

RULE CHANGES RELATED TO PUBLICATIONS

PROPOSED BY THE US OFFICE OF MANAGEMENT AND BUDGET

In the United States, it has been difficult for scientists to ignore the proposed new Office of Management and Budget (OMB) rules related to scientific awards, international collaboration, conference attendance, and publication fees, among other activities. If implemented as scheduled on October 1, 2026, the proposed rules would significantly affect scientists' ability to carry out work effectively and efficiently. The Oceanography Society (TOS) has shared these proposed rules with our membership, and TOS's president, Paula Bontempi, has urged everyone to submit public comments by July 13 (see <https://tos.org/omb-2026-0034>). I certainly have.

Here, I focus on the proposed rules' potential consequences for publications.

From the Federal Register (v. 91, n. 103, May 29, 2026, p. 32232): "OMB is revising the section to make publication costs unallowable unless such costs are expressly required by statute or approved in advance by the Federal agency on a case-by-case basis."

This is a fundamental change to the current rules, which state: "Page charges, article processing charges (APCs), or similar fees such as open access fees for professional journal publications and other peer-reviewed publications resulting from a Federal award are allowable where the publications report work supported by the Federal Government," and the charges are levied impartially by the journal, whether or not the research was supported under a Federal award.

The ambiguous language makes the consequences of the proposed change a bit unclear. On the one hand, it could mean that as long as APCs are an approved item within the grant's budget ("approved in advance"), then authors can, as in the past, charge the APC to their grant without needing to seek further approval. On the other hand, the "case-by-case" wording suggests that for every paper scientists wish to publish, they would need to ask their agency program manager for permission to use grant funds. If that is the government's intent, then this requirement imposes a huge new burden on the authors—and their program managers. Without knowing how favorably such requests will be received, and how quickly the program manager will respond, is it worth the time and effort to submit such requests? Will there be a simple form and portal to submit publication requests? Will agencies require letters containing detailed justification for publishing? Can that letter contain a request for a budget supplement to support APCs, or will the grantee need to use funds budgeted for something else? Will program managers need approval from a political appointee before

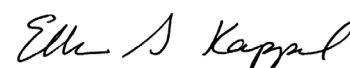
responding positively? If APCs cannot be paid from grants, where will the funds to publish come from? If the burden of paying APCs is shifted to universities, how much support will universities (and other institutions) be able to provide to their researchers?

And, of course, if APCs are no longer permitted in federal grants, will journals like *Oceanography*, which is published by a small nonprofit society, be able to survive? Our APCs cover the cost of humans doing work (editing, design, and web posting, among other tasks), plus they allow us to make your work publicly and openly accessible on the web. We do not have an advertising base nor large donors to cover the costs of publishing and maintaining an archive of past issues.

The text of the proposed new rule also provides OMB's rationale for this rule change: "Publication costs are not inherently necessary to carry out the core programmatic objectives of most Federal awards. In many cases, such activities are discretionary, vary widely in scope and costs, and may serve institutional, professional, or reputational interests rather than the specific objectives of the Federal program."

That statement represents a fundamental misunderstanding of how science advances or an intentional misrepresentation of the need for grants to support scientific publishing. As any scientist knows, good experimental design relies on what you and your colleagues around the globe have learned from previous research, as laid out in the peer-reviewed literature and as discussed at conferences and elsewhere. Advancing the science also relies on your colleagues' evaluation of your experimental design and findings, as shared in the peer-reviewed literature and at conferences. Publishing results offers transparency in scientific background, methodology, and results, and permits others to duplicate your experiment to ensure its validity (reproducibility). Peer review and sharing our results simply makes our science better. Importantly, supporting APCs (and conference attendance) also allows program managers and other agency representatives to see and evaluate the results of the grants they supported.

If you haven't already, I urge you to use this public comment period to submit your thoughts on these proposed OMB rules, whether you pick one or a few rules that are particularly meaningful to you or you take on the whole batch of changes. With more voices, perhaps we can make a difference.



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