AMERICAN ASTRONOMICAL SOCIETY

[200.461, 200.432, 200.454, 200.340, 200.202, 200.220]

July 13, 2026

Andrew Reisig and Joel Savary
Office of Federal Financial Management
Office of Management and Budget
725 17th Street NW
Washington, DC 20503

Re: Regulation for Federal Financial Assistance (Docket No.: OMB-2026-0034)

Dear Mr. Reisig and Mr. Savary,

These comments are submitted on behalf of the American Astronomical Society (AAS) and its over 9,000 members. The AAS is a nonprofit organization described in section 501(c)(3) whose members are professional astronomers and astronomy educators across the United States. Since 1899, the AAS has helped the U.S. astronomical community enhance and share humanity's scientific understanding of the universe by publishing peer-reviewed papers in the astronomical sciences,[1] by organizing conferences for astronomers to gather, collaborate, and share the results of their research, and by facilitating programs to improve astronomy education and support the next generation of scientists. Through these activities, the AAS has provided critical supporting infrastructure that allows the federal government, the public in general, and the astronomical community specifically to maximize the value of federal investments in astronomical facilities and programs, and consequently enable continued U.S. scientific leadership.

The AAS receives some federal grant support for its own programs. However, more importantly, the research activities of most of the individual members of the AAS are supported in large part by grants from and cooperative agreements with, in descending amounts, the National Aeronautics and Space Administration (NASA), the National Science Foundation (NSF), and the Department of Energy. In addition, other important federal players, including the Department of War, the Smithsonian Institution, and the Department of Commerce, are sources of competitive grant support for the astronomical sciences community.

The proposed changes in the Regulation for Federal Financial Assistance (OMB-2026-0034) would be extremely harmful to the AAS as an organization, to its ability to execute programs that support scientific advancement and the communication of results to the public, and to its membership and their pursuit of scientific discovery:

[1] The astronomical sciences include astronomy and astrophysics, planetary science, and solar physics.

- The proposed changes under §200.461, §200.432, and §200.454 would result in significant financial losses to the AAS as a small nonprofit organization.
- The changes to §200.461 and §200.432 would diminish the ability of AAS members to openly communicate the results of their research in a manner aligned with the principles of Gold Standard Science.[2]
- The revisions to §200.340, §200.202, and §200.220 would negatively impact the research carried out by AAS members, creating significant uncertainty for early career researchers with long term impacts on the global standing of the United States and its future in scientific research and technology.

Each of these sets of adverse effects are described in detail below.

I. §200.461: Restrictions on the use of federal grants for publication costs

The AAS is a small, independent publisher, managing five fully open-access journals in the astronomical sciences that collectively published 6,557 peer-reviewed articles in 2025.[3] Additionally, the Society operates the Research Notes of the AAS, which is free to publish in (it is supported through the revenue for the other AAS journals, and its articles do not go through as thorough a peer review process) and is an excellent venue for publishing null results. The Gold Open Access nature of AAS journals means that their content is available to any member of the public, and that the AAS only charges article processing charges (APCs) to the authors of articles. The AAS does not charge subscription fees or open access fees. These APCs are lower than those of competitors in the astronomical sciences sector even though the AAS journals are the leading ones in the discipline. These APCs support the coordination of a rigorous peer review process, a team of data editors working with authors on the integrity and clear presentation of data and software to aid in the reproducibility of results, the application of a rigorous and uniform copy-editing standard, long term digital preservation, and the infrastructure to process manuscripts and provide the full corpus of published content to readers in perpetuity even as technology evolves. These APCs also support *AAS Nova*, a platform that disseminates plain-language summaries of papers published in the journals to the general public. Taken together, the value-added functions supported by APCs allow researchers to fulfill award requirements and advance the Administration's goals of Gold Standard Science, including transparent and reproducible science that is subject to unbiased peer review and accepting of negative results as positive outcomes.

The proposed rule's assertion that "…publication costs are not inherently necessary to carry out…the specific objectives of the Federal program" is false. Attaining the objectives of the

[2] The President's *Executive Order on Restoring Gold Standard Science* may be found at: https://www.whitehouse.gov/presidential-actions/2025/05/restoring-gold-standard-science/.
[3] See https://journals.aas.org/.

federal research programs that provide grant and cooperative agreement support to the U.S. astronomical community very much depends on the rigorously vetted and constantly advancing corpus of published research manuscripts in various publications, including the Society's suite of scholarly journals.

Also, the increasingly widespread use of Artificial Intelligence large language models makes the APC-funded activities that the AAS undertakes more necessary than ever for the community to validate, share, and build upon scientific knowledge effectively and reliably at scale.

§200.461 would make publications costs, including APCs, unallowable under federal awards. First, this proposed change would impact AAS members' ability to effectively communicate the verified results of their research (as well as the activities described above that ensure that those results uphold key Gold Standard Science principles). Many institutions, especially those with fewer financial resources, will not be able to cover publication costs for their researchers in the absence of federal grant support. As a result, only researchers from the wealthiest institutions will be able to publish in scholarly journals.

Second, the proposed change would also result in significant financial losses for the AAS. Based on the number of articles citing federal grants in their acknowledgments, we estimate that at least 20% of all articles submitted to AAS journals are directly supported by U.S. federal grants . In 2025, the total revenue from all AAS scholarly journals was $13.8 million, with a net revenue of $1.5 million. A 20% loss in published content due to the proposed change would result in an approximately $3 million reduction in revenue per year, and a reduction in *net* revenue of at least $1.5 million per year after accounting for variable operational expenses that could be scaled back due to reduced volume.

In short, the proposed rule would, in a conservative best-case scenario, result in zero net revenue to the AAS from its journals. Since journal revenues fully or partially cover the other scientific activities of the AAS, including student skill-building and networking efforts, early and mid-career training workshops, STEM workforce development activities, science communication conferences, and public outreach events, the proposed rule would have a direct impact on the ability of the AAS to serve the public and fulfill its exempt purpose of furthering humanity's scientific understanding. In the worst-case scenario, AAS journals would have to operate at a net loss, quickly reducing the Society's ability to achieve its mission.

In addition, the uncertainty introduced by the proposed rule, including whether it would be applied to grants awarded in FY27 and moving forward, or whether it would be applied retroactively to already awarded grants, makes it extremely difficult to preemptively address required changes while properly serving current authors and the larger U.S. astronomical community. At a time when the rate of manuscript submissions to the AAS journals is growing

(because of their reputation and low costs), reducing staffing levels and operational costs in anticipation of a potential rule change that could lead to uncertain losses would have a significant negative impact on current operations, increasing the time it takes to publish each paper and creating an unsustainable workload for a smaller staff.

II. §200.432: Restrictions on the use of federal grants to attend meetings

The AAS organizes the only regular gatherings for all astronomers across the United States. The Society's annual meetings program includes large winter and summer meetings, discipline-specific meetings for each of its six divisions,[4] and additional topical meetings proposed by AAS members. These meetings are important venues for the astronomical community to gather, network, share the latest research results, plan for upcoming space telescopes and ground-based facilities, and discuss how best to strengthen the U.S. research enterprise going forward.

The proposed revision to §200.432 would make the costs for attending conferences allowable only if participation in the conference is expressly approved by the relevant federal agency and included in the terms and conditions of the federal award. However, conferences are often planned less than a year in advance, making it impossible to list specific conferences that one plans to attend when submitting a proposal for a multi-year grant. While the larger AAS annual meetings are often (but not always) planned a few years in advance, disciplinary and topical conferences are organized with shorter notice to be responsive to the evolving needs of their respective research communities.

The annual AAS winter and summer meetings are attended by anywhere from 600 to 3,000 participants, depending on location and other factors. At least 40% of meeting attendees currently use direct federal grant support to cover the costs of conference participation. An additional 20% cite institutional support, which is, at least in part, coming indirectly from federal grants. In addition, many exhibitors and attendees at AAS conferences are employed at NASA field centers, NASA science centers, and NSF Federally Funded Research and Development Centers (FFRDCs). If these exhibitors and attendees were no longer able to participate in AAS conferences due to the proposed rule change, the revenue from those meetings would be reduced by approximately $1 million per year. Taken together, AAS meetings already operate on thin margins and do not produce net revenue (e.g., larger winter meetings compensate for smaller summer meetings). As a result, if the proposed rule were implemented, the AAS could lose at least $1 million each year if it continued to organize gatherings for the community of astronomical researchers and educators. A loss of this magnitude would prevent future conferences, harming not only the ability of the AAS to further

[4] The six divisions of AAS are: the Division for Planetary Sciences, the Division on Dynamical Astronomy, the High Energy Astrophysics Division, the Historical Astronomy Division, the Laboratory Astrophysics Division, and the Solar Physics Division.

its exempt purposes, but also the public through reductions in scientific collaboration and subsequent reductions in scientific discoveries and advancements.

As described above in the case of AAS journals, it would be impossible for the AAS to cut meetings costs enough to absorb such a loss over the next few years. The Society has already booked venues for three regular AAS meetings and two large division meetings through 2030, and these contracts have large, fixed costs and reserved hotel room blocks that assumed a historically typical number of attendees when they were signed. The AAS would not be able to change these contracts to accommodate dramatic reductions in the numbers of attendees and exhibitors. Therefore, the AAS would suffer significant monetary losses for at least three years if the proposed changes to §200.432 were enacted.

The proposed changes are also likely to reduce student participation in AAS conferences, which will imperil the future of the astronomy field. The AAS currently heavily discounts student conference registration fees, for both undergraduate and graduate students, which enables meeting participation by students from across the United States, including from smaller institutions with less ability to support conference attendance costs. Most meeting attendees are students seeking to present their research results and to advance their learning and careers. If the AAS suffered financial losses as a result of the proposed rule change, it would no longer be possible to provide such opportunities for students at a discounted rate. It is also highly unlikely that many institutions would be able to pick up these costs in the absence of federal grant support, exacerbating impacts on students from institutions with fewer financial resources.

The AAS has also been intentional in hosting its conferences at a wide variety of locations across the United States, recognizing that these meetings bring tourism revenue to their host cities. Recent conferences organized by the AAS have been held in Alaska, Florida, Idaho, Louisiana, Missouri, Tennessee, Texas, Utah, Wisconsin, and many other states. In many cases, these locations have been chosen to provide greater access to students and researchers in their regions. The financial losses that would be caused by the proposed rule change would not be limited to just the AAS as an organization, but would also affect the states and cities that serve as host sites for its meetings – especially in regions with fewer astronomers, where the financial risk of booking venues could become prohibitive.

III. §200.454: Restrictions on the use of federal grants to cover membership dues

The vast majority of AAS members already pay their dues out of pocket, since institutional practices vary on whether researchers are allowed to use federal grants or institutional funds to cover membership dues. Consequently, restricting the use of federal grants to cover membership dues would likely have the highest impact on early career AAS members, who often rely on institutional funds to cover heavily discounted membership fees. For example, the

AAS has a program for graduate students that covers two years of membership dues if the student's institution covers an additional two years. Since the institutional funds being used for this program are partially tied to grants, fewer students will be able to avail themselves of this opportunity. This would disproportionately impact students at institutions with fewer financial resources.

IV. §200.340, §200.202, and §200.220: Other negative impacts to the research community

In addition to the above concerns about proposed changes that would negatively impact the AAS as an organization, the AAS is concerned by several other proposed changes that would be detrimental to its members and to the broader scientific community.

The proposed changes to §200.340 would expand the authority of federal agencies to terminate active grants at the discretion of the agency or pass-through entity, in addition to allowing the temporary suspension of grants for up to 90 days. These changes would be extremely harmful to scientific progress in the United States and would be particularly concerning for early career researchers. Many AAS members have recently experienced grant suspensions and terminations, as well as significant delays in the disbursement of grant funds, impacting the ability of researchers to pay students and postdoctoral scholars. The uncertainty in grant support has already contributed to an 8% decline in enrollment in physics and astronomy graduate programs in Fall 2025,[5] and the enactment of these proposed changes would continue the chilling effect on research and training programs.

The proposed changes would also lead to new types of risks; for example, Moody's Ratings judges that the proposed rule would be credit-negative for entities with high dependence on competitive federal funding because it would materially weaken the reliability of multi-year discretionary funding commitments.[6] The threats of grant cancellations, funding suspensions, and credit downgrades will introduce severe volatility in the scientific research enterprise in the United States, with long-term impacts on the ability of the United States to remain a global leader in research and development.

The global leadership of the United States in the astronomical sciences has been sustained in part by American leadership of international collaborations to build and operate space telescopes and ground-based observatories, alongside stable, long-term federal investments. The proposed changes to §200.202, particularly the adoption of a "domestic-first" framework, would impact the ability of U.S. astronomers to generate the highest-quality science with the best return on investment. For example, by making relatively small contributions to European Space Agency (ESA) space missions, the United States is able to reap substantial scientific

[5] See https://www.aip.org/statistics/federal-funding-and-visa-uncertainty-shape-fall-2026-graduate-admissions-in-physics-and-astronomy.
[6] See https://www.bondbuyer.com/news/moodys-warns-proposed-political-review-of-grants-a-credit-negative.

benefits by securing U.S. researchers' access to critical data and allowing them to publish high-impact results. Similarly, the contributions of ESA and other nations' space agencies to NASA missions have been critical in the success of U.S.-led space science efforts. These opportunities to generate high return on U.S. federal investment could be jeopardized by the provision in §200.220 that would prohibit the use of federal funds to support a bilateral or multilateral collaboration, agreement, program, or activity with a covered foreign country or covered foreign entity, depending on how this section is implemented. Efforts to sustain bilateral and multilateral collaborations and establish new ones are a key foundation for U.S. leadership, and could be harmed by the proposed rule.

Summary

As demonstrated above, several provisions in the proposed changes to the Regulation for Federal Financial Assistance would directly harm the AAS as a non-profit organization, impair federal objectives, negatively impact the Society's members in their exploration of our universe, and harm the public by limiting its access to scientific research and advances. The financial harm to the AAS would also indirectly harm its 9,000 members, as the Society provides critically important services and programs to the astronomical community that help maintain U.S. scientific leadership. On behalf of the U.S. astronomical community, I urge OMB to withdraw the proposed rule in its entirety.

Thank you for your consideration,

Marcel Agüeros, PhD
President, American Astronomical Society