



COUNCIL OF UNIVERSITY LIBRARIANS

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July 10, 2026

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

RE: University of California Libraries' Comment on Proposed Rule, Regulation for Federal Financial Assistance, 91 Fed. Reg. 32198 (May 29, 2026)

Dear Director Vought:

I am writing on behalf of the University of California (UC) Council of University Librarians (CoUL) and UC Libraries to submit our shared comment on the Office of Management and Budget's (OMB) proposed revisions to the [Regulation for Federal Financial Assistance](#) ("Proposed Rule"), issued on May 29, 2026. CoUL and the UC Libraries fully endorse the UC System's Comments submitted to your office by the UC Office of the President. We submit this UC Libraries' Comment to shed further light on the negative impacts of the Proposed Rule as drafted and request its withdrawal or significant revision.

The UC Libraries provide a comprehensive network of essential library services, resources and infrastructure, deeply embedded in the everyday work of UC students, faculty, clinicians, researchers and staff. UC's ten campus libraries and the California Digital Library (CDL) work together to provide quick and often instant access to the world's knowledge; leadership in open science and scholarship; robust research data management and preservation support; and user-friendly, technology-rich learning spaces and services. Through deeply collaborative work and shared services, the UC Libraries secure systemwide operational efficiencies and substantial cost avoidances, all while advancing UC research, teaching, learning, healthcare and public service.

The UC Libraries understand and support OMB's objectives to improve transparency, accountability and oversight for federal funds, clarify requirements and reduce recipient burden. However, as outlined in the UC System's Comments and below, the Proposed Rule as written will not achieve these objectives and instead will undermine research, innovation and higher education in the United States.

With this comment, CoUL speaks to the proposed revisions that directly restrict core academic library services and the advancement of scholarly communication: Sections 200.454(b) and 200.461. This UC Libraries' Comment does not address all changes in the Proposed Rule; the absence of feedback should not be interpreted as agreement.

[200.454(b)] Changes to allowable costs for journals and periodicals

The proposed revisions to § 200.454(b) alter allowable direct and indirect costs under federal grants, such that academic libraries for federally funded research institutions would no longer be permitted to include academic subscriptions critical to research in their indirect cost calculation. Federally funded research will be stymied without essential access to the scholarly corpus, as it provides the ever-evolving baseline upon which researchers identify knowledge gaps, contextualize their work and inform their methodologies. As an essential service to the academy, research libraries provide access to scholarly literature, including journals, periodicals, books and databases. This role is already acknowledged in title 2 of the Code of Federal Regulations (CFR), and the Proposed Rule contradicts Subpart E Cost Principles / Appendix III to Part 200 / B. Identification and Assignment of Indirect Facilities and Administrative Costs / 8. Library Expenses, which expressly includes “the cost of books and library materials purchased for the library.”

The impact of the UC Libraries' provision of access to scholarly content is demonstrable: Systemwide library collections are utilized over 1 billion times annually by UC researchers, faculty, students, clinicians and staff, and directly inform and advance federally funded research amongst other shared academic objectives. Given the impact and essential role of scholarly literature to research, the UC Libraries ask the OMB to withdraw the proposed revisions to § 200.454(b).

[200.461] Changes to allowable costs for scholarly publications

The proposed revisions to § 200.461 alter allowable costs under federal grants to prohibit publication costs, including open access article processing charges or APCs, with limited exceptions. This revision is a notable change from current policy, under which these costs are generally allowable to disseminate research findings to ensure new knowledge and insights are shared with other scientists, clinicians, students, innovators, policymakers and the public. Over the past decade, federal agencies have expanded requirements for federally funded research outputs to be made publicly accessible, recognizing publication and dissemination as integral components of the research enterprise. APCs are one of the primary mechanisms for supporting open access at present. Although the Proposed Rule would not alter those public access requirements, it would shift responsibility for paying publication costs associated with compliance, leaving institutions and researchers to absorb expenses that have historically been allowable costs under federal awards. This creates tension with the federal public access policy and will lead to a confusing and burdensome environment for agencies, researchers and institutions alike. These revisions under the Proposed Rule will disadvantage researchers, particularly those with fewer institutional resources, and severely limit institutions in supporting publication costs. As a result, the impact of federally funded research will be significantly reduced.

UC already estimates that it would need to seek upwards of 6,000 agency grant exception approvals should this § 200.461 revision be enacted. Such an exception process will greatly delay the dissemination of federally funded research and increase administrative overhead for grant recipients, institutions and federal agencies. Further, if these initial UC exception requests are denied, we estimate that the initial

unfunded financial burden on UC researchers and the institution to pay those publication costs could total \$20.4 million, if not significantly more, depending on the number of scholarly outputs published per grant amongst other factors.

UC and the UC Libraries are aligned with the federal government and agencies on the importance of open access publishing and ensuring timely and ready access to scholarly research products for the betterment of science and society and to maximize the American taxpayer's investment in federally funded research. However, the proposed revisions to § 200.461 would greatly increase UC's administrative and financial burden for federally funded research. The UC Libraries proactively negotiate with scholarly publishers to lower and contain the cost of APCs for the University and researchers alike, reducing the cost of complying with agency public access mandates. In 2025, the UC Libraries fully or partially funded the open publication of more than 11,400 UC-authored scholarly journal articles through these UC negotiated agreements, of which 47% were publications from federally funded research projects. These agreements and UC's subsidies reduce but do not eliminate the cost to publish. Disallowing publication costs under federal awards would shift the remaining costs to institutions and researchers, undermining the sustainability of these agreements and creating a substantial unfunded mandate for institutions that are already investing significant resources to advance federal public access goals. Given the shared value and impact of open publication, as well as federal agencies' public dissemination requirements for research results, the UC Libraries ask the OMB to withdraw the proposed revisions to § 200.461 and instead work with universities and publishers to develop a sustainable open access publishing environment.

Conclusion

Peer-reviewed publication is an integral component of the research enterprise, serving as the primary mechanism through which findings are validated, shared and built upon by the scientific community. Federal agencies routinely view publication as a key measure of research productivity and impact because it is through dissemination that research creates public value. Without publication, the return on the federal investment in research is fundamentally incomplete.

As such, costs for scholarly publishing and acquiring access to scholarly literature remain necessary to conduct, communicate and manage federally funded research. Already, UC and other research institutions invest in these scholarly communication activities in furtherance of research, including federally funded research. The Proposed Rule will create an unfunded mandate that forces institutions to absorb previously allowable expenses and further subsidize federally sponsored research. Undoubtedly, the Proposed Rule will be untenable for not only UC but also institutions across the United States. As a result, federally funded researchers and institutions will have significantly diminished scholarly reading and publishing access, degrading not only the dissemination of federally funded research but also development of new research findings and innovations.

CoUL and the UC Libraries are long committed to an open and sustainable scholarly communication ecosystem that supports the open dissemination of research for broad, public benefit and maximizes the return on the American taxpayer's investment in federally funded research. UC's commitment is demonstrated through its open access publishing and repository platform, eScholarship; UC Academic Senate and Presidential systemwide open access policies; the 2018 *Pathways to Open Access* report and toolkit; and UC's active, collaborative advancement of numerous open access paths, including leadership in transformative open access publisher agreements, to name just a few examples. The [2026 Government](#)

[Accountability Office report](#) acknowledges that public dissemination of federally funded research importantly supports innovation in areas of key interest for federal agencies, and the critical role of federal agencies in managing escalating publication costs. The OMB's prohibition of such costs under federal grants does not address our shared interest and challenge in building a sustainable, affordable and open research ecosystem. If the OMB is concerned with the cost of publication, we encourage you to address such concerns with the scholarly publishers who set high-cost publication charges.

CoUL and the UC Libraries join the UC system, individual UC commenters, organizations representing the interests of the nation's research institutions and libraries, including the Association of Research Libraries, and others in calling for the withdrawal of the Proposed Rule or significant revision.

Sincerely,

A handwritten signature in black ink that reads "Suzanne L. Wones". The signature is written in a cursive, flowing style.

Suzanne L. Wones, on behalf of CoUL and the UC Libraries

CoUL Chair 2026-27

University Librarian

UC Berkeley