November 19, 2026

The Honorable Russell Vought
Director, Office of Management and Budget
725 17th Street, NW
Washington, DC 20503

**Re: Proposed Revisions to the Uniform Guidance, 2 CFR Part 200 (Docket OMB-2026-0034)**

Dear Director Vought:

We write as scientific publishers and societies to urge you to halt the proposed revisions to the Uniform Guidance in full and to revisit them with the research community and other stakeholders before any final rule is issued. In particular, we oppose the proposed restrictions on the use of federal research grants to publish findings, access scientific journals, participate in professional societies, and attend scientific conferences. These activities are essential to rigorous research and to turning discoveries into knowledge and practical benefits for society. Restricting them would undermine the return on taxpayers' investment in American science.

Federal support for basic research across a broad range of disciplines lays the groundwork for discoveries whose applications may not be apparent for years. Its full value depends on sustained inquiry and the ability to connect findings across fields. One laboratory's findings become another's starting point when researchers can examine the evidence, assess the methods, and build on the results. Publication, access to scientific literature, and professional exchange are essential to that process, not optional expenses added after the important work is done.

Scientific publishers invest substantial resources in editorial expertise, peer review management, research integrity safeguards, and preservation to maintain a scientific record that can be scrutinized, corrected, and built upon. Researchers contribute essential expertise as authors, editors, and reviewers. The quality control required to achieve gold standard science involves significant coordination and resources that researchers and their institutions cannot reliably supply themselves. Scientific societies also develop professional standards, provide specialized education, and convene expert communities to test emerging ideas.

The proposal would weaken this work in three connected ways.

First, it would generally prohibit researchers from using grant funds to cover publication costs. Section 200.461 would make article publication charges (fees charged to publish articles open access) and other publication costs unallowable except where expressly required by statute or approved case by case by the awarding agency. Making a manuscript available is not the same as maintaining a peer-reviewed scientific record. Publication provides editorial scrutiny, integrity checks, indexing that helps readers find relevant work, preservation, and a living record of corrections. It also helps researchers meet federal public access requirements.

Improving publishing's efficiency and effectiveness is a legitimate goal. But disallowing publication costs does not eliminate the need for editorial scrutiny, research integrity safeguards, preservation, and correction. Nor does the prospect of future AI capabilities establish that these functions can be reliably replaced today, and any alternative would itself require resources to operate. Publication represents a small share of federal research spending, which NIH estimates at less than 1 percent of overall grant spending per year, yet it plays an outsized role in determining how effectively findings are communicated, scrutinized, and put to use. Restricting that support risks sacrificing the benefits of a much larger research investment for a reduction in eligible expenses.

Second, it would prevent grant funds from paying for journal subscriptions and require prior written agency approval for professional memberships. Section 200.454 would restrict support for literature researchers need throughout a project: to design sound studies, identify relevant methods, assess new findings, and avoid

repeating work already done. Researchers need access to relevant evidence regardless of where or how it was published. Removing grant support risks leaving them less informed or forcing institutions to divert resources from other research activities.

Professional memberships sustain the continuing exchange among scientists in the same and adjacent fields through which methods are improved, ideas are tested, and new collaborations take shape. These relationships help individual grants bear fruit. Requiring researchers to demonstrate that a membership is necessary for a particular grant overlooks how science advances: projects draw on expert communities built and maintained over time.

Third, it would make conference attendance costs dependent on advance agency approval incorporated into an award's terms and conditions. Section 200.432 does not adequately account for how research develops. When applying for a multiyear grant, researchers cannot always anticipate which meetings will be most relevant to findings that emerge later. Conferences allow them to challenge preliminary results, improve methods, and find collaborators and practical applications. Rigid approval requirements would add delay and uncertainty, particularly for early-career researchers and institutions with limited administrative resources.

The combined effect matters. Researchers read existing work, test and refine ideas through scientific exchange, and publish findings that others can build upon. Restricting all three activities would weaken the connections that make individual projects more valuable to science and the public. In specialized fields, the journals, meetings, and professional expertise provided by smaller societies may have few ready substitutes.

The U.S. cannot take its position at the forefront of research for granted as other research-intensive nations invest heavily in their own scientific infrastructure, publishing included. Its position depends on sustained support in a broad scientific base and on how quickly researchers, industries, and the public can evaluate and build on discoveries. Robust federal investment in basic research is the foundation of that position, but its returns depend on validated results being shared and usable by those who can act on them first. Patent examiners use published literature to assess whether an invention is new, and companies and agencies use it to evaluate technologies and inform decisions affecting public health, agriculture, national security, and the economy. The scientific record helps businesses translate taxpayer-funded discoveries into new products, services, and economic growth. Trustworthy AI-enabled discovery depends on trustworthy scientific inputs. Models trained on unreliable or poorly documented research risk amplifying errors and generating misleading results. As the U.S. pursues increasingly capable AI systems and the promise of superintelligence, the quality of the scientific knowledge underlying those systems becomes more important, not less. These restrictions would weaken the broad foundation of knowledge on which American innovation depends and diminish the nation's ability to contribute to and benefit from scientific research.

Withdrawing this proposal would preserve the use of the small portion of federal grant funds that support research-related publication costs, journal subscriptions, professional memberships, and conference participation, subject to appropriate accountability and existing cost principles. Until these concerns are resolved, we support continued bipartisan congressional action to prevent OMB from finalizing these restrictions and agencies from imposing equivalent restrictions through their own rules or grant policies.

Responsible stewardship means maximizing the public value of research investment, not simply reducing the expenses a grant may cover. Federal policy should help researchers turn findings into reliable knowledge and practical advances, not place new obstacles in their path.

Sincerely,

The Academy of Legal Studies in Business
American Academy of Periodontology
American Association for Marriage and Family Therapy
American Association of Family & Consumer Sciences
American Association of Physicists in Medicine
American Association of Public Health Dentistry
American Association of Suicidology
American College of Clinical Pharmacology

American College of Clinical Pharmacy
American College of Nurse-Midwives
American College of Prosthodontists
American Council on the Teaching of Foreign Languages
American Dental Education Association
American Geophysical Union
American Neurological Association
American Oil Chemists' Society
American Society for Clinical Pharmacology & Therapeutics
American Society for Photobiology
The American Society of Mechanical Engineers
Association for the Advancement of Blood & Biotherapies
Association for the Sciences of Limnology and Oceanography
Botanical Society of America
Earthquake Engineering Research Institute
Eastern Finance Association
Eastern Sociological Society
Ecological Society of America
Environmental Mutagenesis and Genomics Society
Federation of American Societies for Experimental Biology
The Institute of Food Technologists
International Society for Advancement of Cytometry
International Society for Bipolar Disorders
International Society of Magnetic Resonance in Medicine
John Wiley & Sons
Journal of Money, Credit and Banking
Metaphilosophy
Midwest Political Science Association
National Council on Family Relations
National Ground Water Association
The New York Academy of Sciences
Peripheral Nerve Society
Policy Studies Organization
The Protein Society
Research Society on Alcohol
The Russian Review
Society for Conservation Biology
Society for Consumer Psychology
Society for Ecological Restoration
Society for Maternal-Fetal Medicine
Society for Psychophysiological Research
Society for the Experimental Analysis of Behavior
Society of Hospital Medicine
Society of Plastics Engineers