

Comments of the Editors-in-Chief of *Proceedings of the National Academy of Sciences* (PNAS) and *PNAS Nexus* on Proposed Revisions to the Uniform Guidance (Docket No. OMB-2026-0034) 2 CFR Part 200

We are writing as the Editors-in-Chief of the U.S. National Academy of Sciences' research journals, PNAS and *PNAS Nexus*, to express concern regarding the proposed provisions that would make journal subscriptions, article processing charges, and other publication costs unallowable under federal awards (§200.454, Memberships, subscriptions, and professional activity costs, and §200.461, Publication and printing costs). As written, this rule would directly impact subscriptions and research article submissions to scientific journals, thereby reducing the competitiveness of federally funded researchers, hobbling innovation, and undermining a fundamental pillar of the research ecosystem. Scientific publishing is an essential part of the U.S. research enterprise. Research creates new knowledge which spurs advances in technology, breakthroughs in the treatment of diseases, and novel solutions to society's most pressing problems. This research relies on journals which provide the infrastructure that curates, organizes, disseminates, and preserves that knowledge for researchers, policymakers, industry, educators, and the public. Without sustainable mechanisms for communicating research results, the value and impact of federal research investments are significantly diminished. Scientific publishing is not just an administrative function of research; it is part of the nation's scientific and innovation infrastructure.

PNAS and *PNAS Nexus* are nonprofit, society-owned journals and not permitted to retain a profit. However, like other high-quality journals, there are substantial costs associated with quality assurance. This includes editorial oversight, manuscript processing, screening for compliance with research integrity and other editorial policies, production, digital infrastructure, indexing, archiving, and long-term preservation. The proposed restrictions would remove two of the principal mechanisms that support these activities: subscription revenue and publication fees.

The proposal could have significant consequences for trusted U.S. journals, that are the sources of innovation and ideas fueling scientific discoveries. If American journals cannot sustainably publish federally funded research, authors may publish elsewhere, including on preprint servers or in lower-cost journals outside the United States. Some of these venues may offer fewer safeguards for research quality and integrity and less expert commentary to help contextualize research findings. Such outcomes could make it more difficult for researchers, policymakers, industry, and the public to identify reliable scientific information and could diminish public trust in science.

The proposal also appears to be in tension with the goals of the 2022 OSTP Nelson Memorandum, which sought to expand public access to federally funded research. Public access depends on a sustainable and robust publishing ecosystem. Policies that weaken the financial viability of journals risk undermining the infrastructure needed to achieve those objectives. Such policies may also erode innovation, economic competitiveness, advances in public health, and national security by undermining one of the foundational pillars that advances scientific achievements.

We recognize and support several objectives that may underlie these proposed changes, including expanding public access to federally funded research, promoting transparency in publication costs, and ensuring responsible stewardship of taxpayer resources. These are important goals. However, categorical prohibitions on publication-related expenses risk weakening the infrastructure needed to achieve them. If OMB's concern is the cost or efficiency of publication services, those concerns could be addressed through measures such as reasonable cost guidelines, enhanced reporting, or exceptions for nonprofit and society-owned journals. Such approaches would promote accountability while preserving the systems that communicate, preserve, and make discoverable the results of federally funded research.

Sincerely,

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