

The New York Academy of Sciences

115 Broadway, New York, NY 10006

15 July 2026

Submitted electronically via www.regulations.gov

Office of Management and Budget

725 17th Street NW

Washington, DC 20503

Re: Docket No. OMB-2026-0034; Comments of The New York Academy of Sciences on the Proposed Rule “Regulation for Federal Financial Assistance,” 91 Fed. Reg. 32198 (May 29, 2026)

To the Office of Management and Budget:

The New York Academy of Sciences (the Academy) appreciates the opportunity to comment on the proposed rule “Regulation for Federal Financial Assistance,” which would rescind and replace the Uniform Guidance codified at 2 CFR Part 200.

One of the oldest scientific societies in the United States—founded in 1817—the Academy is an independent, nonpartisan 501(c)(3) nonprofit organization whose mission is to drive innovative solutions to society’s challenges by advancing scientific research, education, and policy. The Academy serves a global community of scientists at every career stage through scientific conferences and symposia that convene approximately 2,600 participants each year; professional learning and STEM education programs that train more than 2,100 students and early-career scientists annually; international scientific prizes, including the Blavatnik Awards for Young Scientists; fellowships; the International Science Reserve (a global network for scientific crisis preparedness); and its international multidisciplinary journal *Annals of the New York Academy of Sciences*, published since 1823 and among the oldest continuously published scientific journals in the United States.

The Academy shares OMB’s commitment to responsible stewardship of Federal funds and supports the goals of simplification, plain language, and accountability that animate much of the proposal. However, several of the proposed provisions would conflict with both existing Federal policy and longstanding, objective scientific practice, and would impose administrative burdens and barriers to the dissemination of federally funded research—burdens whose cost would exceed any savings.

Our comments below address the provisions most consequential for both the Academy’s programs and the diverse, global scientific community it serves. An accompanying Appendix provides section-by-section analysis, supporting data, and proposed alternative regulatory language for each provision discussed below.

Publication Costs [200.461]

Proposed 200.461 would make publication costs, including page charges, article processing charges, and open access fees, for peer-reviewed publications unallowable unless expressly required by statute or approved in advance on a case-by-case basis. It would further provide that a general requirement to make results publicly available must not be construed as authorizing publication costs.

The preamble reasons that publication is “not inherently necessary” to the objectives of most Federal awards but rather may only serve “institutional, professional, or reputational interests.” We believe this misapprehends how science is, and has been, carried out. Publication in peer-reviewed literature is not a discretionary embellishment to research but one of the critical steps that research must follow to become part of accepted scientific understanding—to enter into the permanent scholarly record. A federally funded study that cannot be published is, for practical purposes, incomplete, with public investment in it remaining unrealized.

The proposed 200.461 would also place recipients in an untenable position. Federal research agencies, implementing the 2022 White House Office of Science and Technology Policy public access memorandum, now require that peer-reviewed publications arising from federally funded research be made publicly available, in many cases immediately upon publication. 200.461 would preserve those obligations while prohibiting recipients from using award funds to pay the ordinary, reasonable costs of meeting them: a rule that mandates open dissemination while defunding the means of dissemination is inconsistent with itself and with the administration’s own stated commitments to transparency, reproducibility, and rigorous peer review in federally supported science.

Proposed 200.461 would likewise destabilize nonprofit society journals. The Academy has published *Annals of the New York Academy of Sciences* for more than two centuries; it levies article publication charges impartially and reinvests them in peer review, editorial standards, and the scientific community. And because publication costs represent a relatively small fraction of a typical award budget, regulation that bars their use for publications would insignificantly reduce the cost of federally funded research yet significantly reduce the return on it.

The Academy recommends that OMB retain the longstanding allowability framework of the current 200.461 and clarify that costs necessary for complying with Federal public access requirements are allowable (see specific language in the Appendix).

Conferences and Scientific Exchange [200.432, 200.421, 200.219]

Proposed 200.432 would make conference costs allowable only where participation is expressly approved by the Federal agency and included in the terms and conditions of participants’ awards. Scientific conferences are among the core infrastructure of the research enterprise, where results are often first presented and tested, collaborations formed, and the next generation of scientists trained.

More than one third of Academy conference participants are students, postdoctoral fellows, or early-career researchers, with many from academic and government institutions dependent on Federal research funding. Academy survey data show measurable returns on conference participation: 37 percent of attendees report that an Academy conference altered the course of their research, 92 percent gained new knowledge in STEM, and 80 percent made at least one professional contact directly relevant to their research. Because conference presentations typically arise from findings made after an award is issued, requiring that participation be written into the original award terms would misalign funding with how research dissemination actually occurs.

Relatedly, proposed 200.421 should not bar targeted, program-specific outreach for abstracts, speakers, and participants because meetings cannot happen or reach intended aims and audiences without such outreach. Also, proposed 200.219 should be clarified to preserve good-faith scientific curation, peer review of abstracts, and neutral, consistently applied safety and conduct policies at federally supported events.

The Academy recommends that conference costs remain allowable when reasonably related to the award's objectives, with any required agency approval available through ordinary grant-management processes rather than only the award's original terms.

Memberships, Subscriptions, and Professional Activity Costs [200.454]

Proposed 200.454 would permit membership costs only where necessary to fulfill award requirements and subject to prior (written) agency approval, and would make subscriptions to professional, academic, and technical periodicals unallowable in all cases. However, professional societies should not be considered perquisites; rather, they provide essential training, mentoring, ethical standards, research dissemination opportunities, and professional networking through which federally funded scientists stay current and thrive.

Academy membership fees are \$36 per year for students and \$135 for professionals, relatively modest amounts whose case-by-case Federal approval would cost more to administer than the memberships themselves.

The Academy recommends that membership costs be allowable when reasonably related to the purposes of the award, with recipient-level documentation, rather than agency prior approval, sufficing for low-cost memberships. The Academy further recommends that subscriptions to professional, academic, and technical periodicals remain allowable when reasonably related to the purposes of the award.

Covered Foreign Collaborations [200.220]

The Academy supports appropriate safeguards for research security, export controls, and sanctions compliance. Proposed 200.220 should make clear, however, that ordinary participation in open scientific conferences, public scientific meetings, and professional

society activities in which no Federal funds flow to a covered foreign entity and no restricted data or technology is transferred does not constitute a covered collaboration.

Academy conferences draw participants from over twenty countries, and programs such as the International Science Reserve depend on lawful, open scientific exchange across borders. Ambiguity on this point would chill precisely the exchange that maximizes the return on Federal research investments.

Concluding Remarks

The practices the proposed OMB regulations would burden, including peer-reviewed publication, open scientific meetings, and professional scientific societies, are not overhead. They are among the objective, longstanding mechanisms by which science tests, refines, and corrects itself, and by which public investment in research yields discoveries and cures, as well as significant productivity and growth of the U.S. economy.

The Academy urges OMB to consider adopting the alternative regulatory language set out in the accompanying Appendix, which preserves OMB's stewardship objectives while safeguarding the dissemination, validation, and exchange of scientific ideas on which federally funded science has experienced compounded returns over decades.

We would welcome the opportunity to provide further information or data in support of these comments.

Respectfully submitted,

Nicholas B. Dirks

President and Chief Executive Officer

The New York Academy of Sciences

Appendix

The New York Academy of Sciences Comments on OMB-2026-0034-0001

Supplemental Comments and Proposed Alternative Language

9 July 2026

[200.432] Conferences

OMB proposes to add a requirement that costs for attending conferences are allowable only if participation is expressly approved by the Federal agency and included in the terms and conditions of the Federal award.

While the Academy supports OMB's goal of ensuring that Federal funds are used responsibly and in ways that advance program outcomes, proposed 200.432 would create unnecessary administrative barriers to the timely dissemination of federally funded research, limit participation by early-career scientists, and weaken the scientific exchange that is essential to maximizing the public return on Federal research investments.

Specific comments

(a) Conferences are core infrastructure for federally funded science. Scientific conferences are not peripheral to the research enterprise. They are one of the primary mechanisms through which federally funded researchers share findings, receive expert feedback, identify collaborators, test new ideas, recruit talent, accelerate translation, and drive professional visibility and research advancement.

(b) The proposed change would disproportionately affect emerging scientists. Student, postdoctoral, and early-career attendees comprise over a third of annual Academy conference participants. Requiring that conference costs be pre-approved in the original award terms would fall most heavily on these emerging scientists, who are often least able to absorb registration or travel costs personally and most dependent on grant-supported participation.

(c) The proposed requirement is impractical for scientific dissemination. Academy conferences feature abstracts, posters, lightning talks, and invited talks annually, a significant share of which involve federally funded research. These presentations often arise after an award has already been issued. Requiring conference participation to be included in the original award terms is impractical and misaligned with how scientific meetings and research dissemination occur.

(d) The proposed rule could reduce conference participation and viability. Over half of Academy conference attendees come from the academic or government sector, the vast majority of whom are affiliated with institutions that receive Federal research funding. Reduced allowability for conference costs would therefore predictably reduce

participation by the researchers and trainees most central to the Federal research enterprise.

(e) Conference participation produces measurable scientific impact. Academy survey data show that conference participation directly supports knowledge transfer, collaboration, workforce development, and scientific progress: 37 percent said attending an Academy conference altered the course of their research; 92 percent gained new knowledge in STEM; 80 percent made at least one new professional contact directly relevant to their research; 14 percent established a novel research collaboration; 12 percent co-authored a proposal or publication with a new contact; and 8 percent started a joint business venture or generated new business.

(f) Academy conferences offer a cost-effective dissemination venue. Preserving reasonable allowability for conference participation helps ensure that federally funded researchers, especially trainees and early-career scientists, can access high-quality scientific exchange without being limited to only the largest or most expensive venues.

Proposed alternative language

The Academy recommends that OMB clarify that conference costs are allowable when attendance, presentation, training, or participation is reasonably related to the Federal award's scientific, educational, dissemination, workforce-development, or collaboration objectives, and when the recipient maintains appropriate documentation. Where agency approval is required, such approval should be permitted through ordinary prior approval, rebudgeting, or agency-specific grant-management processes, rather than only through inclusion in the original terms and conditions of the award. The Academy recommends the following clarifying language for OMB's consideration:

Costs of attending or participating in conferences are allowable when such participation is reasonably related to the purposes of the Federal award, including research dissemination, presentation of findings, scientific or technical training, professional development of federally supported personnel, collaboration, recruitment, or other activities that advance the award's objectives. Recipients must maintain documentation supporting the relationship between the conference participation and the Federal award. When prior approval is required by the Federal agency, such approval may be provided through the terms and conditions of the Federal award, an agency-approved budget, rebudgeting action, written prior approval, or other agency-authorized grant-management processes.

[200.454] Memberships, Subscriptions, and Professional Activity Costs

OMB proposes that membership costs are allowable only if necessary to fulfill award requirements and subject to prior written approval of the Federal agency, and that

subscriptions to business, professional, academic, and technical periodicals are unallowable in all cases, with no provision for agency approval.

While the Academy supports OMB's goal of ensuring that Federal funds are used responsibly, proposed 200.454 would disconnect federally funded scientists from professional societies that provide career development, convening, mentoring, research dissemination, peer communities, ethics and professional standards, and training.

Specific comments

(a) Professional society membership supports the Federal research enterprise. For scientists, professional society membership is not merely an affiliation or general credential. It often provides access to infrastructure researchers need to stay current in their fields, share and evaluate emerging findings, identify collaborators, receive training, and participate in professional networks that strengthen the conduct and impact of federally funded research.

(b) The proposed change would affect the scientists most dependent on professional networks. The Academy serves a broad scientific membership that includes students, postdoctoral fellows, early-career researchers, faculty members, government scientists, and nonprofit researchers.

(c) Many Academy members are affiliated with federally funded institutions. This creates a clear Federal-award nexus. Even where membership dues are modest, uncertainty about allowability may discourage institutions and researchers from supporting participation in professional societies that directly advance federally funded scientific work.

(d) Academy membership is tied to research dissemination, professional learning, and workforce development. These benefits directly support scientific collaboration and the professional competencies needed to conduct federally funded research effectively.

(e) Membership supports early-career STEM workforce development at scale. The Academy serves more than 2,100 students and early-career scientists annually through professional learning and training programs, which help them build skills essential to research success, including scientific communication, career planning, project management, leadership, mentoring, grant readiness, publishing, research productivity, and cross-sector collaboration.

(f) Academy membership is a modest and cost-effective investment. For a relatively small cost (\$36 per year for students and \$135 per year for professionals), members receive access to scientific programming, professional learning opportunities, member rates for conferences and symposia, and a broader scientific network. This makes Academy membership a cost-effective mechanism for supporting federally funded scientists and strengthening the research workforce.

(g) The categorical prohibition on subscription costs would disconnect federally funded researchers from the scholarly literature. Proposed 200.454(b) would make

subscriptions to business, professional, academic, and technical periodicals unallowable in all cases, with no exception for agency approval. Access to peer-reviewed literature is a fundamental input to all research. Prohibition on subscriptions would compound the effects of proposed 200.461, leaving federally funded researchers facing barriers to both publishing in the scholarly record and reading it.

Proposed alternative language

The Academy recommends that OMB clarify that membership costs in professional, scientific, technical, or academic organizations are allowable when the membership is reasonably related to the purposes of the Federal award, including research dissemination, scientific or technical training, professional development of federally supported personnel, collaboration, mentoring, workforce development, or access to field-relevant scientific resources. For low-cost memberships below a reasonable threshold, OMB should also consider allowing recipient-level documentation rather than requiring Federal agency prior approval in every instance. The Academy further recommends allowability of subscriptions to professional, academic, and technical periodicals reasonably related to a Federal award. The Academy recommends the following clarifying language for OMB's consideration:

Costs of membership in professional, scientific, technical, or academic organizations are allowable when the membership is reasonably related to the purposes of the Federal award, including research dissemination, scientific or technical training, professional development of federally supported personnel, collaboration, mentoring, workforce development, or access to field-relevant scientific resources. Recipients must maintain documentation supporting the relationship between the membership and the Federal award. Federal agencies may require prior approval for such costs where appropriate, but prior approval should not be required for low-cost memberships that are reasonable, allocable, and adequately documented under the recipient's internal policies. Costs of subscriptions to business, professional, academic, and technical periodicals are allowable when the subscription is reasonably related to the purposes of the Federal award and is adequately documented under the recipient's internal policies.

[200.219] Event Services

OMB proposes to establish requirements related to event services in connection with federally funded activities, intended to prevent discrimination in the provision of services for events, meetings, or expressive activities, including facility access, security, logistics, and related support.

While the Academy supports the principle that federally funded activities should be administered fairly, transparently, and without unlawful discrimination, proposed 200.219 could create uncertainty for nonprofit scientific organizations that host conferences,

symposia, workshops, and public scientific programs involving federally funded researchers or federally supported activities. Because the Academy convenes scientific meetings and events across disciplines and sectors, the rule should make clear that scientific curation, neutral safety protocols, and professional meeting standards remain permissible.

Specific comments

(a) Scientific meetings require content curation based on expertise and relevance.

They are curated professional settings designed to advance specific scientific, educational, translational, or workforce-development objectives.

(b) Peer review and speaker selection must remain protected scientific functions.

Participants are selected through professional judgment, scientific review, programmatic relevance, and expert assessment. These decisions are essential to the integrity of scientific meetings.

(c) Codes of conduct and safety protocols must remain enforceable. The Academy maintains and enforces event policies designed to support respectful, safe, and productive scientific exchange. These policies are essential for ensuring that scientific meetings can proceed safely and professionally.

(d) Nonprofit scientific organizations need clear rules for federally supported events.

Clear guidance is especially important where federally funded researchers participate in broader scientific meetings that are not themselves fully federally funded.

(e) Event service decisions must account for legitimate operational considerations.

Scientific meetings and events involve complex operational decisions, including venue access, room assignments, audiovisual support, security, registration, accessibility, speaker logistics, and staff support. These decisions should not be treated as discriminatory when they are based on neutral, documented, and consistently applied criteria.

Proposed alternative language

The Academy recommends that OMB avoid creating uncertainty that could discourage participation, sponsorship, facility use, or collaboration. To preserve OMB's objective of preventing unlawful discrimination in event services while ensuring that scientific organizations can continue to conduct rigorous, safe, and professionally managed conferences and symposia, the Academy recommends the following clarifying language for OMB's consideration:

Nothing in this section shall be construed to prohibit recipients or subrecipients from making good-faith scientific, educational, editorial, peer-review, operational, safety, or programmatic decisions regarding event programming, speaker selection, abstract review, registration, facility use, security, or event services, provided such

decisions are based on neutral and consistently applied criteria reasonably related to the purpose, format, safety, integrity, or administration of the event.

[200.220] Covered Foreign Collaborations

OMB proposes to prohibit recipients and subrecipients from using Federal funds to support a bilateral or multilateral collaboration, agreement, program, or activity with a covered foreign country or covered foreign entity, unless authorized by statute or approved by the agency head or designee.

While the Academy recognizes the importance of protecting federally funded research from inappropriate foreign influence, national security risks, and unauthorized transfer of sensitive research, technology, or data, proposed 200.220 could create uncertainty for researchers, universities, nonprofit scientific organizations, and professional societies that host or participate in international scientific conferences and programs. The Academy's meetings and International Science Reserve reflect the practical reality that many scientific challenges require lawful, open exchange across institutions and national borders.

Specific comments

(a) Science is global, and many scientific challenges require international exchange.

Scientific progress depends on the ability of researchers to share publicly releasable findings, test ideas, receive expert feedback, and learn from peers across institutions and national borders.

(b) Open scientific conferences are not the same as restricted foreign collaborations.

Attendance at open scientific meetings, presentation of publicly releasable research, and ordinary professional exchange are not equivalent to entering into a bilateral or multilateral research agreement, transferring Federal funds to a covered foreign entity, sharing restricted data or technology, or conducting controlled research with a prohibited collaborator.

(c) Overbroad uncertainty would reduce the return on Federal research investment.

Federal research funding is intended to generate knowledge, accelerate discovery, and produce public benefit. That return depends in part on researchers' ability to disseminate findings, receive critique, identify collaborators, and stay current in fast-moving fields.

(d) Scientific societies can support compliance without chilling lawful exchange.

The Academy supports clear compliance obligations related to export controls, sanctions, research security, disclosure requirements, and restrictions on sensitive or controlled research. Scientific organizations can and should maintain appropriate safeguards where Federal funds, sensitive research, restricted technology, or prohibited entities are involved.

Proposed alternative language

The Academy recommends that OMB clarify that the restriction applies to covered collaborations, agreements, programs, or activities involving a covered foreign country or covered foreign entity, and not to ordinary participation in open scientific conferences, public meetings, or professional society activities where no restricted transfer, covered agreement, or Federal funding relationship with a covered foreign entity exists. The Academy recommends the following clarifying language for OMB's consideration:

Nothing in this section shall be construed to prohibit participation in open scientific conferences, public scientific meetings, professional society activities, or presentation of publicly releasable research, provided that such participation does not involve the transfer of Federal funds to a covered foreign country or covered foreign entity, the creation of a bilateral or multilateral collaboration, agreement, program, or activity with a covered foreign country or covered foreign entity, or the unauthorized disclosure or transfer of restricted data, controlled technology, or other protected information.

[200.421] Advertising and Public Relations

OMB proposes to make advertising and public relations costs generally unallowable under Federal awards, with limited exceptions. One important exception appears to preserve allowability for programmatic advertising and outreach necessary to meet award requirements, such as recruiting project participants.

While the Academy supports OMB's goal of ensuring that Federal funds are not used for general promotional activity, institutional branding, or unrelated public relations, scientific programs often require targeted communications to reach the appropriate research community. In that context, outreach is not ancillary promotion; it is a core program function. For the Academy, such outreach may include calls for abstracts, posters, speakers, applications, nominations, registration, and participant recruitment for scientific conferences, workshops, training programs, and related activities.

Specific comments

(a) Scientific conferences require targeted outreach to fulfill their purpose. Federally supported scientific meetings are designed to disseminate research, convene relevant experts, train researchers, and support collaboration. These goals cannot be achieved unless the appropriate scientific audience is aware of the opportunity to participate.

(b) Outreach is essential to research dissemination and participant recruitment.

Targeted outreach helps ensure that federally funded scientific meetings reach the researchers, trainees, and institutions most likely to benefit from and contribute to the program. Without clear allowability for such outreach, federally supported programs may

have lower attendance, fewer abstract submissions, less disciplinary breadth, and reduced impact.

(c) Program outreach is distinct from institutional branding or general public relations.

These activities are not general promotion of the institution. They are necessary to carry out the federally supported program and ensure that the intended scientific community can participate.

(d) Uncertainty would reduce access and weaken program outcomes. Ambiguity about allowability would diminish the impact of federally supported programs by making them harder for the intended scientific community to find and access.

Proposed alternative language

The Academy recommends that OMB clarify that outreach for federally supported scientific meetings, conferences, symposia, workshops, training programs, fellowships, competitions, and related scientific activities is allowable when the communication is designed to recruit participants, solicit scientific contributions, disseminate award-related opportunities, or support participation by the intended audience. The Academy recommends the following clarifying language for OMB's consideration:

Nothing in this section shall be construed to prohibit reasonable, allocable, and program-specific outreach or communications necessary to carry out the purposes of a Federal award, including outreach to recruit participants, solicit abstracts or applications, announce federally supported conferences, symposia, workshops, training programs, or scientific activities, communicate participation requirements, disseminate award-related opportunities, or share program outcomes where such dissemination is part of the award.

[200.461] Publication and Printing Costs

OMB proposes to revise 200.461 to make publication costs unallowable under Federal awards, including page charges, article processing charges (APCs), and similar fees such as open access fees for professional journal publications and other peer-reviewed publications, unless such costs are expressly required by Federal statute or approved in advance by the Federal agency on a case-by-case basis. The proposal further provides that a general requirement to make results publicly available must not be construed as authorizing publication costs.

While the Academy supports OMB's goal of ensuring that Federal funds are used responsibly and directed toward the programmatic objectives of each award, proposed 200.461 would separate the final and essential step of the research process, peer-reviewed publication, from the Federal awards that fund the underlying research, impede compliance with existing Federal public access requirements, and weaken the system of objective validation through peer review on which the credibility of federally funded science depends.

Specific comments

(a) Peer-reviewed publication is the culmination of federally funded research, not an ancillary activity. Publication in peer-reviewed journals is the mechanism through which research findings are objectively validated, permanently archived, and made usable by other researchers, practitioners, industry, and the public. Federally funded research that cannot be published is, for most practical purposes, incomplete, and the public investment in it remains unrealized.

(b) The proposed rule conflicts with Federal public access requirements. Under current Federal public access policies, including those adopted by research agencies pursuant to the 2022 White House Office of Science and Technology Policy public access memorandum, federally funded researchers are required to make peer-reviewed publications publicly available, in many cases immediately upon publication. Proposed 200.461(b) would expressly provide that a general requirement to make results publicly available must not be construed as authorizing publication costs. The combined effect is that recipients would remain obligated to make their results publicly accessible while being prohibited from using award funds to pay any ordinary and reasonable costs of doing so.

(c) Case-by-case prior approval is impractical for how scientific publication occurs. Publications arise from research, typically well after an award has been issued and on timelines that cannot be predicted at the proposal stage. Requiring advance, case-by-case agency approval for each publication would generate a high volume of low-dollar approval requests, burden both agencies and recipients, delay the dissemination of completed research, and discourage publication altogether where approval timelines are uncertain.

(d) The proposal would weaken society journals and the peer-review infrastructure they sustain. Making such charges unallowable for federally funded authors would reduce submissions, destabilize the nonprofit publishing infrastructure on which rigorous peer review depends, and disadvantage society publishers relative to venues that do not maintain comparable standards.

(e) The proposed change would disproportionately affect early-career researchers and less-resourced institutions. Researchers without access to discretionary or institutional funds, disproportionately students, postdoctoral fellows, early-career scientists, and investigators at less-resourced institutions, would be least able to absorb publication costs personally. The result would be a system in which the ability to publish federally funded research depends on institutional wealth rather than scientific merit.

(f) The savings would be minimal and the forfeited return substantial. Publication costs represent a very small fraction of a typical Federal award budget, yet publication is the step at which the public return on the entire award is realized. Making these costs unallowable would not reduce the cost of the underlying research; it would reduce the return on it.

Proposed alternative language

The Academy recommends that OMB retain the longstanding allowability framework reflected in the current 200.461, under which publication costs are allowable when the publication reports federally supported work and charges are levied impartially, and clarify that costs necessary to comply with Federal public access requirements are allowable.

The Academy recommends the following language for OMB's consideration:

Publication and printing costs, including page charges, article processing charges, and open access or similar fees, are allowable when (1) the publication reports work supported by the Federal Government; (2) the charges are reasonable and levied impartially on all items published by the journal, whether or not under a Federal award; and (3) the recipient maintains documentation supporting the relationship between the publication and the Federal award. Publication costs that are incurred to comply with a Federal statute, regulation, agency public access policy, or the terms and conditions of the Federal award are allowable without separate prior approval. The recipient or subrecipient may charge the Federal award during closeout for the costs of publication or sharing of research results if the costs were not incurred during the period of performance of the Federal award.