



American Society for Horticultural Science

1018 Duke Street, Alexandria, Virginia 22314
703.836.4606 (voice) • 703.836.2024 (fax) • ashs@ashs.org • ashs.org

Docket ID: OMB-2026-0034

Submitted by American Society for Horticultural Science (ASHS) on 7/9/2026

The American Society for Horticultural Science (ASHS) comments on provisions that would directly affect ASHS as a nonprofit scientific society. ASHS publishes peer-reviewed journals, convenes an annual scientific conference, supports professional development, and provides venues for reviewing, presenting, and disseminating horticulture science.

[§ 200.461 - Publication and printing costs]: ASHS requests OMB revise § 200.461 so reasonable publication costs remain allowable to report federally supported work, fair charges by the journal, and costs associated with the approved budget or charged during closeout. Page charges, processing charges, open-access fees, and fees for peer-reviewed publication, should not be unallowable by default. ASHS's HortScience, HortTechnology, and the Journal of the American Society for Horticultural Science provided public open-access, peer-review, editorial oversight, archiving, and dissemination of horticultural research, Extension, and education research.

Publications are not separate from federally funded science. It is how results are evaluated, preserved, verified, and made available to stakeholders and scientists. Peer review research is the fundamental gold-standard mechanism for validating research results and ensuring research dollars are used to communicate credible findings. Defaulting costs unallowable would reduce submissions of federally funded work to society journals, weakening verification of research results, shifting costs to authors and institution, and limit access to funded scientific information without direct means to pay for these costs. The result would be less transparency in federally funded research.

[§ 200.432 - Conferences]: ASHS requests OMB revise § 200.432 so conference attendance costs remain allowable for meetings related to the award, participation is reasonable and documented, and the conference supports dissemination or translation of award results. ASHS' Annual Conferences are a primary venue for presenting and disseminating horticultural science through technical sessions, presentations, keynote speakers,

workshops, and student competitions. Scientific conferences, like publications, are how researchers share, receive feedback, build collaborations, and maximize the impact of federal research investments. Creating unnecessary barriers to sharing federally funded research results does not promote the stated objectives of the rule. Requiring a named specific conference in the original award does not reflect how science is conducted. Researchers often do not know at proposal submission which conference will be the best venue for sharing and gaining insights into the research. Such requirement would reduce dissemination to stakeholders and researchers and hinder student presentations, networking, and career development. This will have a significant and lasting negative impact on the US specialty crop industry and domestic production.

[§ 200.454 - Memberships, subscriptions, and professional activity costs]: ASHS requests OMB revise § 200.454 to allow reasonable professional society membership cost when related to the award or necessary for presenting, publishing, reviewing, or disseminating award-supported work. ASHS also requests that academic and technical periodicals remain allowable when necessary for award performance.

ASHS membership supports the professional structure through which horticultural scientist organizes technical communities, participate in Interest Groups, serve on committees, mentor students, receive society communications, and contribute to scientific exchange. It is not a social club or unrelated professional expense. For federally funded scientists, ASHS membership supports the networks necessary to publish, present, review, and disseminate award work. Prior approval requirements would reduce participation, especially among students, early-career, Extension specialist, and researchers at smaller institutions. ASHS membership also provides significant discounts for publishing and conference attendance saving financial resources of federally funded grants.

[§§ 200.421 and 200.467 - Scientific outreach and program administration]: ASHS requests clarification that scientific communications needed to support peer-reviewed publications, conferences, calls for abstracts, conference registration, publication notices, award related program recruitment, and dissemination of research findings remain allowable when they are necessary to carry out an approved federal award.

These activities are not general advertising, lobbying, selling, or promotional public relations. For a scientific society such as ASHS, they are essential functions that support peer review, research dissemination, professional training, and the public communication of federally funded horticultural science in support of the US specialty crop industry.

[§ 200.219 - Event services]: ASHS requests clarification that § 200.219 does not limit a scientific society's ability to apply neutral scientific, professional, safety, ethical, and programmatic standards to conference programming. ASHS must be able to peer review abstracts, organize sessions by scientific merit and relevance, set presentation standards, enforce codes of conduct, and curate programs that advance horticultural science.