COASTAL AND ESTUARINE RESEARCH FEDERATION®
Publishers of the journal *Estuaries and Coasts*

13 July 2026

The Honorable Russell Vought
Director
United States Office of Management and Budget

Via Regulations.gov

Re: Regulation for Federal Financial Assistance, Docket ID No. OMB-2026-0034

Dear Director Vought,

The Coastal and Estuarine Research Federation (CERF) respectfully submits the following comments in response to the proposed revisions to several parts of the Office of Management and Budget (OMB) Guidance for Federal Financial Assistance located in title 2 of the Code of Federal Regulations (CFR) subtitle A, and to 2 CFR subtitle B, which proposes to conform changes to the respective implementing regulations for the listed federal agencies for the OMB policy requirements in subtitle A.

CERF is a multidisciplinary scientific society of more than 1,300 members who study and manage coastal and estuarine systems worldwide. CERF is a not-for-profit and non-partisan organization whose mission is to advance research, knowledge, and stewardship of coasts and estuaries and sustain the education and professional development of a diverse and inclusive community.

The work that CERF and its members do is vital to American security and prosperity. The U.S. has 95,471 miles of shoreline (NOAA, 2024). Almost 40% of Americans live in coastal counties, which also produce $10 trillion in goods and services and employ 54.6 million people (NOAA, 2026). The marine economy – industries specifically associated with marine systems such as fisheries and shipping – supports 2.6 million jobs, $511 billion annually in goods and services (1.8% of GDP), and $827 billion annually in sales (1.7% of GDP) according to 2023 data (BEA, 2025). In addition, more than 20% of coastal county citizens are considered socially vulnerable as defined by the U.S. Census (NOAA, 2026). These citizens and industries benefit from the work done by CERF members, who use applied research and management approaches to address

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real-world challenges such as improving commercial and recreational fisheries management, supporting a growing aquaculture industry, protecting communities from coastal hazards through research focused on restoring critical habitats such as seagrasses and salt marshes, understanding and mitigating the impacts of invasive species, preparing communities for severe weather events including hurricanes, improving water quality, and more. CERF actively supports these research, stewardship, and education endeavors through our biennial conference, peer-reviewed journal *Estuaries and Coasts* (published in partnership with Springer Nature), professional development programming, and other activities.

Throughout its 55-year history, CERF has received many federal grants in support of its mission and activities, including from the National Oceanic and Atmospheric Administration (NOAA), National Science Foundation (NSF), and Environmental Protection Agency (EPA). These grants have supported our biennial conference, outreach and dissemination of research, and student and workforce development programs. In addition, CERF members, which include coastal scientists and the management community, receive support through federal grants, cooperative agreements, and other forms of federal assistance. Members may use federal funds to conduct and disseminate research by publishing in *Estuaries and Coasts*, attend our biennial conference, and participate in other society offerings.

The proposed revisions to the Guidance for Federal Financial Assistance will have a serious detrimental impact on CERF's operations and its ability to advance its mission in several meaningful ways.

Therefore, CERF submits comments on the proposed rule and specifically on sections § 200.205, § 200.300, § 200.340, § 200.342, § 200.219, § 200.220, § 200.432, § 200.454, and § 200.461 (in that order).

1. § 200.205—Federal Agency Review of Merit of Proposals, § 200.300—Statutory and national policy requirements, § 200.340—Termination and suspension and § 200.342—Opportunities to object, hearings, and appeals.

Introduction

CERF has been the recipient of several competitive, discretionary federal awards for programs to recruit and retain students in marine sciences and develop leadership skills of professionals in the field so they are well-positioned to address critical problems faced by coastal communities nationwide. In 2023, CERF received an award entitled "C-COAST: Changing the Culture of our Occupations to Achieve Systemic Transformation" (Award No. 2233699) under the NSF solicitation "Leading Culture Change Through Professional Societies of Biology" (BIO-LEAPS, NSF 22-542). This four year, $2M collaborative research award, with an original end date of April 30, 2027, was terminated approximately two years into the project due to changes in NSF priorities. While no specific reason was given, we can only conclude the termination was because it was considered a "diversity, equity, and inclusion (DEI)" award (NSF, 2025), despite there being no evidence or charge that the programs supported by this award constituted "illegal DEI" or violated federal law. This demonstrates a situation where changing administration policies superseded the well-established NSF process through which CERF's proposal was selected for this award, which included merit-based peer review and consideration of statutorily mandated broadening participation goals. CERF was also denied the opportunity to appeal the termination. CERF would like to continue the programs supported by the terminated award, as well as similar workforce development and broadening participation programs, ideally with support from the federal government.

Background

In § 200.205, OMB proposes to change how proposals are reviewed and awards selected, in part to ensure "alignment of Federal awards with administration priorities." To address this concern, the proposed rule would require senior appointees to establish a new pre-issuance review process and evaluate proposals, "ensuring that discretionary awards advance the President's policy priorities, prohibit the use of funds for discriminatory or otherwise impermissible purposes, and emphasize ensuring compliance with applicable law."

OMB proposes to revise § 200.300 "to ensure that no person otherwise eligible will be unlawfully excluded from participation in, unlawfully denied the benefits of, or otherwise subjected to unlawful discrimination in the administration of Federal programs, activities, projects, assistance, and services." The section further specifies that federal agencies must ensure awards are not used to support "'Diversity, equity, and inclusion' (DEI) or 'diversity, equity, inclusion, and accessibility' (DEIA) policies, principles, or practices that violate any applicable Federal anti-discrimination laws. This includes racial preferences or other forms of racial discrimination used by the recipient or subrecipient that violate any applicable Federal anti-discrimination laws, including activities where race or intentional proxies for race will be used as a selection criterion for employment or program participation."

OMB proposes to revise § 200.340 to make it easier to terminate awards for convenience. Specifically, OMB proposes to add the following: "The Federal agency or pass-through entity, to the extent permitted by law, may terminate a Federal award in part or its entirety if the Federal agency or pass-through entity determines that a termination is in the interest of the Federal agency or pass-through entity, including if a Federal award does not effectuate program goals, Federal agency priorities, or the national interest as they exist at the time of the termination." Revisions to § 200.342 could allow agencies to terminate awards without due process, as it states agencies are not required to allow for objections, hearings, and appeals for discretionary termination.

These four sections combined could shift the federal government away from addressing research priorities identified by the scientific community and selecting proposals deemed most meritorious through a rigorous peer review process. Instead, they would push agencies toward awards that align with ideologically driven political priorities, including prohibitions on legitimate, legal broadening participation research and programs. The proposed rule may also have unintended consequences: it risks hindering much-needed workforce development programs and generating inefficiencies in the use of tax dollars by early termination of federal grants without providing the opportunity for due process.

Analysis

CERF supports the stated goals of preventing waste of tax dollars and ensuring those dollars go to improve American lives or advance American interests. However, CERF respectfully disagrees that the proposed revisions will achieve these goals and, instead, may harm American interests.

The vague requirements that all awards align with a current President's policy priorities, combined with the ability to terminate awards at will, provide enormous leeway to political appointees to determine the direction of scientific research. This may shift the U.S. scientific enterprise away from addressing the most pressing research questions in the best interest of the nation and may risk our standing as the global leader in science. Existing processes for determining priorities for federal research funding priorities provide for extensive expert and community input. For example, The National Academies of Science, Engineering, and Medicine produce community-driven "decadal survey" consensus reports, commissioned by federal agencies, which outline research priorities relevant for the next decade. Federal agencies such as NSF also develop strategic plans with extensive community input, and these plans guide funding priorities and solicitations. While national interest may be the overarching framework, expert input by the scientific community is essential to the future of U.S. science.

OMB claims the current § 200.300 includes an "unlawful DEI provision" and that the proposed revision would prohibit the use of federal funds for illegal discrimination or that violate any applicable federal anti-discrimination laws. It is unclear why this revision is necessary given that no federal award should be made that violates federal law. This provision instead may allow federal agencies to prohibit lawful broadening participation activities. The proposed rule states "In 2024, one study claimed that more than one-quarter of new National Science Foundation (NSF) grants went to diversity, equity, and inclusion and other far-left initiatives," which is in part defined as "racial preferences or other forms of racial discrimination by the grant recipient, including activities where race or intentional proxies for race will be used as a selection criterion for employment or program participation." The study, which is not cited in the proposed rule, is likely a misinterpretation of the grant proposal structure. NSF funding opportunities encourage or require investigators to address diversity and broadening participation as part of the Broader Impacts review criteria, which is a required section of proposals. The lack of a clear definition of "illegal" DEI leaves room for broad interpretation by appointed officials, and risks compromising much needed workforce development programs.

In addition, the text is in direct conflict with several research- and education-focused broadening participation provisions in federal statute, including the America COMPETES Reauthorization Act of 2010 (Pub. L. 111–358) and CHIPS and Science Act of 2022 (P.L. 117-167). The NSF Broader Impacts Review Criterion, as codified in 42 U.S.C. §1862p–14, states that one of the broader impacts goals is "Expanding participation of women and individuals from underrepresented groups in [Science, Technology, Engineering, and Mathematics] STEM." In addition, 42 U.S.C §1885a and §1885b authorize NSF to support activities designed to increase the participation of women, minorities, and persons with disabilities in science and engineering. These broadening participation activities extend to other research agencies such as NOAA, as codified in 33 U.S.C. § 893a. The proposed revisions may be interpreted to bar any use of race or a proxy for race in federally-funded broadening participation activities, even if those activities are mandated in statute and even if they do not exclusively use race as a selection criterion. For example, for CERF's Rising TIDES program, which was funded by NSF through our C-COAST award, anyone who self-identifies as facing barriers to pursuing a career in coastal and estuarine disciplines is eligible. The obstacles are not exclusively race-based and may include characteristics such as veteran status, financial barriers, disability, and lack of access to educational opportunities; thus, as interpreted by legal experts, would not qualify as discriminatory or "illegal DEI." However, these obstacles could be incorrectly misinterpreted as illegal under the proposed rule.

Prohibiting broadening participation activities negatively impacts the U.S. scientific enterprise and American competitiveness. Growth and diversification of the STEM workforce are important to sustaining America's innovation, discovery, and global leadership in science: the federal government has identified a need to grow the STEM workforce (U.S. Bureau of Labor Statistics 2025), and evidence shows diverse teams are better at problem-solving (e.g., Aminpour et al., 2021; Bendor and Page 2018). Broadening participation activities aid in the inclusion of *all* talent. Specific to the CERF community, the 2025 National Academies of Science, Engineering, and Medicine consensus report *Forecasting the Ocean: The 2025–2035 Decade of Ocean Science*, commissioned by NSF and written by preeminent scientists in the field, highlighted the need to broaden perspectives in the ocean science workforce, concluding that "successfully addressing ocean science research challenges in the coming decade will depend on the cultivation and development of an expanded and transdisciplinary ocean science workforce." Thus, there is scientific consensus on the importance of diversifying marine science and, more broadly, the STEM workforce.

The termination provisions also have a chilling effect on scientific research and programs, which typically span multiple years. OMB argues the proposed termination provisions are necessary so that "agencies can best ensure the responsible management and safeguarding of taxpayer resources throughout the award lifecycle. Federal agencies—and ultimately, the American taxpayer—should not remain obligated to continue funding discretionary awards that do not best or most effectively serve the authorized public purposes of the particular program." While we agree agencies should have the ability to terminate awards for violating the terms and conditions as already exists in § 200.340, we argue the proposed revisions will result in unintended waste of taxpayer dollars.

The priorities of the scientific endeavor necessary to maintain research competitiveness and address national interests evolve incrementally and are unlikely to change substantively after an award is made: The National Academies of Science, Engineering, and Medicine project research priorities out for 10 years; most research agency strategic plans span more than the 4-year term of an administration. In contrast, as noted in the rationale for the proposed revisions, "Federal agency priorities may change in response to new direction from politically accountable leadership," implying politics and not science may be used to determine agency priorities for research funding. This may result in priorities shifting from one administration to the next—or even within a single administration—over the lifetime of a grant. Mid-award termination may make the work to date useless as experiments or programs are abandoned prematurely, thus losing out on scientific discoveries and wasting tax dollars already spent.

As noted in our comments above, the merit review process ensures that awards are made based on the recommendations of experts in the field, in response to federal priorities stated in the relevant funding opportunity. Yet when a new administration took office and terminated CERF's C-COAST award, there was no scientific reason provided for why our research was no longer relevant, only that NSF's priorities had changed. As a result, we had completed only half of the research on the effectiveness of our workforce development programs, leaving us unable to draw conclusions that could benefit similar programs in the future or inform our broader understanding of culture change in scientific disciplines.

The changes to award selection processes and threat of discretionary termination also impacts STEM workforce development. The U.S. Bureau of Labor Statistics (2025) has stated the need to grow the STEM workforce to sustain America's innovation, discovery, and global leadership in science. Coastal systems face growing challenges—including climate variability and extreme weather events, sea-level rise, habitat loss and degradation, pollution, fisheries management, and increasing coastal populations and resource use—that require a highly trained and diverse workforce. Federally-funded workforce development programs are indispensable because they help ensure the scientific, technical, and management expertise needed to understand and sustain these ecosystems is available now and in the future. Consistent grant funding is critical to maintaining this pipeline; investigators and academic institutions may be reluctant to accept graduate students and postdoctoral scholars into projects if funding cannot be guaranteed for the duration of their studies. Hence, early career researchers, essential to workforce development, are likely to be deterred from pursuing an advanced degree due to uncertainties in funding that could prematurely end their studies.

Specifically, the premature termination of CERF's C-COAST grant led to the unplanned lay off of an early career staffer. Our ability to employ staff funded primarily by a federal award may be compromised given the uncertainty of grant funding. This limits our ability to support the growth in the STEM workforce.

Recommendations

We recommend the text in § 200.205 be modified to remove political interference with award decisions by removing the provisions for pre-issuance review by political appointees.

We argue the proposed revisions to § 200.300 are unnecessary because funding of illegal activities is already prohibited by federal law and the lack of definition of prohibited activities is too broad to guide the development of proposals or recipient compliance; therefore, we recommend these proposed revisions be removed.

We recommend the provision for termination "*At the discretion of the Federal agency or pass-through entity"* be removed or modified to require stronger justification by subject-matter experts, rather than political appointees, for changing agency priorities. In addition, section § 200.342 should allow for objections, hearings, and appeals for discretionary termination that go beyond noncompliance.

Conclusion

As written, the proposed revisions to sections § 200.205, § 200.300, § 200.340, and § 200.342 will not achieve the intended goals of ending the waste of tax dollars and ensuring those dollars go to improve American lives or advance American interests. Instead, the revisions risk shifting federal research dollars away from expert-identified priorities that are best suited for advancing the U.S. scientific enterprise toward rapidly-shifting and politically-motivated decisions. The overly broad and vague definitions for determining priorities and prohibited activities will have a chilling effect on the scientific community, particularly as it relates to broadening participation in research and other activities that CERF has prioritized historically. Federal law already prohibits the use of funds for purposes that violate federal anti-discrimination laws. The proposed revisions are redundant with these laws and may be misinterpreted by agencies to bar all broadening participation activities, even those that may be mandated in statute. Thus, we recommend this language not be included in the rule.

The proposed revisions for § 200.340 and § 200.342 that allow for discretionary termination without appeal will not achieve OMB's stated goal of responsible management and safeguarding of taxpayer resources; instead, it will result in additional waste as projects are abandoned midstream without the analysis of subject-matter experts. We recommend these changes be removed. Terminations should be based primarily on non-compliance with the terms of a grant and the ability to appeal against any termination must be provided in all cases.

2. § 200.219—Prohibition of discriminatory event services

Introduction
CERF convenes a biennial conference for coastal and estuarine scientists, resource managers, and educators to share their latest research findings, develop new ideas and collaborations, network, and learn from each other. Attendees span career stages and represent academia, government, non-governmental organizations, and the private sector. Our conference, which serves about 1,400 participants, is a core means for advancing our mission. Conferences are also critical to the financial sustainability of our organization as revenues are re-invested in mission-oriented programs benefitting our members. Conference attendees also support the economy through spending on travel, lodging, and local restaurants and entertainment. We have been a recipient and, in some circumstances, a subrecipient, of federal financial assistance to support these conferences.

Background
OMB proposes a new section § 200.219 "to ensure that Federal funds are not used, directly or indirectly, to subsidize violations of the First Amendment of the U.S. Constitution involving suppression of free speech of disfavored groups." The revised section § 200.219 (a)(3) broadly applies to any policies that have "the purpose or effect of suppressing lawful expression of speech protected by the First Amendment." Section § 200.219 (b) would apply to non-public entities receiving federal financial assistance for specific events, which would apply to CERF conferences supported by federal funds.

Analysis
We support the stated purpose of § 200.219: preventing recipients and subrecipients from excluding conference speakers or attendees because of their viewpoint. We are concerned, however, that the proposed text is written more broadly than that purpose requires. Violations of free speech are already barred by the First Amendment. As drafted, however, the text is broad enough to potentially prohibit content-neutral conduct rules that have nothing to do with viewpoint discrimination such as reasonable restrictions on disruptive protest activity during conference programming. CERF's code of conduct prohibits sustained disruptions to ensure our conferences can be run in an orderly fashion, and violations of our code of conduct may result in expulsion from the conference or other consequences. Even though this provision does not favor or disfavor any particular viewpoint, and its purpose is to prevent disruption of programming and protect attendee safety rather than suppress free expression, our code of conduct could be misinterpreted to include "political, ideological, or religious" speech. We are concerned that our code of conduct may violate this new section and prevent us from managing disruptive behavior. A content-neutral conduct policy, applied equally to any attendee regardless of their viewpoint, governs how attendees behave once they are already at the event, a distinction the proposed rule does not draw. If finalized without clarification, this section may be construed as barring organizations such as CERF from adopting codes of conduct because they could be incorrectly characterized as discriminatory.

Recommendations

We recommend OMB to revise § 200.219 to make clear that the prohibition applies to viewpoint- or content-based decisions, such as denying a speaking platform or imposing discriminatory fees.

Conclusion
We agree with the goal of preventing organizations from discriminatory behavior related to political, ideological, or religious speech at federally-funded events. However, we are concerned that, as written, the rule may prevent event organizers from placing reasonable, content-neutral restrictions on behavior that disrupts programming and the safety and well-being of attendees. We ask that § 200.219 be revised, as described above, to clearly distinguish viewpoint-based discrimination from content-neutral conduct rules, so that organizations receiving federal financial assistance can continue to safely and fairly manage the events they sponsor.

3. § 200.220—Prohibition of using Federal funds for covered foreign Collaborations

Introduction
CERF is an international organization; our members, conference attendees, program participants, and journal editors and authors represent a global community of coastal and estuarine researchers, managers, educators, and students. Coastal and estuarine habitats occur around the world and the challenges and opportunities facing them are often similar across systems. There is much we can learn from collaborations with our foreign colleagues working in analogous systems. The comparative approach is fundamental to scientific inquiry because it identifies patterns and differences across species, ecosystems, or populations. By comparing systems under different conditions, scientists can test hypotheses, distinguish general principles from local effects, improve predictions, and better understand the mechanisms driving natural processes and environmental change.

In addition, coastal ecosystems systems in neighboring countries or regions are intrinsically connected by currents and the movement and migration of organisms, such as birds and fishes. For example, North American bird migration is a seasonal movement between breeding and wintering areas driven by food availability, climate, and reproduction. Each spring and fall, billions of birds travel along major flyways—the Atlantic, Mississippi, Central, and Pacific—linking Arctic, temperate, and tropical ecosystems while supporting biodiversity, pollination, pest control, and seed dispersal. Studying fish migration is essential for fisheries management because it reveals how populations are connected among rivers, estuaries, coastal waters, and the open ocean. Understanding migration pathways, connectivity, and population structure helps identify critical habitats, protect spawning and nursery areas, define biologically meaningful management units, assess stock resilience, and develop sustainable harvest strategies that maintain healthy fish populations and fisheries.

International collaborations strengthen American efforts to protect coastal communities, support the marine economy, and maintain scientific competitiveness and innovation. They strengthen scientific competitiveness by bringing together complementary expertise, technologies, data, and perspectives to address shared coastal and estuarine challenges. They accelerate innovation, enable large-scale comparative studies, improve predictive models, expand access to funding and infrastructure, and ensure that scientific discoveries inform effective management and conservation across national boundaries.

Background
OMB proposes a new section § 200.220 “To protect the national security interests of the United States … “by prohibiting “the obligation or expenditure of Federal funds to support certain foreign collaborations involving covered foreign countries or covered foreign entities.” This section states that “Federal funds may not be obligated or expended by a recipient or subrecipient to support a bilateral or multilateral collaboration, agreement, program, or activity with a covered foreign country or covered foreign entity.” The prohibition applies to both direct and indirect costs.

Analysis
CERF acknowledges that the protection of national security is of utmost importance and that federal funds should not be used to support activities that may pose a risk. However, we argue the language in the proposed section is overly broad and could be interpreted to include individual-level scholarly activities. For example, the People's Republic of China is currently on the covered foreign country list. CERF has had and/or currently has members, conference attendees, and journal editors and authors from China. It is unclear whether having Chinese participants in these programs or activities would be prohibited under the proposed section, thus making compliance a challenge. In the proposed text, there is a provision that allows a federal agency head to make exceptions; however, the rule does not stipulate the conditions for these exceptions. Case-by-case determination would likely be cumbersome and, by default, lead to the unintended prohibition of the participation of coastal and estuarine professionals from covered foreign countries. In addition, barring the use of indirect funds would create an untenable administrative burden to document that no federal funds are used in covered activities, counter to the stated purpose of reducing recipient burden. CERF is a very small organization with only one employee; it is difficult to imagine how we would be able to comply with this rule if applied broadly.

Recommendations
We urge OMB to revise this section to replace blanket restrictions with targeted, risk-specific measures such as prohibitions with specific foreign entities identified as national security risks. Existing security guidelines such as those in the CHIPS in Science Act could be used to determine these measures. A clear, time-bound process for reviewing and approving exceptions should also be included in the revisions.

Conclusion
CERF agrees with the need to protect U.S. national security and national interest, but argues the current proposed language is overly broad and will prevent international collaboration that poses little to no risk to the U.S. It could instead result in the loss of benefits to the U.S. people and economic development. Because of the vague language, research collaborations and the free exchange of ideas via peer-reviewed scholarly publications and conferences are likely to be stifled. We urge OMB to narrow these restrictions to follow more specific guidelines for identifying risk and develop a clear process for determination of exceptions that includes a reasonable timeline.

4. § 200.432—Conferences

Introduction
CERF's conferences bring together students, researchers, resource managers, policy makers, and educators to share cutting edge scientific research findings and evolving management practices from active coastal restoration and mitigation projects. In-person interactions at the meetings also achieve CERF's goal of educating and training coastal scientists and practitioners. For example, early career scientists, including but not limited to undergraduate and graduate students, often identify future collaborators, mentors, and employers at CERF conferences. The biennial conference is an important venue for grantees to disseminate the results of their federally-funded research and other activities. Conference attendees, especially academic researchers and students, frequently rely on federal grants to cover registration fees and associated travel expenses. Changes to how federal agencies approve grant spending for attending professional society meetings may prevent a large segment of coastal and estuarine professionals and students from attending and reaping the professional benefits of CERF conferences, and may diminish the impact of federally-funded research by reducing dissemination and knowledge exchange.

Background
OMB proposes to expand § 200.432 to require that costs associated with attending a specific conference must be expressly approved by the funding agency at the time an award is made and that federal funds cannot be used to attend conferences that do not serve to advance program outcomes.

Analysis
We anticipate two challenges to implementation of this rule change: 1) conference details, such as location and date, are typically not announced with enough lead time to be included in a grant proposal budget (particularly for multi-year awards), and 2) the timeline projected in a grant proposal does not always match the awarded timeline of the grant (e.g., grant end dates can be adjusted through no-cost extensions). The requirement for pre-approval for attending a specific conference, potentially several years in advance, also decreases the likelihood the grantee will be able to present their scientific findings at all, if personal or other circumstances prevent them from attending their pre-approved conference. Therefore, this rule change may have the unintended consequence of limiting federal grantees' ability to attend and present at society meetings.

Conferences are an important venue for disseminating the results of research, which is a critical component of the value of federally-funded research. Conference presentations allow investigators to receive feedback on their work, which may improve the research and its outputs. Sharing results with the broader scientific community ensures the community can apply these results to their work, build on the results to advance the science, and avoid duplication of efforts, thus advancing program outcomes, as conference attendance can boost scientific output. There is evidence (e.g., Kwok et al., 2018; Hou and Yang, 2025) that researchers who attend society meetings produce more publications, and more influential publications (assessed via citation impact). A small change to how costs associated with conferences may be covered by federal grants can lead to disproportionately large losses in high-quality and high-impact research from the coastal and estuarine community.

Recommendations
CERF strongly recommends OMB reconsider proposed changes to § 200.432 in favor of allowing flexibility in grant spending on conference attendance (i.e., without express prior

approval). Instead, OMB could find other mechanisms to ensure conference attendance advances program outcomes (e.g., adjust reporting requirements).

Conclusion
The proposed change to § 200.432 will directly impact CERF by limiting participation of federal grantees in biennial conferences, potentially resulting in decreased research output and dissemination in the coastal and estuarine community, as well as lost opportunities to educate and train members of this community. We thus recommend the added paragraph (b) be removed before the rule is finalized.

5. § 200.454—Memberships, Subscriptions, and Professional Activity Costs § 200.461—Publication and Printing Costs

Introduction
A central way CERF advances its mission is through its peer-reviewed journal, *Estuaries and Coasts*, one of the only interdisciplinary journals focused on ecosystems at the land-sea interface, including estuaries, tidal freshwater, wetlands, lagoons, and nearshore coastal waters. It publishes cutting-edge and applied research spanning the physical, chemical, geological, and biological sciences, all through a rigorous peer review process. The journal's research is routinely used by scientists and managers conducting federally-sponsored work on coastal resilience, ecosystem restoration, water quality, fisheries, and climate adaptation, resulting in direct benefits to Americans. For example, its extensive publication record on restoring salt marshes and seagrasses, critical nursery habitat for commercial and recreational fisheries, has translated into measurable benefits for those industries.

The dissemination of research results is critical to advancing research in our field. The rigorous peer-review process of a well-regarded journal provides assurance that the output is of high quality; thus, publishing results in journals such as *Estuaries and Coasts* is seen as the primary mechanism for broadly disseminating research results and a critical part of achieving the benefits of federally-funded research.

CERF publishes *Estuaries and Coasts* through a partnership with Springer Nature. However, publishing such a journal can be costly and those costs must be recovered either by paying to read the articles (e.g., journal subscriptions) or to publish the articles (e.g., open access fees). Frequently, journal publishing costs are paid by authors through federal grant funding. Many institutions rely on federal funds, including indirects, to support journal subscriptions that allow their employees to access these articles. Society membership often comes with access to society-published journals, as it does with CERF membership.

The current publication model of *Estuaries and Coasts* is hybrid, a scholarly publishing model in which a subscription-based journal allows individual authors to make their articles open access by paying an article processing charge (APC). Articles for which no APC is paid remain accessible only to subscribers or institutions with journal access. In 2025, approximately 175 articles were published, of which about 87 (50%) were open access.

CERF relies heavily on journal royalties to support many of its other mission-driven programs, including subsidizing its biennial conference and professional development programming. Of our three main revenue sources – membership dues, conference, and journal royalties – only the journal consistently generates a net revenue, which is necessary to sustain all other CERF programs. Journal subscription and publishing fees are important components of these royalties.

Background

The proposed revisions to § 200.454 would substantially narrow the allowability of costs related to professional memberships and journal subscriptions under federal awards. Under the proposed rule, membership costs would be allowable only when they are necessary to fulfill the requirements of a federal award and would need to receive prior written approval from the federal agency. In addition, subscriptions to business, professional, academic, and technical periodicals, including scientific journals, would become categorically unallowable.

The proposed revisions to § 200.461 would make all publication costs (including page charges, article processing charges (APCs), or similar fees such as open access fees for professional journal publications and other peer-reviewed publications) unallowable under federal awards.

Therefore, proposed revisions to these sections would largely prohibit the use of federal funds to disseminate research results by making the two main mechanisms for accessing research publications unallowable costs: journal subscriptions (either through libraries or society membership) and open-access publication fees.

Analysis

The proposed changes would likely have significant consequences for CERF and the broader coastal and estuarine science community:

- Restricting the use of federal funds for professional society memberships would create additional administrative burdens for individuals and may discourage researchers from maintaining memberships in organizations such as CERF. Reduced participation in scientific societies could weaken scientific collaborations, professional development opportunities, and knowledge exchange that directly contribute to the success of federally-funded coastal and estuarine research. For members who access *Estuaries and Coasts* through their CERF membership, letting that membership lapse would mean losing access to the journal.
- The prohibition on using federal funds for subscriptions to professional and academic journals would limit access to journal articles. While researchers at large institutions may retain access through well-funded libraries, investigators at smaller universities, state agencies, Tribal organizations, and nongovernmental and nonprofit institutions often rely on grant-supported subscriptions to access current scientific literature. Even larger institutions may fund libraries and, thus, journal subscriptions, as indirect expenses. Ensuring no federal funds go toward journal subscriptions via indirect costs would impose an unnecessary administrative burden.
- The limitations on using federal funds for open-access fees or APCs would limit access to *Estuaries and Coasts* articles to those with a subscription through their library or institution, or those who pay membership dues. But as noted above, both of those options would largely become unallowable costs, leaving individual article purchases as the only remaining option.

Limiting access to peer-reviewed research could impede the quality, efficiency, and reproducibility of federally-funded research while also reducing revenue that supports CERF's mission and long-term sustainability.

The limit on open access fees is particularly troubling. Peer-reviewed, open-access scientific publications are essential for science to be shared transparently and publicly. The proposed revision to § 200.461 is contrary to the stated goal of improved transparency, accountability, and oversight. Nothing meets this goal more than widely available peer-reviewed publications. The creation of publications requires labor, technology, and distribution networks, all of which entail costs. Publication costs are inherently necessary to carry out the core programmatic objectives of most of our federal awards. If there is no way to cover publication costs, this will contribute to a lack of transparency, further limiting accountability and oversight. Clearly, not allowing publication costs will only undermine the policy's goals.

There are many advantages to open-access publication, including reproducibility, accessibility to the broader scientific community and the public, increased scientific innovation through access to research knowledge, and reduced waste by preventing unnecessary duplication of research studies (Logullo et al., 2024). Further, open-access publication can significantly increase citations and, thereby, the visibility of federally-funded research to the broader community (Clark et al., 2024).

The proposed changes to § 200.461 would also contradict the 2022 Office of Science and Technology Policy (OSTP) Nelson Memo, which emphasizes the importance of public access to federally-funded research. Peer-reviewed publications are an impartial manner of making results publicly available. Limiting these costs to a "case-by-case basis" would severely restrict data sharing and could limit public trust in federally-funded science.

Publication is already a time-consuming process due to its collaborative, peer-reviewed nature. These proposed revisions would create unnecessary administrative burden by requiring "prior written approval" for every publication cost. This will lead to extra paperwork and slow down both research offices and federal program administrators, thereby inhibiting research progress and advancement.

CERF is specifically concerned with the proposed changes to make publication costs unallowable except on a "case-by-case" basis, including open access fees for professional journal publications and other peer-reviewed publications. These proposed changes would severely impact our ability to meet our core values of advancing research, knowledge, and stewardship of coasts and estuaries by restricting our ability to share research findings with the broader scientific community and the general public.

Open access publication of research on coastal and estuarine ecosystems provides benefits that extend well beyond academia by making scientific information immediately available to the people and organizations responsible for managing coastal resources. Some of the principal advantages of open access publications in journals like *Estuaries and Coasts* include:

- <u>Improved evidence-based management</u>: Resource managers, including state and federal agencies, can access the latest science without subscription barriers, enabling the rapid incorporation of research into fisheries management, habitat restoration, water quality programs, and coastal planning.
- <u>Better conservation outcome</u>: Open access enables conservation practitioners, nongovernmental organizations, and local communities to apply new knowledge on habitat restoration, biodiversity conservation, climate resilience, and ecosystem functioning, improving the effectiveness of conservation actions.

- Support for sustainable fisheries and aquaculture: Research on fish recruitment, nursery habitats, water quality, harmful algal blooms, oyster health, and ecosystem connectivity is directly relevant to maintaining sustainable fisheries and shellfish production, which underpin many coastal economies.
- Enhanced climate adaptation and hazard resilience: Freely available research helps communities and decision-makers prepare for sea-level rise, coastal erosion, flooding, storm impacts, and changing ocean conditions, leading to more resilient infrastructure and natural resource management.
- Greater accessibility for local stakeholders: Commercial and recreational fishing organizations, port authorities, coastal businesses, watershed groups, educators, and local governments often lack access to subscription journals. Open access democratizes scientific knowledge and broadens participation in coastal stewardship.
- Faster translation of science into policy: Policymakers can directly consult peer-reviewed studies when developing regulations, management plans, and restoration priorities, reducing reliance on secondary summaries or outdated information.
- Economic benefits through informed decision-making: Healthy estuaries support fisheries, tourism, recreation, shipping, aquaculture, and coastal property values. By informing management that sustains ecosystem services, openly available science contributes to the long-term economic vitality of coastal communities.
- Greater collaboration and innovation: Open access facilitates collaboration among researchers, agencies, industry, and international partners, accelerating scientific progress and encouraging the development of new monitoring technologies, predictive models, and management strategies.

Management decisions affecting estuaries and coasts are strongest when based on current scientific evidence. Open access ensures that the latest research is available not only to universities but also to agencies, local governments, consultants, businesses, and community organizations responsible for maintaining these resources. This broad accessibility supports more effective management decisions that help sustain both ecological integrity and the economic activities that depend on healthy coastal ecosystems. In this way, open access strengthens the connection between scientific discovery, natural resource stewardship, and the long-term sustainability and resilience of coastal economies.

Recommendations

Contrary to the OMB argument that "Publication costs are not inherently necessary to carry out the core programmatic objectives of most Federal awards," dissemination of research results is a critical component of any federally-funded research award. Indeed, the research is only valuable insofar as its results are shared with the broader scientific community and stakeholders, preferably through reputable, peer-reviewed publications to ensure quality and credibility. Proposed changes to sections § 200.454 and § 200.461 would significantly slow the dissemination of knowledge from federally-funded research. CERF would like to see the federal government work with scientific societies and scientific journal publishers to increase access through avenues such as transformative agreements rather than reducing access through these broad prohibitions.

We recommend OMB revise the § 200.454 to preserve the allowability of professional society memberships and scientific journal subscriptions when they are directly related to the objectives of a federal award. At a minimum, subscriptions to peer-reviewed scientific journals and memberships in nonprofit professional societies that support research, education, and scientific collaboration should remain allowable when adequately justified. If prior approval for memberships is retained, OMB should establish a streamlined, time-bound approval process that minimizes administrative burden while recognizing the essential role that professional societies and scientific publications play in advancing federally funded research.

We recommend that publication costs (including page charges and processing charges) and open access fees for peer-reviewed publications remain allowable under federal awards. We respectfully request removal of the revisions that make publication costs unallowable and instead maintain the current language in § 200.461 that allows publication costs as particular cost objectives or an allocable indirect cost.

Conclusion
Although the proposed revisions are intended to strengthen transparency, accountability, and oversight of federal expenditures, the restrictions on memberships, journal subscriptions, and publishing costs risk undermining the scientific infrastructure that supports federal research investments. For organizations such as the CERF, the changes could reduce member engagement, limit access to critical scientific literature, and weaken the dissemination of coastal and estuarine research through *Estuaries and Coasts*. They may also negatively impact CERF's financial viability and our ability to provide additional services in support of our members and our mission. The proposed revisions also undercut federal open access mandates by restricting the primary funding mechanism for disseminating open access research. This will severely limit public access to science that is funded by the federal government, thereby restricting scientific innovation and advancement as well as the use of research results for the public good. Maintaining reasonable flexibility for these costs would better support the federal government's goals of promoting high-quality, evidence-based research and ensuring that publicly funded science remains accessible to the research community.

Conclusion
CERF supports the core goals of the proposed rule; however, we believe the revisions will largely not meet these goals and in fact may impede them. They will negatively impact CERF's ability to meet its mission by impacting federally-funded workforce development programs, conference management, and journal activities. They will also negatively impact our members, who make important contributions to U.S. coastal communities and economies through federally-funded programs. We thus urge OMB to consider these comments and recommendations to ensure that the U.S. continues to be a leader in the field of coastal and estuarine science and management.

Respectfully,

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