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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, Santa Barbara Library Comments on Proposed Rule, Regulation for Federal Financial Assistance, 91 Fed. Reg. 32198 (May 29, 2026)

Dear Director Vought,

The University of California, Santa Barbara Library appreciates the opportunity to comment on the Office of Management and Budget's proposed revisions to 2 CFR Part 200.

We write specifically to express our strong opposition to the proposed revisions to:

- **§200.461 (Publication and Printing Costs);** and
- **§200.454 (Memberships, Subscriptions, and Professional Activity Costs).**

We respectfully urge OMB to withdraw both provisions. Together, these changes would undermine the scholarly communication ecosystem that enables federally funded research to be conducted, disseminated, preserved, and reused. Rather than reducing costs, the proposed rule would shift financial burdens to research institutions and libraries while diminishing the public value of federally funded research.

Institutional Context

The UC Santa Barbara Library serves as the scholarly and information infrastructure for a leading public R1 research university, supporting the full lifecycle of research—from discovery and access to

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scholarly resources, to publication, preservation, and long-term stewardship of research outputs. Through its collections, digital infrastructure, scholarly communication services, and open access initiatives, the Library enables faculty, students, and researchers to conduct, disseminate, and preserve federally funded research. The proposed revisions to §§200.461 and 200.454 would undermine this research ecosystem by restricting both researchers' ability to publish their findings and their access to the scholarly literature, data, and other information resources essential to conducting high-quality research.

Concerns Regarding §200.461: Publication Costs

The proposed revision would make publication costs—including article processing charges and other open access publishing fees—generally unallowable under federal awards. This proposal conflicts with federal public access policies that increasingly require immediate public access to federally funded research. Researchers cannot reasonably be expected to comply with these requirements while simultaneously being denied the ability to charge legitimate publication costs to the grants that supported the research.

A peer-reviewed publication is not an optional or secondary activity. It is an essential outcome of the research process and the primary mechanism through which scientific knowledge is validated, shared, and translated into public benefit. Publication enables research findings to enable future discoveries, policy, education, and innovation.

Disallowing publication fees will not eliminate those costs. Instead, they will be transferred to universities, libraries, departments, or individual researchers—many of whom lack alternative funding. Early-career researchers and investigators with limited institutional resources would be disproportionately affected, creating additional inequities in the research ecosystem.

The proposed case-by-case approval process is also impractical. It would introduce unnecessary administrative burden for both federal agencies and research institutions without improving accountability or reducing costs.



Concerns Regarding §200.454: Memberships, Subscriptions and Professional Activity Costs

The proposed revision to §200.454 would prohibit the use of federal funds for subscriptions to “business, professional, academic, and technical periodicals”.

Access to current scholarly literature is fundamental to the research process. Researchers depend on journals, databases, standards, datasets, and other scholarly resources to review prior work, develop research questions, design experiments, validate findings, and ensure the rigor and reproducibility of their research.

Although research libraries make substantial investments in research collections, no library can provide every specialized resource required by every funded research project. Principal investigators often rely on grant funding to obtain discipline-specific journals, databases, datasets, or other resources that are essential to their research but fall outside institutional collections.

The proposed prohibition would eliminate this flexibility and inevitably increase pressure on already constrained library collection budgets. Rather than reducing costs, it would simply transfer them from research grants to institutional budgets without providing additional resources to absorb those expenses.

Conclusion

The UCSB Library respectfully urges OMB to withdraw the proposed revisions to §§200.461 and 200.454(b) in their entirety.

Publication costs and subscriptions to scholarly resources are fundamental components of research and should remain allowable costs when they are reasonable, necessary, and directly support federally funded research. The proposed revisions would weaken the nation's research infrastructure by disrupting both the dissemination of new knowledge and researchers' access to the existing scholarly record. Rather than reducing costs, they would shift financial and administrative burdens onto research institutions and libraries, diminish public access to federally funded research, and ultimately undermine U.S. research productivity, innovation, and global competitiveness.



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Respectfully submitted,

A handwritten signature in blue ink, reading "Todd Grappone".

Todd Grappone
University Librarian
University of California, Santa Barbara Library

A handwritten signature in blue ink, reading "Lidia Uziel".

Lidia Uziel
Associate University Librarian for Research Resources and Scholarly Communication
University of California, Santa Barbara Library