

August 24, 2026

Mr. Brian Stone
Chief of Staff, Performing the duties of the NSF Director
The National Science Foundation
Randolph Building, 401 Dulany Street
Alexandria, VA 22314

Submitted via Regulations.gov

**Re: Information Collection 3145-0058:
NSF Guidance on Financial Assistance Draft For Public Comment (NSF-2026-OTR-0001-0003)**

To Mr. Stone:

STM welcomes the opportunity to comment on the proposed changes incorporated into NSF's draft Guidance on Financial Assistance (GFA), which proposes to replace the Proposal and Award Policies and Procedures Guide (PAPPG).

Our members include scholarly societies, commercial publishers, university presses, and others in the scientific publishing community. They work on behalf of millions of scientists, medical professionals, engineers, other researchers, and members of the public who are the authors, readers, reviewers, editors, and users of trusted scholarly content. Their efforts help ensure the reach and utility of vetted and unbiased information that advances public health, technological innovation, and economic growth. They make significant investments in infrastructure, systems, and people to review, validate, communicate, and preserve trusted information. These contributions to the research enterprise have consistently been recognized by NSF, the Federal government, institutions, and libraries by insisting that research be communicated in the peer-reviewed outlets published by STM members.

STM supports NSF's commitment to transparency, accountability, public access, research integrity, and responsible stewardship of federal funds. These objectives are fully consistent with the principles that have long made the United States the global leader in scientific research and innovation. Clear guidance that is easy to navigate, clarifies requirements based on statutory, regulatory, and administrative policy, and ensures a complete understanding of responsibilities benefits the entire American research enterprise.

However, STM is concerned that the draft guidance does not yet provide recipients with the clarity needed to achieve those goals. In several places, significant requirements are incorporated by reference rather than explained in the guidance itself, making it harder for recipients to understand their obligations and increasing administrative burden. That problem is compounded by the notice's limited explanation of how the draft GFA differs from the current PAPPG and what statutory, regulatory, or policy basis supports each change, which limits stakeholders' ability to assess the practical impact of the proposal.

Further, STM is alarmed that the draft GFA justifies some of these changes with the goal of “[a]ligning with the proposed revisions to the Office of Management and Budget’s (OMB) Uniform Guidance at 2 CFR 200 through the proposed rule published on May 29, 2026 (see 91 Fed. Reg. 32,198, May 29, 2026).” As NSF is no doubt aware, those proposed revisions have not been finalized and have received significant public comment, including nearly 500,000 comments on Regulations.gov and concerns raised by Members of Congress in letters to the Administration and in legislative text. NSF should not rely on or implement elements of a proposed OMB rule before that rule is finalized.

1. STM’s concerns with proposed revisions to OMB Uniform Guidance

While it is unclear exactly how the GFA incorporates OMB’s proposed revisions to 2 CFR 200, the introduction to the GFA identifies several areas in which NSF intends to align the draft guidance with those proposed revisions. In that context, we refer NSF to our submission to OMB regarding the proposed revisions, which raised concerns regarding provisions affecting research dissemination, publication and conference costs, merit review, international scientific collaboration, and grant-administration practices.¹ While the draft GFA does not clearly articulate how OMB’s proposed revisions may influence provisions of NSF’s GFA, we briefly highlight the issues we raised in our submission to OMB below to ensure that they are considered where they may apply to NSF’s revised guidance.

a. Publication, Subscription, and Conference Costs (likely related to Guide 12)

In its comments to OMB regarding proposed changes to §§ 200.461, 200.454, and 200.432, STM emphasized that publication, dissemination, access to scholarly literature, and participation in scientific conferences are fundamental components of the research process rather than ancillary activities. STM noted that federal public-access requirements, Gold Standard Science initiatives, and guidance from NSF and other agencies all recognize the importance of communicating research findings. STM therefore urged OMB to continue allowing reasonable publication, subscription, and conference costs, emphasizing that these activities support peer review, research integrity, public access, scientific communication, innovation, and return on taxpayer investment. STM also expressed concern that additional approval requirements would increase administrative burden and hinder the dissemination of federally funded research, thereby lessening the impact and purpose of funded research.

b. Merit Review and Scientific Excellence (likely related to Guide 8)

STM is concerned that proposed changes to § 200.205 would weaken the long-standing system of expert merit review that has been central to U.S. scientific leadership. While NSF does not appear to be proposing to implement these changes directly, the draft GFA is unclear on the ultimate decision authority for federal assistance. STM believes that federal funding decisions should continue to be grounded in scientific and intellectual merit, broader impacts, and expert peer review rather than political or insufficiently defined criteria. Independent expert review is consistent with both congressional directives governing NSF and the Administration’s Gold

¹ STM’s submission is available at <https://stm-assoc.org/document/stm-comments-on-omb-proposed-revision-to-guidance-for-federal-financial-assistance-july-2026/>

Standard Science principles, including rigor, transparency, reproducibility, and unbiased evaluation. STM urged OMB to preserve expert-driven grant review as the foundation of federal research funding.

c. International Activities and Research Security (likely related to guides 6, 14 and 22)

STM supports strong research-security safeguards but notes that broad restrictions on international collaboration could undermine American scientific leadership and reduce the impact of federally funded research. Proposed changes to §§ 200.202(e) and 200.220 could substantially restrict activities that are central to NSF-funded research and reflected in existing guide language. Modern research, scholarly communication, standards development, peer review, conferences, and data sharing frequently depend on international cooperation. STM recommends relying on existing research-security frameworks, including NSPM-33 and agency-specific security policies, rather than creating broad limitations that could discourage lawful and productive scientific collaboration.

d. Research Stability, Transparency, and Predictability (likely Guide 25)

Research depends on stable funding, transparent competition, and clear administrative processes. STM is concerned that expanded discretionary termination authority, as proposed in §§ 200.340, 200.341, and 200.204, could disrupt ongoing research, jeopardize dissemination of research outputs, and create uncertainty that discourages ambitious long-term projects. STM also urged OMB to preserve maximal transparency in funding opportunity announcements. Open competition, public notice, and clear selection criteria are important safeguards that promote accountability, merit-based funding, and public trust in the federal research enterprise.

2. Specific comments on provisions of the GFA

Because the draft GFA does not consistently identify how proposed changes to 2 CFR 200 would be implemented, STM's ability to comment on some provisions is necessarily limited. However, in some cases changes are outlined which may be in response to OMB's proposal or to other authorities. In particular, several public-access and data-sharing provisions are sufficiently clear to warrant specific comment. We therefore provide below both support for provisions that advance effective dissemination and targeted recommendations to improve clarity, alignment with existing authority, and practical implementation.

a. Publication is critical to NSF's mission in providing financial assistance

Research does not create public value merely when discoveries are made. Public value is realized when findings are validated, communicated, preserved, discovered, and translated into new knowledge, technologies, products, treatments, and public policy. Scholarly publishing provides the framework that enables these outcomes through peer review, editorial oversight, metadata creation, discoverability services, archiving, accessibility enhancements, and long-term preservation.

Throughout the document, NSF emphasizes the importance of publication to understanding scientific contributions and intellectual merit and to achieving the goals of project funding. For example, in Guide 3, grant applications are required to provide lists of publications to demonstrate

success of prior NSF support, as well as for biographical sketches. In addition, in Guide 23, the draft GFA notes that NSF expects publication of any significant findings.

Accordingly, NSF guidance should explicitly recognize publication and dissemination as mission-enabling research activities rather than optional or secondary outputs. Research findings achieve their greatest impact when they become part of a trusted and enduring scholarly record. The guidance should avoid language that implies research is complete prior to independent review and effective communication of results. Such recognition would be consistent with longstanding federal policy and NSF's own expectation that significant research findings will be submitted for publication.

[G12] The draft GFA states that Guide 12 is revised to “[d]isallow publication costs consistent with proposed revisions to 2 CFR 200.” It is not clear which provision of the Guide would disallow those costs directly, but STM urges NSF to continue allowing reasonable publication costs on NSF awards, consistent with section II.D.2.f.vi.b of the PAPPG.

[G21.B.2.a] Ensuring such funding would also support changes made to the PAPPG on January 22, 2026 to expand NSF's Public Access Policy, which are repeated in Guide 21. STM urges NSF to retain language that fees related to publication in support of public access are allowable expenses on NSF awards.

STM previously commented on proposed changes to the PAPPG which were never fully implemented, although the January 22, 2026 partially implemented changes related to implementation of the 2022 OSTP memo on “[Ensuring Free, Immediate, and Equitable Access to Federally Funded Research](#)” and the “[NSF Public Access Plan 2.0: Ensuring Open, Immediate and Equitable Access to National Science Foundation Funded Research](#)” issued pursuant to Biden Administration regulatory guidance. STM would like to reiterate concerns noted in our previous submission about unfunded mandates². While STM and its members strongly support open access and efforts to improve the dissemination of articles reporting on NSF-funded research,³ the only way to move towards further openness in scholarly communication is to support the investments made in the private sector that enable openness with quality and integrity. NSF will need to provide direct support for any publishing and data sharing requirements in grant budgets and flexible implementation mechanisms in order to preserve a free and competitive marketplace for innovation and investments in scholarly communication. Only through such support can NSF fully enable communication and sharing activities that advance impact and protect the ability of researchers to publish in the outlet that they believe best advances their research.

In our previous comments on proposed changes to the PAPPG, STM noted that the accepted manuscript (AM),⁴ which is required to be deposited in G21.B.2.a, is a product of the investment

² See STM's full submission at <https://s3.eu-west-2.amazonaws.com/stm.offloadmedia/wp-content/uploads/2026/08/10095618/STM-submission-on-NSF-PAPPG-Feb-2025.pdf>.

³ Read more about the commitment of STM and its members to open access at <https://stm-assoc.org/what-we-do/strategic-areas/open-research/open-science/stm-stands-for-open-access/>, and about our partnerships in support of data sharing at <https://stm-assoc.org/what-we-do/strategic-areas/open-research/research-data/best-practices/>.

⁴ STM urges NSF to consistently use the version naming recommendations of the National Information Standards Organization (NISO), as articulated in NISO RP-8-2008, Journal Article Versions (JAV): Recommendations of the NISO/ALPSP JAV Technical Working Group (<https://www.niso.org/sites/default/files/2017-08/RP-8-2008.pdf>), in this case “Accepted Manuscript (AM)” rather than “Author's Accepted Manuscript.” The latter term is misleading.

and peer review services of the publishers of the “scholarly journals or juried conference proceedings” in which those manuscripts are accepted. While immediate access to the AM may appear cost-free to the researcher and funder, the AM reflects the process of validation and improvement invested in by publishers, which includes editorial assessment, peer review coordination, research integrity checks, and quality assurance. This work depends on some form of revenue to support the significant publisher investments. Although deposit in NSF PAR may involve no technical deposit fee, it is not accurate to assume that authors can publish in their journal of choice at no cost while also making the AM immediately and freely available. In fact, most journals do not allow immediate posting of manuscripts without payment. This is because the integrity and quality of the scholarly record require continual investment and oversight. STM therefore urges NSF to clarify (1) that there may not be a cost-free compliance mechanism and (2) that publication costs, including costs necessary to satisfy licensing obligations consistent with grant requirements, are allowable costs.

STM notes that publishers increasingly provide options for researchers to publish gold OA, where the authoritative Version of Record is made available immediately upon publication, and NSF-funded authors are increasingly choosing that route to publication.⁵ STM also notes that Congress has indicated that OSTP is reviewing the 2022 OSTP memo and may be considering its revision or repeal. We urge NSF to avoid putting prescriptive requirements or restrictions in place in such an uncertain policy environment.

b. Support for data-sharing and technical requirements

[G5.H] STM supports the inclusion of a section outlining requirements for data management and sharing plans in proposals. Appropriate data sharing and management is as critical to the impact of funded research as publication of reports describing the data and findings. However, STM is concerned that this section does not clearly distinguish between publications and data. That confusion is reinforced in Guide 3.H, which indicates that the availability of publications is to be described in a Data Management and Sharing Plan, although Guide 21.B partially ameliorates the problem by treating publications and data separately.

Publications are not and should not be considered “data,” and different concerns, requirements, and restrictions relate to publications rather than data. In particular, there are a host of issues related to copyright and licensing that apply to publications but not to data. STM also notes, as above, that identifying appropriate funding is critical to the success of public access.

STM urges NSF either to create a separate section addressing public access to publications or to revise the heading of Guide 5.H to “Public Access Plan.” That Public Access Plan could then include two subsections: “Publications Management and Sharing Plan” and “Data Management and Sharing Plan.” This structure would be consistent with NSF’s existing guidelines for Data Management and Sharing Plans, which do not mention publications, and with the distinction between publications and data reflected in Guide 21.

⁵ See data in STM’s Open Access Dashboard, which provides values for articles reporting on NSF-funded research: <https://stm-assoc.org/oa-dashboard/oa-dashboard-2/open-access-uptake-based-on-funded-research/>

[G21.B.2.b] Relatedly, STM notes that data and research products subject to data management and sharing policies are generally not subject to copyright. It may be appropriate, therefore, to separate out the Data and Research Product Sharing requirements and policies from this section, which is focused on Intellectual Property and Copyright.

[G21.B.2.c] STM supports requirements for persistent identifiers (PIDs) for articles and datasets. The publishing community has been a key driver of the use of PIDs for digital objects, enabling citation, linking, discovery, access, interoperability, and reuse. To ensure that PIDs do not become disconnected digital detritus, they must be linked to persistent objects and authoritative records. STM urges NSF to ensure that any new PIDs created for versions of articles in the NSF Public Access Repository (PAR) do not compete with the authoritative and maintained Version of Record (VoR). Where new PIDs are created for versions of articles in the NSF Public Access Repository (PAR), they should be connected to and reported with the Digital Object Identifier (DOI) of the VoR.

[G5.H.5] In addition, the section of the project description requiring a listing of “Results from Prior NSF Support” should require publication lists to include the VoR DOI alongside the PAR ID number. This would ensure that the publication remains connected to the authoritative version in the scholarly record and would highlight whether the VoR has been revised or retracted since the publication was deposited in NSF’s PAR.

[G21.B.2.d] STM supports the use of metadata to promote the usability and integrity of all digital objects. STM and its members have been key drivers of metadata quality and use. STM notes that metadata creation, maintenance, and quality assurance are not cost-free and may create new administrative burdens for researchers. STM therefore urges NSF to ensure that appropriate funding is available to support metadata integrity, including through funding for publication costs and subscriptions.

In its previous comments on the PAPPG, STM recommended explicit recognition that public-access costs may include publication charges, licensing arrangements, repository-related expenses, and data management activities necessary to satisfy federal requirements. STM further recommended that budgets include sufficient resources to implement public-access and data-sharing plans effectively.

Public access obligations cannot be implemented sustainably if researchers are expected to satisfy publication, dissemination, and data-sharing requirements without corresponding resources. Publication and dissemination are necessary elements of research communication. Reasonable costs associated with those activities should continue to be treated as legitimate components of federally funded research. NSF should ensure that implementation of public-access policies does not inadvertently discourage dissemination, reduce participation in scholarly communication, or impose unfunded mandates on researchers and institutions.

c. Preservation of copyright

Especially in the age of artificial intelligence, where research outputs are increasingly indexed, aggregated, and reused by systems and tools, provenance and respect for copyright is critical to ensuring the quality and integrity of the scholarly record. STM therefore greatly appreciates that the draft GFA implicitly acknowledges the importance of copyright for the advancement of individual

rights and ensuring the impact of funded research. However, STM also notes that other provision in the draft GFA may conflict with the rights of copyright holders, as noted earlier.

[G21.B.1] STM appreciates the language in this section that acknowledges that NSF’s license to copyrighted material is limited, and “recipient’s control of NSF-supported copyrighted material” should be limited only “in exceptional circumstances.” STM urges NSF to ensure that this is interpreted to limit any demands for government rights under a federal purpose license or other mechanisms.

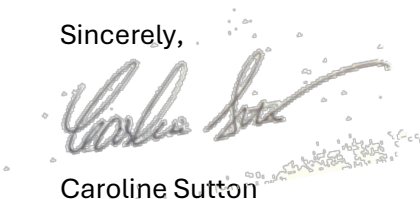
3. Conclusion

America’s scientific leadership depends on a trustworthy, reliable, and validated knowledge base, supported by expert merit review, rigorous evaluation of evidence, transparent dissemination of findings, and collaboration across institutions and disciplines. Scholarly publishing plays an essential part in this endeavor: it enables peer review, editorial oversight, metadata, persistent identifiers, discoverability, preservation, correction, and long-term access to the authoritative scholarly record. STM and its members appreciate their longstanding partnership with researchers and institutions in making NSF-supported research visible, reliable, reusable, and impactful.⁶

STM supports NSF’s commitment to transparency, accountability, public access, research integrity, and responsible stewardship of federal funds. To advance those goals, final guidance should recognize publication and dissemination as mission-enabling research activities, distinguish publications from data, preserve reasonable publication-related costs as allowable expenses, and ensure that new public-access requirements are supported by practical, flexible, and sustainable implementation mechanisms.

STM and its members stand ready to work with NSF and other federal science agencies to help ensure that final guidance strengthens the research enterprise, supports trusted scholarly communication, and advances American scientific leadership. STM appreciates the opportunity to comment on the draft GFA and welcomes continued dialogue on these and other issues related to support for the research enterprise, scholarly communication, and American scientific leadership.

Sincerely,

A handwritten signature in dark ink, appearing to read 'Caroline Sutton', is positioned above the printed name. The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Caroline Sutton
CEO
STM

⁶ For additional discussion of this partnership in the NSF context, see STM’s submission on NSF’s draft 2026-2030 Strategic Plan: <https://stm-assoc.org/document/stm-response-to-nsf-strategic-plan/>