics disciplines. For example, the humanities lack any governmental equivalent to the National Science Foundation's biennial Science and Engineering Indicators, which places STEM education in a global competitiveness context, a helpful rationale for funding. The elimination of the Office of Data & Evaluation and then further terminating our grant ensures that our knowledge of the impact of the humanities will remain limited, harming all disciplines represented by the MLA.

27. A persistent misperception about the humanities is that undergraduates who major in these disciplines do not find successful employment. Based on the limited data about the humanities that we do have, we know this to be untrue. In fact, humanities undergraduate majors find employment on par with many other popular majors such as biology and other bench sciences. Yet fewer programs exist for the humanities to help students connect with careers in their fields. Our terminated grant, "Reimagining Humanities Coursework for Career Readiness: A Virtual Workshop for Teachers of Languages and Literature" was funded through the NEH Spotlight program (a program that has also been slated for termination). With this funding, we provided professional development for humanities faculty members who wished to better support their students by connecting learning outcomes and skills from humanities classes to career readiness principles. The termination of this grant midstream harms those who were participating in the program, as well as our sharing of the very positive outcomes with others. While we committed to completing core work in order to minimize harm to the immediate participants as much as possible, we did so at a financial loss, manifested largely through staff

time that was already undercompensated (as is often the case for NEH awards) relative to the effort involved. The grant termination also slowed progress in offering new support for other participants in the future.

28. Humanities graduate students and graduate programs, which already lacked the kind of federal support offered by NSF to the sciences, will be further harmed by the elimination of the recent grant to the ACLS, under which MLA held a subaward for \$90,000 over three years. The grant responded to an NEH program for a three-year program of research and discussion that would culminate in a national convening on the future of graduate education. The loss of funding alone harmed the ability of national leading scholarly societies like MLA to identify needs and to strengthen graduate programs across the country that were already under duress, and slowed our ability to respond to and support graduate programs facing massive changes in the past year that have led to program closures and pauses in graduate admissions. We also know from our research how such disinvestment in humanities programs weakens those programs' ability to survive in the competitive higher education marketplace. For example, following the financial crisis of 2008-2009, investment in language programs via Federal Title VI funding dropped. Before the financial crisis, Title VI funding had increased from \$54.58 million in 1998 to a peak of \$110.31 million in 2010 (with federal appropriations lagging in the crisis). It then dropped precipitously to \$68.26 million the following year. Language enrollments, which we have tracked since 1958, also increased through 2009 before falling to, in 2021, a lower enrollment count than was evident in 1998. Lack of federal funding for humanities programs harms the field in ways that are hard to recover from; the terminated NEH grant foreclosed an investment in the future of humanities graduate education at a moment where we

see ongoing harm through program closures and freezes in graduate enrollment that will have generational impact.

29. Not only are programs, departments, institutions, and individuals served by MLA harmed directly by the NEH changes, but grant terminations and the closure of available funding lines destroys both future and past work of MLA members. Clearly, grant terminations that occur mid-stream directly harm the project teams' future work, job prospects, current employment status, and intellectual efforts. But terminations also erase months or years of past work that can no longer come to fruition due to stop work notices and lack of funding. Applying for an NEH grant is a months-long process. The application writing process requires days of work, typically involving not just the project director but collaborators and administrative support from the applicant institution, and often including involvement from university leadership. Once submitted, NEH staff and grant peer review—essential elements at the heart of why NEH grants are widely recognized and valued—takes place over months. In short, the timeline from beginning an application to receiving an award can take anywhere from 6 to 9 months. The work leading up to an award is uncompensated labor, and NEH grants rarely cover the full cost of work even when they are received. In short, applicants must invest a considerable amount of time and intellectual labor into the process, which shapes the possible range of activities the scholar might pursue within the timespan they have allotted for their research, all of which informs the metrics that govern their promotion and possible achievement of tenure. Further, many NEH grants are structured to support planning, development, and implementation stages of projects. A commitment to a project is a commitment at the expense of other options. With these terminations of both grants and programs, MLA members face the erasure of months or years of past work with a number of effects: direct harm through 1) loss of past work because it can no

longer be completed under the terms agreed, 2) loss of the future outcomes that were the promised outcomes of the grant, and 3) loss of future work that would have been dependent on the work the grant was supposed to support.

30. The loss of NEH funding more generally will harm higher education in the United States. The NEH represents the only democratic, open funding processes in the country for humanities scholars. While private foundations provide support for humanities research across the country, the vast majority of those gifts are from invited proposals directed by the foundation itself. In contrast, NEH provides open opportunities for any eligible applicant to submit proposals for funding consideration, a principle aligned with NEH's founding legislation that asserts that "the arts and humanities belong to all people of the United States." NEH's peer-review-based selection process likewise has drawn on the expertise of the diversity of institutions, disciplines, and people.

I declare under penalty of perjury that the foregoing is true and correct. Executed on March 3, 2025 in New York, New York.

A handwritten signature in black ink, appearing to read "Paula M. Krebs".

Paula M. Krebs
Executive Director
Modern Language
Association of America