

EXHIBIT 4

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

AMERICAN ASSOCIATION OF PHYSICS TEACHERS, et al.,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	
	)	
NATIONAL SCIENCE FOUNDATION, et al.,	)	
	)	
Defendants.	)	
	)	

Declaration of Scott W. Delaney, ScD JD MPH

I, Scott W. Delaney, declare that the statements below are true and correct to the best of my knowledge:

1. I am offering this Declaration in my individual capacity and not on behalf of my employer. It is based on my personal knowledge and information that I have reviewed, as discussed below.

2. I am an epidemiologist at the Harvard T.H. Chan School of Public Health (HSPH). My research investigates how environmental, social, and legal forces affect neurodegenerative diseases in older Americans and neurodevelopmental health in American children. I have conducted epidemiologic research at HSPH in various capacities—first as a student, then as a postdoctoral research fellow, and finally as an independent researcher—for 11 years. I hold a Doctor of Science from HSPH (ScD, 2020); a Master of Public Health from the Johns Hopkins Bloomberg School of Public Health (MPH, 2015); a Juris Doctor from the University of Illinois College of Law (JD, 2004); and a Bachelor of Science from the University

of Illinois College of Business (BS, Finance, 2000). Prior to my career in epidemiology, I practiced law in several capacities.

3. Formally, I hold the title of Research Scientist at HSPH. Research Scientists at HSPH have full privileges to conduct independent research and apply for grant funding as Principal Investigators (PIs).

4. I have significant experience with federal grants in the context of awards from the National Institutes of Health (NIH). Throughout my career in epidemiology, I have applied for and received multiple types of grants from NIH either individually as a Principal Investigator or as part of teams. My current research activities are supported entirely by an NIH R01 research grant.

5. I also have familiarity with National Science Foundation (NSF) grants. NSF and NIH funding mechanisms share many features in common. For example, both NSF and NIH grants entail extremely rigorous peer review and federal oversight, and both are exceedingly important to the scientific community in the United States. I have worked directly with students funded by NSF grants (e.g., Graduate Research Fellowship Program awardees) and with scientists funded by a joint NIH/NSF research grant.

6. I am the co-founder of a website called Grant Watch that tracks recent terminations of grants by NIH and NSF. <https://grant-watch.us/>.

7. The origins of Grant Watch date to early March 2025, when I read news articles reporting that the Trump Administration had terminated a large number of NIH grants for vague and undefined policy reasons. These news articles reported that NIH was specifically targeting grants addressing transgender health topics or topics related to “diversity, equity, and inclusion” (DEI), but those terms were never defined in the press. Importantly, news articles contained little

detail on specific examples of terminated grants, and it was not publicly known how many grants had been terminated, which grants had been targeted for termination, or the exact reasons that the grants were being terminated beyond the nominal excuses noted above. This lack of government transparency raised challenges for the health science research community.

8. To address this gap, I created an online spreadsheet using Google Sheets in early March 2025 to crowd-source information on terminated grants. Through social media posts and emails to other academic researchers, I asked researchers to submit information through the Google Sheet detailing any terminated NIH grants about which they had personal knowledge. In response to these efforts, I received suggestions to meet with many other researchers who either had their grants terminated or were interested in the terminated grant tracking effort. One such researcher was Dr. Noam Ross of rOpenSci, who had launched an independent effort to track grant terminations. We met and quickly combined our resources and expertise to aggregate data from a wide spectrum of sources in service of identifying terminated NIH grants. Dr. Ross is the other co-founder of Grant Watch and a full partner in all our efforts.

9. Throughout March and April 2025, our NIH grant tracking effort grew as the Trump Administration continued to terminate a wide spectrum of awards, often *en masse* (i.e., the Administration would terminate tens or hundreds of grants in a single day), and always based only on vague and undefined policy assertions.

10. On Friday, April 16, 2025, I read social media posts and news articles reporting that the Trump administration had expanded its grant termination effort to NSF. Much as with NIH grant terminations, these reports suggested the NSF grant terminations were conducted *en masse* and without transparency. At the time, there was little public information about how many grants had been terminated, which grants had been terminated, or the exact reasons why the

grants were terminated. Dr. Ross and I believed that compiling information about NSF grant terminations was necessary to help the scientific community understand what was happening and to advocate for the importance of continued science funding in the United States.

11. In response, Dr. Ross and I agreed on the evening of April 18, 2025, to begin tracking terminated NSF grants as well. We began publicizing a web form on social media that same day (i.e., on April 18, 2025) to crowd-source and collect information about NSF grant terminations. Within days, we launched an online database of terminated NSF grants, which has continued to grow over time.

12. Our database of NSF grant terminations is based on a combination of multiple sources of information. We aggregate terminated grant information from Principal Investigators and other scientists (i.e., crowd-sourced reports), as well as other user-submitted lists of terminated grants, and we augment this data with information from publicly accessible government databases: NSF's Award Search and USAspending.gov. We also incorporate data from NSF.gov, which published its own list of terminated NSF grants for the first time in May.

13. In late April 2025, my collaborators and I launched the Grant Watch website as a public resource to shine a light on NIH and NSF grant terminations. The website included our trackers of terminated grants from both agencies and a brief description of the methods we use to create the trackers. Because we aggregate data from multiple sources, our trackers are the most comprehensive, up-to-date public resources available of terminated NSF and NIH grants. While NSF.gov hosts the government's official list of terminated NSF grants, which so far to date we have found to be complete, we add a broad number of additional characteristics about each grant, thereby providing considerably more contextual detail than the official government list.

14. By reviewing information in our trackers, including crowd-sourced submissions and other available information about grant terminations, I have observed the following patterns.

15. Overall, the process by which NSF grants have been terminated has been extremely disorganized and chaotic. Widespread grant termination notices have been communicated inconsistently both within NSF and outside of it. For example, I have heard from some NSF program officers that they were not told that certain grants they oversee had been terminated. In other cases, Principal Investigators were not told in a timely fashion that their grants were terminated, and other researchers found out certain grants were terminated before Principal Investigators were informed.

16. The result was widespread confusion, in which NSF staff, university administrators, and PIs were uncertain of the status of certain NSF grants. In fact, PIs often contacted me directly to find out whether I knew if their grant had been terminated.

17. Based on my review of our data, NSF sent out termination notices in multiple large waves. The first wave of grant terminations was on Friday, April 18, 2025. Our tracker identifies 388 grants terminated on that date.

18. Large waves of NSF grant terminations were also sent out over five successive weeks, usually on Fridays, including on April 25, 2025; May 2, 2025; May 9, 2025; Thursday, May 15, 2025; and Wednesday, May 28, 2025.

19. I reviewed over a hundred termination notices submitted to our tracker through our crowd-sourcing efforts. There are no substantive differences or individualized rationales in any of the termination notices I reviewed. They all contain nearly identical boilerplate language.

20. Specifically, the termination notices that I have reviewed all begin with the following language: “The U.S. National Science Foundation (NSF) has undertaken a review of

its award portfolio. Each award was carefully and individually reviewed, and the agency has determined that termination of certain awards is necessary because they are not in alignment with current NSF priorities.”

21. Termination notices in the April 25 and May 2, 2025, waves all seem to contain an identical typo that underscores their boilerplate nature: “not in alignment with current NSF priorites [sic].”

22. The termination notices then say: “Effective immediately, the following are terminated:”. Then, the letters identify the terminated grant(s) by NSF Award Id. The award ID number and the addressee are the only individualized parts of the termination notice.

23. The termination notices then say: “NSF is issuing this termination to protect the interests of the government pursuant to NSF Grant General Conditions (GC-1) term and condition entitled ‘Termination and Enforcement,’ on the basis that they no longer effectuate the program goals or agency priorities. This is the final agency decision and not subject to appeal. Costs incurred as a result of this termination may be reimbursed, provided such costs would otherwise be allowable under the terms of the award and the governing cost principles. In accordance with your award terms and conditions, you have 30 days from the termination date to furnish an itemized accounting of allowable costs incurred prior to the termination date.”

24. I reviewed the list of terminated grants and found that NSF has terminated grants across a wide range of program areas. NSF is organized into eight directorates that are based on academic disciplines or directorate goals. The largest number of grant terminations was in the STEM Education directorate, which supports efforts to train the next generation of American scientists, technicians, engineers, mathematicians, and educators. But NSF also cut millions of dollars of grants in each of the other directorates, including Biological Sciences; Computer and

Information Science and Engineering; Engineering; Geosciences; Mathematical and Physical Sciences; Social, Behavioral and Economic Sciences; and Technology, Innovation, and Partnerships.

25. NSF also terminated grants that were awarded to fulfill statutory mandates to promote diversity. One example is the “Eddie Bernice Johnson Inclusion across the Nation of Communities of Learners of Underrepresented Discoverers in Engineering and Science Initiative,” or the “Eddie Bernice Johnson INCLUDES Initiative.” Before NSF started terminating awards in April 2025, there were 87 active awards under the INCLUDES program. NSF has since terminated 40 of those awards, or 46% of the prior total number of such awards. I determined these numbers by searching NSF’s public awards database (<https://www.nsf.gov/awardsearch/advancedSearch.jsp>) using the Element Code associated with the INCLUDES program (032Y00) and date parameters for active and expired awards with end dates on or after April 18, 2025. I compared the results of the search against NSF’s list of terminated grants (<https://www.nsf.gov/updates-on-priorities#termination-list>) and our Grant Watch database.

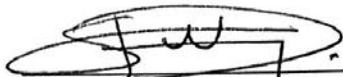
26. Another example is the Louis Stokes Alliances for Minority Participation (LSAMP). Before NSF started terminating awards in April 2025, there were 139 active awards under the LSAMP program. NSF has since terminated 92 (66%) of those awards. I determined those numbers using the same approach described in the previous paragraph, but using the Element Code associated with the LSAMP program (913300).

27. Based on my experience as an academic researcher, I believe the mass termination of NSF grants will have a devastating effect on scientific research in the United States. Unless these terminations are reversed quickly, many scientists’ careers will be

permanently derailed by this sudden and unexpected loss of funding. Students and young faculty will be particularly harmed. Their careers in science may never recover if and when they seek alternative professions. As a result, the Trump Administration's widespread summary NSF terminations have imperiled America's future as the global leader in scientific research.

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

Executed this 17 day of June, 2025.



SCOTT W. DELANEY