

February 24, 2014

Mr. David S. Ferriero
Archivist of the United States
National Archives and Records Administration
700 Pennsylvania Avenue, NW
Washington, DC 20408-0001

Dear Mr. Ferriero:

The Association for Documentary Editing, which as you know represents a diverse community of individuals and projects working on a variety of textual materials for publication in various electronic and print formats, respectfully asks that the comments period for the proposed changes to the NHPRC's grants program be kept open through April 30.

The Overview of Proposed Changes to the NHPRC Grants Program appeared on the Annotation blog of archives.gov on February 13. The closing date for comments is February 27, allowing only two weeks for comment on policy changes that, according to the Overview, took two years to develop. The report on The Digital Citizen and the American Record, which is cited in the announcements of the proposed new grant programs, has not yet been released. On a practical level, this proposed transformation has generated confusion and concern among current recipients of grants. Some activities that presently qualify for NHPRC grant support, and which in some cases constitute a significant part of the performance objectives of current grants for publications projects, will no longer qualify if the changes are implemented. For some projects, even if they qualify, the timetable for submission of applications and decisions by the Commission will change significantly with no allowance for adjustment by the projects or their sponsoring institutions.

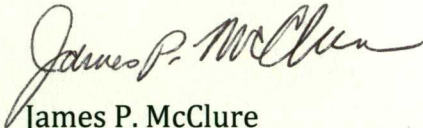
More fundamentally, the proposed new grant programs will overturn the Commission's longstanding role in the creation of authoritative editions of American historical documents. A transformation of this magnitude deserves and requires thoughtful discussion and evaluation by users and audiences of the editions, as well

as editors, sponsoring institutions, and the academic presses that are partners in the editorial enterprise.

That discussion cannot take place by February 27, or in time to allow implementation of the proposed changes to meet the FY 2015 grants cycle.

For decades, NHPRC support has been crucial to editions that make the record of the nation's history accessible to the American public. These proposed changes demand more consideration than is possible in the proposed timetable.

Sincerely yours,



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cc: Kathleen Williams, Executive Director, NHPRC
Lucy Barber, Deputy Executive Director, NHPRC