

Submitted by ASA Executive Director Ron Wasserstein to Regulations.gov regarding, OMB-2026-0034-0001, Proposed rule on Regulation for Federal Financial Assistance, June 30, 2026

Thank you for the opportunity to respond to the proposed OMB that would disallow or restrict the use of federal research grants to support high-quality, peer-reviewed scientific publications. The American Statistical Association (ASA) is the largest professional association of statisticians and data scientists in the US, and is devoted to promoting the sound practice of statistics.

The rules proposed in §200.454 (journal subscriptions) and in §200.461 (publication costs) are of particular concern. Policies that would prohibit or condition the eligibility of publication costs for federally funded research will severely impact the statistical community. They will diminish the impact of federal research investments and hamper independent scientific inquiry and debate.

A fundamental responsibility of the American Statistical Association (ASA) is to disseminate research that drives discovery, fuels innovation, and benefits the public. Through our journals, we uphold research integrity and enhance the impact of federally funded research by maintaining a validated, vetted research record. Our publications provide independent, mission-driven outlets for the exchange of scientific ideas. Further, the revenue we earn from our journals is reinvested in the association's programs, such as education, workforce development, standards-setting, and other activities that advance statistical research. The loss of such revenue, then, would greatly impede our ability to fulfill our mission to promote the practice and profession of statistics.

For research to serve its public purpose, results must be carefully reviewed, disseminated, and maintained in the scientific record. Thus, the inclusion of publication costs as a standard component of research funding helps ensure the return on federal research dollars. These costs support the necessary infrastructure and expert labor to serve the public good. Peer-reviewed scholarship is fundamental to scientific progress and stimulates economic growth, national security, and public benefit. Together with our publishing partners, ASA provides essential components of the scientific enterprise: peer review, editorial and ethical oversight, fraud and plagiarism detection, corrections, preservation, accessibility, transparency, metadata, and the platforms necessary for researchers, educators, policymakers, and the public to use the research record reliably.

The proposed OMB regulations would bar payment for publication expenses while still expecting public access to research results. This creates a fundamental contradiction: non-profit professional associations are expected to publish research, yet denied access to the funding systems that make publication possible. ASA makes essential investments in research integrity and in maintaining a diverse, independent marketplace of ideas. A prohibition on publication expenses would weaken both, undermining confidence in the scientific record and the skeptical inquiry on which research depends.