Drees's What Are the Humanities For?

with Peter Harrison, "Defining and Defending the Humanities"; Michael Ruse, "Willem Drees on the Humanities"; Douglas F. Ottati, "Theology among the Human Humanities"; Lisa L. Stenmark, "Who are the Humanities For? Decolonizing the Humanities"; Donald L. Drakeman, "Some Second Thoughts about the Humanities"; and Willem B. Drees, "The Coherence and Character of the Humanities: A Reply to Critics."

SOME SECOND THOUGHTS ABOUT THE HUMANITIES

by Donald L. Drakeman

Abstract. Willem Drees' excellent What Are the Humanities For? triggered a series of second thoughts about the role of the humanities in modern society. These include several topics on which he and I agree but where we may be out of step with current trends, such as a dedication to "value-free" scholarship and the continuing importance of the academic study of religion. It also provided an opportunity to question why religion has been excluded from policy debates involving the principal interface between science and religion in the twenty-first century: the creation of new medicines and their delivery to the billions of religious people around the world. Finally, I question the assumption that studying the humanities necessarily promotes critical thinking and argue that achieving that goal is more important now than ever before.

Keywords: academic freedom; critical thinking; humanities; public health; religious studies

A medieval Master of Arts could teach philosophy and all seven of the classical liberal arts, from astronomy to rhetoric (Clark 2006, 45). In today's complex aggregation of specialties and subfields, few scholars are knowledgeable across the bounds of even one discipline, let alone the full range of arts and sciences. It was a rare opportunity, in reading *What Are the Humanities For?* (Drees 2021), to see how Willem Drees has not only mastered the original liberal arts, but also has oriented them within the considerably broader range of subjects embraced by modern universities. His fluency across so many fields will, I hope, inspire other scholars to

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appreciate the widespread work of the twenty-first-century university, and to find more opportunities for cross-fertilization. As Professor Drees has shown throughout his many writings, the long march from medieval master to present-day professor need not trap us in narrow specialties, despite a seemingly inevitable trajectory that threatens to splinter higher education into ever more narrowly defined programs, centers, and sections.

One of the most striking aspects of *What Are the Humanities For?* is how much I agreed with Professor Drees about nearly everything. (I have not found this to be a common experience in reading academic books.) When I read that his project was to "seek understanding of the understanding of human self-understandings" (13), I may have wondered if he had fully achieved the blurb's stated aim of accessibility, but it made sense to me. He succeeds admirably in realizing that meta-meta understanding by showing how so many different disciplines and methodologies do, in fact, share a common focus. But rather than end here, on a purely congratulatory note of general agreement, I thought it might be useful briefly to reflect on what we might both be wrong about. After all, we are about the same age, received PhDs in religion at about the same time, obtained advanced degrees in other academic disciplines, spent a considerable amount of time talking about science with scientists, and wrote books about the humanities. Perhaps our views, which have been shaped by a number of shared circumstances, need to be given a second thought.

Academic Freedom

The issue on which we agree that is probably generating the strongest opposition at the moment is the idea that there should be "academic distance from ... political and ideological interests" (101), that scholarship should be "value-free" (102), and that it is important to have an environment characterized by "civility" and "patience" (92). Universities in various countries are struggling to determine to what extent academic freedom, free speech, and even civility are essential to the educational enterprise (Whittington 2018; Baer 2019; Smith 2020). In fact, it is not clear that the value-free pursuit of knowledge has even been a desired outcome throughout much of higher education's history.

Cambridge and Oxford, for example, were Anglican institutions for centuries. In the early seventeenth century, King Charles I was concerned about incipient signs of independent thinking at those universities, especially on the subject of the Church. An official declaration was adopted explicitly for the purpose of "avoiding ... Diversities of Opinions." The king's declaration proclaimed that any professor or student who "put his own sense or comment to the meaning" of any of the Church's 39 Articles and "fail[ed] to take [them] in the literal ... sense shall be liable to our

displeasure," which was not a comforting thought in the era of the Star Chamber (*Articles* 1629, 5).

Some who found this heavy-handed enforcement of orthodoxy stifling moved to Massachusetts, where they had the freedom to create both a new university and a new orthodoxy. Harvard's Dudleian Lectures, the oldest endowed lecture series in American higher education, were established in 1750. The four rotating topics were spelled out in detail in the donor's will. One is "against Popery," with the lecturers enjoined to show how "the church of Rome is that mystical Babylon" known for "tyranny, usurpations, and ... crying wickedness in ... high places" (quoted in Maier 1985, 18). Vast numbers of religious colleges and universities were subsequently founded in America, each with the goal of promoting the spread of one approach to religious education to the exclusion of others.

Throughout the history of higher education, the perceived need for doctrinal loyalty has not always been theologically based. During the Cold War, a number of American states required professors in their university systems to sign loyalty oaths. Although many of the oaths were eventually struck down by the Supreme Court in 1967, California's somewhat milder oath remained on the books. As recently as 2008, a controversy arose when a Quaker professor was required to swear (that is the first problem) that she would defend the Constitution of California and the United States against enemies (that is the second problem, especially if that defense could include bearing arms) (Heins 2008).

What this very brief history tells us is that, within higher education, there have been regular and repeated efforts to establish orthodoxies and marginalize dissenters. Today, the Star Chamber may be gone, but well over 100 Princeton University professors recently petitioned to establish a faculty committee to investigate and discipline other Princeton professors for racism in their research and publications (Smith 2020).² These kinds of contemporary concerns over racism in academic research have been raised in virtually every field of inquiry, including the sciences (Garrod 2006).

Value-free, objective scholarship in an environment of academic freedom marked by patience and civility is, in my view, the right goal, but it is not one that has frequently been achieved, or even desired, throughout academic history. The alternatives keep recurring because they are rooted in a desire to do something that sounds eminently sensible: to distinguish good ideas from bad ones, and to promote the good ones to the exclusion of the bad ones. Professor Drees and I may have grown up in an environment as close to our shared vision of what it should be as can be found in the history of scholarship, and he has been an articulate advocate for that approach in this book and elsewhere (Drees 2008). However, that vision will continue to be challenged, and it is not clear at this point that we will ultimately find ourselves on the winning side of twenty-first-century academic history.

Religion and Science

Another point of view we share is the important place for the academic study of religion (or religious studies) in the modern university, even if, as Professor Drees points out, the discipline of theology has descended from its position as the highest of the "higher faculties" (the others being Medicine and Law) into the sphere of the humanities, thus plummeting into the "lower faculties" of arts and philosophy (73), the fields one historian of education has called the "last and least" in prestige, wealth, and power (Clark 2006, 81).³ Professor Drees' discussion of the current incarnation of the field is on the mark, but my concern is that contemporary descriptions of the academic study of religion often have a tendency to feel like apologias—justifications for why the study of religion deserves to be included when the modern university is dedicated to science and reason.

Religion's place in the curriculum is by no means secure. Psychology Professor Steven Pinker opposed the establishment of a "Reason and Faith" general education requirement at Harvard, noting that "faith" is just "a euphemism for 'religion." For Harvard to "magnify the significance" of religion by including it with other requirements in science, culture, world history, and current affairs would be "to give it far too much prominence." In fact, he argued, the basic and contested question of whether "religion is a major force is ... best left to our colleagues in history, government, and area studies." Such a reason-and-faith curricular requirement, he posited, would be merely "an American anachronism ... in an era in which the rest of the West" is moving on (Pinker 2006).

In light of these kinds of comments, it is not surprising that we feel a need to defend the academic study of religion, especially since, even in anachronistic America, "religious studies departments are on the chopping block" (American Academy of Religion 2020). We may again be on the wrong side of history, but we should not go quietly. Perhaps it is time to shift our position in these discussions from defense to offense, lest the rest of our colleagues lose sight of the fact that there are over five billion people around the world for whom being religious is part of their self-understandings (Pew Research Center 2015).

Academic attitudes similar to those expressed by Pinker are preventing religion from being taken seriously at what may be the principal interface between science and religion in the twenty-first century: the creation of new medical treatments and their delivery (or not) to those 5 billion religious people and their neighbors. When the government controls decisions about health care access and distribution, the formation of public health policy is frequently a matter of life and death. For many millennia, and still today, religion has been a major, often *the* major, way in which vast numbers of people think about life and death issues. It would therefore seem reasonable for health policy experts and officials to consider how

religion and religiously derived values should be taken into account when making society-wide health care decisions. Yet, those potential religious inputs are frequently dismissed as irrelevant at best, and counterproductive at worst.

Ouite recently, for example, the editor-in-chief of the leading journal in the field, the American Journal of Public Health, described the journal's position on religion as follows: "Religious beliefs tend to be divisive, across religious faiths or between those who have a faith and those who do not. This is why we avoid confronting religious values in AIPH." Although he then notes that faith-based organizations should not automatically "be excluded from mainstream public health," he adds the caveat that they must first be committed to a proper view of "health equity" (Morabia 2019, 341). Faith-based organizations can thus play a role in the *implementa*tion of health policy decisions, such as by encouraging the immunization of underserved populations, but not in *establishing* those policies in the first place. As Katelyn Long and her colleagues have pointed out, "Secular academic public health is intellectually influenced in great part by enlightenment liberalism, which tends to consign religion to the private domain" (2019, 415). Tyler VanderWeele and Harold Koenig add the observation that when religion is discussed at all in "public health curricula ... it is often in the context of being an impediment to public health progress" (2017, 47). It is, perhaps, not surprising that the fairly new *Journal of Re*ligion and Public Health was launched not by a university in what Pinker describes as the West but by The State Islamic University Syarif Hidayatullah Jakarta, Indonesia (Journal of Religion and Public Health 2019).

To achieve public health policy's goal of moving beyond religion and its propensity for divisiveness, the field focuses on what are generally described as universal principles. But even nonreligious people do not agree on these universal principles, leading public health policy makers such as the U.K.'s NICE (the National Institute for Health and Clinical Excellence) to set "procedural justice" as the ultimate goal. To achieve procedural justice, "decision-makers [must] be 'accountable for their reasonableness'" through a process that includes "publicity, relevance, challenge and revision, and regulation" (2005, 9). NICE sets out these policy goals at length in a "Social Value Judgements" document, where it explicitly relies on the work of two Harvard professors, Norman Daniels and Daniel Sabin, whose classic text on public health decision-making does not even have an index entry for "religion" (Daniels and Sabin 2002).

Religion scholars should be joining these discussions, not only by reminding the decision makers of the religiosity of the public whose health care is being regulated, but also by exploring the nature of this faith in reason, that is, the belief that there are completely secular universal principles, and that we, as a global or even national society, can identify and agree upon them through a reasoning process. Those of us interested in

the intersection of religion and politics might also question the viability, as durable public policies relating to life-and-death issues, of public health decisions that have been made without taking into account so many people's religiously based self-understandings. As Professor Drees suggests, a "plea for neutral discourse in the public sphere, and a clear distinction of public and private" may be "too grandiose" (91).

Finally, we might also ask whether many people actually subscribe to the views that have been expressed by the AJPH's editor, NICE, and Sabin and Daniels—that is, that important decisions can and should be based on universal secular principles. We can get a reasonably good sense of the answer to that question due to decades of surveys in moral development stimulated by the work of psychologist Lawrence Kohlberg and his numerous followers. Kohlberg identified six stages of moral development, from "naïve moral realism" (Stage 1) to the "morality of universalizable, reversible and prescriptive general ethical principles," where procedural justice "becomes a solution to substantive justice problems" (Stage 6) (Colby and Kohlberg 1987, 1:25, 31). The formation of public health policy through a dedication to procedural justice in evaluating universal principles of equity and equality, as pledged by NICE, would seem to fit securely in Stage 6. Meanwhile, religious understandings would typically fall in Stages 3 or 4. Stage 3, "interpersonally normative morality," is based primarily on people's understanding of what a good person would do, which, depending on the community, may or may not involve following particular religious precepts and commitments. Stage 4 involves a broader, social system-wide view, which could be based on the concept of a "higher moral or religious law," and moral judgments may be "made in reference to ... moral and religious institutions and systems of belief" (Colby and Kohlberg 1987, 1:28). Then, in Stage 5, the perspective shifts to that of "a rational moral agent aware of universalizable values and rights" (Colby and Kohlberg 1987, 1:29).

Much has been written about Kohlberg's stages of moral development, but what is most relevant for present purposes are the survey results on one particular point: How many people reflect a Stage 5 or 6 approach, or what is typically called "postconventional thinking" about universalizable values? The answer is: not many. After 25 years of in-depth surveys, Kohlberg's team of researchers dropped Stage 6 and its focus on procedural justice, because "none of the longitudinal subjects in the studies ... clearly indicate[d] a focus of reasoning distinct from Stage 5," with the possible exception of one person with "graduate training in philosophy" (Colby and Kohlberg 1987, 1:32–33, 73). In the survey results, even Stage 5 appears fairly infrequently, with a mixed 4/5 or 5 score appearing only in "one sixth to one eighth" of the adults in a 20-year longitudinal survey (Colby and Kohlberg 1987, 1:101). Meanwhile, the vast majority of adults registered "conventional" moral reasoning in the Stage 3 to Stage 4 range

(Colby and Kohlberg 1987, 1:101). Subsequent review studies show "little serious evidence for Stage 5 [or 6] scoring in Kohlbergian studies from around the world" (Rest et al. 1999, 34). A revised "neo-Kohlbergian" test identified one subpopulation that scored the highest of any group by evidencing a substantial amount of postconventional thinking: "graduate students in moral philosophy and political science," with medical students somewhat behind but also much closer to postconventional thinking than the general population (Rest et al. 1999, 89–90).

In short, most people are conventional moral thinkers, and large numbers of them understand themselves as being religious. Those religious self-understandings may well include commitments to particular religious values in life-and-death decision-making contexts. Meanwhile, medical students and graduate students in moral philosophy and political science are the people who are most likely to become the public health decision makers of the future—note that the two Harvard bioethicists cited by NICE are a physician and a political philosopher—and they tend to take postconventional approaches.

In light of the attitudes expressed by public health professionals and their academic colleagues, it is not surprising that scholars have said that, in general, "public health interventions and programs are rooted in utilitarian ethics," a classically postconventional approach (Bellefleur and Keeling 2016, 1). It should also be expected that there will be occasions on which the conventionally minded public will object to the utilitarian policy's failure to take into account strongly held beliefs that are not easily embraced by a consequentialist calculus. For example, the greatest good for the greatest number policy approach has already led to multiple cases in the U.S. federal courts during the COVID crisis. In the midst of battling the global pandemic, health officials had to spend time litigating whether, for example, gambling casinos in Nevada, with their obvious contributions to the Las Vegas economy, can be subject to fewer restrictions than churches, whose benefits to society, or even to their members, fit less easily in a utilitarian equation.⁵

Even in the United Kingdom, where the National Health Service has been rated more popular than either the Royal Family or the London Olympics as "a symbol of what is great about Britain," NICE has come under fire when its utilitarian judgments have conflicted with more conventional decision-making (Katwala 2013). When expensive new cancer drugs failed to generate enough "quality adjusted life years" to be recommended for use by the NHS, intense political pressure led Parliament to establish a special Cancer Drugs Fund to pay for them outside the NHS budget. This "politically created exception to some of the principles at the heart of the United Kingdom's most popular institution" shows that even a national commitment to postconventional aspirations will not necessarily endure in a world of largely conventional thinking (Drakeman 2016, 43).

Religion scholars have an opportunity to play an important role in how modern society deals with the difficult issues presented by the creation and development of new medical interventions. At present, while many of the most influential public health professionals are consciously ignoring religiously based input, the opposing arguments are being made primarily by religious groups seeking a seat at the policy-making table, which can seem like special pleading for a particular religious tradition. Here, objective-as-possible, value-free scholarship about the role of religion in modern society, together with careful analyses of the ontological and epistemological issues related to the concept of secular universalizable values, could provide an outstanding example of engaged scholarship.

THE HUMANITIES AND COMMERCE

This discussion of public health decision-making brings us to a topic on which Professor Drees and I diverge, although possibly less than it may appear. He was kind enough to mention my Why We Need the Humanities book, which highlights the instrumental importance of the humanities. One of my arguments is based on the key role of distributive justice decisions by public health policy makers for the future of the biopharmaceutical industry, and hence for the likelihood of continued progress in the creation of new medicines (Drakeman 2016, chapter 2). But then he says that describing humanities "research as useful problem solving, and counting impact in terms of ... commercially marketable outcomes relies upon a rather shallow and naïve view of what a society is" (179). Had he used the word "solely" once or twice in that sentence, we would have been in full agreement. But, as written, it leads to the basic question: If the humanities really do have instrumental value, even value that has a "positive 'return of investment'" (179) in commercial terms, why does it demonstrate a shallow or naïve understanding of society to frame the issue that way?

The answer to that question may be that the desire for a sharp divide between the humanities and practical things has been with us for millennia. Classicist Eric Adler points out that, "as far as the ancients were concerned, the non-freeborn person could learn a trade, but such pragmatic fare was too uncultured for the elite. Freeborn people, they thought, should experience an education attuned to higher ideals" (2020, 42). What the Romans called the *studia humanitatis* "comprised all those [liberal] arts not deemed unbecomingly technical and utilitarian" (Adler 2020, 43). When scholars fret that many people today describe the humanities as "useless" (Nussbaum 2010, 2), perhaps that is because not being useful was the original plan.

Yet, if our goal is that of Professor Drees, that is to seek understanding "of the ways in which people ... construct and experience the world they

live in" (7), then we need to understand that a large portion of the human population understands themselves, at least in part, as owners or employees of for-profit, commercial enterprises, to which they will dedicate nearly half of their adult waking hours. Many see themselves as performing a valuable societal role by contributing to the profitability of a business that provides employment opportunities for their neighbors and tax revenues to support their communities. They may even be grateful that their work supplies the financial means by which the members of their households can pursue their "multiple interests of various kinds" (179). As we humanities scholars seek to understand their self-understandings as workers, as breadwinners, and as contributors to the commercial marketplace, we would do well to learn about what those activities mean to them, and to society, irrespective of "whether [we as] scholar[s] share ... those beliefs or values" (17). And if, in the course of doing so, we discover something that we ourselves do, as humanities scholars, that also makes a contribution to the economy, we should talk about it.

These are nevertheless uncomfortable topics for many contemporary humanities scholars. We could avoid them altogether if we simply returned to the way the humanities have been created, nurtured, and evaluated for much of human history: by doing them on our own time. Montesquieu's inheritance let him retire to the life of the mind; Renaissance painters had patrons or wealthy spouses or earned money by painting portraits of rich burghers; David Hume was a librarian; John Stuart Mill spent his career with the East India Company; and T.S. Eliot worked in banking and publishing. Earlier in humanities history, "Medieval academics typically made their living by [personally] collecting fees from [the students attending] lectures and examinations" (Clark 2006, 44). Humanities students at the same time supported themselves by taking notes in law and medical courses so the wealthier students in the higher faculties did not have to spend their time attending lectures (Clark 2006, 87).

More recently, Institute for Advanced Study founder Abraham Flexner famously celebrated the "Usefulness of Useless Knowledge" (175), but we need to read his wonderful article in context. The Institute, "where members would endure no faculty meetings, suffer no committees, supervise no students, and, ultimately, have, as he put it, ... 'no duties—only opportunities," was not funded by the government, but by wealthy families (Drakeman 2017). The "Useless Knowledge" article had a companion piece, "Adventures in Money-Raising," which explains how he successfully talked the Rockefellers, Carnegies, and other families who had accumulated massive industrial fortunes into supporting scholarly research. University leaders would do well to consider it required reading (Flexner 1939, 1940).

To be sure, the value of the humanities is much greater than their contributions to medicine, health, and commerce. Reading and writing about

the humanities is just as intrinsically important as we read in the beautiful prose of scholars such as Zena Hitz (2020) and Stefan Collini (2012). For me, doing so has been a labor of love for nearly 50 years—while I earned a living doing something else. I would recommend it to everyone. But, once humanities scholars ask society to be paid from the public purse—especially to be paid for doing something as personally fulfilling and intrinsically valuable as seeking to understand the human condition—we should be willing to answer Helen Small's rhetorical question: "Are academics seriously unwilling to concede that activities for which they receive public money should be partly assessed in terms of measurable benefits passed on to society?" (2013, 62). That the humanities can help resolve important issues of public policy involving a large segment of the economy would seem at least to be a reasonable part of an answer to that question.

In fact, I am pleased to report that both Professor Drees and I have directly contributed to corporate profits, even in our own scholarship. We have both chosen to share some of our research by publishing books with Routledge Press (Drees 2010; Wilson and Drakeman 2020), a subsidiary of Informa PLC. From our perspective, we are authors of peer-reviewed scholarly works that have been published by a highly regarded academic press. From the publisher's perspective, we are freelance content providers for the most profitable division of a fast-growing global media company (Informa 2019). Describing it that way may sound shallow in the halls of academia, but it is just one more place where the humanities contribute to the successful practice of capitalism.

CRITICAL THINKING AND THE HUMANITIES

I would like to highlight one more humanities issue on which I think Professor Drees and I agree, but where we may be overly optimistic. We have gone along with, or at least not challenged, the traditional arguments that studying the humanities fosters critical thinking. This topic deserves far more attention than I can give it here, but at the very least I think we should award that frequently espoused claim the traditional Scottish legal verdict of "Not Proven."

Many of the historic arguments for the humanities' ability to foster critical thinking have centered on the mental discipline developed by studying Latin and Greek (Brock 2000; Adler 2020). For the most part, university curricula have abandoned the classical language requirements, but not the critical thinking conclusion that accompanied them. Nor have we thought critically about whether studying the humanities is better than, or even as good as, education in the STEM fields in building critical thinking skills.

Complicating these arguments further is the fact that we do not have a good definition of "critical thinking," although I would be happy at least to start with the task Professor Drees sees as being "important for all citizens in our time": "critical analysis of online sources, their rhetoric, and their plausibility" (121). In this observation, he has not only identified a key goal of critical thinking, but also pointed in the direction of something new in the history of higher education that should encourage us to rethink our approach to the humanities' teaching mission in the modern university.

Historically, universities were places where scholars, who owned otherwise unavailable books, read those books aloud during lengthy lectures (Clark 2006, 70–71). Students needed to go to the universities to learn things because that was literally where the knowledge resided. Examinations would measure how well the students absorbed that knowledge, and then, upon graduating, the students went out again into the nonacademic world, where many of them would have few additional opportunities to come into contact with the breadth of information that they had experienced in their university studies.

Times have changed. Now, nearly all college graduates routinely carry the twenty-first-century equivalent of the Royal Library at Alexandria in their pockets. Every minute, that easily searchable electronic library grows ever larger with new information. We scholars are no longer the keepers or curators of the universe of knowledge, nor, I suspect, the primary place students obtain information, even during their university studies. Since we can no longer effectively filter that knowledge transfer through our own critical thinking faculties, we need to teach students how to tell good information from bad—to perennially ask themselves, "How do we know what we think we know?"—whether they read it in a book, a scholarly article, or a blog.

Yet while universities' role in the world has fundamentally changed, many of our attitudes about teaching and learning have not. A quick glance through university catalogues shows how many of our humanities courses are organized around a particular body of knowledge. Too often, questions about where that knowledge comes from are relegated to research methods courses (often primarily for postgraduate students) or epistemology classes in philosophy. But, in the current environment, all of our students need to be constantly echoing the 2,400-year-old dialogue between Socrates and Theaetetus about what knowledge really is.

Critical thinking, especially in the acquisition and evaluation of new knowledge, needs to be an even more fundamental component of the definition of an educated person than ever before. If there is a divide between the humanities and the sciences, it is that the scientific method has a built-in epistemology. It is not clear to me that the humanities will likewise develop a standard methodology (or even that one would be feasible), but we need to recognize that, if we really want to live up to our "critical thinking" billing, we need to devote far more energy and attention to training our students to think about what knowledge is, and to teach them how to

evaluate arguments and assertions. They need to leave the university not only with a degree testifying to the mastery of a body of knowledge, but also with the intellectual tools to decide on the reliability of the purported knowledge that they will encounter for the rest of their lives. If the twenty-first-century humanities succeed in doing only this, they would be making an extremely valuable contribution to the common good, and would provide us with an excellent answer whenever we are asked, "What Are the Humanities For?".

Notes

- 1. Harvard has decided to revise the donor-mandated "against Popery" topic to broadly encompass "Roman Catholicism and Protestantism" (Dudleian Lectures 2020). Professor Drees would be an outstanding Dudleian lecturer for one of the other specified topics: "natural religion."
- 2. For a description of reactions to the petition, which included many other proposals, see Tomlinson (2020).
- 3. While theology/religion worked its way down, one might make an interesting argument that business took its place, at least to judge by facilities and faculty compensation.
- 4. For its status as the top international journal of public health, see the Google Scholar citation metrics, as well as Merigó and Núñez (2016).
 - 5. See, for example, Calvary Chapel Dayton Valley v. Sisolak, 591 U.S. (2020).
- 6. Among the countries worldwide with available public and private sector data in 2018, 82% of employees worked in private-sector jobs while only 18% of employees worked in the public sector (see International Labour Organization 2018).

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