



University of California
San Francisco

Library

Kalmanovitz Library
530 Parnassus Avenue, rm 130
San Francisco, CA 94143-2207

Chris Shaffer, MS, FMLA, AHIP

University Librarian
Assistant Vice Chancellor,
Academic Information
Management
Adjunct Professor, Department of
Medicine, School of Medicine

chris.shaffer@ucsf.edu
415-476-5557
www.library.ucsf.edu

Docket ID No. OMB-2026-0034

RE: UCSF Library Comment on Proposed Rule, Regulation for Federal
Financial Assistance, 91 Fed. Reg. 32198 (29 May 2026)

Dear Director Vought:

I write on behalf of the UCSF Library at the University of California, San Francisco. UCSF is dedicated exclusively to health sciences research, education, and patient care, and is one of the nation's largest recipients of federal research funding. The UCSF Library's mission is to connect people, stimulate inclusive learning, advance scientific inquiry, and enable open access to historical and current health sciences information resources. We advance our mission by providing access to the current and historical scholarly record and the clinical evidence base, along with expert support for searching, managing, and publishing the literature; research data management, data science, and AI services; and the teaching and learning environments suited for a health sciences campus. Researchers, clinicians, educators, and trainees rely on these services and resources daily, in the laboratory and at the bedside. The UCSF Library endorses the comments submitted by the University of California Office of the President on behalf of the UC system and by the UC Council of University Librarians on behalf of the UC Libraries. We ask that the Proposed Rule be withdrawn or significantly revised. I am writing separately to underscore, from the perspective of an academic health sciences library, two provisions that would directly harm the conduct and dissemination of federally funded biomedical research.

§ 200.454(b), excluding journal and periodical subscriptions from indirect cost calculations. Scholarly literature is research infrastructure. Every federally funded project the UCSF Library supports begins and ends in the literature. Investigators reference scholarly literature to identify knowledge gaps, design research methods, and put their findings in context, while clinicians consult it daily in patient care. Appendix III to Part 200 expressly includes "the cost of books and library materials purchased for the library" among allowable library expenses, and the Proposed Rule reverses that recognition without explanation. These costs would not disappear, they would shift onto institutions that are already absorbing the cost of decades of unreimbursed compliance requirements. The practical result at health sciences libraries would be large-scale subscription cancellations, leaving researchers cut off from the evidence on which their work depends and clinicians making treatment decisions without access to current literature. In a health sciences setting, that is a risk to patient care and scientific advancement, not an administrative inconvenience.

§ 200.461, prohibiting publication costs, including open access article processing charges. These costs are generally allowable under current policy because dissemination is a critical part of the research process. Unpublished and inaccessible findings do not provide accountability to the taxpaying public and

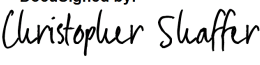


slow the pace of scientific and clinical discoveries. Nowhere is this clearer than in medicine, where federal public access policy exists so that clinicians, patients, and researchers anywhere can read the results of taxpayer-funded research. The prohibition would leave federally funded results behind paywalls or force researchers to pay out of pocket, with the burden falling hardest on early-career investigators and less-resourced institutions. It also works against federal agencies' own public access policies that were established to accelerate equitable access, enhance government transparency, reduce duplication, and improve public health, among other major drivers. Furthermore, the limited exception process would generate thousands of case-by-case agency approvals, adding administrative burden rather than reducing it. If OMB is concerned about the high cost of publishing, the place to apply pressure is on the publishers who set those charges, not the researchers and libraries who pay them.

Both provisions rest on the same oversight: treating the reading and publishing of science as incidental to research when, instead, they are fundamental to research and how the public receives a return on its investment.

OMB's stated objectives of transparency, accountability, clarity, and reduced burden are sound. As drafted, the Proposed Rule fails to achieve those objectives. The UCSF Library joins the UC system, the UC Libraries, and research institutions across the country in asking OMB to withdraw the Proposed Rule and, if revisions to the Uniform Guidance are pursued, to issue a new proposal with meaningful stakeholder engagement.

Respectfully submitted,

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Chris Shaffer, MS, FMLA, AHIP
University Librarian
Assistant Vice Chancellor for Academic Information Management
Adjunct Professor, Department of Medicine, School of Medicine
University of California, San Francisco